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January 14, 2014

FREEDOM OF INFORMATION ACT REQUEST

Via U.S. Mail, Facsimile (202-685-6580), and E-Mail (DONFOIA-PA@navy.mil)

Chief of Naval Operations (DNS-36)
Attn: FOIA Service Request Dept.
2000 Navy Pentagon
Washington, DC 20350-2000

Re: Walter F. Herndon v. Weil McLain Co. (Our File No.: 933677)
Case No.: 13-24364 CA 27 (Broward County Circuit Court, Florida)

Dear Chief:

Our firm represents Weil McLain Co. in the above-referenced case. Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, we are requesting copies of all asbestos abatement records pertaining to the US Naval Surface Warfare Center in Panama City, Florida. Please see the attached "Schedule A" for a detailed list of the records requested. Please forward copies of all documents to our office. If the cost for duplication and shipping is over $100, please call my direct line at 305-995-5437 for further authorization.

Thank you for your prompt attention to this matter.

Very truly yours,

JESSICA PEÑA

/jp

Dept Of the Navy (OPNAV) PA/FOIA Policy Office
Freedom Of Information/Privacy Act Request
Date Received: 1/30/14 Statutory due date: 2/28/14
DON PA/FOIA/consult Tracking Number: 2014F000543
Acknowledgement date:_____

SCHEDULE "A"

PLEASE FORWARD DOCUMENTS TO:
Michael R. Holt, Esq.
Rumberger, Kirk & Caldwell
80 SW 8th Street, Suite 3000
Miami, FL 33130

FACILITY: US Naval Surface Warfare Center, Panama City Division
110 Vernon Avenue, Panama City, Florida 32407

Please produce your entire file on the above-referenced facility, including, but not limited to the following:

DOCUMENTS REQUESTED

1. Any and all records and documents regarding the use and presence of asbestos-containing products and insulation, including but not limited to boilers, turbines, generators, or pumps from 1970 to 2013.

2. Any and all records and documents regarding the presence of asbestos-containing products and insulation, including but not limited to boilers, turbines, generators, and pumps, which had already been installed but were still present as of 2013.

3. Any and all documents listing or describing the outside or independent contractors (not employed by the naval base) and crews that inspected, maintained, repaired, overhauled, constructed, demolished, or built any asbestos-containing products, including but not limited to boilers, generators, turbines, or pumps from 1970 to 2013.

4. Any and all records, documents, and contracts from insulation contractors, crews, and firms that installed or repaired asbestos insulation at the from 1970 to 2013.

5. Any and all maintenance and repair records, including but not limited to job tickets, certificates, certifications, work orders, schematics, inspection logs, boiler logs, maintenance logs, and personnel logs of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators from 1970 to 2013.

6. Any and all purchase orders, requisition slips, distribution records, work orders, blue prints, and mechanical drawings regarding the installation of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators from 1970 to 2013.

7. Any and all purchase orders, requisition slips, distribution records, work orders, blue prints, and mechanical drawings regarding the removal of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators 1970 to 2013.

8. Any as-built drawings, mechanical drawings, and blueprints showing the location, amount, or use of asbestos-containing materials, including but not limited to boilers, turbines, generators, or pumps from 1970 to 2013.

9. Any and all OSHA reports, violations, inspections, warnings, and/or fines for the presence, use, installation, removal, storage, isolation, and containment of asbestos-containing materials from 1970 to 2013.

10. Any and all Department of Environmental Protection reports, violations, inspections, warnings, and/or fines for the presence, use, installation, removal, storage, isolation, and containment of asbestos-containing materials from 1970 to 2013.

11. Any and all industrial hygiene reports regarding the extent, absence, presence, amount, type, and/or percentage of asbestos 1970 to 2013.

12. Any and all records, documents, blueprints, diagrams, progress reports, progress payment records, and contracts from all asbestos abatement contractors from 1970 to 2013.

13. Any and all workers' compensation records alleging or claiming asbestos-related pulmonary or respiratory injuries 1970 to 2013.