**AHERA REINSPECTION**
**The Gaston High School**
**at**
**300 Park Street**
**Gaston, Oregon 97119**

**Prepared For:**

**Brian Van Dyke, Facilities**
**Gaston School District SD 511J**
**300 Park Street**
**Gaston, Oregon 97119**

**EIS Job No. 2021002. Gaston High School**

**Prepared By:**

**Charles A. Spear**
**AHERA Certification #IRO-21-2439A**
**Environmental Inspection Services**
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Charles A. Spear

**Charles A. Spear, Partner**

**March 16, 2021**

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March 16, 2021
EIS JOB No. 2021002.Gaston High School

Brian Van Dyke, Facilities
Gaston School District SD 511J
300 Park Street
Gaston, Oregon 97119

RE: Asbestos 2021 AHERA 3-year Reinspection of the Gaston High School located at 300 Park Street in Gaston, Oregon

Dear Mr. Brian Van Dyke,

The Federal Asbestos Hazard Emergency Response Act ( commonly referred to as AHERA) was signed into law in 1986. AHERA requires both private and public non-profit primary and secondary schools to inspect all buildings that are leased, owned, or otherwise used as school buildings for the presence of asbestos-containing building materials (ACBM). The U.S. Environmental Protection Agency (EPA) published regulations and enforces AHERA.

EIS is pleased to present the March, 2021 AHERA reinspection for The Gaston High School located at 300 Park Street in Gaston, Oregon. The subject high school has been partially remodeled and renovated. Suspect asbestos-containing building materials (ACBM) includes on-foot tan tile, wall plaster/textures, sprayed on applications of "popcorn" ceiling materials, moulding mastic adhesives, and 1" grey tile. No problematic asbestos containing building materials conditions were observed in the school.

The subject original functional spaces were examined throughout for the presence of confirmed and suspect asbestos-containing building materials (ACBM). All representative functional spaces and relative homogeneous sampling areas were examined during the inspection process.

A total of sixteen (16) data sheets were completed for the school and no noteworthy wear and debris considerations were noted for the subject building materials. The sheets summarize the accessibility and condition of identified confirmed and/or suspect asbestos-containing building materials (ACBM) observed throughout the original Gaston High School building.



Bus: 503.678.5063 | Cell: 503.680.6398 11981 Fargo Road, NE, Aurora, OR 97002 www.environmentalinspectionservices.net

All identified ACBM are candidate materials for in-place operations and maintenance and asbestos abatement is not recommended or required. The condition of the existing suspect ACBM in the school is good to excellent and considered to be protective of student safety and health. No bulk samples were collected from suspect asbestos-containing building materials (ACBM).

**THERMAL SYSTEM INSULATION (TSI)**

No Thermal system insulation (TSI) was observed during this inspection.

**RESILIENT FLOOR COVERINGS (VINYL FLOOR TILE & SHEET FLOOR LINOLEUM)**

Varieties of suspect resilient floor coverings as grey tile.

No samples were collected from vinyl floor tile. Refer to data sheet No.s 1,7,11,5,9 and 13 for vinyl tile additional details. All examined floor coverings were observed in the stairwells, hallways and classrooms and were noted in good to excellent condition, well maintained, accessible, and intact. No significant floor covering condition or damage concerns were noted. Minor damaged floor tiles may be replaced as a repair item.

**COVE-BASE ADHESIVE**

Cove-base mastic adhesive was observed on floor moulding within various functional spaces throughout the subject high school to include the kitchen, gymnasium, and classrooms. The moulding is intact and in good condition. No samples were collected in moulding mastics.(Refer to data sheets No.s 4,6,10,12, and 15 for details.

**TAPE JOINT COMPOUND**

Tape joint compound was noted throughout the high school wall surfaces in areas of sheet rock joints. This compound is typically applied to taped joints applied between sheet rock wall surfaces. Tape joint compound exists on sheet rock panels throughout the subject building. The compound usage was extensive and is likely throughout the entire structure original pre-1980 wall panel tape joints. The compound is in good condition, sealed and or encapsulated, and a candidate building material for operations and maintenance.

**ACOUSTIC CEILING TILES**

No ceiling tile data sheets were developoed during this inspection. No ceiling tile concerns were noted.

**PLASTER (SKIM COAT)**

Original wall surfaces have plaster skim coat applications observed within functional areas of the building. No samples were collected. EIS noted no plaster concerns. Refer to data sheet No.s 2,8, and 16 for details. The wall plaster surfaces were noted to be in good condition and candidate building materials for in-place operations and maintenance. The existing plaster surfaces are sealed and coated in latex paint applications and considered to be in good condition. No concerns were noted.

All suspect and previously analytically confirmed ACBM were noted to be in good to excellent condition. All ACBM are considered candidate building materials for operations and maintenance in accordance with the standard O&M recommendations stated in The AHERA Management Plan and the EPA Manual known as Managing Asbestos in Place - A Builder Owners Guide to Operations and Maintenance Programs for Asbestos-Containing Materials per EPA Manual No. 20T 2003 dated July, 1990.

Candidate ACBM include skim coat applications on wall surfaces, acoustic ceiling tiles, ceiling tile mastics, moulding mastic adhesive, and vinyl asbestos tiles. No asbestos containing debris or other related asbestos material concerns were noted at the aforementioned building. No asbestos containing debris, damaged and disturbed ACBM or other related asbestos material concerns were noted at the aforementioned materials. Asbestos-containing thermal system insulation piperuns were observed in the building. Asbestos abatement is not recommended or necessary at this time.

Thank you for the opportunity to perform the March, 2021 asbestos reinspection. Progress has been made since the AHERA Management Plan issuance and initial inspections. The Gaston High School has been partially remodeled, relatively modern, and remaining plaster skim coats and original VAT and ceiling tile materials are well maintained and no asbestos material safety concerns were noted in the school. If there are any questions feel free to contact us at (503) 680-6398.

Respectfully,

Charles A. Spear
Partner
AHERA Inspector IRO-21-2439A

This reinspection of the Gaston High School Building and outbuildings was performed on Friday, February 26, 2021 by Charles A. Spear. AHERA Inspector Certification No. IRO-21-2439A. The AHERA Inspector expiration date is February, 2022. All inspection / assessment activities were performed in accordance with the reinspection requirements of Part III 40 CFR Part 763. Asbestos-Containing Materials in Schools; Final Rule and Notice.

# RESUME

## CHARLES ARTHUR SPEAR
## REGISTERED ENVIRONMENTAL ASSESSOR
## REA - 01241

## AHERA INSPECTOR (EPA CERTIFICATION NO. IRO-21-2439A)

## CERTIFIED ENVIRONMENTAL INSPECTOR
## CEI - 10364

**Professional Background**

Charles A. Spear, President and founder of Environmental Inspection Services has over 20 years technical experience ranging from facility food technologist to hazardous waste site remediation at Federal SUPERFUND sites from California to Maryland. Mr. Spear has successfully performed over 3,000 Phase One, Phase Two, and Phase Three Environmental Site Assessment inspections on properties from California to Alaska and east to Maryland. Mr. Spear has managed such projects as spilled mustard gas and organophosphate remediation as a sergeant of the U.S.Army Chemical Corps Technical Escort Unit Drill & Transfer Unit at Umatilla Army Depot and removal of leaking solvent underground storage tanks in California and Oregon.

Specifically, Mr. Spear has worked with clients such as: the International Fabric Care Industry (IFI), the U.S. Environmental Protection Agency, The U.S. Department of Defense, The Oregon Department of Environmental Quality (ODEQ), The Oregon Department of Forestry, INTEL, Sun Microsystems, IBM, Rohm & Haas, General Electric, AT&T, Texaco, Unocal, BP, Lockheed Missile and Space Center, FMC Corporation, Oregon Department of Fish & Wildlife, Washington Department of Fish & Wildlife, City of Beaverton, City of Hillsboro, City of Corvallis, Housing Authority of Portland, Northwest Oregon Housing Authority, Washington County Department of Housing, Housing & Urban Development, numerous lenders and mortgage companies, many private development and site remedial site projects, and many attorneys and investors.

Mr. Spear managed complex tank farm removals at Xidex Corporation in Sunnyvale, California and was the site cleanup manager at the Rose City Plating Site currently developed as the Oregon Convention Center. Mr. Spear is a certified hazardous waste professional who has coupled military experience as a Nuclear, Biological and Chemical Specialist (U,S. Army MOS 54E20) with experience as a professional research engineer in both the corrugated paper and petroleum industries.

Mr. Spear has managed food industry quality control as an inplant food technologist and prepared cost reduction programs as a corrugated box board industrial engineer in Dallas, Texas. He is currently registered with the states of California, Washington, and Oregon and is an active member of the national respected Environmental Assessment Association. Due diligence projects have been performed throughout the United States from FairGaston, Alaska to San Diego, California.

Professional experience includes the following:

**Professional Experience**

* Dry Cleaner Inspections
* Environmental Consultation
* Waste Reduction Audits
* Regulatory Compliance Audits
* Drum Yard Clearances
* Tank Farm Removals/Replacements
* Lab Packaging & Supervision
* Environmental Site Assessments
* Superfund Site Remediation
* Hazardous Waste site Project Design & Management
* Habitat/Wetlands Restoration
* AHERA asbestos inspections for school districts
* Landfill Remediation
* Agricultural assessments
* Indoor air quality inspections

**Professional Employment/Consultation**

* C.F.S. Continental Coffee, Inc., Food technologist, Chicago, Illinois
* Holiday Industries, Research Engineer, Grand Prairie, Texas
* Alton Packaging Corporation, Industrial Engineer, Dallas, Texas
* U,S. Army Chemical Corps., Nuclear, Biological, Chemical Specialist - Special assignment - Umatilla Army Depot (DATS)
  U.S. Army Chemical Corps. Technical Escort Unit in Edgewood, Maryland
* Rollins Environmental Services, Remedial Project Manager
* Crown Environmental Services, Technical Director, Redmond, California
* Dames & Moore, Design Engineer, Portland, Oregon
* Pegasus Environmental Management Services, Director of Technical Services
* Pacific Tank & Construction, Manager of Estimation, Portland, Oregon
* Enviro-Logic Inc., Director of Environmental Site Assessment Division
* Environmental Inspection Services Inc., Founder/President

## Professional Education

* Bachelor of Science, Chemistry, Northeastern Illinois University, 1978
* U.S. Army Chemical School, Ft. McClellan, Alabama, 1983
* U.S. Army Technical Escort Unit, Accident/Incident Response Training Center 1983
* Registered Environmental Assessor REA - 01241
* Certified Environmental Inspector CEI - 10364
* AHERA Certified Asbestos Inspector IR-16-2439A
* ODEQ Soil Matrix Assessor & UST Decommission Supervisor
* Washington DOE Registered Environmental Assessor
* Wetland Specialist - Training Wetlands Institute 1997
* EPA/HUD Lead-Based Paint (LBP) Inspector & Risk Assessor
* ASTM Certification Training, May, 2004

## Additional Education

* Joint Military Material Packaging & Transportation
* Asbestos Abatement Seminar attendance 1987
* Thin Layer Chromatography, 1989
* Oregon Registered Underground storage Tank Supervisor, 1998
* Oregon Registered Soil Matrix Assessor, 1998
* Washington Registered Assessor, 1991
* Washington Registered Underground Storage Tank Supervisor, 1991
* Wetland Training Institute Delineation Course Study University of Portland March 1997
* 40-Hour HAZMAT Certified
* AHERA-Certified Inspector

## Special Skills

* Facility Environmental Compliance Audits
* ASTM standard Environmental Site Assessments
* Computer Programming
* Organic surfactant chemical synthesis and analysis
* Hazardous Waste Site remediation/ estimating/ standards development
* Design of filtration systems, batch and continuous process optimization studies
* QA/QC Procedures
* SUPERFUND Site Management
* Industrial/ Research Engineering
* Hazardous Waste Site Remediation/ Consultation
* Wetlands Delineation and Habitat Restoration

## Certification

* U.S. Army MOS 54E20 - U.S. Army Chemical Corps.
* International Fire Code Institute (IFCI) Certified UST Supervisor
* International Fire Code Institute (IFCI) Certified Soil Matrix Assessor
* Certified Hazardous Waste Manager
* 40-hour OSHA Training
* 40-hour OSHA Supervisor Training
* Registered Environmental Assessor (DOE)
* DEQ Registered UST Supervisor
* DEQ Registered Soil Matrix Assessor
* Resolution Trust Corporation (RTC) approved Environmental Assessor
* California Registered Environmental Assessor (REA-01241) - discontinued
* Department of Ecology (DOE) Registered Environmental Assessor
* Environmental Assessment Association, Certified Environmental Inspector & Transaction Specialist (CEI-10364)
* AHERA Certified Asbestos Inspector
* Wetland Delineator Graduate Wetland Training Institute, University of Portland 1997
* EPA/HUD LBP Inspector & Risk Assessor
* ASTM certification

# REGULATIONS

## Asbestos - Background

Asbestos is generally referred to as six naturally occurring fibrous minerals found in certain types of rock formations. The minerals Chrysotile, Amosite, and Crocidolite have been most commonly utilized in building materials. Asbestos is typically separated into very thin fibers. Asbestos is strong, incombustible, and corrosion resistant and was utilized early in the century into the 1970's. Asbestos may cause substantial health problems when it is inhaled in sufficient quantities.

Asbestos is considered to be a hazardous air contaminant and a known human carcinogen. Once used extensively as an insulation material, asbestos has been banned from most construction and manufacturing since the mid-1970's. The most dangerous forms of asbestos are those materials containing asbestos which can be easily crushed or crumbled known as "friable asbestos". Friable asbestos is dangerous since asbestos fibers can be easily released into the air. Such activities as remodeling and demolition projects are likely to disturb asbestos. If asbestos-containing building materials (ACBM) are not handled properly then these types of projects can pose as a serious threat to workers and the general public.

## Regulatory Background

In 1986, Congress enacted the Asbestos Hazard Emergency Response Act (AHERA or TSCA Title II) which mandated a regulatory program to address asbestos hazards in schools. A copy of the Environmental Protection Agency Asbestos Model Accreditation Plan interim Final Rule (59FR2236-5260) is enclosed for reference. President Reagan signed into law the Asbestos Hazard Emergency Response Act (AHERA) on October 22, 1986. This law enacted, among other provisions, Title 2 of the Toxic Substances control Act (TSCA) 15 U.S.C. Section 2641 through 2654; Section 203 of Title II, 15 U.S.C. 2643. Copies of AHERA 40 CFR Part 763 are enclosed for reference.

**AHERA requires the following:**

(1.0) - Perform an original inspection and periodic re-inspections every three years for asbestos containing material;

(2.0) - Develop, maintain, and update an asbestos management plan. A copy must be kept in the school building, as well as in the districts administrative office;

(3.0) - Provide an annual written notification to parent, teacher, and employee organizations regarding the availability of the school's asbestos management plan for review and any asbestos abatement actions taken or planned in the school;

(4.0) - Designate a contact person (also known as the asbestos designee) to ensure the responsibilities of the local education agency are properly implemented. Details on the asbestos designee's responsibilities may be found at : www.epa.gov/region02/ahera/ampauditchecklist.pdff

(5.0) - Perform a periodic visual surveillance every six months of all known or suspected asbestos-containing building material;

(6.0) - Provide custodial staff with asbestos hazard awareness training

Note: If a building has never been inspected for asbestos, a new AHERA inspection must be completed as soon as possible. Pursuant to AHERA Section 763.85(a), any building leased or acquired on or after October 12, 1988, that is used as a school building shall be inspected for asbestos prior to use as a school building. In the event that the emergency use of an uninspected building as a school building is necessitated, such building must be inspected for asbestos within 30 days after the commencement of such use.

Section 112 of the Clean Air Act (CAA) requires EPA to develop emission standards for hazardous air pollutants. In response to this section the EPA published a list of hazardous air pollutants and promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations.

The asbestos NESHAP (40 CFR 61, Subpart M) addresses milling, manufacturing and fabricating operations, demolition, and renovation activities, waste disposal issues, active and inactive waste disposal sites and asbestos conversion processes.

In the initial Asbestos NESHAP rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed and those materials that were unlikely to result in significant fiber release. The terms "friable and non-friable" were used to make this distinction. EPA has since determined that, if severely damaged, or otherwise non-friable materials can release significant amounts of asbestos fibers.

Friable asbestos-containing material (ACM) is defined by the Asbestos NESHAP as any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure (section 61.141). Non-friable material is ACM not reduced to powder by similar circumstances.

## ACTIVITY

Background

It is the responsibility and primary mission of the AHERA inspector to determine whether ACBM is present in a building and to assess the physical characteristics of the ACBM in the structure. The inspection process includes an investigation of available records; an inspection of the functional spaces; an assessment of the condition of observed ACBM; reviews of available architectural and as built plans; review of work change orders; examination of material specifications indicating the presence of ACBM; examination of friable and non-friable ACBM; delineation of homogenous sample areas; collection of samples; and information on ACBM conditions.

The Gaston High School gymnasium, kitchen, cafeteria, classrooms, library, offices, galleries, vestibules, and hallways were examined for suspect ACBM during the AHERA reinspection. Data forms were completed. The completed forms were edited for completeness and potential problem areas or areas requiring abatement or extensive repair were noted. Copies of the forms are attached for review and reference and generally represent a condition evaluation and summary of the potential homogeneous sampling areas and functional space areas. No concerns were noted regarding all examined ACBM.

## REINSPECTION

Charles A. Spear conducted a triennial asbestos reinspection of the Gaston High School building on Friday, February 26, 2021. Actual field activities included blueprint and/or facility floor plan review; an interview with the maintenance supervisor; and a physical reinspection examination of all suspect and confirmed friable and non-friable asbestos-containing building materials at the subject Gaston school. The Gaston School hallways, common rooms, and class rooms wall, floor and ceiling surfaces are well maintained.

The accredited EIS inspector performed a preliminary examination of the subject structure. The AHERA inspector confirmed the existence of suspect asbestos-containing building materials (ACBM) such as vinyl asbestos floor tiles; moulding mastic adhesives; skim coat plaster applications on sheet rock; science room table surfaces, sprayed-on applications of "popcorn" ceiling materials, and acoustic ceiling tiles ceiling tile adhesives, and miscellaneous and cementitious materials.

All accessible areas to include The Gaston School gymnasium, hallways, classrooms, offices, cafeteria, boiler room, girls and boys locker rooms, original kitchen, shops, science rooms, galleries, vestibules, and storage rooms and stairwells were examined for suspect ACBM during the AHERA reinspection. All the aforementioned functional areas were visibly inspected during this AHERA reinspection. No significantly damaged ACBM was observed during these inspections.

The Gaston High School Building walkover revealed all asbestos-containing materials to be candidate building materials for Operations and Maintenance. The original AHERA Management Plan confirmed asbestos in several forms. Operations and Maintenance is recommended for all confirmed and suspected asbestos-containing materials to include vinyl asbestos tiles (VAT); ceiling tiles; and miscellaneous materials. No ACBM concerns were noted for the aforementioned materials. Asbestos abatement is not recommended for the subject facility ACBM at this time. Minor repair of damaged areas is adequate and protective.

All the aforementioned materials are in good condition and candidate materials for Operations and Maintenance. No noteworthy damages or disturbances of ACBM were observed. These materials have low potential for damage with no influence of vibration or potential for air erosion.

## SUMMARY OF FRIABLE / NONFRIABLE ACBM

Staff and maintenance personnel are encouraged to consult the forms prior to maintenance activities planned for suspect ACBM.

### 1.0 Vinyl Asbestos Tile (VAT) Non-Friable

Varieties of suspect resilient floor coverings to include one foot tan pattern tile, one foot grey pat vinyl tile, and one foot white/grey floor tile in the hallways and classrooms No samples were collected from vinyl floor tile. (Refer to data sheet No.s 1,7,11,5,9 and 13 for details).

Description - a nonfriable vinyl material with vinyl filler and binder. An adhesive mastic is utilized to adhere to the vinyl floor surfacing to another substrate. The VAT asbestos content is described as a separate matrix from the adhesive mastic. VAT subject to removal must be removed in whole pieces by using the proper tools with wetting and proper handling, wrapping and disposal procedures. No poor condition floor coverings were noted.

**AHERA Classification-Miscellaneous**

### COVE-BASE ADHESIVE

Cove-base mastic adhesive was observed on floor moulding within various functional spaces throughout the subject high school to include the hallways, kitchen, gymnasium, and classrooms. Very minor edge wear was noted. The moulding is intact and in good condition. No samples were collected in moulding mastics.
No samples were collected in moulding mastics.
(Refer to data sheets No.s 4,6,10,12, and 15).

### TAPE JOINT COMPOUND

Tape joint compound was noted throughout the high school wall surfaces in areas of sheet rock joints. This compound is typically applied to taped joints applied between sheet rock wall surfaces. Tape joint compound exists on sheet rock panels throughout the subject building. The compound usage was extensive and is likely throughout the entire structure original pre-1980 wall panel tape joints. The compound is in good condition, sealed and or encapsulated, and a candidate building material for operations and maintenance.

Products not utilized as TSI or surfacing materials are classified as miscellaneous materials. Materials such as transite pipe, ceiling tiles, fire doors, gaskets, vinyl floor coverings, duct work flexible connections, roofing felt, roofing flashing, and fume hood ducting and paneling are miscellaneous materials.
These miscellaneous materials were noted in various areas of the subject building as noted in data sheets. Samples were not collected from suspect ACBM.

ACM sprayed or troweled onto surfaces for acoustical, decorative, or fireproofing purposes. Asbestos is blended in to spray-applied and troweled-on products to include structural fireproofing, stucco, plaster, acoustical and decorative surfaces, and joint compounds.

## 2.0 Thermal System Insulation (TSI)

AHERA Classification - TSI

No TSI was observed at this time.

Insulation used on mechanical systems to prevent heat ,loss or gain and condensation. Seam and hot water lines, boiler tanks, expansion joints, fittings and other mechanical systems are commonly insulated with pre-fabricated asbestos-containing magnesium silicate. The material is typically white in color and is encased in a plaster-impregnated canvas wrapping. Asbestos containing mud compounds are often used on elbows, valves, identification plates, miscellaneous fittings, and for other special applications on mechanical systems.

## 3.0 Acoustic ceiling Tiles, Suspect - Non Friable Miscellaneous

No specific ceiling tile quality concerns were noted. No problematic ceiling tiles were observed on ceiling surfaces throughout the building. No problematic ceiling tiles were observed on ceiling surfaces throughout the building.

Fibrous acoustical ceiling tiles, varying in size from one foot square to two by four foot lengths. Fibrous material integrated with cellulose binder and directly adhered to ceiling surfaces. The material in most classrooms is in good condition. Ceiling tiles are easily damaged and may create a dust hazard if the material is broken, abraded, cut, or drilled. Acoustical ceiling tiles were observed on ceiling surfaces in the classrooms. The adhesive tabs to the tiles are suspect ACBM and are candidate building materials for in-place operations and maintenance. No ceiling tile or mastic concerns were noted.

**4.0 Adhesive mastic**

Cove-base mastic adhesive was observed on floor moulding within various functional spaces throughout the subject high school to include the kitchen, gymnasium, classrooms, and annex buildings. Edge wear was noted in the kitchen, annex room No. 24, and other minor areas in the building. The moulding is otherwise intact and in good condition. No samples were collected in moulding mastics. (Refer to data sheet No.s 4,6,10,12,and 15 for details.

Typical to adhere ceiling acoustic panels to underlying substrate. Material is non-problematic and non-friable.

ACM sprayed or troweled onto surfaces for acoustical, decorative, or fireproofing purposes. Asbestos is blended in to spray-applied and troweled-on products to include structural fireproofing, stucco, plaster, acoustical and decorative surfaces, and joint compounds.

**(5.0) - Sprayed-on acoustic popcorn ceiling materials**

Suspect popcorn ceiling materials were observed within the subject building hallways, ans classroom No. 109. Popcorn ceiling materials are an acoustic sprayed-on application spray applied to ceiling sheet rock surfaces as an acoustic material. Refer to sheet No.s 3 and 14 for details).

## RECOMMENDATIONS AND CONCLUSIONS

All sprayed on applications of "popcorn" ceiling materials, vinyl asbestos tiles flooring materials; acoustic ceiling tiles; ceiling tile mastics; moulding mastic adhesives, and miscellaneous skim coat plaster applications on sheet rock wall panels materials are candidate building materials for Operations and Maintenance. Asbestos abatement of confirmed asbestos-containing building materials is not recommended at this time.

In all areas where work or work-related activities are planned materials must be properly tested and classified as non-asbestos. If confirmed, all asbestos containing building materials must be handled, managed, or removed in accordance with state and federal regulations. Asbestos abatement is not recommended or required at this time. No environmental concerns regarding ACBM at the Gaston School were noted at this time.

All confirmed ACBM scheduled for material damage or disturbance by renovation, remodeling, or demolition must be properly abated in accordance with EPA and ODEQ recommendations and procedures.

All maintenance workers and related staff must handle ACBM in accordance with the protective provisions of the Oregon Occupational Safety and Health Administration (OSHA) requirements. Maintenance and staff personnel are encouraged to follow the management recommendations of the AHERA management plan and related operations and maintenance procedures as outlined in the appendix of this letter.

## LIMITATIONS

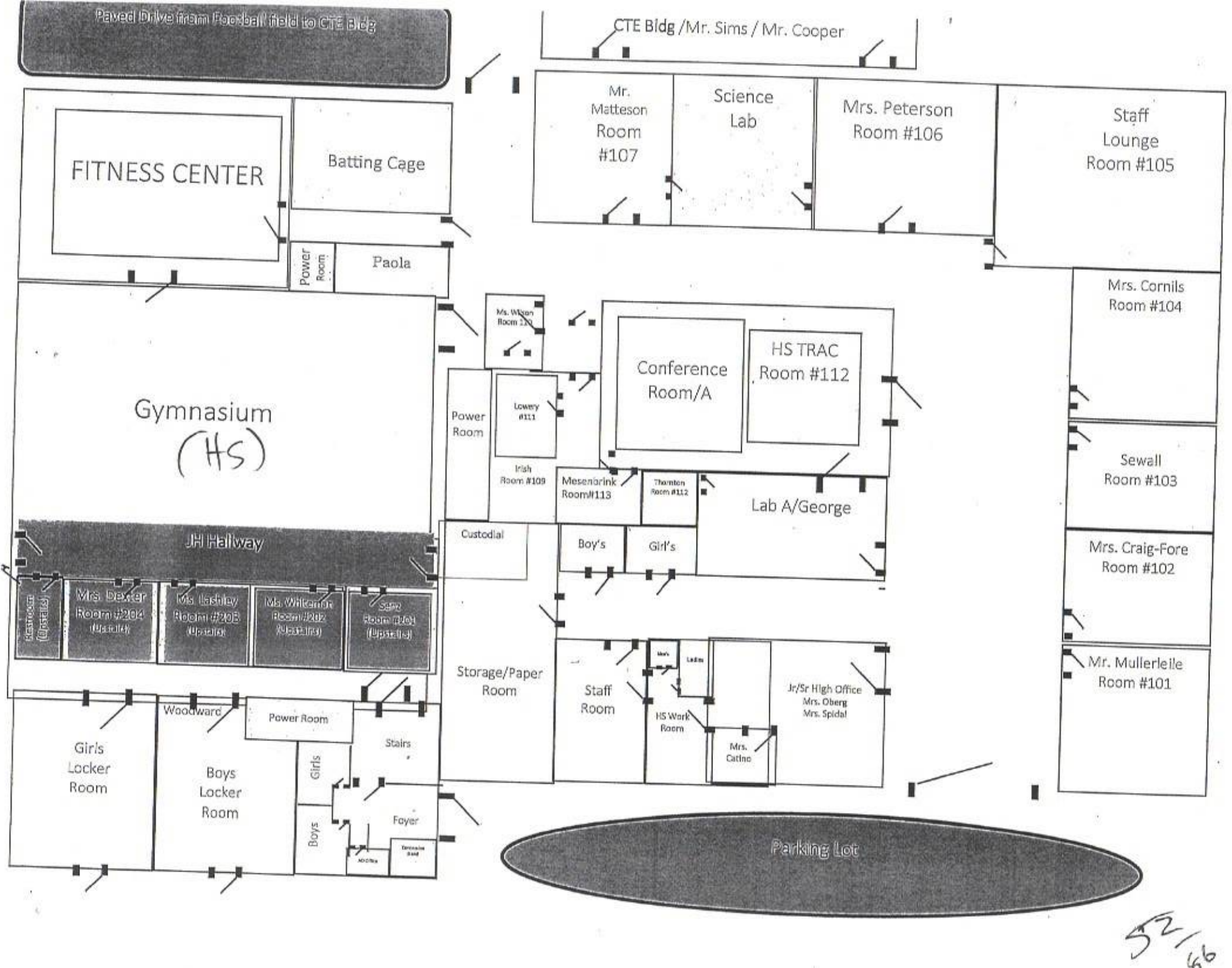
This report was prepared in accordance with generally accepted AHERA standards of environmental reinspection practice at the time this investigation was performed. Evaluations of the conditions at the site for the purpose of this investigation are made from a limited number of observation points and may be subjective in some cases. The subject school district is solely responsible for providing any notices or disclosures to concerned public agencies or to the public.

Environmental Inspection Services has prepared this report based on information collected from available records and files. The scope of this investigation is limited and did not include subsurface exploration or chemical screening of soil and groundwater beneath the site. No bulk material samples were collected from the subject school suspect ACBM for the purposes of this reinspection.

The findings and conclusions are not to be regarded as scientific certainties. Findings are based on professional judgement concerning data significance. Evaluation of the presence of asbestos-containing building materials in the subject school is based upon actual analytical test results, EIS gathered data initially furnished in previous reinspection and the site specific AHERA Management Plans prepared by others. This report is an expression of professional opinion and is not a warranty express or implied.

# APPENDIX 1.0

# SITE PLAN


Paved Drive from Football field to CTE Bldg
CTE Bldg /Mr. Sims / Mr. Cooper
Mr. Matteson Room #107
Science Lab
Mrs. Peterson Room #106
Staff Lounge Room #105
FITNESS CENTER
Batting Cage
Power Room
Paola
Mrs. Cornils Room #104
Gymnasium (HS)
Conference Room/A
HS TRAC Room #112
Power Room
Lowery #111
Irish Room #109
Mesenbrink Room#113
Thornton Room #112
Lab A/George
Sewall Room #103
JH Hallway
Custodial
Boy's
Girl's
Mrs. Craig-Fore Room #102
Mrs. Dexter Room #204
Ms. Lashley Room #203
Ms. Whitenton Room #202
Mr. Mullerleile Room #101
Storage/Paper Room
Staff Room
HS Work Room
Mrs. Catino
Jr/Sr High Office Mrs. Oberg Mrs. Spidal
Girls Locker Room
Woodward
Power Room
Stairs
Boys Locker Room
Girls
Boys
Foyer
Parking Lot

52/66

# APPENDIX 2.0

# RECORDING FORMS FOR ASSESSMENT DATA

# RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING Gaston H/S JHS FLOOR Second
FUNCTIONAL AREA classroom HOMOGENEOUS MATERIAL 1' tan pat tile
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING Y CEILING _____ WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL 1' tan pat tile

APPROXIMATE AMOUNT OF MATERIAL(SF) 11K sf (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING___ TSI___ MISC___ FLOOR Y CEILING___

DESCRIPTION 1' tan pat tile

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 11K sf (LF) _____
FRIABLE: _____ (YES) Y (NO) _____
NON-FRIABLE _____ (YES) ___ (NO) X
WARNING LABELS (YES) ___ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ___ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION___ PHYSICAL X WATER __ FIRE _
EXTENT OF DAMAGE: LOCALIZED___ DISTRIBUTED X
PERCENT OF DAMAGE: 0%___ 1-10% X 10-25%___ 25-100%___
OVERALL RATING: GOOD X FAIR___ POOR___
DESCRIPTION: _____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: ___ HIGH___ MODERATE___ LOW X
INFLUENCE OF VIBRATION: ___ HIGH___ MODERATE___ LOW X
POTENTIAL FOR AIR EROSION: ___ HIGH___ MODERATE___ LOW X
OVERALL RATING: ___ HIGH___ MODERATE___ LOW X
DESCRIPTION _____

LOCATION IN AIR PLENUM: YES Y NO___
COMMENTS _____

INSPECTOR: _____ ACCREDITATION NO. IRO-21-2439A
SIGNATURE: _____ DATE: 2/26/21 — TW

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING Gaston H/C / JS FLOOR Second
FUNCTIONAL AREA classrm HOMOGENEOUS MATERIAL wall texture
TYPE OF SUSPECT MATERIAL SURFACING Y TSI
FLOORING CEILING WALLS X OTHER
DESCRIPTION OF MATERIAL wall texture

APPROXIMATE AMOUNT OF MATERIAL(SF) ~ 30K (LF)

REINSPECTION DATA :

ACBM TYPE: SURFACING X TSI MISC FLOOR CEILING

DESCRIPTION wall texture
APPROXIMATE AMOUNT OF MATERIAL (SF) 30K+ (LF)
FRIABLE: (YES) X (NO)
NON-FRIABLE (YES) (NO) X
WARNING LABELS (YES) (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION PHYSICAL Y WATER FIRE
EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED Y
PERCENT OF DAMAGE: 0% 1-10% X 10-25% 25-100%
OVERALL RATING: GOOD X FAIR POOR
DESCRIPTION: Intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE
POTENTIAL FOR CONTACT: HIGH MODERATE LOW Y
INFLUENCE OF VIBRATION: HIGH MODERATE LOW X
POTENTIAL FOR AIR EROSION: HIGH MODERATE LOW X
OVERALL RATING: HIGH MODERATE LOW X
DESCRIPTION O&M

LOCATION IN AIR PLENUM: YES X NO
COMMENTS O&M

INSPECTOR: C Spear ACCREDITATION NO. IAO-24-3911
SIGNATURE: Charles Spear DATE: 2/26/24-Tue

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING Gaston JHS FLOOR MAIN
FUNCTIONAL AREA hallway HOMOGENEOUS MATERIAL popcorn ceeln
TYPE OF SUSPECT MATERIAL SURFACING X TSI _____
FLOORING_____ CEILING _____ WALLS _____ OTHER_____
DESCRIPTION OF MATERIAL popcorn ceeln

APPROXIMATE AMOUNT OF MATERIAL(SF) 600 (LF)_____

REINSPECTION DATA :

ACBM TYPE: SURFACING____ TSI____ MISC___ FLOOR____ CEILING X

DESCRIPTION
popcorn ceeln
APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 600 (LF)_____
FRIABLE: _____ (YES) x (NO) _____
NON-FRIABLE _____ (YES)___ (NO) x
WARNING LABELS (YES)____ (NO) x
CHANGE FROM INITIAL AHERA REPORT (YES)____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION x PHYSICAL ___ WATER __ FIRE _
EXTENT OF DAMAGE: LOCALIZED x DISTRIBUTED_____
PERCENT OF DAMAGE: 0%___ 1-10% x 10-25%___ 25-100%___
OVERALL RATING: GOOD x FAIR___ POOR___
DESCRIPTION:_____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE x INACCESSIBLE_____
POTENTIAL FOR CONTACT: ____ HIGH___ MODERATE____ LOW x
INFLUENCE OF VIBRATION: ____ HIGH___ MODERATE____ LOW x
POTENTIAL FOR AIR EROSION: ____ HIGH____MODERATE____ LOW x
OVERALL RATING: ____ HIGH____MODERATE____ LOW x
DESCRIPTION: X Candidate for in-place operations and maintenance
LOCATION IN AIR PLENUM: YES x NO___
COMMENTS
Operations and
Maintenance O&M

INSPECTOR: Charles Spear ACCREDITATION NO. ~~IR-19-2439A~~ IRO-21-2439A
SIGNATURE:_____ DATE: 2/26/24

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING Gaston H/S 5/S. FLOOR Second Level
FUNCTIONAL AREA ~~Industrial~~ HOMOGENEOUS MATERIAL Window mastic
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER X
DESCRIPTION OF MATERIAL Window mastic

APPROXIMATE AMOUNT OF MATERIAL(SF) _____ (LF) 7 LK

REINSPECTION DATA :

ACBM TYPE: SURFACING ____ TSI ____ MISC X FLOOR ____ CEILING ____

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) _____ (LF) _____
FRIABLE: _____ (YES) x (NO) _____
NON-FRIABLE _____ (YES) ___ (NO) x
WARNING LABELS (YES) ____ (NO) x
CHANGE FROM INITIAL AHERA REPORT (YES) ____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION x PHYSICAL ___ WATER __ FIRE _
EXTENT OF DAMAGE: LOCALIZED x DISTRIBUTED _____
PERCENT OF DAMAGE: 0% ___ 1-10% x 10-25% ___ 25-100% ___
OVERALL RATING: GOOD x FAIR ___ POOR ___
DESCRIPTION: good

POTENTIAL FOR DISTURBANCE: ACCESSIBLE x INACCESSIBLE _____
POTENTIAL FOR CONTACT: ____ HIGH ___ MODERATE ____ LOW x
INFLUENCE OF VIBRATION: ____ HIGH ___ MODERATE ____ LOW x
POTENTIAL FOR AIR EROSION: ____ HIGH ___ MODERATE ____ LOW x
OVERALL RATING: ____ HIGH ___ MODERATE ____ LOW x
DESCRIPTION: Candidate for in-place operations and maintenance
LOCATION IN AIR PLENUM: YES x NO ___
COMMENTS
Operations and Maintenance candidate for O&M

INSPECTOR: Charles Spear ACCREDITATION NO. IR-19-2439A
SIGNATURE: _____ DATE: 2/26/21 - Tav

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S. FLOOR Main
FUNCTIONAL AREA Halls. HOMOGENEOUS MATERIAL gray pat vinyl (1')
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING X CEILING _____ WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL DKt

APPROXIMATE AMOUNT OF MATERIAL (SF) 10Kt (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING ___ TSI ___ MISC ___ FLOOR X CEILING ___

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 10Kt (LF) _____
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) ___ (NO) X
WARNING LABELS (YES) ___ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ___ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER ___ FIRE ___
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: _____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: ___ HIGH ___ MODERATE X LOW ___
INFLUENCE OF VIBRATION: X HIGH ___ MODERATE ___ LOW ___
POTENTIAL FOR AIR EROSION: ___ HIGH ___ MODERATE X LOW ___
OVERALL RATING: ___ HIGH ___ MODERATE X LOW ___
DESCRIPTION hallway 1' gray pat tile

LOCATION IN AIR PLENUM: YES ___ NO ___
COMMENTS _____

INSPECTOR: Charles Spear ACCREDITATION NO. IAO-21-2439A
SIGNATURE: Charles Spear DATE: 2/26/21

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S. FLOOR MAIN
FUNCTIONAL AREA gym. HOMOGENEOUS MATERIAL MASTIC
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER X
DESCRIPTION OF MATERIAL MOVLDING mastic

APPROXIMATE AMOUNT OF MATERIAL (SF) _____ (LF) 100

REINSPECTION DATA :

ACBM TYPE: SURFACING ___ TSI ___ MISC X FLOOR ___ CEILING ___

DESCRIPTION
MOVLDING Mastics
APPROXIMATE AMOUNT OF MATERIAL _____ (SF) _____ (LF) 100 +
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) _____ (NO) X
WARNING LABELS (YES) _____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) _____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER ___ FIRE ___
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: _____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: _____ HIGH ___ MODERATE ___ LOW X
INFLUENCE OF VIBRATION: _____ HIGH ___ MODERATE ___ LOW X
POTENTIAL FOR AIR EROSION: _____ HIGH ___ MODERATE ___ LOW X
OVERALL RATING: _____ HIGH ___ MODERATE ___ LOW X
DESCRIPTION OEM

LOCATION IN AIR PLENUM: YES X NO ___
COMMENTS OEM

INSPECTOR: Charles Spicer ACCREDITATION NO. FRO-21-2439A
SIGNATURE: Charles Spicer DATE: 2/26/21 FM

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/G FLOOR MAIN
FUNCTIONAL AREA offices HOMOGENEOUS MATERIAL 1' tan pat tile
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING X CEILING _____ WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL 1' tan pat tile

APPROXIMATE AMOUNT OF MATERIAL (SF) 1 Ct (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING ___ TSI ___ MISC ___ FLOOR X CEILING ___

DESCRIPTION 1' tan pat tile

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 1K sq (LF) _____
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) ___ (NO) X
WARNING LABELS (YES) ___ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ___ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER ___ FIRE ___
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: Intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: ___ HIGH ___ MODERATE ___ LOW X
INFLUENCE OF VIBRATION: ___ HIGH ___ MODERATE X LOW ___
POTENTIAL FOR AIR EROSION: ___ HIGH ___ MODERATE ___ LOW X
OVERALL RATING: ___ HIGH ___ MODERATE ___ LOW X
DESCRIPTION O&M

LOCATION IN AIR PLENUM: YES X NO ___
COMMENTS O&M

INSPECTOR: Charles Spear ACCREDITATION NO. IAO-21-24391-A
SIGNATURE: Charles Spear DATE: 2/26/21 FL

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S. FLOOR MAIN
FUNCTIONAL AREA office HOMOGENEOUS MATERIAL wall textures
TYPE OF SUSPECT MATERIAL SURFACING X TSI ____
FLOORING ____ CEILING ____ WALLS ____ OTHER ____
DESCRIPTION OF MATERIAL wall textures

APPROXIMATE AMOUNT OF MATERIAL (SF) 1K sf (LF) ____

REINSPECTION DATA :

ACBM TYPE: SURFACING X TSI ____ MISC ____ FLOOR ____ CEILING ____

DESCRIPTION wall surfaces

APPROXIMATE AMOUNT OF MATERIAL ____ (SF) 1K sf (LF) ____
FRIABLE: ____ (YES) X (NO) ____
NON-FRIABLE ____ (YES) ____ (NO) X
WARNING LABELS (YES) ____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ____ PHYSICAL X WATER ____ FIRE ____
EXTENT OF DAMAGE: LOCALIZED ____ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ____ 1-10% X 10-25% ____ 25-100% ____
OVERALL RATING: GOOD X FAIR ____ POOR ____
DESCRIPTION: - intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE ____
POTENTIAL FOR CONTACT: ____ HIGH ____ MODERATE ____ LOW X
INFLUENCE OF VIBRATION: ____ HIGH ____ MODERATE ____ LOW X
POTENTIAL FOR AIR EROSION: ____ HIGH ____ MODERATE ____ LOW X
OVERALL RATING: ____ HIGH ____ MODERATE ____ LOW X
DESCRIPTION O&M

LOCATION IN AIR PLENUM: YES X NO ____
COMMENTS O&M

INSPECTOR: Charles Speer ACCREDITATION NO. IRO-21-24341
SIGNATURE: Charles Spr DATE: 2/26/21 -FW

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RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/G. FLOOR MAIN
FUNCTIONAL AREA halls HOMOGENEOUS MATERIAL white/grey 1' tile
TYPE OF SUSPECT MATERIAL SURFACING ____ TSI ____
FLOORING X CEILING ____ WALLS ____ OTHER ____
DESCRIPTION OF MATERIAL 1' tile white pat/grn.

APPROXIMATE AMOUNT OF MATERIAL (SF) 10 KT (LF) ____

REINSPECTION DATA :

ACBM TYPE: SURFACING ____ TSI ____ MISC ____ FLOOR X CEILING ____

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL ____ (SF) X (LF) ____
FRIABLE: ____ (YES) X (NO) ____
NON-FRIABLE ____ (YES) ____ (NO) X
WARNING LABELS (YES) ____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ____ PHYSICAL X WATER ____ FIRE ____
EXTENT OF DAMAGE: LOCALIZED ____ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ____ 1-10% X 10-25% ____ 25-100% ____
OVERALL RATING: GOOD X FAIR ____ POOR ____
DESCRIPTION: intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE ____
POTENTIAL FOR CONTACT: ____ HIGH ____ MODERATE ____ LOW X
INFLUENCE OF VIBRATION: X HIGH ____ MODERATE ____ LOW ____
POTENTIAL FOR AIR EROSION: ____ HIGH ____ MODERATE ____ LOW X
OVERALL RATING: ____ HIGH ____ MODERATE ____ LOW X
DESCRIPTION O&M

LOCATION IN AIR PLENUM: YES X NO ____
COMMENTS O&M

INSPECTOR: Charles Spear ACCREDITATION NO. IH0-21-2439A
SIGNATURE: Charles Spear DATE: 2/26/21 -Final

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S. FLOOR MAIN
FUNCTIONAL AREA Women's HOMOGENEOUS MATERIAL Molding mastic
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER X
DESCRIPTION OF MATERIAL Mastic

APPROXIMATE AMOUNT OF MATERIAL (SF) _____ (LF) 10K+

REINSPECTION DATA :

ACBM TYPE: SURFACING ____ TSI ____ MISC X FLOOR ____ CEILING ____

DESCRIPTION
10K + mastics

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 10K (LF) _____
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) ____ (NO) X
WARNING LABELS (YES) ____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER __ FIRE _
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: Intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE ____
POTENTIAL FOR CONTACT: ____ HIGH ___ MODERATE ____ LOW X
INFLUENCE OF VIBRATION: ____ HIGH ___ MODERATE ____ LOW X
POTENTIAL FOR AIR EROSION: ____ HIGH ___ MODERATE ____ LOW X
OVERALL RATING: ____ HIGH ___ MODERATE ____ LOW X
DESCRIPTION Ofm

LOCATION IN AIR PLENUM: YES X NO ___
COMMENTS Ofm

INSPECTOR: Charles Speer ACCREDITATION NO: I-A0-20-24398
SIGNATURE: Charles Speer DATE: 2/26/21 -KM

# RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S FLOOR MAIN
FUNCTIONAL AREA classroom HOMOGENEOUS MATERIAL 1 gray put filler
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING √ CEILING _____ WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL √ tan put white filler
Class 101, 102
APPROXIMATE AMOUNT OF MATERIAL (SF) 1K per (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING___ TSI___ MISC___ FLOOR X CEILING___

DESCRIPTION
gray put wall
APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 1K per (LF) _____
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) _____ (NO) X
WARNING LABELS (YES) _____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) _____ (NO) _____

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION___ PHYSICAL X WATER __ FIRE _
EXTENT OF DAMAGE: LOCALIZED___ DISTRIBUTED X
PERCENT OF DAMAGE: 0%___ 1-10% X 10-25%___ 25-100%___
OVERALL RATING: GOOD X FAIR___ POOR___
DESCRIPTION: Intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: ____ HIGH___ MODERATE____ LOW X
INFLUENCE OF VIBRATION: ____ HIGH___ MODERATE____ LOW X
POTENTIAL FOR AIR EROSION: ____ HIGH____MODERATE____ LOW X
OVERALL RATING: ____ HIGH____MODERATE____ LOW X
DESCRIPTION O&M

LOCATION IN AIR PLENUM: YES X NO___
COMMENTS O&M

INSPECTOR: Charles Spear ACCREDITATION NO. FLO-21-24325
SIGNATURE: Charles Spear DATE: 2/26/21 - Fri

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S FLOOR Main
FUNCTIONAL AREA Classrooms HOMOGENEOUS MATERIAL window mastic
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER X
DESCRIPTION OF MATERIAL Window mastic

APPROXIMATE AMOUNT OF MATERIAL (SF) _____ (LF) 10 LF

REINSPECTION DATA :

ACBM TYPE: SURFACING ___ TSI ___ MISC X FLOOR ___ CEILING ___

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) _____ (LF) 10 LF
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) ___ (NO) X
WARNING LABELS (YES) ___ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ___ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER ___ FIRE ___
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: Intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE ___
POTENTIAL FOR CONTACT: ___ HIGH ___ MODERATE ___ LOW X
INFLUENCE OF VIBRATION: ___ HIGH ___ MODERATE ___ LOW X
POTENTIAL FOR AIR EROSION: ___ HIGH ___ MODERATE ___ LOW X
OVERALL RATING: ___ HIGH ___ MODERATE ___ LOW X
DESCRIPTION Okay

LOCATION IN AIR PLENUM: YES X NO ___
COMMENTS Okay

INSPECTOR: Charles Spear ACCREDITATION NO. IAO-24-2439 M
SIGNATURE: Charles Spear DATE: 2/2/26-FV

# RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S FLOOR MAIN
FUNCTIONAL AREA classrooms HOMOGENEOUS MATERIAL 1 grey pat tile
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL Class 105 E other 106/107

APPROXIMATE AMOUNT OF MATERIAL (SF) 1K per (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING ___ TSI ___ MISC ___ FLOOR X CEILING ___

DESCRIPTION 1 grey pat tile

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 1K per (LF) _____
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) ___ (NO) X
WARNING LABELS (YES) ___ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ___ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER ___ FIRE ___
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: (1 Feet

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: ___ HIGH ___ MODERATE ___ LOW X
INFLUENCE OF VIBRATION: ___ HIGH ___ MODERATE ___ LOW X
POTENTIAL FOR AIR EROSION: ___ HIGH ___ MODERATE ___ LOW X
OVERALL RATING: ___ HIGH ___ MODERATE ___ LOW X
DESCRIPTION OBU

LOCATION IN AIR PLENUM: YES ___ NO ___
COMMENTS OBU

INSPECTOR: Charles Spear ACCREDITATION NO. IAO-21-2439A
SIGNATURE: Charles Spear DATE: 2/26/21

# RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S. FLOOR MAIN
FUNCTIONAL AREA Class 109 HOMOGENEOUS MATERIAL popcorn ceiling
TYPE OF SUSPECT MATERIAL SURFACING X TSI ____
FLOORING ____ CEILING ____ WALLS ____ OTHER ____
DESCRIPTION OF MATERIAL Sprayed on popcorn

APPROXIMATE AMOUNT OF MATERIAL (SF) 1K sf (LF) ____

REINSPECTION DATA :

ACBM TYPE: SURFACING X TSI ____ MISC ____ FLOOR ____ CEILING ____

DESCRIPTION
Sprayed on popcorn
APPROXIMATE AMOUNT OF MATERIAL ____ (SF) 1K sf (LF) ____
FRIABLE: ____ (YES) X (NO) ____
NON-FRIABLE ____ (YES) ____ (NO) X
WARNING LABELS (YES) ____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ____ PHYSICAL X WATER ____ FIRE ____
EXTENT OF DAMAGE: LOCALIZED ____ DISTRIBUTED ____
PERCENT OF DAMAGE: 0% ____ 1-10% ____ 10-25% ____ 25-100% ____
OVERALL RATING: GOOD ____ FAIR ____ POOR ____
DESCRIPTION: ____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE ____
POTENTIAL FOR CONTACT: X HIGH ____ MODERATE ____ LOW ____
INFLUENCE OF VIBRATION: X HIGH ____ MODERATE ____ LOW ____
POTENTIAL FOR AIR EROSION: X HIGH ____ MODERATE ____ LOW ____
OVERALL RATING: ____ HIGH ____ MODERATE X LOW ____
DESCRIPTION O&M

(N) popcorn ceils

LOCATION IN AIR PLENUM: YES X NO ____
COMMENTS O&M

INSPECTOR: Charles Spear ACCREDITATION NO. IH0-21-2439R
SIGNATURE: Charles Spear DATE: 2/26/21 -RN

# RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S FLOOR Main
FUNCTIONAL AREA class room HOMOGENEOUS MATERIAL Mudroom linoleum
TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER X
DESCRIPTION OF MATERIAL _____

APPROXIMATE AMOUNT OF MATERIAL (SF) _____ (LF) 1K pr

REINSPECTION DATA :

ACBM TYPE: SURFACING ___ TSI ___ MISC X FLOOR ___ CEILING ___

DESCRIPTION
Mudroom linoleum
APPROXIMATE AMOUNT OF MATERIAL _____ (SF) _____ (LF) 1K pr
FRIABLE: _____ (YES) X (NO) _____
NON-FRIABLE _____ (YES) _____ (NO) X
WARNING LABELS (YES) _____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) _____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ___ PHYSICAL X WATER ___ FIRE ___
EXTENT OF DAMAGE: LOCALIZED ___ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ___ 1-10% X 10-25% ___ 25-100% ___
OVERALL RATING: GOOD X FAIR ___ POOR ___
DESCRIPTION: _____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: ___ HIGH ___ MODERATE ___ LOW X
INFLUENCE OF VIBRATION: ___ HIGH ___ MODERATE ___ LOW X
POTENTIAL FOR AIR EROSION: ___ HIGH ___ MODERATE ___ LOW X
OVERALL RATING: ___ HIGH ___ MODERATE ___ LOW X
DESCRIPTION _____

LOCATION IN AIR PLENUM: YES X NO ___
COMMENTS _____

INSPECTOR: Charles Spear ACCREDITATION NO. IEO-21-2435R
SIGNATURE: Charles Spear DATE: 2/26/21

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING H/S FLOOR Men
FUNCTIONAL AREA throughout HOMOGENEOUS MATERIAL skim coat texture
TYPE OF SUSPECT MATERIAL SURFACING ____ TSI ____
FLOORING ____ CEILING ____ WALLS X OTHER ____
DESCRIPTION OF MATERIAL textures

APPROXIMATE AMOUNT OF MATERIAL (SF) 50 K+ (LF) ____

REINSPECTION DATA :

ACBM TYPE: SURFACING X TSI ____ MISC ____ FLOOR ____ CEILING ____

DESCRIPTION skim coats

APPROXIMATE AMOUNT OF MATERIAL ____ (SF) 50K+ (LF) ____
FRIABLE: ____ (YES) X (NO) ____
NON-FRIABLE ____ (YES) ____ (NO) X
WARNING LABELS (YES) ____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) ____ (NO) Y

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION ____ PHYSICAL X WATER ____ FIRE ____
EXTENT OF DAMAGE: LOCALIZED ____ DISTRIBUTED X
PERCENT OF DAMAGE: 0% ____ 1-10% X 10-25% ____ 25-100% ____
OVERALL RATING: GOOD X FAIR ____ POOR ____
DESCRIPTION: ____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE ____
POTENTIAL FOR CONTACT: ____ HIGH ____ MODERATE ____ LOW X
INFLUENCE OF VIBRATION: ____ HIGH ____ MODERATE ____ LOW X
POTENTIAL FOR AIR EROSION: ____ HIGH ____ MODERATE ____ LOW X
OVERALL RATING: ____ HIGH ____ MODERATE ____ LOW X
DESCRIPTION Okay

LOCATION IN AIR PLENUM: YES X NO ____
COMMENTS Okay

INSPECTOR: Charles Sipe ACCREDITATION NO. I20-21-24357
SIGNATURE: Charles Sipe DATE: 2/26/21

# APPENDIX 3.0

# REGULATIONS

EPA United States Environmental Protection Agency

# Asbestos Laws and Regulations

This page provides a listing of the laws and regulations pertaining to asbestos implemented by EPA and certain other federal agencies. Learn more about EPA actions to protect the public from asbestos exposure including banned/prohibited uses. [link to page at beginning of this file]

EPA Asbestos-Related Laws

- The Asbestos Hazard Emergency Response Act (AHERA)
- The Asbestos Information Act (AIA)
- The Asbestos School Hazard Abatement Reauthorization Act (ASHARA)
- The Clean Air Act (CAA)
- Safe Drinking Water Act (SDWA)

- The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

EPA Asbestos Regulations

- Restrictions on Discontinued Uses of Asbestos (40 CFR Parts 9 and 721)
- Asbestos-Containing Materials in Schools Rule (40 CFR Part 763, Subpart E)
- Asbestos Worker Protection Rule (40 CFR Part 763, Subpart G)
- Asbestos Ban and Phaseout Rule (Remanded) (40 CFR Part 763, Subpart I)
- Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) Regulations (40 CFR Part 61, Subpart M)
- CERCLA Hazardous Substances and Reportable Quantities

Other Federal Agencies with Asbestos Regulations

- Occupational Safety and Health Administration (OSHA)
- Consumer Product Safety Commission (CPSC)
- Mine Safety and Health Administration (MSHA)

## EPA Asbestos-Related Laws

**The Asbestos Hazard Emergency Response Act (AHERA) (Toxic Substances Control Act (TSCA) Title II)**
This law required EPA to promulgate regulations (e.g., the Asbestos-Containing Materials in Schools Rule) requiring local educational agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked EPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools. The Toxic Substances Control Act defines asbestos as the asbestiform varieties of: chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite/grunerite); anthophyllite; tremolite; and actinolite.

- TSCA Subchapter II: Asbestos Hazard Emergency Response (15 U.S.C. § 2641-2656)

**Asbestos Information Act (Public Law 100-577)**
This law helped to provide transparency and identify the companies making certain types of asbestos-containing products by requiring manufacturers to report production to the EPA.

- 15 U.S.C. § 2607(f)

**Asbestos School Hazard Abatement Reauthorization Act (ASHARA)**
This law extended funding for the asbestos abatement loan and grant program for schools. ASHARA also directed EPA to increase the number of training hours required for the training disciplines under the Asbestos Model Accreditation Plan (MAP) and to expand the accreditation requirements to cover asbestos abatement projects in all public and commercial buildings in addition to schools.

Docket ID: OPTS-62048E; FRL-3269-8

- Asbestos School Hazard Abatement Reauthorization Act of 1990
- Asbestos Model Accreditation Plan
- February 3, 1994 Federal Register Notice: Asbestos Model Accreditation Plan

**Clean Air Act (CAA) (42 USC § 7401 *et seq.*)**
This law defines the EPA's responsibilities for protecting and improving the nation's air quality and the stratospheric ozone layer and includes provisions for the EPA to set national emission standards for hazardous air pollutants, including asbestos.

- Section 112- National Emission Standards for Hazardous Air Pollutants

**Safe Drinking Water Act (SDWA)**
The Safe Drinking Water Act (SDWA) is the federal law that helps ensure the quality of Americans' drinking water. Under the SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards.

## Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

This law, also known as Superfund, was enacted to address abandoned hazardous waste sites in the U.S. The law has subsequently been amended, by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and the Small Business Liability Relief and Brownfields Revitalization Act of 2002. CERCLA authority may be appropriate to respond to the release or potential release of asbestos into the environment.

## EPA Asbestos Regulations

**Restrictions on Discontinued Uses of Asbestos Rule**
This final rule strengthens the Agency's ability to rigorously review an expansive list of asbestos products that are no longer on the market before they could be sold again in the United States. Persons subject to the rule are required to notify EPA at least 90 days before commencing any manufacturing, importing, or processing of asbestos or asbestos-containing products covered under the rule. These uses are prohibited until EPA conducts a thorough review of the notice and puts in place any necessary restrictions or prohibits use.

Docket ID: EPA-HQ-OPPT-2018-0159; FRL 9991-33

- 40 CFR Parts 9 and 721 – Restrictions on Discontinued Uses of Asbestos

**Asbestos-Containing Materials in Schools Rule**
Pursuant to the Asbestos Hazard Emergency Response Act (AHERA), the Asbestos-Containing Materials in Schools rule requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans and perform asbestos response actions to prevent or reduce asbestos hazards. Public school districts and non-profit private schools, including charter schools and schools affiliated with religious institutions (collectively called local education agencies) are subject to the rule's requirements.

Docket ID: OPTS-62048E; FRL-3269-8

- Asbestos-Containing Materials in Schools Rule (40 CFR Part 763, Subpart E)
  - Interim Transmission Electron Microscopy (TEM) Analytical Methods (Appendix A to Subpart E of 40 CFR Part 763)
  - Asbestos Model Accreditation Plan (Appendix C to Subpart E of 40 CFR Part 763)
  - Transport and Disposal of Asbestos Waste (Appendix D to Subpart E of 40 CFR Part 763)
  - Interim Method of the Determination of Asbestos in Bulk Insulation Samples (Appendix E to Subpart E of 40 CFR Part 763)

**EPA Asbestos Worker Protection Rule**
Through the authority of Section 6 of the Toxic Substances Control Act (TSCA) the EPA extended worker protection requirements to state and local government employees involved in asbestos work who were not previously covered by the the Occupational Safety and Health Administration's (OSHA) asbestos regulations.

Docket ID: OPPTS-62125B; FRL-6751-3

- 40 CFR Part 763, Subpart G – Asbestos Worker Protection

**Asbestos Ban and Phaseout Rule (Remanded )**
On July 12, 1989, the EPA issued a final rule banning most asbestos-containing products. In 1991, this regulation was overturned by the Fifth Circuit Court of Appeals. However, as a result of the Court's decision, only a few asbestos-containing products remain banned.

See Asbestos Ban and Phase-out Federal Register notices.

Docket ID: OPTS-62048E; FRL-3269-8

- 40 CFR Part 763, Subpart I -- Prohibition of the Manufacture, Importation, Processing and Distribution in Commerce of Certain Asbestos-Containing Products; Labeling Requirements

**Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP)**
The asbestos NESHAP regulations specify work practices for asbestos to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require the owner of the building or the operator to notify the appropriate state agency before any demolition, or before any renovations of buildings that could contain a certain threshold amount of asbestos or asbestos-containing material. In addition, particular manufacturing and fabricating operations either cannot emit visible emissions into the outside air or must follow air cleaning procedures, as well as follow certain requirements when removing asbestos-containing waste.

Docket ID: OAR–2002–0082, FRL–7561–2

- 40 CFR Part 61, Subpart M (Complete Rule)
  - 40 CFR §61.145—Standard for demolition and renovation

- 40 CFR §61.150—Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations

## CERCLA Hazardous Substances and Reportable Quantities

Asbestos is designated as a hazardous substance with a reportable quantity in the Superfund regulations.

- 40 CFR Part 302.4 - Designation of Hazardous Substances and Reportable Quantities

## Other Federal Agencies with Asbestos Regulations

**Occupational Safety and Health Administration (OSHA)**
OSHA oversees the working conditions for U.S. workers by implementing and managing occupational safety and health standards. The following regulations pertain to handling asbestos in the workplace.

- Asbestos General Standard—Specification of permissible exposure limits, engineering controls, worker training, labeling, respiratory protection, and disposal of asbestos waste
  - 29 CFR 1910.1001
- Asbestos Construction Standard—Covers construction work involving asbestos, including work practices during demolition and renovation, worker training, disposal of asbestos waste, and specification of permissible exposure limits
  - 29 CFR 1926.1101

**Consumer Product Safety Commission (CPSC)**
The CPSC protects consumers and families from consumer products that pose a fire, electrical, chemical, or mechanical hazard or can injure children. Below are the following CPSC bans or restrictions on asbestos-containing products:

- Emberizing Materials
  - 16 CFR Part 1305
- Patching Compounds
  - 16 CFR Part 1304
- Asbestos Containing Garments for General Use
  - 16 CFR § 1500.17(a)(7)

**Mine Safety and Health Administration (MSHA)**
MSHA is responsible for overseeing the safety and health of miners in the U.S. The following MSHA regulations apply to asbestos in mines:

- Surface Mines: exposure limits, engineering controls, and respiratory protection measures for workers in surface mines
  - 30 CFR part 56, subpart D
- Underground Mines: exposure limits, engineering controls, and respiratory protection measures for workers in underground mines
  - 30 CFR part 57, subpart D

## Final Asbestos Rule

In April 2019 EPA issued a final rule to ensure that asbestos products that are no longer on the market cannot return to commerce without the Agency evaluating them and putting in place any necessary restrictions or prohibiting use. Learn more.

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