AHERA ASBESTOS MANAGEMENT PLAN & ASBESTOS INSPECTION REPORT

March 9th, 2024

Spray School District Campus
303 Park Ave.
Spray, OR 97874
Wheeler County

EIS Job No. 2024005

Prepared For:

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PART I INTRODUCTION

1.1 DISCLAIMER

In drafting this Asbestos Management Plan, the Management Planner has attempted to inspect all areas of any building or structure where asbestos might be located. In conducting each inspection, the Management Planner has relied on information provided by employees and/or agents of the school district. The Management Planner, therefore, disclaims any responsibility for failing to mention in the Management Plan any area or areas that remain unknown to the Management Planner for any of the following reasons:

1. Inaccessible areas such as structural voids, pipe chase, and/or tunnel accesses which are nailed shut, covered over, or located under or behind heavy equipment (i.e., shop equipment, cabinets, etc.).

2. Sub-flooring or other materials located under the existing floor covering including adhesives and mastics.

3. Any thermal system insulation which may be hidden under the outer pipe wrap.

4. Exterior materials, structural materials, and building materials not covered under AHERA, which may be regulated by the National Emission Standards for Hazardous Air Pollutants (NESHAP) in the event of renovation or demolition.

5. Areas behind walls resulting from remodeling or renovation.

6. Entire length of tunnel or crawl space due to significant contamination, presence of water, or insufficient head space.

7. Any material above the ceiling not visually inspected due to ceiling construction, such as interlocking metal squares or panels.

8. Miscellaneous materials which may be present within the school, such as boiler gaskets and fittings, interior components of ductwork and/or plenum work, kitchen exhaust hoods, etc.

The above list is not intended to be inclusive but is representative of instances where the detection of possible areas of asbestos contamination is outside the control of the Management Planner and could not be detected through standard inspection practices.

AHERA management plans apply only to certain assessable areas of the school buildings, including interior areas, tunnels, crawlspaces, porticos, covered exterior hallways or walkways, and any portion of a mechanical system used to condition interior spaces. Most building materials located on exterior portions of the building and inaccessible interior areas of the building are not covered by this management plan: therefore, this Management Plan does not meet the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP), which requires a thorough asbestos inspection, including selective demolition, before any renovation or demolition activity. Please contact Environmental Inspection Services Pro, LLC (EIS) before starting any renovation or demolition activity so that a thorough asbestos inspection can be performed.

Third-party use of this Management Plan shall be at their own risk. EIS places no restrictions on the reproductions of this Management Plan, other than reproductions must be of the entire document to avoid the dissemination of out-of-context information. EIS makes no warranty or guarantee of its work product and/or professional opinion. EIS does not assume liability for the use of any information, methods, or materials contained herein, or for damages arising from such use. EIS does not assume responsibility for any injury to individuals or property or any financial loss, sustained because of the use or application of this Management Plan.

1.2 BACKGROUND

The Clean Air Act of 1977 required the United States Environmental Protection Agency (USEPA) to develop standards to address the potential health aspects associated with the adverse effects of asbestos exposure as an indoor contaminant. In October 1986 the USEPA promulgated the Asbestos Hazard Emergency Response Act (AHERA), which was signed into law by President Reagan.

The AHERA regulations require that all local education agencies conduct inspections of each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and non-friable asbestos-containing building materials (ACBM). The original inspections must have been completed before October 12, 1988.

Any building leased or acquired on or after October 12, 1988, to be used as a school building shall be inspected for friable and non-friable ACBM before use as a school building. In the event of an emergency use of a building that has not been inspected for ACBM, the building shall be inspected within 30 days after the commencement of such use.

AHERA requirements are very comprehensive in scope. Schools are required to appoint a designated person who is trained to oversee asbestos activities within the school district and ensure compliance with this new rule. These rules require that only accredited personnel are used by the schools to conduct inspections and develop management plans, design, and carry out response action, and conduct surveillance of school buildings at six-month intervals; proper training and awareness for custodians, maintenance staff, and short-term workers; annual notifications to building occupants. and parents; and maintenance of records satisfied. An annual update of the plan is also required.

This document is the Management Plan for this school building and provides the information, recommendations, and responses required under the law. It was the authors' intent who developed this plan, to present a useful and meaningful text for the readers and users of the plan. A glossary of terms and acronyms that appear in the text of this plan is, therefore, provided to the reader. An index to the Management Plan is provided, also. For further information regarding this Management Plan, contact your Local Educational Agency (LEA) Designated Person.

1.3 CONTACT INFORMATION

1.3.1 – Local Education Agency (LEA) and School Information

Local Education Agency: Spray School District
Address: 303 Park Ave. Spray, OR 97874
Telephone Number: (541) 468-2226

School: Spray School District Campus
Address: 303 Park Ave. Spray, OR 97874
Telephone Number: (541) 468-2226

1.3.2 – LEA Designated Person Information

Name of Designated Person: Robin Champagne
Address: 303 Park Ave. Spray, OR 97874
Telephone Number: (541) 468-2226
Course Name:
Training Agency:
Date:
Hours of Training:

1.3.3 – Management Planner Information

Name: Matthew C. Spear
Firm: Environmental Inspection Services Pro, LLC
Address: 430 N First. St. Carlton, OR 97111
Telephone Number: (503) 680-6398
State of Accreditation: Oregon
Accreditation Number: MP-23-0717C

By signing below, I confirm that I am fully accredited by the State of Oregon and the United States Environmental Protection Agency (USEPA) under 40 CFR Part 763 Subpart E to carry out the functions of an AHERA management planner.

Signature: 
Date: 3/9/24

1.4 SCHOOL BUILDING LIST

Name of Building: Spray School District Campus – Elementary School Building
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 1955 (Recent Remodels Unknown)
ACBM Status: **The building has friable & nonfriable suspected ACBM assumed to be ACM.**

Name of Building: Spray School District Campus – Stone Building
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 1920 (Recent Remodels Unknown)
ACBM Status: **The building has friable & nonfriable suspected ACBM assumed to be ACM.**

Name of Building: Spray School District Campus – Science Lab Building
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 1997 (Recent Remodels Unknown)
ACBM Status: **The building is AHERA exempt under 40 CFR Part 763.99(a)(7).**

Name of Building: Spray School District Campus – Gymnasium
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 1945 (Recent Remodels Unknown)
ACBM Status: **The building has friable & nonfriable suspected ACBM assumed to be ACM.**

Name of Building: Spray School District Campus – Weight Room
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 2001 (Recent Remodels Unknown)
ACBM Status: **The building is AHERA exempt under 40 CFR Part 763.99(a)(7).**

Name of Building: Spray School District Campus – Wood Shop Building
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 2006 (Recent Remodels Unknown)
ACBM Status: **The building is AHERA exempt under 40 CFR Part 763.99(a)(7).**

Name of Building: Spray School District Campus – High School Building
Construction Type: Original Construction w/ Remodels
Address: 303 Park Ave. Spray, OR 97874
Construction Date: 1947 (Recent Remodels Unknown)
ACBM Status: **The building has friable & nonfriable suspected ACBM assumed to be ACM.**

Name of Building: Spray School District Campus – Boys Dorm Building
Construction Type: Original Construction w/ Remodels
Address: 105 Main St. Spray, OR 97874
Construction Date: 1998 (Recent Remodels Unknown)
ACBM Status: **The building is AHERA exempt under 40 CFR Part 763.99(a)(7).**

Name of Building: Spray School District Campus – Welding Shop Building
Construction Type: Original Construction w/ Remodels
Address: 105 Main St. Spray, OR 97874
Construction Date: 2008 (Recent Remodels Unknown)
ACBM Status: **The building is AHERA exempt under 40 CFR Part 763.99(a)(7).**

Name of Building: Spray School District Campus – Girls Dorm Building
Construction Type: Original Construction w/ Remodels
Address: 704 Willow St. Spray, OR 97874
Construction Date: 1971 (Recent Remodels Unknown)
ACBM Status: **The building has friable & nonfriable suspected ACBM assumed to be ACM.**

1.5 DESIGNATED PERSON ASSURANCES

In accordance with 40 CFR ' 763.93(i) of the Environmental Protection Agency Asbestos-Containing Material in Schools regulation, the undersigned Local Education Agency (LEA) Designated Person (DP) hereby certifies that the following general responsibilities of the LEA under 40 CFR ' 763.84 have been or will be met:

1. Ensure that the activities of any persons who perform inspections, re-inspections, and periodic surveillance, develop and update management plans, and develop and implement response actions, including operations and maintenance, are carried out per Part 763, Subpart E.

2. Ensure that all custodial and maintenance employees are properly trained as required by Part 763, Subpart E, and other applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration asbestos the standard for construction, the EPA worker protection rule, or applicable State regulations).

3. Ensure that workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress.

4. Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may encounter asbestos in a school are provided information regarding the locations for Asbestos-Containing Building Materials (ACBM) and suspected ACBM assumed to be Asbestos-Containing Materials (ACM).

5. Ensure that warning labels are posted per ' 40 CFR 763.95.

6. Ensure that management plans are available for inspection and notification of such availability has been provided as specified in the management plan under ' 40 CFR 763.93(g).

7. Designate a person to ensure that requirements under ' 763.84 are properly implemented and ensure that the designated person receives adequate training to perform duties assigned under ' 763.84. Such training shall provide, as necessary, basic knowledge of the health effects of asbestos; detection, identification, and assessment of ACM; options for controlling ACBM; asbestos management programs; relevant Federal and State regulations concerning asbestos, including those in Part 763, Subpart E, and those of the Occupational Safety and Health Administration, U.S. Department of Transportation, and the U.S. Environmental Protection Agency.

8. Consider whether any conflict of interest may arise from the inter-relationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under Part 763, Subpart E.

Name of Designated Person:
Signature:
Date:

1.6 EVALUATION OF RESOURCES

The following resources are necessary for the school district to comply with the requirements under AHERA:

- A person or persons to conduct periodic surveillance activities

- Two-hour awareness training for all maintenance and custodial employees

- Additional 14-hour training and medical clearances for employees will be involved in the implementation of operations and maintenance activities, and will respond to minor fiber release episodes

- Accredited asbestos inspector/management planner

- Accredited asbestos project designer if removal, encapsulation, or enclosure of ACBM is necessary

- Accredited abatement contractor and abatement workers if removal, repair, encapsulation, enclosure, and operations and maintenance activities (not conducted by school personnel) of ACBM are necessary

- Operations & Maintenance Budget

- Personal Protection Budget

- Costs associated with future re-inspections

PART II INSPECTION/REINSPECTION/PERIODIC SURVEILLANCE

2.1 INITIAL INSPECTION

EIS Pro LLC has reviewed the existing management plan and initial inspection as provided by the Spray School District. These files are now considered archived and are incorporated within the March 2024 management plan update by EIS Pro LLC.

2.2 3-YEAR RE-INSPECTIONS

AHERA requires that at least once every three years after a management plan has been in effect, a re-inspection must be made by an accredited inspector of all friable and non-friable known or assumed ACBM in each school building that the LEA leases, owns, or otherwise uses as a school building (40 CFR ' 763.85(b)(1)-(2)).

- **The next 3-year re-inspection must be completed no later than March 2027**

2.3 6-MONTH PERIODIC SURVEILLANCE

At least once every six (6) months after a management plan is in place, the LEA shall conduct periodic surveillance in the school that contains ACBM or is assumed to contain ACM. The person conducting periodic surveillance shall visually inspect all areas in the school that have been identified in the management plan as having ACBM, record the date of surveillance, his/her name, and any changes in the condition of the materials and submit the record to the LEA Designated Person for inclusion in the management plan. The periodic surveillances will be conducted under the following schedule:

- **1st periodic surveillance due September 2024**
- **2nd periodic surveillance due March 2024**
- **3rd periodic surveillance due September 2025**
- **4th periodic surveillance due March 2025**
- **5th periodic surveillance due September 2026**

PART III RESPONSE ACTIONS

3.1 SELECTING A RESPONSE ACTION OR OTHER ACTION

AHERA requires that an accredited management planner recommend an appropriate response action for all areas of thermal system insulation (TSI) and friable ACBM remaining in the school. The final decision, on which action should be taken, however, rests with the LEA.

AHERA identifies five possible response actions for managing asbestos in schools, as listed below. Activities that create a high probability that ACBM will be damaged or weakened to such an extent that it would be rendered friable are also considered response actions. Small-scale, short-duration activities are not considered response actions.

- **Operations and Maintenance (O&M) Program** - This is a program of work practices designed to maintain friable ACBM in good condition and ensure the cleanup of asbestos fibers previously released. An effective O&M program can prevent further release by minimizing and controlling friable ACBM disturbance or damage. An O&M program is not appropriate as an initial response action for any damaged or significantly damaged material.

- **Repair** - This involves returning damaged ACBM to an undamaged condition or to an intact state by replacing limited sections or patching damaged areas.

- **Encapsulation** - This involves the treatment of ACBM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers. The encapsulant either creates a membrane over the surface (Bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant). Both types of encapsulants are applied to the material surface using airless spray equipment at low pressure to reduce the release of fibers during the application.

- **Enclosure** - This involves creating an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air. The barrier is typically attached physically or sprayed on. For example, materials such as PVC or corrugated metal may be fastened around insulated piping, or a barrier may be constructed around asbestos fireproofing on structural members by spraying material that cures into a hard shell.

- **Removal** - This involves the taking out or the stripping of substantially all ACBM from a damaged area, a functional space, or a homogeneous area in a school building.

Under AHERA, the response action to be taken must be "sufficient to protect human health and the environment." Once it is determined which response actions meet these criteria, the LEA may choose the action that is the "least burdensome." ACBM is reassessed and recommended response actions reviewed every three years as part of the re-inspection process.

The LEA is required to implement an O&M program whenever any friable ACBM is present or assumed to be present in a building.

Response actions, other than small-scale, short-duration repairs must be designed and conducted by an accredited Asbestos Hazard Abatement Project Designer.

To determine if a response action is required and, if so, what response actions are available to the School District to address damaged ACBM or the prevention of damage to friable ACBM in the school buildings, the following Hazard Assessment Table will be used:

AHERA HAZARD RANKING	ACM CONDITION	DISTURBANCE POTENTIAL
1	Good	Low
2	Good	Moderate
3	Good	High
4	Fair	Low
5	Fair	Moderate
6	Fair	High
7	Poor	Any

Once a Hazard Rank has been assessed and selected for suspect friable/non-friable ACBM, the following response actions must be implemented.

HAZARD RANK	AHERA CLASSIFICATION	DESCRIPTION	RESPONSE ACTION OPTIONS
6 or 7	1	Damaged or significantly damaged thermal system insulation	• Repair the damaged area • Remove the damaged material if it is not feasible, due to technological factors, to repair the damage • Maintain all thermal system insulation ACM and its covering in an intact state and undamaged condition
4, 5, or 6	2	Damaged friable surfacing ACM	• Encapsulate • Enclose • Remove • Repair
6 or 7	3	Significantly damaged friable surfacing ACM	• Immediately isolate the functional space and restrict access, unless isolation is not necessary to protect human health and the environment • Remove the material in the functional space or, depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclose or encapsulate.
4, 5, 6, or 7	4	Damaged or significantly damaged friable miscellaneous ACM	• Immediately isolate the functional space and restrict access, unless isolation is not necessary to protect human health and the environment • Remove the material in the functional space or, depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclose or encapsulate.
2	5	ACBM with a potential for damage	• At least implement an Operations and Maintenance (O&M) program
3	6	ACBM with the potential for significant damage	• Implement an O&M program • Institute preventative measures appropriate to eliminate the reasonable likelihood that the ACBM or its covering will become significantly damaged, deteriorated, or delaminated • Remove or enclose the material as soon as possible if appropriate preventative measures cannot be effectively implemented • Consider isolating the area and restricting access to the ACBM if necessary to avoid imminent and substantial endangerment to human health or the environment
1	7	Any remaining friable ACBM or friable suspected ACBM	• Should at least implement an Operations and Maintenance (O&M) program

3.2 COMPLETION OF RESPONSE ACTIONS

Upon the conclusion of any response action, an accredited person designated by the school district will perform final clearance activities within each functional space where the response action was completed, to determine whether the action has been properly completed. Final clearance activities include both a visual inspection and final air sampling and analysis.

- **Visual Inspection** - A visual inspection involves visually examining the asbestos removal area for evidence that the abatement has been completed, including thorough clean-up. The inspection should be conducted as rigorously as possible, with all spaces and surfaces where the abatement was conducted being extensively examined for residual ACBM debris.

The presence of any visible residue on surfaces within the abatement area indicates a need for additional cleaning of the surfaces. Only after visual inspection clearance has been completed may final air sampling be done. The results of the visual inspection shall be documented and signed by the person conducting the visual inspection. If an area passes visual inspection but then fails to meet air sampling and analysis requirements after that inspection, the site must be re-cleaned, and an additional visual inspection be conducted to detect any material that may have been uncovered or released during re-cleaning.

- **Final Air Sampling and Analysis** - Section 763.90 of the AHERA Rule requires that the LEA accomplishes final air sampling and analysis of all removal, encapsulation, or enclosure projects by using the transmission electron microscopy (TEM) method unless the project involves no more than 160 square feet or 260 linear feet of ACBM, in which case phase contrast microscopy (PCM) may be used. Note that no final air clearance is required for small-scale, short-duration O&M projects.

Sampling operations for airborne asbestos following an asbestos abatement action must be performed by qualified individuals completely independent of the abatement contractor to avoid possible conflict of interest. EPA recommends that The LEA obtained professional assistance to perform the sampling and analysis.

Response Action documentation is kept in an abatement project manual that is specific to the abatement activity. The list of response actions conducted in the building since the inception of AHERA is to be included in Appendix I of this Management Plan. Small-scale short-duration activities are also included on this list for completeness, even though they are not considered response actions.

PART IV OPERATIONS AND MAINTENANCE

4.1 PLAN FOR OPERATIONS AND MAINTENANCE (O&M)

All maintenance and custodial staff who work in buildings that contain ACM or assumed ACBM have received the required two-hour Awareness Training. In addition, maintenance and custodial staff whose duties may cause them to come into contact with asbestos-containing materials have received an additional 14 hours of training, as specified in Paragraph 763.92 (a) (2).

The School District has made its decision that its employees will only be involved with Small-scale, Short Duration Projects.

The School District ensures that the following procedures will be followed for any O&M Activities that disturb friable ACBM:

- Restrict entry into the area by persons other than those necessary to perform the maintenance project, either by physically isolating the area or by schedule.

- Post signs to prevent entry by unauthorized persons.

- Shut off or temporarily modify the air-handling system and restrict other sources of air movement.

- Use work practices or other controls such as wet methods, protective clothing, HEPA vacuums, mini-enclosures, and glove bags as necessary to inhibit the spread of any released fibers.

- Clean all fixtures or other components in the immediate work area.

- Place the asbestos debris and other cleaning material in a sealed, leak-tight container.

The School District intends to comply with the provisions of Appendix A to Subpart E of 40 CFR Part 763 when performing small-scale, short-duration O&M activities. The School District also intends to comply with all applicable EPA, OSHA, and ODEQ regulations. The School District is responsible for implementing a medical surveillance program and respiratory protection program. Additionally, the School District shall provide the proper personal protective equipment to each staff member performing small-scale, short-duration O&M activities.

4.2 CLEANING PROCEDURES

The initial cleaning is required at least once of all areas in a school building where friable ACBM, damaged or significantly damaged thermal system insulation ACM, or friable assumed ACBM is present following inspection of the building and before the initiation of any response action, other than O&M activities or repair. Initial cleaning of these areas will be performed by maintenance and custodial staff who have received the Two-Hour Awareness Training.

The following work practices are established for these cleaning activities:

- Avoid bumping pipes, walls, and other surfaces with brooms, mops, vacuum cleaners, and other cleaning equipment.

- Do not use dry brooms, mops, dust cloths, or standard vacuum cleaners, which will simply re-suspend fibers.

- All dusting and mopping shall be conducted using wet cleaning techniques (mops or cloths dampened with water or a dust suppressant) or with vacuum cleaners equipped with HEPA filters:

- All curtains, books, upholstered furniture, carpets, and other irregular surfaces shall be cleaned with a HEPA vacuum cleaner.

- All non-carpeted floors shall be wet-mopped, and all other horizontal surfaces such as the tops of light fixtures and file cabinets shall be wiped with damp cloths or HEPA-vacuumed.

- Spray (mist) bottles of water or a dust suppressant shall be used to keep the mops and cloths damp.

- Cleaning materials (mop heads, cloths, and HEPA filters) shall be washed after each cleaning: When changed these materials must be discarded as asbestos waste and placed in 6-mil plastic bags, the bags sealed and labeled: “DANGER – CONTAINS ASBESTOS FIBERS – AVOID CREATING DUST – CANCER AND LUNG DISEASE HAZARD,” and the bags deposited in a landfill approved by Ohio EPA to accept asbestos waste. Small quantities of waste could also be stored in labeled drums or other durable containers, in secured areas on-site, and a disposal company could then transport the waste to an appropriate landfill periodically.

- HEPA filters should be removed from vacuum cleaners with great care. Consult The manufacturer’s instructions for filter removal. Workers should wear at least air-purifying respirators and shall mist the filters with water as they are removed.

• Ladders, mops, buckets, vacuum cleaners, and all cleaning equipment shall be washed or wiped with damp cloths when the cleaning is finished.

• Whenever changing filters in the HVAC system of the building containing friable ACM, the filters must be misted with water or amended water as they are removed, placed in plastic bags, sealed, and discarded as asbestos waste. Workers should wear at least an air-purifying respirator.

4.3 HOUSEKEEPING PREVENTATIVE MEASURES

• **Vacuuming -** Where vacuuming methods are selected, HEPA-filtered vacuuming equipment must be used and emptied in a manner that minimizes the reentry of asbestos into the workplace.

• **Waste Disposal -** Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal shall be collected and disposed of in sealed, labeled, and impermeable bags or other closed, labeled, impermeable containers.

• **Care of Asbestos-Containing Flooring Material -** All vinyl and asphalt flooring material shall be maintained under the following work practices unless it is demonstrated that the material does not contain asbestos:

o Sanding of flooring material is prohibited.

o Stripping of finishes shall be conducted using low-abrasion pads at a speed lower than 300 rpm and wet methods.

o Burnishing or dry buffing may be used only on flooring that has sufficient finish so that the pad cannot contact the flooring material.

• **Dust and debris in an area containing accessible thermal system insulation or surfacing material, or visibly deteriorated ACM**:

o Shall not be dusted, swept dry, or vacuumed without using a HEPA filter.

o Shall be promptly cleaned up and disposed of in leak-tight containers.

4.4 OTHER PREVENTATIVE MEASURES

Employees shall be informed of the following activities that are prohibited when asbestos-containing materials are involved:

• Not to drill holes in asbestos-containing materials.

- Not to hang plants or pictures on structures covered with asbestos-containing materials.

- Not to sand asbestos-containing floor tile.

- Not to damage asbestos-containing materials such as pipe wrap while moving furniture or other objects.

- Not to install curtains, drapes, or dividers in such a way that they damage asbestos-containing materials.

- Not to dust floors, ceilings, moldings, or other surfaces in asbestos-contaminated environments with a dry brush or sweep with a dry broom.

- Not to use an ordinary vacuum cleaner to clean up asbestos-containing debris.

- Not to remove ceiling tiles below asbestos-containing materials without wearing the proper respiratory protection, clearing the area of other people, and observing asbestos removal waste disposal procedures.

- Not to remove ventilation system filters dry.

- Not to shake ventilation system filters.

4.5 MAINTENANCE ACTIVITIES

- Small-scale, Short Duration activities (projects involving 3 square feet or less or 3 linear feet or less), as defined in Appendix B to Subpart E of 40 CFR Part 763[5], will be performed only by those maintenance and custodial staff who have received sixteen hours of training. The work practice procedure described above will be followed as indicated before; these projects will be limited in scope, dealing primarily with minor repairs of materials that do not require removal.

- Large projects (projects requiring more than three square feet or three linear feet) will be conducted by outside contractors (utilizing fully trained and accredited workers, project designers, and contractor supervisors). Air clearance and site inspection by the LEA will be made following these projects to determine if the action has been properly completed.

4.6 FIBER-RELEASE EPISODES

Custodial and maintenance workers must report to the LEA Designated Person the presence of asbestos debris on the floor, water or physical damage to the ACM, or any other evidence of possible fiber release. Note that fiber-release episodes can also occur during maintenance or renovation projects.

Each fiber release episode must be documented and included in the updated management plan.

• **Minor Episodes (involving the falling or dislodging of 3 square or linear feet or less of friable ACBM)** -Only maintenance and custodial staff who have received the Sixteen hours of training will be utilized using standard wet cleaning and HEPA vacuuming techniques described above; this personnel will follow the Small-scale, Short-duration guidelines are outlined in Appendix B to Subpart E of 40 CFR Part 763.

• **Major Episodes (involving the falling or dislodging of more than 3 square or linear feet of friable ACBM)** - If more than 3 square feet of surfacing ACM or more than 3 linear feet of thermal system, ACM delaminates or dislodges from its substrate, the episode must be considered major. A large breach in the containment barrier for a maintenance or abatement project should also be considered a major episode. Should major fiber release episodes occur, the following procedures shall be immediately implemented:

o Restrict entry into the area and post signs to prevent entry into the area by persons other than those necessary to perform the response action

o Shut off, or temporarily modify, the air-handling system to prevent the distribution of fibers to other areas in the building

o The response action for any major fiber release episode must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions

o Only accredited project designers and contractors will be utilized in the event of a major fiber release episode. Air clearance and site inspection by the LEA will be made to determine if the action has been properly completed.

4.7 TRANSPORT & DISPOSAL OF ASBESTOS WASTE

The School District intends to comply with the provisions of Appendix D to Subpart E of 40 CFR Part 763 regarding the transport and disposal of asbestos waste. A chain-of-custody recordkeeping procedure will be utilized to ensure proper containerization, transport, and disposal of asbestos waste.

4.8 RECORDKEEPING

Section 763.84 of CFR Part 763 required that all schools ensure that (1) inspections, re-inspections, periodic surveillance, and response action activities are properly carried out; (2) custodial and maintenance employees are properly trained; (3) workers and building occupants are informed each year about inspections, response actions, and post-response action activities, including re-inspection and periodic

surveillance: (4) short-term workers (e.g., telephone repair workers, and pest control operators) who may encounter asbestos in a school are provided information about locations of asbestos-containing building material; (5) warning labels are posted as required; and (6) management plans are available for review, and that parent, teacher, and employee organizations are notified of the availability of the plan. Extensive records are required to be kept to support compliance with these regulations.

Under 40 CFR ' 763.94(h), for each major and minor fiber release episode occurring as a result of operations and maintenance activities under 40 CFR ' 763.91(f), the asbestos management plan must include a record of the following information: date and location of the episode, method of repair, preventive measure or response action is taken, and if ACBM is removed, the name and location of the storage and disposal site of the ACM.

The Preventative Measures and Response Action Activities form will be used to document the name, signature, and accreditation number of the persons performing major asbestos activities, copies of state accreditations, start and completion dates, the location where the activity occurred, description of preventative measures used, and name and location of the disposal site, if ACBM was removed.

Following a response to a fiber release episode, the Preventative Measures and Response Action Activities Report form will be completed and placed under Appendix I of this Management Plan.

PART V PLAN TO INFORM - NOTIFICATIONS

5.1 ANNUAL NOTIFICATION

AHERA requires, at least once each school year, the LEA must notify in writing parent, teacher, and employee organizations of the availability of the AMP and must include in the AMP, a description of the steps taken to notify such organizations and a dated copy of the notification. In the absence of any such organizations for parents, teachers, or employees, the LEA must provide written notice to that relevant group of the availability of the AMP and must include in the AMP a description of the steps taken to notify such groups and a dated copy of the notification. Copies of these letters shall be kept in Appendix P.

5.2 OCCUPANTS

AHERA requires the LEA to take steps to inform workers and building occupants, or their legal guardians, about inspections, re-inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress. Under 40 CFR ' 763.84(c), the LEA must inform them about these activities at least once each school year.

As applicable with AHERA, OSHA, and other regulations, workers, and building Occupants will also be notified about planned or ongoing inspections, periodic surveillance, response actions, and post-response action activities in the respective school buildings.

Warning labels are to be attached immediately adjacent to any friable and non-friable ACBM and assumed ACBM located in routine maintenance areas of each school building.

The labels shall be prominently displayed in a readily visible location and remain posted until the ACBM is abated. The label will be in print of large size or bright color and read:

CAUTION: ASBESTOS. HAZARDOUS. DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT.

5.3 SHORT-TERM WORKERS AND CONTRACTORS

Contactors entering the school property and conducting work on the interior of the buildings will be required to review the Management Plan prior to starting work at the site to ensure that ACBM will not be damaged during work activities. The contractor will be required to sign a “Certificate of Worker’s Acknowledgement” form located in Appendix N acknowledges they have reviewed the Management Plan and that there

activities will not disturb ACBM in any of the buildings. Completed Certificate of Worker's Acknowledgement forms will be placed in Appendix O of this Management Plan. If ACBM is required to be disturbed to fulfill the contractor's scope of work, the designated person should be notified before the start of work.

PART VI GLOSSARY

6.1 DEFINITIONS

Unless otherwise noted with an asterisk (*), the following definitions contained in this The glossary can be found under 40 CFR ' 763.83:

Act means the Toxic Substances Control Act (TSCA), 15 U.S.C. 2601, et seq.

Accessible when referring to asbestos-containing material (ACM) means that the material is subject to disturbance by school building occupants or custodial or maintenance personnel during their normal activities.

Accredited or accreditation when referring to a person or laboratory means that such person or laboratory is accredited in accordance with section 206 of Title II of the Act.

Air erosion means the passage of air over friable asbestos-containing building material (ACBM) which may result in the release of asbestos fibers.

Asbestos means the asbestiform varieties of Chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite grunerite); anthophyllite; tremolite; and actinolite .

Asbestos-containing material (ACM) when referring to school buildings means any material or product that contains more than 1 percent asbestos.

Asbestos-containing building material (ACBM) means surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school building.

Asbestos debris means pieces of ACBM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

Damaged friable miscellaneous ACM means friable miscellaneous ACM that has deteriorated or sustained a physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, has delaminated such that its bond to the substrate (adhesion) is inadequate or for any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars, or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

Damaged friable surfacing ACM means friable surfacing ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or which has delaminated such that its bond to the substrate (adhesion) is inadequate, or which, for any other reason, lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers. separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars, or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

Damaged or significantly damaged thermal system insulation ACM means thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal systems insulation equipment where the insulation has lost its structural integrity or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges, or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage.

Designated Person means a person appointed by the Local Education Agency (LEA), under 40 CFR ' 763.84 (g), who is trained to ensure the proper implementation of AHERA in school buildings. *

Encapsulation means the treatment of ACBM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).

Enclosure means an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air.

Fiber release episode means any uncontrolled or unintentional disturbance of ACBM resulting in visible emission.

Friable when referring to material in a school building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously non-friable material after such previously non-friable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

Functional space means a room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped ceiling and the floor or roof deck above), such as classroom(s), a cafeteria, gymnasium, hallway(s), designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

High-efficiency particulate air (HEPA) refers to a filtering system capable of trapping and retaining at least 99.97 percent of all monodispersed particles 0.3 µm in diameter or larger.

Homogeneous area means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

Local education agency (LEA) means: (1) Any local educational agency as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 3381). (2) The owner of any nonpublic, nonprofit elementary, or secondary school building. (3) The governing authority of any school operated under the defense dependent's education system provided for under the Defense Dependents' Education Act of 1978 (20 U.S.C. 921, et seq.).

Miscellaneous ACM means miscellaneous material that is ACM in a school building.

Miscellaneous material means interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.

Non-friable means material in a school building that when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

Operations and maintenance program means a program of work practices to maintain friable ACBM in good condition, and ensure clean-up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACBM disturbance or damage.

Phase contrast microscopy (PCM) refers to the procedure outlined in NIOSH Method 7400 for the evaluation of fibers in air samples.*

Polarized light microscopy (PLM) refers to the method outlined in 40 CFR ' 763, Appendix E to Subpart E, for the identification of asbestos in bulk samples.*

Potential damage means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, during their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations, and maintenance practices, changes in occupancy, or recurrent damage.

Potential significant damage means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable

likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. (3) The material is subject to major or continuing disturbance, due to factors including, but not limited to accessibility or, under certain circumstances, vibration, or air erosion.

Preventive measures mean actions are taken to reduce the disturbance of ACBM or Otherwise, eliminate the reasonable likelihood of the material's becoming damaged or significantly damaged.

Removal means the taking out or the stripping of substantially all ACBM from a damaged area, functional space, or a homogeneous area in a school building.

Repair means returning damaged ACBM to an undamaged condition or to an intact state to prevent fiber release.

Response action means a method, including removal, encapsulation, enclosure, repair, operations, and maintenance, that protects human health and the environment from friable ACBM.

Routine maintenance area means an area, such as a boiler room or mechanical room, that is not normally frequented by students and in which maintenance employees or contract workers regularly conduct maintenance activities.

School means any elementary or secondary school as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 2854).

School building means (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food. (2) Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education. (3) Any other facility used for the instruction or housing of students or for the administration of educational or research programs. (4) Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described in this definition of "school building" under paragraphs (1), (2), or (3). (5) Any portico or covered exterior hallway or walkway. (6) Any exterior portion of a mechanical system used to condition interior space.

Significantly damaged friable miscellaneous ACM means damaged friable miscellaneous ACM where the damage is extensive and severe. Significantly damaged friable surfacing ACM means damaged friable surfacing ACM in a functional space where the damage is extensive and severe.

State means a State, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Northern Marianas, the Trust Territory of the Pacific Islands, and the Virgin Islands.

Surfacing ACM means surfacing material that is ACM. Surfacing material means the material in a school building that is sprayed on, troweled on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

Thermal system insulation (TSI) means material in a school building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, water condensation, or other purposes.

Thermal system insulation ACM means thermal system insulation that is ACM.

Transmission electron microscopy (TEM) refers to the method outlined in 40 CFR ' 763, Appendix A to Subpart E, for the identification of asbestos in air samples.* Vibration means the periodic motion of friable ACBM which may result in the release of asbestos fibers.

6.2 ACRONYMS

ACM -Asbestos-containing material

ACBM -Asbestos-containing building material

AHERA -Asbestos Hazard Emergency Response Act

DOT -Department of Transportation

DP -AHERA Designated Person

EPA -U.S. Environmental Protection Agency

HEPA -High-efficiency particulate air

LEA -Local Education Agency

NIOSH -National Institute for Occupational Safety and Health

NIST -National Institute of Standards and Technology

NVLAP -National Voluntary Laboratory Accreditation Program

O&M -Operations and maintenance

OSHA -Occupational Safety and Health Administration

PCM -Phase contrast microscopy

PLM -Polarized light microscopy

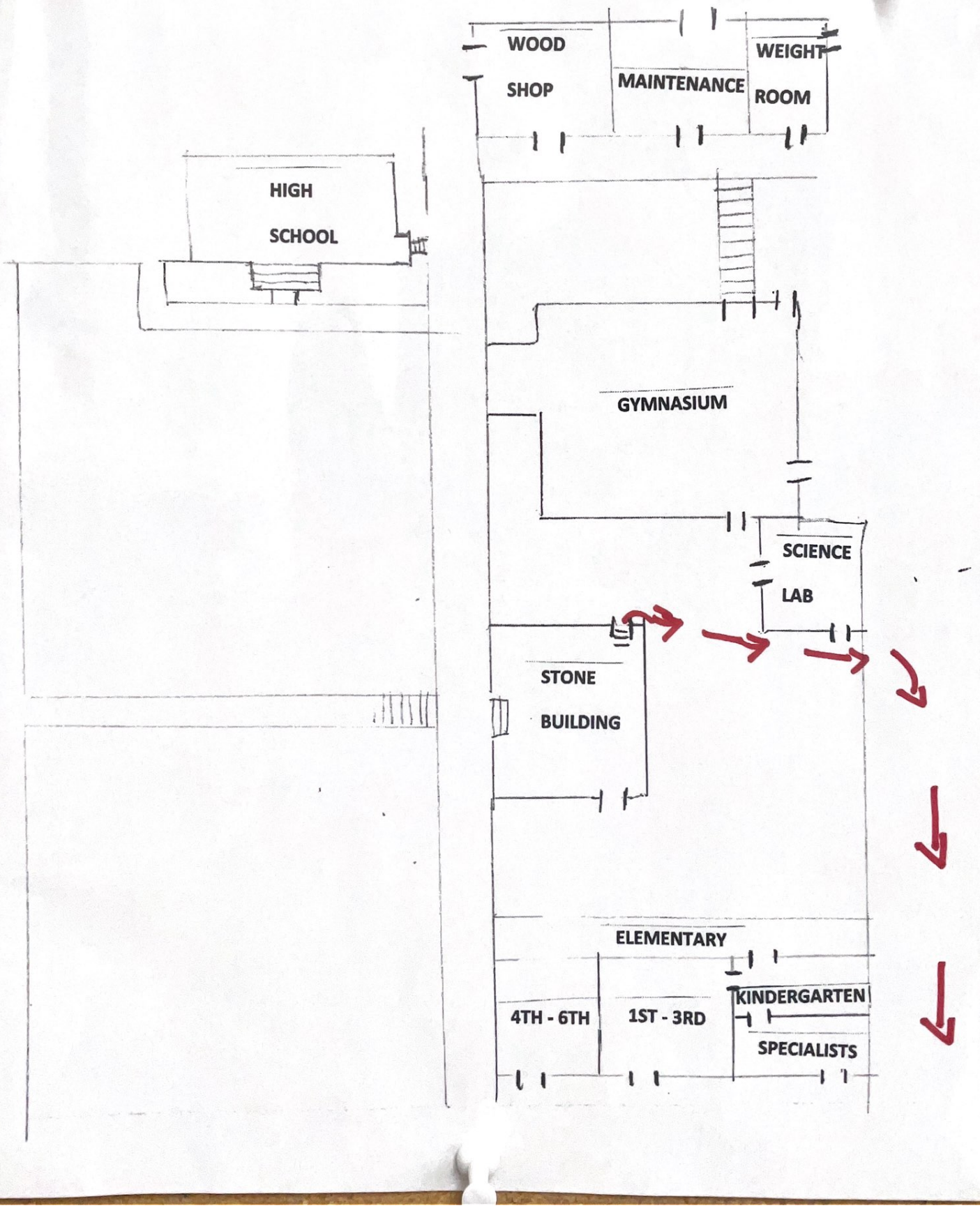
TEM -Transmission electron microscopy

TSI -Thermal system insulation

APPENDIX A

BUILDING FLOOR PLAN(S)

Evacuation for STONE BUILDING
Go out thru Cafeteria Door



APPENDIX B

AHERA 3-YEAR RE-INSPECTION(S)

ENVIRONMENTAL INSPECTION SERVICES PRO LLC

Bus: (503) 680-6398 | Cell: (503) 944-9818

430 N First St., Carlton, OR 97111

1.0 EXECUTIVE SUMMARY

AHERA 3-Year Re-inspection Report

March 9th, 2024

Subject Location(s):

Spray School District Campus
303 Park Ave.
Spray, OR 97874
Wheeler County

Prepared For:

Spray School District #1
C/O Robin Champagne, Facility Manager

Dear Mrs. Robin Champagne, or to whom it may concern,

As required by the Asbestos Hazard Emergency Response Act (AHERA) Environmental Inspection Services Pro, LLC (EIS) has completed the 3-year re-inspection of the Spray School District Campus buildings located at 303 Park Avenue in Spray, Oregon (school buildings). EIS Pro LLC Senior Project Manager and AHERA-accredited Asbestos inspector and management planner Matthew C. Spear conducted the AHERA asbestos reinspection of the school buildings on Tuesday, February 26th, 2024.

AHERA requires that local education agencies have an accredited Asbestos Inspector conduct a re-inspection at least once every 3 years after a management plan and an initial inspection have been established for each “School Building” that they lease, own, or otherwise use as a school building for asbestos-containing building material (ACBM). AHERA defines “School Buildings” as; (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food, (2) Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education, (3) Any other facility used for the instruction or housing of students or the administration of educational or research programs, (4) Any maintenance, storage, or utility facility, including the hallway, essential to the operation of any facility described in (1), (2), or (3) of this paragraph, (5) Any portico or covered exterior hallway or walkway, and (6) Any exterior portion of a mechanical system used to condition interior space.

During the inspection of the school buildings, EIS Pro LLC considered the following for the suspect ACBMs:

- Visual re-inspection and re-assessment of the condition of all friable known or assumed ACBM
- Visual inspection of material that was previously considered non-friable ACBM and physically touching the material to determine whether it has become friable since the last inspection or re-inspection
- Identification of any homogeneous areas with material that has become friable since the last inspection or re-inspection
- Assessment of the condition of the newly friable materials in areas where samples are collected, and newly friable materials in areas that are assumed to be ACBM
- Re-assessment of the condition of friable known or assumed ACBM previously identified

During the inspection, EIS Pro LLC routinely assessed friable and non-friable known or assumed ACBM within the building. Building floor plans are included in Appendix A of the AHERA Asbestos Management Plan. The findings of the re-inspection are detailed in the Material Summary of this re-inspection. This summary includes the type, description, location, estimated quantity, estimated cost, friability, current condition, the potential for the damage, and recommended response actions, if any, for each friable and non-friable known or assumed ACBM within the building. The general recommendations of the management planner are provided in Appendix C of the AHERA Asbestos Management Plan.

The re-inspection process under the AHERA rules states that a school building must be reinspected by an accredited inspector at least every three years. Every six months, a periodic assessment is required for the identified materials under the three-year reinspection. See the recommended activity schedule below:

Recommended Activity Schedule:

03/9/2024 – Reinspection End Date

09/9/2024 – Periodic Surveillance

03/9/2025 – Periodic Surveillance

09/9/2025 – Periodic Surveillance

03/9/2026 – Periodic Surveillance

09/9/2026 – Periodic Surveillance

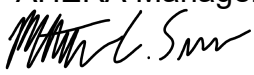
03/9/2027 – Reinspection Due Date

Please note this asbestos inspection was conducted to meet the requirements of AHERA. This inspection does not meet the requirements of NESHAP; therefore, a thorough asbestos inspection is required before any renovation or demolition activity.

The inspection for ACMs was reasonably non-destructive. Therefore, materials located behind walls, above solid ceilings, or in other inaccessible areas may not have been identified, assessed, or quantified. If during demolition or renovation, additional suspect materials are discovered, these materials should be documented and treated as asbestos-containing, unless tested otherwise.

All suspected asbestos materials that were not sampled or otherwise determined to be non-ACM are assumed to be asbestos-containing unless or until tested and shown otherwise. All activities involving these materials should be in strict compliance with the requirements stipulated in AHERA & NESHAP.

Respectfully submitted,
Environmental Inspection Services Pro LLC
Matthew C. Spear,
AHERA Inspector #: IRO-23-0717C
AHERA Management Planner #: MP-23-0717C



2.0 MATERIAL SUMMARY

Known or suspected asbestos-containing building materials are listed below in order of hazard priority. The priorities established by the Accredited Inspector are based on the assessments. Material may be listed more than once if its location varies and if the assessment criteria also dramatically change.

Priority	Material	Location	Category	Quantity	Removal Cost
1	Popcorn Ceiling Texture	Girl's Dorm Building	#2 (Damaged Friable Surfacing ACM)	500 SF	$7,500.00
2	Spray-Applied Insulation	Gymnasium Building	#2 (Damaged Friable Surfacing ACM)	6,000 SF	$90,000.00
3	12" x 12" Vinyl Floor Tile & Mastic (White, Grey, Tan, & Black)	Elementary & High School Classrooms	Miscellaneous Non-friable ACBM or Assumed ACBM	10,000 SF	$150,000.00
4	Wall & Ceiling Texture	Throughout	#2 (Damaged Friable Surfacing ACM)	50,000 SF	$750,000.00
5	Gypsum Wallboard w/ Tape & Joint Compound	Throughout	Miscellaneous Non-friable ACBM or Assumed ACBM	50,000 SF	$750,000.00
6	Ceiling Tile & Mastic	Classrooms; Offices	Miscellaneous Non-friable ACBM or Assumed ACBM	10,000 SF	$150,000.00
7	Wall Base & Mastic	Throughout	Miscellaneous Non-friable ACBM or Assumed ACBM	5,000 LF	$75,000.00
8	Window Caulking	Exterior Windows	Miscellaneous Non-friable ACBM or Assumed ACBM	5,000 LF	$75,000.00

The quantities and removal costs provided in this report are estimates. While these estimates provide a usable depiction, actual amounts may vary. In addition, where small quantities are involved, a higher, minimum cost may be charged by an asbestos abatement contractor.

Priority #1

Homogenous area – Popcorn Ceiling Texture

Functional Space – Girl's Dorm Building

Type – Surfacing

F/NF – Friable

Quantity – 500 SF

Description – A spray-on or paint-on ceiling or acoustic ceiling treatment with a bumpy surface often created by tiny particles of vermiculite or polystyrene, which gives the ceiling sound-deadening properties. Mixtures are available in fine, medium, and coarse grades.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – #2 (Damaged Friable Surfacing ACM or Assumed ACBM)

Concern Category – Moderate Concern

Current Damage – Good (< 1% Distributed; < 1% Localized Deterioration & Physical Damage)

Accessibility – Low (Out of Reach)

Popcorn Ceiling texture is suspected to contain asbestos. Direct contact will worsen friability. At a minimum, establish an operations and maintenance program. Before disturbing the surfacing, a qualified inspector should take samples. Remove using full isolation if the texture is asbestos-containing (positive). Other methods may be acceptable; contact the local air pollution authority and worker protection division. Carpeting and reflooring are permitted if existing material remains undisturbed. Polarized light microscopy (PLM) analysis is considered conclusive for this material. All trace sample results of this material should be verified through scanning or transmission electron microscopy (SEM or TEM).

Response:

Maintain O&M program. Do not disturb without proper training. Remove if possible.

Priority #2

Homogenous area – Spray-Applied Insulation

Functional Space – Gymnasium Building

Type – Surfacing

F/NF – Friable

Quantity – 6,000 SF

Description – A spray-on applied insulating treatment with a bumpy surface often created by tiny particles of vermiculite or polystyrene, which gives the treatment insulating properties. The thickness of the application is dependent on the necessary insulation value of the space.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – #2 (Damaged Friable Surfacing ACM or Assumed ACBM)

Concern Category – Moderate Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Deterioration & Physical Damage)

Accessibility – Moderate (Out of Reach; Sporting Events)

Spray-applied insulation is suspected to contain asbestos. Direct contact will worsen friability. At a minimum, establish an operations and maintenance program. Before disturbing the surfacing, a qualified inspector should take samples. Remove using full isolation if the texture is asbestos-containing (positive). Other methods may be acceptable; contact the local air pollution authority and worker protection division. Carpeting and reflooring are permitted if existing material remains undisturbed. Polarized light microscopy (PLM) analysis is considered conclusive for this material. All trace sample results of this material should be verified through scanning or transmission electron microscopy (SEM or TEM).

Response:

Maintain O&M program. Do not disturb without proper training. Encapsulate if possible.

Priority #3:

Homogenous area –12” x 12” Vinyl Floor Tile w/ Mastic

Functional Space – Elementary & High School Classrooms

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 10,000 SF (Estimated)

Description – Manufactured 12” x 12” floor tiles composed of a dense vinyl matrix that often contains asbestos and is adhered to the substrate with a mastic that often also contains asbestos.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Moderate Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Deterioration & Physical Damage)

Accessibility – High (Primary Floor Surface)

Floor tiles and mastic are suspected to contain asbestos. Drilling, grinding, sanding, etc. will create friability. At a minimum, establish an operations and maintenance program. Before disturbing the flooring, a qualified inspector should take samples that include both the flooring and mastic, which adhere the flooring to the floor substrate. Remove using full isolation if the flooring and/or mastic is asbestos-containing (positive). Other methods may be acceptable; contact the local air pollution authority and worker protection division. Carpeting and reflooring are permitted if existing material remains undisturbed. Polarized light microscopy (PLM) analysis is considered conclusive for this material. All trace sample results of this material should be verified through scanning or transmission electron microscopy (SEM or TEM).

Response:

Maintain O&M program. Do not disturb without proper training. Remove or encapsulate if possible.

Priority #4:

Homogenous area – Wall & Ceiling Texture

Functional Space – Throughout

Type – Surfacing

F/NF – Friable

Quantity – 50,000 SF

Description – A spray-on or paint-on wall treatment with a textured surface often created by tiny particles, which gives the wall sound-deadening properties. Mixtures are available in fine, medium, and coarse grades.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – #2 (Damaged Friable Surfacing ACM or Assumed ACBM)

Concern Category – Moderate Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Deterioration & Physical Damage)

Accessibility – Low (Minimal Contact)

The wall texture is suspected to contain asbestos. Direct contact will worsen friability. At a minimum, establish an operations and maintenance program. Prior to disturbing the surfacing, a qualified inspector should take samples. Remove using full isolation if the texture is asbestos-containing (positive). Other methods may be acceptable; contact the local air pollution authority and worker protection division. Carpeting and reflooring are permitted if existing material remains undisturbed. Polarized light microscopy (PLM) analysis is not considered conclusive for this material due to the potential presence of many small fibers that are invisible under PLM magnification. All negative sample results of wall texture should be verified through scanning or transmission electron microscopy (SEM or TEM).

Response:

Maintain O&M program. Do not disturb without proper training. Encapsulate if possible.

Priority #5:

Homogenous area – Gypsum Wallboard

Functional Space – Throughout

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 50,000 SF

Description – Manufactured panels typically 4 feet by 8 feet composed of compressed gypsum plaster with paper face and backing. Seams are covered with tape and joint compound and nail or screw locations are covered with joint compound only.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Low Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Deterioration & Physical Damage)

Accessibility – Moderate (Primary Wall Surface)

It is very difficult to determine all possible varieties of gypsum wallboard in each building because the material is obscured by paint and other finishes. Even if some gypsum wallboard tests negative (no asbestos detected), other locations of gypsum wallboard may contain asbestos. It is EIS Pro LLC's experience that 3 to 5 percent of all gypsum wallboard samples contain asbestos. An accredited inspector should take full-depth samples before repair, remodeling, demolition, or other activities that would impact any wallboard or plaster. If the sample tests are positive (asbestos-containing), remove them using current regulatory guidelines.

Response:

Maintain O&M program. Do not disturb without proper training.

Priority #6:

Homogenous area – Ceiling Tile & Mastic

Functional Space – Classrooms; Offices

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 10,000 SF

Description – Manufactured 12” x 12” or 12” x 24” ceiling tiles composed of a dense fibrous matrix that often contains asbestos and is adhered to the substrate with a mastic that often also contains asbestos.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Low Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Deterioration & Physical Damage)

Accessibility – Low (Out of Reach)

Ceiling tiles and mastic are suspected to contain asbestos. Drilling, grinding, sanding, etc. will create friability. At a minimum, establish an operations and maintenance program. Prior to disturbing the tile, a qualified inspector should take samples that include both the tile and mastic, which adheres the tile to the floor substrate. Remove using full isolation if the tile and/or mastic is asbestos-containing (positive). Other methods may be acceptable; contact the local air pollution authority and worker protection division. Polarized light microscopy (PLM) analysis is not considered conclusive for this material due to the potential presence of many small fibers that are invisible under PLM magnification. All negative sample results of ceiling tiles should be verified through scanning or transmission electron microscopy (SEM or TEM).

Response:

Maintain O&M program. Do not disturb without proper training.

Priority #7:

Homogenous area – Wall Base & Mastic

Functional Space – Throughout

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 5,000 LF

Description – Baseboard finishing material and adhesive holding the wall base to the substrate.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Low Concern

Current Damage – Good (< 1% Distributed; < 1% Localized Deterioration & Physical Damage)

Accessibility – Moderate (Primary Floor-to-Wall Base)

Wall base and specifically the mastic which adhere the base to the substrate, are suspected to contain asbestos. Drilling, grinding, sanding, etc. will create friability. At a minimum, establish an operations and maintenance program. Before disturbing the material, a qualified inspector should take samples that include both the cove base and mastic, which adhere the base to the substrate. Remove using full isolation if the wall base and/or mastic is asbestos-containing (positive). Other methods may be acceptable; contact the local air pollution authority and worker protection division.

Response:

Maintain O&M program. Do not disturb without proper training.

Priority #8:

Homogenous area – Window Caulking/Sealant

Functional Space – Exterior Windows

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 5,000 LF

Description – Manufactured, generally pre-mixed matrix putty compound that may contain asbestos fibers for reinforcement and insulating cement. The material may be utilized to seal, insulate, or stabilize structural or mechanical systems.

Sample Results – Assumed Positive

Assessment:

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Low Concern

Current Damage – Good (< 1% Distributed; < 1% Localized Deterioration & Physical Damage)

Accessibility – Low (Minimal Contact)

The material is generally non-friable in a pliable state. Age and exposure may change friability. Before impacting the material by remodeling, demolition, or removal, a qualified inspector should take samples for analysis. If the samples are analyzed as containing asbestos, remove them using wet methods, controlled conditions, and proper worker protection.

Response:

Maintain O&M program. Do not disturb without proper training. Encapsulate if possible.

APPENDIX C

MANAGEMENT PLANNER GENERAL RECOMMENDATIONS

MANAGEMENT PLANNER'S GENERAL RECOMMENDATIONS

The following represents the recommendations for asbestos within the LEA school buildings:

All ACBM in the school shall be managed in place following the EIS Pro LLC AHERA Operations and Maintenance (O & M) Program. The condition of such materials will be monitored until all the ACBM have been removed from the building. A successful O&M program includes the following elements:

A. Cleaning - All areas of the school where friable ACBM or suspected ACBM assumed to be ACM are present shall be cleaned at least once after the completion of the initial inspection. Additional cleaning may be necessary if the Management Planner makes a written recommendation indicating the methods and frequency of such cleaning.

B. O & M Activities - The LEA shall ensure that the procedures described below are followed to protect building occupants from any O & M activities that may disturb known or assumed ACM:

1. Restrict entry into the area either by physically isolating or by scheduling.
2. Post warning signs to prevent entry by unauthorized persons.
3. Shut off or temporarily modify the air-handling system.
4. Shut off or temporarily modify the air-handling system.
5. Use proper work practices and engineering controls such as wet methods, protective clothing, HEPA-vacuums, mini enclosures/glove bags, etc., to inhibit the spread of fibers.
6. Place all asbestos debris and other contaminated materials in a sealed, leak-tight container for disposal.

C. Minor Fiber Release Episodes - The LEA shall ensure that the procedures described below are followed in the event of a minor fiber release episode (i.e., disturbance of 3 linear/square feet or less of friable ACM):

1. Saturate the debris using the wet method.
2. Place the debris in a sealed leak-tight container and clean the area.
3. Repair the area of damaged ACBM with materials such as asbestos-free spackling, plaster, insulation, or seal with an encapsulant.

D. Major Fiber Release Episode - The LEA shall ensure that the procedures described below are followed in the event of a major fiber release episode (i.e., disturbance of more than 3 linear/square feet of friable ACBM):

1. Restrict entry into the area and post warning signs.
2. Shut off or temporarily modify the air handling system to prevent the spread of fibers to other areas of the school.

3. The response for any major fiber release episode must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions.

E. Periodic Surveillance - At least once every six (6) months after a management plan is in place; the LEA shall conduct periodic surveillance in the school that contains ACBM or is assumed to contain ACM. The person conducting periodic surveillance shall visually inspect all areas in the school that have been identified in the management plan as having ACBM, record the date of surveillance, his/her name, and any changes in the condition of the materials and submit the record to the LEA Designated Person for inclusion in the management plan.

F. Renovation and Demolition Activities - The EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulation requires that a facility conduct a thorough asbestos inspection to determine the presence, condition, and quantity of ACM before any renovation or demolition activity. Thorough inspections require identifying asbestos in both interior and exterior parts of the building, including inaccessible areas (requiring selective demolition inspection techniques). **AHERA management plans do not satisfy the requirements of NESHAP for a thorough asbestos inspection. Please contact Environmental Inspection Services Pro, LLC before any renovation or demolition activity so that a thorough asbestos inspection can be performed.**

G. Preventive Measures for Typical ACM - The LEA shall institute appropriate preventive measures to eliminate the reasonable likelihood that all ACBM within the building will become damaged, deteriorated, or delaminated. Below are typical recommended preventive measures. If your building has a type of ACBM that is not covered below, please contact Environmental Inspection Services Pro, LLC for further guidance with preventive measures:

1. SURFACING MATERIALS - "Surfacing Materials" means materials in a school building that are sprayed on, troweled on, or otherwise applied to surfaces. These include sprayed-on fireproofing materials on structural members, acoustical plaster, hard plaster on walls and ceilings, or other materials applied to surfaces for acoustical, fireproofing, or other purposes.

Surfacing Materials are generally considered friable and can release asbestos fibers if damaged by impact, air erosion, vibration, and/or water intrusion. The following procedures, when properly implemented, will reduce the potential for fiber release:

- Maintain the materials in an intact state and undamaged condition. Reduce the likelihood of fiber release by ensuring that the surfacing materials are not damaged by impact, scrapping, dusting, use of leaf blowers, etc.

• Prevent water leakage. If the material is significantly damaged, removal is the best option. For minor damage, an enclosure is a temporary solution. Encapsulation of damaged sprayed-on fireproofing material is not recommended.

• Train the custodial people who are responsible for the care and maintenance of surfacing materials.

2. THERMAL SYSTEM INSULATION (TSI) - Thermal System Insulation (TSI)" means insulating materials applied to pipes, pipe fittings, boilers, breechings, tanks, ducts, or other components to prevent process heat loss or gain, water condensation, or for other purposes.

TSI is generally considered a friable ACM. This means it can be easily damaged, increasing the potential for fiber release. The following procedures, when properly implemented, will reduce the potential for fiber release:

• Identify the locations and label TSI. Warning signs should be posted outside locations of TSI.

• Reduce the likelihood of fiber release by ensuring that the insulation is not damaged or otherwise disturbed. Avoid storing/stacking on/near TSI to reduce contact damage.

• Maintain the TSI in an intact state and undamaged condition. Repair damaged areas as soon as possible to prevent further deterioration. If repair is not feasible due to extensive damage/deterioration, the material will need to be properly removed.

• Train the custodial people who are responsible for the care and maintenance of TSI.

3. MISCELLANEOUS MATERIALS - "Miscellaneous Materials" are all other asbestos-containing materials in a school building that do not fall under the categories of Surfacing Materials or TSI. These include floor tiles, floor tile and carpet mastic, gypsum wallboard, and joint compound, ceiling tiles and associated mastics, transite panels, laboratory countertops, cove base and associated mastic, window caulking, and glazing compounds, etc. The following maintenance procedures are recommended for these materials:

• Maintain these materials in an intact state and undamaged condition. Reduce the likelihood of fiber release by ensuring that the miscellaneous materials are not damaged by sanding, grinding, abrading, or other activities that may cause asbestos fibers to be released from the material. Below are additional recommendations for certain miscellaneous materials:

Vinyl Asbestos Floor Tiles (VAT) - are considered non-friable, however routine maintenance procedures such as spray-buffing, burnishing, wet scrubbing, and stripping can generate asbestos fibers.

Following procedures, when properly implemented, will reduce the potential of fiber release:

- Do not sand, grind, or abrade the tiles. Stripping of VAT should be done as infrequently as possible. When stripping becomes necessary, follow the appropriate work practices. Never perform dry stripping.

- During spray-buffing or burnishing the floor, operate the machine at the lowest workable speed and use the least abrasive pad. Use a wet mop for routine cleaning whenever possible.

- Routinely check whether chair and desk glides are in good condition and replace them when necessary. Worn glides can gouge the floor and cause fiber release.

- Place carpets/floor mats in all entrances to reduce the abrasion of floor tiles by sand and pebbles. During winter, parking lots and walkways are swept to the extent possible to avoid the tracking of salt and ice-melting compounds into the school by the students.

- Train the custodial people who are responsible for the care and maintenance of VAT.

Ceiling Tiles, and if applicable Associated Mastic

- Reduce the likelihood of fiber release by limiting access to the area above the ceiling tiles. Maintain the ceiling tiles in undamaged condition.

Fire doors and other Insulated Doors

- Since there may be a few different types of doors throughout the building, door cores must be considered to have asbestos-containing interior insulation unless sample results prove otherwise. Before performing any maintenance on any door (lock change, drilling, etc.), the door should be surveyed by qualified personnel to rule out the existence of an asbestos core.

Crawlspace, Attic Space, and Tunnel Areas

- Reduce the likelihood of fiber release by limiting access to these areas. Entrances to these areas should remain sealed with an airtight covering. Entry should only be made for essential maintenance work by properly trained and authorized persons with proper personal protective equipment.

APPENDIX D

6-MONTH PERIODIC SURVEILLANCE FORM(S)

LEA NAME: **SCHOOL NAME:**

(Number __ of__, make copies as necessary)

AMP FORM 18 - PERIODIC SURVEILLANCE PLAN/REPORT

Periodic Surveillance Plan: At least once every six months after the AMP is in effect, periodic surveillance will be conducted in each building that the LEA leases, owns, or otherwise uses as a school building that contains ACBM or is assumed to contain ACBM. At a minimum, surveillance is planned to be conducted during the fall and spring (insert alternate time frames and other details, as needed). Each person performing periodic surveillance must: visually inspect all areas that are identified in the AMP as ACBM or assumed ACBM, record the date of the surveillance, his or her name, and any changes in the condition of the materials, and submit a copy of the record to the DP for inclusion in the AMP.

			1st six months Date_____	2nd six months Date_____	
HA No.	Description of ACBM	Area Inspected	ACBM Condition*	ACBM Condition*	Date ACBM Removed

* If no change in condition, write N/C

Surveillance Inspector's Name	**Surveillance Inspector's Signature**	**Date**

APPENDIX E

MANAGEMENT PLANNER TRAINING RECORDS

THIS IS TO CERTIFY THAT

MATTHEW SPEAR

HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE

for

ASBESTOS MANAGEMENT PLANNER INITIAL COURSE

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 5/11/2023 - 5/12/2023

Course Location: Portland, OR

Certificate: MP-23-0717C

PBS

AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

Expiration Date: 05/12/2024

For verification of the authenticity of this certificate contact:
PBS Engineering and Environmental Inc.
4412 S Corbett Avenue
Portland, OR 97239
503.248.1939

Andy Fridley, Instructor

THIS IS TO CERTIFY THAT

MATTHEW SPEAR

HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE

for

ONLINE AHERA ASBESTOS INSPECTOR REFRESHER

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 09/06/2023

Course Location: Online

Certificate: IRO-23-0717C

CCB #SRA0615 4-Hr Training

4-Hour Online AHERA Inspector Refresher Training; AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

Expiration Date: 09/06/2024

For verification of the authenticity of this certificate contact:
PBS Engineering and Environmental Inc.
4412 S Corbett Avenue
Portland, OR 97239
503.248.1939

Andy Fridley, Instructor

APPENDIX F

DESIGNATED PERSON TRAINING RECORDS

LEA DESIGNATED PERSON TRAINING RECORD

The person designated by _____ to ensure that Section 763.84 of the AHERA regulation (40 CFR Part 763) is properly implemented will be:

Name: _____

Address: _____

Telephone: _____

Course Name:

Course Location: _____ Course

Dates: ___/___/___ and ___/___/___

A Designated Person/O&M Worker Training course was designed to train persons to serve as the school's Designated Person as well as perform maintenance duties which may disturb asbestos-containing building materials. This course provided an in-depth discussion of the following topics.

- Health effects associated with asbestos exposure.
- Detection, identification, and assessment of ACM.
- Options for controlling ACM.
- Relevant Federal and State regulations (including those specified in AHERA).
- Information regarding asbestos and its various uses and forms.
- Locations of ACM identified throughout each building in which they work.
- Recognition of damage, deterioration, and delamination of ACM.
- The location and availability of the management plan.
- Descriptions of the proper methods of handling of ACM.
- Information on the use of respiratory protection (as specified in AHERA).
- Hands-on trains in the use of respiratory protection, other personal protection measures, and good work practices.

APPENDIX G

EMPLOYEE TRAINING RECORDS

LEA NAME: **SCHOOL NAME:**

(Number __ of__, make copies as necessary)

AMP FORM 5 - TRAINING RECORD FOR MAINTENANCE AND CUSTODIAL STAFF

Every member of the maintenance and custodial staff who works in a building that contains ACBM must receive awareness training of at least 2 hours whether or not they are required to work with ACBM. Maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM must receive an additional 14 hours of training (total 16 hours of training). A record of the aforementioned training is required to be included in the AMP under 40 CFR §§ 763.93(h) and 763.94(c) of the EPA Asbestos-Containing Materials in Schools regulation, 40 CFR Part Subpart E.

Employee Name (Please Print)	Job Title	Course Name	Training Agency	Date	Location of Training	Number of Hours Completed

ATTACHMENT

- Copies of training certificates suggested, but not required by EPA

APPENDIX H

BLANK PREVENTATIVE MEASURES AND RESPONSE ACTION ACTIVITIES FORM

Preventative Measures and Response Action Activities Form

School _____

Project Name _____ Date _____

Contractor's Name_____

Contractor's Address_____

Disposal Facility Name _____

Disposal Facility Location _____

Location of the preventative measures and response action:

Description of the preventative measures and response action:

Was an abatement design/specification prepared for this activity?
__Yes. If yes, attach specifications created to complete the activity
__ No.

Attach to this document accreditation certificates, disposal certificates and results of air sampling report. The air sampling report shall include the following:

- name and signature of the person collecting the air samples,
- the location were the air samples were collected,
- date air samples were collected,
- name and address of the laboratory,
- date and method of analysis (attach laboratory report),
- name and signature of analyst,
- statement that laboratory meets applicable requirements

Please maintain a copy of this completed form and required attachments in Appendix J of the Management Plan.

APPENDIX I

COMPLETED PREVENTATIVE MEASURES AND RESPONSE ACTION ACTIVITIES FORM

ENVIRONMENTAL INSPECTION SERVICES PRO LLC

Bus: (503) 680-6398 | Cell: (503) 944-9818

430 N First St., Carlton, OR 97111

APPENDIX J

BLANK MAJOR/MINOR FIBER RELEASE FORM

ASBESTOS FIBER RELEASE EPISODE

DATE __/__/__

(ACCIDENTAL OR UNCONTROLLED)

1) AMOUNT OF MATERIAL INVOLVED:

____ Less than three (3) square or three (3) linear feet. (MINOR)
____ Greater than three (3) square or three (3) linear feet. (MAJOR)
(EPISODES INVOLVING MORE THAN THREE (3) SQUARE OR THREE LINEAR FEET MAY NOT BE RESPONDED TO BY 16 HR. O&M TRAINED PERSONNEL)

2) DATE AND TIME OF EPISODE:

DATE: ___/___/___
TIME: _____

3) LOCATION: SCHOOL NAME _____ BUILDING NAME _____
ADDRESS _____
_____

BASEMENT____ GROUND FLOOR ____ 2ND____ 3RD____ 4TH____

CLASSROOM ____ (#)	STAIRWELL ____	LIBRARY ____	HALLWAY ___
CAFETERIA ____	KITCHEN ____	AUDITORIUM ____	LOUNGE ____
GYMNASIUM ____	LOCKER RM.(B) ____	LOCKER RM.(G) ____	OFFICE ____
MUSIC RM .____	LAVATORY (B) ____	LAVATORY (G) ____	CUSTODIAL RM .___
TUNNEL ____	BOILER RM .____	STORAGE RM .____	OTHER _____

4) TYPE OF MATERIAL:

Thermal ____	Surfacing ____	Miscellaneous ____
(pipe, boiler, etc.)	(sprayed or troweled)	(floor tile, ceiling tile, etc.)

5) EPISODE DESCRIPTION AND RATIONALE: _____
_____
_____
_____

6) EPISODE RESPONSE:

Evacuated Area ____ Sealed Off Area _____ Restricted Access _____
Posted Signs ____ Shut Down or Modified Ventilation Systems (heat, AC, etc.) _____

7) ISSUED WORK PERMIT: O & M _____ Contractor _____
(If the episode involves more than three (3) feet of material, a certified asbestos contractor must be used.)

SIGNATURE _____ **DATE ___/___/___**
(DESIGNATED PERSON)

APPENDIX K

COMPLETED MAJOR/MINOR FIBER RELEASE FORM

APPENDIX L

BLANK O&M FORMS

ENVIRONMENTAL INSPECTION SERVICES PRO LLC

Bus: (503) 680-6398 | Cell: (503) 944-9818

430 N First St., Carlton, OR 97111

OPERATIONS AND MAINTENANCE (O&M) ASBESTOS WORK PERMIT

(in-house asbestos work)

(SCHOOLS MUST COMPLETE THIS FORM EACH TIME THEIR EMPLOYEE WORKS WITH ASBESTOS)

1) TYPE OF ASBESTOS WORK ACTIVITY:
CLEAN ___ REPAIR ___ REMOVE ___ ENCAPSULATE ___ ENCLOSE ___ ISOLATE ___

2) AMOUNT OF MATERIAL TO BE DISTURBED:

____ Less than three (3) square or three (3) linear feet.
____ Small Scale Repair (individual repairs each less than (3) square or linear feet)
____ Cleaning

3) EMPLOYEES NAME: _____
(THE PERSON DOING THE WORK) (PRINT)

4) SUPERVISORS NAME: _____
(DESIGNATED PERSON) (PRINT)

5) DATE & TIME OF THE WORK: DATE: ___/___/___ **TIME:** FROM _____ TO _____

6) LOCATION: SCHOOL NAME _____ BUILDING _____
ADDRESS _____

BASEMENT____ GROUND FLOOR ____ 2ND____ 3RD____ 4TH____

CLASSROOM ____ (#)	STAIRWELL ____	LIBRARY ____	HALLWAY ____
CAFETERIA ____	KITCHEN ____	AUDITORIUM ____	LOUNGE ____
GYMNASIUM ____	LOCKER RM.(B) ____	LOCKER RM.(G) ____	OFFICE ____
MUSIC RM .____	LAVATORY (B) ____	LAVATORY (G) ____	CUSTODIAL RM ___
TUNNEL ____	BOILER RM .____	STORAGE RM .____	OTHER _____

7) WORK METHODS: WET METHOD ____ HEPA VACUUM ____ GLOVEBAG ____
CONTAINMENT ____ RESTRICTED ACCESS ____ POSTED SIGNS ____
SHUT DOWN OR MODIFIED HEATING AND VENTILATING SYSTEM ____

8) TYPE OF MATERIAL: Thermal ____ (pipe, boiler, etc.) Surfacing ____ (sprayed/troweled) Miscellaneous ____ (floor tile, ceiling tile, etc.)

9) WORK DESCRIPTION AND RATIONALE: _____

_____

_____

_____

10) WASTE STORAGE OR DISPOSAL SITE: _____

11) TRAINING: (there must be a yes answer to these questions to approve work)
Employee has received asbestos training (2hr Awareness and 14hr O&M)? ____
Employee has had an OSHA asbestos medical exam during the last year? ____
Employee was provided all necessary equipment to work with asbestos? ____

12) WORK PERMIT APPROVED: ____ (yes) ____ (no)

SIGNATURE _____ **DATE** ___/___/___
(SUPERVISOR /DESIGNATED PERSON)

CONTRACTED ASBESTOS ABATEMENT PROJECT WORK PERMIT

(Schools must complete this form for each contracted asbestos project)

SCHOOL NAME _____ **BUILDING NAME** _____
ADDRESS _____

1) TYPE OF ACTIVITY:
CLEAN ___ REPAIR ___ REMOVE ___ ENCAPSULATE ___ ENCLOSE ___ ISOLATE ___

2) AMOUNT OF MATERIAL DISTURBED: TOTAL FOOTAGE: _____ Sq. Ft / Ln. Ft.
Less than (3) square or (3) linear feet. ____ Greater than (3) square or (3) linear feet. ____

3) CONTRACTOR: NAME _____
ADDRESS _____

4) CONTRACTOR'S ASBESTOS LICENSE # _____ EXPIRATION DATE ___/___/___

5) DATE OF THE WORK ACTIVITY: START ___/___/___ STOP ___/___/___

6) EPA NOTIFICATION COMPLETE _____ (yes) **ODH NOTIFICATION COMPLETE _____** (yes)

7) LOCATION: BASEMENT___ GROUND FLOOR ____ 2ND___ 3RD___ 4TH___

CLASSROOM ____ (#)	STAIRWELL ____	LIBRARY ____	HALLWAY ____
CAFETERIA ____	KITCHEN ____	AUDITORIUM ____	LOUNGE ____
GYMNASIUM ____	LOCKER RM.(B) ____	LOCKER RM.(G) ____	OFFICE ____
MUSIC RM .____	LAVATORY (B) ____	LAVATORY (G) ____	CUSTODIAL RM .___
TUNNEL ____	BOILER RM .____	STORAGE RM .____	OTHER _____

8) CONTRACTOR'S PROJECT SUPERVISOR: _____ ODH#_____

9) CONTRACTOR'S PROJECT WORKERS (ALL): _____
_____
_____

10) WORK METHODS: WET METHOD ____ HEPA VACUUM ____ GLOVEBAG ____
CONTAINMENT ____ RESTRICTED ACCESS ____ POSTED SIGNS ____
SHUT DOWN OR MODIFIED HEATING AND VENTILATING SYSTEM ____

11) TYPE OF MATERIAL: Thermal ____ (pipe, boiler, etc.) Surfacing ____ (sprayed/troweled) Miscellaneous ____ (floor tile, ceiling tile, etc.)

12) WORK DESCRIPTION AND RATIONALE: _____
_____
_____

13) FINAL CLEARANCE AIR SAMPLING AND VISUAL INSPECTION:
Person performing final visual inspection: _____
Visual inspection date: ___/___/___
(final clearance air samples are required for projects greater than 3 feet)
Laboratory (name & address) _____
_____
Person that collected the samples: _____
Sample collection date: ___/___/___ **Sample analysis date** ___/___/___
SAMPLE TYPE: PCM ___ TEM ___ Method NIOSH 7400 AGGRESSIVE
Sample Results: 1) _____ 2) _____ 3) _____ 4) _____ 5) ____

14) WASTE DISPOSAL SITE _____

SIGNATURE _____ **DATE** ___/___/___
(School's Designated Person)

Contracted Asbestos Abatement Project

Date ___/___/___

(PAPERWORK CHECKLIST)

SCHOOL NAME _____ **BUILDING NAME** _____

ADDRESS _____

(The school must obtain a copy of the following items from the contractor or laboratory and keep them on file for each and every contracted asbestos project.)

CONTRACTOR

1) Contractor's Liability Insurance _____
2) Performance Bond (if required) _____
3) Contractor's Worker Compensation Certificate _____
4) Contractor's Asbestos Abatement License _____
5) Ohio Department of Health Notification _____
6) EPA Notification (NESHAP) _____
7) Affidavit of Contractor _____
8) Waste Transport Manifests _____
9) Landfill Disposal Papers _____
10) Workers' Training Certificates
(for each and every worker and supervisor) _____
11) Workers' Medical Papers
(for each and every worker and supervisor) _____
12) Workers' Safety and Health Agreement Forms
(for each and every worker and supervisor) _____
13) Contractor's Work-site Entry and Exit Log _____
14) Contractor's Progress Reports (daily) _____
15) Contractor's OSHA Air Sampling Reports _____
16) Certification of Final Visual Inspection
(This form should include: The location and date of final visual inspection, and signatures of the contractor and laboratory that performed it. _____

LABORATORY

17) Independent Clearance Air Sample Reports (applies to all Response Actions)
(The school <u>must</u> use an independent laboratory. Do not allow the contractor to hire this lab. The school <u>must</u> hire and pay for the lab. You must have a minimum of FIVE (5) samples each less than 0.01 fibers per cubic centimeter.
(This report will come from the lab and must include: The sample results; the dates of collection and analysis; the signatures of the persons that performed sample collection and sample analysis; and the locations of the sampling pumps). _____

18) Independent Daily Air Monitoring Reports _____

CERTIFICATION OF VISUAL INSPECTION

SCHOOL NAME _____

ADDRESS _____

_____

WORK AREA LOCATION _____

_____

_____

_____

CONTRACTOR'S CERTIFICATION

In accordance with all federal, state and local laws, regulations, codes, standards and requirements and any more stringent criteria agreed upon, the contractor hereby certifies that they have visually inspected the work area (all surfaces including pipes, beams, ledges, walls, ceiling and floor, Decontamination Unit, sheet plastic, etc.) and have found no dust, debris or residue.

by (Signature) _____ Date ___/___/___

(Print Name) _____

(Print Title) _____

INDEPENDENT PROFESSIONAL AIR SAMPLING LABORATORY'S CERTIFICATION

The Independent Professional Air Sampling Laboratory hereby certifies that they have accompanied the contractor on a visual inspection and verifies that this inspection has been thorough and to the best of their knowledge and belief, the contractor's certification above is a true and honest one.

by (Signature) _____ Date ___/___/___

(Print Name) _____

(Print Title) _____

APPENDIX M

COMPLETED O&M FORMS

ENVIRONMENTAL INSPECTION SERVICES PRO LLC

Bus: (503) 680-6398 | Cell: (503) 944-9818

430 N First St., Carlton, OR 97111

APPENDIX N

BLANK CERTIFICATE OF WORKERS ACKNOWLEDGEMENT FORM

Certificate of Worker's Acknowledgement

School _____

Project Name _____ Date _____

Contractor's Name_____

This school building contains materials that have been identified as asbestos-containing materials.

WORKING WITH ASBESTOS CAN BE DANGEROUS. INHALING ASBESTOS FIBERS HAS BEEN LINKED WITH VARIOUS TYPES OF CANCER. IF YOU SMOKE AND INHALE ASBESTOS FIBERS THE CHANCE THAT YOU WILL DEVELOP LUNG CANCER IS GREATER THAN THAT OF THE NON-SMOKING PUBLIC.

The Owner for the above project requires that prior to initiating any work that would results in disturbance of building materials (i.e. drilling, sanding, removal), it is required that the management plan be referenced to determine if materials associated with work activities contain asbestos.

In the event materials that contain asbestos are to be disturbed, employees must be supplied with the proper respirator, be trained in its use and have received a medical examination. Employees must also be trained in safe work practices and in the use of the equipment found on the job. These things are to have been done at no cost to the employee.

RESPIRATORY PROTECTION: You must have been trained in the proper use of respirators, and informed of the type respirator to be used on the above referenced project. You must be given a copy of the written respiratory protection manual issued by your employer. You must be equipped at no cost with the respirator to be used on the above project.

TRAINING COURSE: You must have been trained in the dangers inherent in handling asbestos and breathing asbestos dust and in proper work procedures and personal and area protective measures. This training must have been the equivalent in curriculum, training method and length to the EPA Model Accreditation Plan (MAP) asbestos abatement worker training (40 CFR Part 763, Subpart E, Appendix C).

MEDICAL EXAMINATION: You must have had a medical examination within the past 12 months at no cost to you. This examination must have included: health history, pulmonary function tests and may have included an evaluation of a chest x-ray.

By signing this document you are acknowledging only that the Owner of the building you are about to work in has advised you of your rights to training and protection relative to your employer. Please maintain a copy of this completed form in Appendix O of the Management Plan.

Signature_____

Printed Name_____ Witness_____

APPENDIX O

COMPLETED CERTIFICATE OF WORKERS ACKNOWLEDGEMENT FORMS

APPENDIX P

ANNUAL NOTIFICATIONS

ENVIRONMENTAL INSPECTION SERVICES PRO LLC

Bus: (503) 680-6398 | Cell: (503) 944-9818

430 N First St., Carlton, OR 97111

ANNUAL ASBESTOS NOTIFICATION

TO: Parents/Guardians, Students, Teachers, Staff, and Support Groups

FROM: Robin Champagne, Facility Manager

RE: Annual Notification of Availability of Asbestos Management Plan and Update of Activities
Spray School District #1

DATE: January 1st, 2024

On October 22, 1986, President Reagan signed into law the Asbestos Hazard Emergency Response Act (AHERA, Public Law 99-519). The law required the EPA to develop regulations that provide a comprehensive framework for addressing asbestos problems in public and private elementary and secondary schools. On October 30, 1987, EPA published the Asbestos-Containing Materials in Schools Rule (40 CFR Part 763 Subpart E). This new rule requires all school districts to inspect for friable and non-friable asbestos in school buildings, develop Management Plans that address asbestos hazards in school buildings, and implement response actions in a timely fashion.

One of the requirements of this law is to annually notify parents, teachers, staff, and support groups of the availability and location of the school building's Management Plan. The Management Plan for each school is in the building's Main Office, along with a duplicate copy located in the Program Manager's/Designated Person's Office. Also, please be advised that information regarding any inspections/re-inspections, surveillance, response actions, and post-response action activities, if performed, are also included in the Management Plan and available for your review.

Should you have any questions regarding this notification, please contact Robin Champagne at (541) 468-2226 or by email at rchampagne@spray.k12.or.us.