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REPORT

ASBESTOS OPERATIONS AND MAINTENANCE PROGRAM TOWN HALL 83 MOUNTAIN ROAD SUFFIELD, CONNECTICUT

Prepared for

TOWN OF SUFFIELD
Suffield, Connecticut

Prepared by

TRC Environmental Corporation
Windsor, Connecticut

January 2014

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APPENDICES

1.0 INTRODUCTION

1.1 Asbestos Handling Policy

Any activity or procedure, whether performed by approved in-house personnel or outside contractors, that directly or indirectly relates to ACM shall be covered under the administration of the O&M Program. General cleaning and housekeeping tasks shall take into consideration the proper recognition, methods, protection, and in some cases, actual handling of asbestos containing materials

It is the further objective of the Town of Suffield to minimize building occupant exposure to airborne asbestos fibers by implementing this Asbestos Operations and Maintenance (O&M) Plan at this facility.

The Operations and Maintenance (O&M) Plan is an essential element of a total control program for the asbestos-containing materials (ACM) present in a facility or building. An O&M Program can be defined as a formulated plan of hazard communication, training, periodic surveillance, housekeeping, maintenance repair/cleanup and emergency response to properly manage ACM in place. The purpose of an O&M Program is to:

1. Periodically inspect ACM for signs of damage or deterioration.
2. Conduct necessary housekeeping/emergency clean-ups safely.
3. Provide direction, supervision and documentation for asbestos related activities.
4. Ensure proper communication and notification of the presence and location of ACM, and provide for effective training in managing the ACM in place.

1.2 Facility's Asbestos Manager

Ms. Julie Oakes will be the Facility's Asbestos Manager for the Town Hall Building. The Facility's Asbestos Manager shall coordinate and approve all Facility's work activities related to ACM including:

- Provide hazard communication information to all of the Town Hall employees and contractors who may encounter ACM;
- Inform maintenance staff, custodial staff and outside contractors (i.e. electrical, telephone, etc. repair personnel) of the location of ACM for routine work;
- Review proposed building maintenance and renovation activities and determine their potential impact to existing ACM;
- Notify appropriate personnel when asbestos related work may result in asbestos exposure;
- Require that only contractors trained in asbestos hazard and control measures be allowed to handle the ACM;

- Arrange for a State of Connecticut Licensed Asbestos Abatement Contractor to work on the asbestos and for an Industrial Hygiene firm to oversee the work activities and provide air monitoring services;
- Ensure that abatement projects are properly notified to the Connecticut Department of Public Health (CTDPH) and USEPA using the appropriate forms
- Ensure that final air clearance testing is conducted following abatement involving greater than 3SF/3LF of ACM and the results are submitted to the CTDPH on the appropriate form
- Ensure that any ACM removed from the facility is disposed in accordance with federal and state regulations and tracked using the CTDPH asbestos waste shipment record;
- Inspect identified ACM periodically to ensure it is not deteriorating in a manner that may result in fiber release;
- Be knowledgeable in practices and procedures for asbestos management and maintain an appropriate level of training;
- Review this plan annually to ensure it complies with any changes in applicable regulations.

1.3 Facility Description

The Town Hall building has two levels plus a basement and an attic. The building is the primary municipal government building in the Town. The basement, first and second floors consist of offices, conference rooms and service areas. The attic is used for storage.

2.0 REGULATORY SUMMARY

The Town Hall building is regulated to various extents under the following sets of asbestos regulations, depending upon the type of activity being conducted at their facility:

- CTDPH Standards for Asbestos Abatement (19a-332a-1 through 16)
- CTDPH Asbestos Licensure and Training Reqs. (20-440-1 through 9 and 20-441)
- OSHA Asbestos General Industry Standards (29 CFR 1910.1001)
- OSHA Asbestos in Construction Standards (29 CFR 1926.1101)
- EPA Asbestos NESHAP (40 CFR Part 61 Subpart M)
- EPA Asbestos Model Accreditation Plan (40 CFR Part 763 Subpart E, App. C)

A glossary of terms used in asbestos work, these regulations and this O&M Plan is included in **Appendix B**. A summary of the Applicable Regulations is included in **Appendix C**.

The following reference documents are also available to assist in the implementation of the O&M Plan.

- EPA's Guidance For Controlling Asbestos-Containing Materials in Buildings – June 1985 (Purple Book)

- EPA's Asbestos in Buildings – Guidance For Service and Maintenance Personnel – July 1985

- EPA's Managing Asbestos In Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos Containing Materials - July 1990 (Green Book)

- EPA's Recommended Interim Guidance for Maintenance of Asbestos-Containing Floor Coverings – 1990

- EPA's A Guide to Performing Reinspections Under the Asbestos Hazard Emergency Response Act (AHERA) – February 1992 (Yellow Book)

3.0 IDENTIFIED ACM/PACM AND HAZARD ASSESSMENT

The following tables summarize the identification, location and quantity of known ACM and confirmed non-ACM at the Town Hall Building. These tables are based on investigative surveys for asbestos-containing materials conducted by TRC Environmental, Inc. of Windsor, Connecticut.

The U.S. Environmental Protection Agency has produced a draft document entitled *Guidance for Assessing and Managing Exposure to Asbestos in Buildings*. The EPA report proposes the use of "decision trees" for estimating the risks posed by exposure to ACBM and recommends certain response actions which are consistent with the Asbestos Hazard Emergency Response Act (AHERA) regulations. TRC's asbestos hazard assessments and recommendations are derived from these guidelines for each material noted.

The two factors that must be evaluated when doing a hazard assessment for friable asbestos are the present condition of the ACBM and the potential for future disturbance of the ACBM. To use the EPA's Decision Tree, the present condition of the friable ACBM is evaluated as either being significantly damaged, damaged or not damaged. The potential for future disturbance takes into account a number of factors which include accessibility to building occupants, level of activity of building occupants, mechanical vibrations and air erosion. The response actions then selected for each type of ACM are sufficient to protect human health and the environment. Generally, there are five recognized courses of action to control ACBM: 1) removal and disposal; 2) repair; 3) enclose; 4) encapsulate; and 5) operations and maintenance (O&M) programs. The U.S. EPA has indicated that there are no longer any grounds for deferring action in a building with ACBM. Even when ACBM is identified in a building and exists under ideal conditions (non-friable, minimum access, no physical damage, etc.), the absolute minimum corrective action that should be taken consists of a comprehensive O&M program and periodic re-inspection of the building.

TRC's recommendations for a specific corrective action or abatement measure are also presented in the attached table for each type of ACM in each homogeneous area. The response actions are based on the U.S. EPA's Decision Tree (enclosed) and have been developed by an EPA accredited asbestos management planner.

TABLE 1
BULK SAMPLE SUMMARY OF SUSPECT ASBESTOS CONTAINING MATERIALS
TOWN HALL
SUFFIELD, CONNECTICUT

Sample No.	Sample Location	Homogeneous Material	% and Type Asbestos
01	Meeting room 112 ceiling	PL1 - White skim coat	ND<1%
		PL1 - Grey plaster	ND<1%
02	Social services office 107	PL1 - White skim coat	ND<1%
		PL1 - Grey plaster	ND<1%
03	Upper level closet	PL1 - White skim coat	ND<1%
		PL1 - Grey plaster	ND<1%
04	Upper Level hall	CT2 – 1x1 spline ceiling tile	ND<1%
05	Main entrance	CT2 – 1x1 spline ceiling tile	ND<1%
06	Emergency management office 114	G4 – Orange carpet glue	ND<1%[1]
07	Meeting room 112	G4 – Orange carpet glue	ND<1%
08	Meeting room 112	G5 – tan covebase glue	ND<1%[1]

NA/PVA Not analyzed/positive via inseparable association with a confirmed positive ACM

NA/PS Not analyzed/positive stop, homogeneous to sample proven to contain asbestos

ND<1% Non-detected, less than 1%

NAD No asbestos detected

\+ Although found to be negative by analysis, material is homogeneous to a determined ACM and therefore must be considered positive

1 NOB material; result confirmed by TEM analyses

* Quantified by PLM 600 Point Counting with Gravimetric Reduction

TABLE 1 BULK SAMPLE SUMMARY OF SUSPECT ASBESTOS CONTAINING MATERIALS TOWN HALL SUFFIELD, CONNECTICUT			
Sample No.	**Sample Location**	**Homogeneous Material**	**% and Type Asbestos**
09	Meeting room 112	G5 – tan covebase glue	ND<1%
10	Emergency management office 114	G6 – tan cove base glue	ND<1%[1]
11	Emergency management office 113	G6 – tan cove base glue	ND<1%
12	Stairwell S-2	G7 – tan stair tread glue	ND<1%[1]
13	Stairwell S-2	G7 – tan stair tread glue	ND<1%
14	Upper floor hall	G8 – brown glue daub associated with CT2	ND<1%[1]
15	Main entrance	G8 – brown glue daub associated with CT2	ND<1%
16	Meeting room 112	SHR1 – white joint compound	ND<1%
		SHR1 – white sheetrock	ND<1%

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TABLE 1 BULK SAMPLE SUMMARY OF SUSPECT ASBESTOS CONTAINING MATERIALS TOWN HALL SUFFIELD, CONNECTICUT			
Sample No.	**Sample Location**	**Homogeneous Material**	**% and Type Asbestos**
17	Computer room 313	SHR1 –white joint compound	ND<1%
		SHR1 – white sheetrock	ND<1%
18	IT department 311	SHR1 –white joint compound	ND<1%
		SHR1 – white sheetrock	ND<1%
19	Corridor 122	SHR1 –white joint compound	ND<1%
		SHR1 – white sheetrock	ND<1%
20	Economic development 305	SHR2 – off-white sheetrock	ND<1%
21	Conference room 304	SHR2 – off-white sheetrock	ND<1%
22	Hall lower level o/s bathrooms	FT1 –black mastic	10% chrysotile
		FT1 – red 9x9 floor tile	3% chrysotile
23	Probate office 107	FT1 –black mastic	NA/PS
		FT1 – red 9x9 floor tile	NA/PS

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Sample No.	**Sample Location**	**Homogeneous Material**	**% and Type Asbestos**
24	Probate office 107	FT2 –tan glue	ND<1%
		FT2 – grey/white specks floor tile	ND<1%[1]
25	Probate office 107	FT2 –tan glue	ND<1%
		FT2 – grey/white specks floor tile	ND<1%
26	Kitchen room 116	FT3 –tan glue	ND<1%[1]
		FT3 – off white 12x12 speckled floor tile	ND<1%[1]
27	Kitchen room 116	FT3 –tan glue	ND<1%
		FT3 – off white 12x12 speckled floor tile	ND<1%
28	Town engineer 108	FT4 –tan/black mastic	3% chrysotile
		FT4 – blue 12x12 floor tile	Trace chrysotile[1]

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TABLE 1 BULK SAMPLE SUMMARY OF SUSPECT ASBESTOS CONTAINING MATERIALS TOWN HALL SUFFIELD, CONNECTICUT			
Sample No.	**Sample Location**	**Homogeneous Material**	**% and Type Asbestos**
29	Town engineer 108	FT4 –tan/black mastic	NA/PS
		FT4 – blue 12x12 floor tile	ND<1%
30	Lower level handicapped bathroom	FT5 –brown mastic	ND<1%[1]
		FT5 – white/tan flake floor tile	ND<1%[1]
31	Lower level handicapped bathroom	FT5 –brown mastic	ND<1%
		FT5 – white/tan flake floor tile	ND<1%
32	Tax Collector 208	FT6 –beige mastic	ND<1%[1]
		FT6 – off-white pinhole floor tile	ND<1%[1]
33	Tax Collector 208	FT6 –beige mastic	ND<1%
		FT6 – off-white pinhole floor tile	ND<1%
34	Town Clerk 201	FT7 – tan mastic	ND<1%[1]
		FT7 – blue/lt. blue 12x12 speckled floor tile	ND<1%[1]

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