

Asbestos Hazard Emergency Response Act Three-Year Asbestos Re-Inspection and Management Plan Update

for
Roger Ludlowe Middle School

For Compliance with
State of Connecticut Department of Public Health
Asbestos-Containing Material in Schools Regulation
(Sections 19a - 333-1 through 19a - 333-13)
and
EPA Asbestos Hazard Emergency Response Act
(Title 40 CFR, Part 763, Subpart E)

Fairfield Public Schools
Fairfield, Connecticut

October 2021



56 Quarry Road
Trumbull, CT 06611



FUSS & O'NEILL

October 19, 2021

Mr. Angelus Papageorge
Executive Director of Operations
Fairfield Public Schools
501 Kings Highway East, Suite 210
Fairfield, CT 06825

RE: Three-Year AHERA Asbestos Re-Inspection and Management Plan Update
Re-Inspection Date: May 24, 2021
Roger Ludlowe Middle School, 689 Unquowa Road, Fairfield, CT
Fuss & O'Neill Project No. 20190061.A10

Dear Mr. Papageorge:

This letter summarizes the three-year AHERA Asbestos Re-Inspection and Management Plan Update conducted by Fuss & O'Neill, Inc. (Fuss & O'Neill) for the Roger Ludlowe Middle School located at 689 Unquowa Road in Fairfield, Connecticut (the "Site"). This letter is an important document that must be kept on file at the school as well as at a central location where the Management Plans are preserved.

Roger Ludlowe Middle School was constructed in 2003 and, according to a written statement from the architect, no asbestos-containing building materials (ACBM) were specified for use in the building construction. A copy of the architect's letter is on file at the Site and the central location where the management plans are maintained.

Additionally, Fuss & O'Neill understands that no building additions or renovation activities have been conducted since the original building construction. It is important to note that if any additions or renovation activities are to be performed at the school, a similar letter should be obtained and, if possible, Safety Data Sheets for the new or replacement materials used in construction should be retained and filed with the Asbestos Management Plan.

If you have any questions regarding this report, please do not hesitate to contact us. Thank you for this opportunity to have served your environmental needs.

Sincerely,

Eduardo Miguel Marques
Senior Environmental Analyst

EMM/nw

56 Quarry Road
Trumbull, CT
06611
† 203.374.3748
800.286.2469
f 203.374.4391

www.fando.com

California
Connecticut
Maine
Massachusetts
New Hampshire
Rhode Island
Vermont

Table of Contents

Asbestos Hazard Emergency Response Act Three-Year Re-Inspection and Management Plan Update Roger Ludlowe Middle School

1	Introduction	1
1.1	Background	1
1.2	Local Education Agency (LEA) Responsibilities	1
1.3	Accreditation	2
2	Building Description	3
3	Three Year Re-Inspection	3
3.1	Review of Existing Records	3

Appendices

End of Report

APPENDIX A	ARCHITECT'S LETTER
APPENDIX B	EXISTING RECORDS CHECKLIST
APPENDIX C	EPA ACCREDITATIONS AND ASBESTOS INSPECTOR AND MANAGEMENT PLANNER STATE LICENSES

1 Introduction

1.1 Background

The Clean Air Act required the United States Environmental Protection Agency (EPA) to develop standards to address the potential health risks associated with adverse effects of asbestos exposure as an indoor contaminant. In October 1986, the EPA promulgated the Asbestos Hazard Emergency Response Act (AHERA) located at Title 40 CFR, Part 763, Subpart E.

The AHERA regulations required that local education agencies (LEAs) conduct inspections of each school building that they lease, own, or otherwise use as a school building to identify friable (easily crumbled or crushed to powder by hand pressure) and non-friable asbestos-containing building materials (ACBM) locations. The original inspections were required to have been completed prior to October 12, 1988.

AHERA also requires that any building leased or acquired on or after October 12, 1988 that is to be used as a school building shall be inspected for friable and non-friable ACBM prior to 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 commencement of such use.

The regulatory requirements remain in effect for private or public school systems, a church-affiliated school of any denomination, a school dedicated to the education of children with special needs, or a charter school. In the State of Connecticut, the Department of Public Health (CTDPH) is responsible for AHERA regulation enforcement.

1.2 Local Education Agency (LEA) Responsibilities

- A. The LEA is responsible for compliance with the AHERA regulation. The following responsibilities must be followed:
1. The LEA must designate a person to ensure that all of the AHERA requirements are properly implemented. The Designated Person must receive adequate training to perform their duties.
 2. The LEA must ensure that management plans are maintained in a central location, as well as at each facility, and such plans and records are available for inspection or review at all times.
 3. The LEA must inform all workers, building occupants or their legal representative in writing at least once per school year about asbestos-related activities, and the availability of the AHERA management plans for the school buildings.

4. The LEA must ensure proper accreditation for all persons who perform asbestos inspections, asbestos re-inspections, develop/update management plans, develop response actions, and perform required response actions including operations and maintenance (O&M) activities that may disturb asbestos.
5. The LEA must provide training for all custodial and maintenance staff who regularly perform building maintenance where ACBM are present. The training must be provided upon initial hire, as well as annual updates.
6. The LEA must provide information (disclosure) to any workers who may perform work and may come into contact with asbestos in school buildings where ACBM or presumed ACBM are present.
7. The LEA must ensure that known ACBM or presumed ACBM are provided with warning labels in routine maintenance areas.
8. The LEA must ensure that periodic surveillance is performed at least once every six months, after management plan implementation, in all school buildings that it leases, owns, or otherwise uses that contains ACBM or presumed ACBM.
9. The LEA must ensure that once every three years, after a management plan is implemented, a Re-Inspection is performed at each school building that it leases owns or otherwise uses that contains ACBM or presumed ACBM.

Refer to above-mentioned regulation for full requirements and responsibilities.

1.3 Accreditation

A. Local Education Agency (LEA):

LEA:	Fairfield Public Schools
Address:	501 Kings Highway East, Suite 210 Fairfield, CT
Phone:	(203) 255-8235
Fax:	(203) 255-8246

B. Designated Person:

Designated Person:	Mr. Joseph Giacobbe
Address:	3400 Fairfield Avenue Fairfield, CT
Phone:	(203) 255-8448
Fax:	(203) 255-8246

C. Asbestos Consultant:

Firm: Fuss & O'Neill, Inc.
Address: 56 Quarry Road
Trumbull, CT
Phone: (203) 374-3748
Fax: (203) 374-4391

D. Asbestos Inspector:

Inspector: Mr. James B. Blum
CTDPH License #: 000841
Expiration Date: November 30, 2021

E. Asbestos Management Planner:

Planner: Mr. Eduardo Miguel Marques
CTDPH License #: 000201
Expiration: February 28, 2022

2 Building Description

Roger Ludlowe Middle School was constructed in 2003 and, according to a written statement from the architect, asbestos-containing building materials (ACBM) were not specified for use during the building construction. A copy of the letter from the Architect is on file at the Site. Please refer to *Appendix A* for a copy of the architect's letter. Fuss & O'Neill has not been informed of any additions or building renovation activities that have occurred since the original building construction.

3 Three Year Re-Inspection

3.1 Review of Existing Records

An important part of this AHERA re-inspection involved researching prior documentation that is required to be present at the school, as well as at the central recordkeeping location where management plans are stored.

Prepared by:



Eduardo Miguel Marques
Senior Environmental Analyst

Reviewed by:



Jared D. Smith, CSP
Senior Project Manager

Appendix A

Architect's Letter

Perkins Eastman

ARCHITECTURE
CONSULTING
INTERIOR DESIGN
PLANNING
PROGRAMMING

October 26, 2005

AMC Technology Inc.
P.O. Box 413
Stratford, CT 06615

Attn: Anthony Vuozzo

Re: Project Name: Roger Ludlowe Middle School
Project Number: 13890.02
No ACBM specified

Dear Mr. Vuozzo:

As Per my conversation with Norm Benjamin we offer the following:

No ACBM was specified as a building material in any construction document issued through this office for Roger Ludlowe Middle School and, to the best of our knowledge, no ACBM was used as a building material in the building.

Please feel free to contact me if you have any further questions.

Thank you.

Sincerely,



Christine Schlendorf
Associate

cc: Norm Benjamin
File
LMB, JMK, ABS

PERKINS EASTMAN
CHARLOTTE, NC
CHICAGO, IL
LOS ANGELES, CA
MCLEAN, VA
NEW YORK, NY
OAKLAND, CA
PITTSBURGH, PA
SHANGHAI, PRC
STAMFORD, CT
PERKINS EASTMAN BLACK
TORONTO, ON

L. BRADFORD PERKINS FAIA
MARY-JEAN EASTMAN FAIA
J. DAVID HOGLUND FAIA
AARON B. SCHWARZ FAIA
JONATHAN N. STARK AIA

PERKINS EASTMAN ARCHITECTS PC
115 FIFTH AVENUE
NEW YORK, NY 10003
T 212.353.7200
F 212.353.7676

WWW.PERKINSEASTMAN.COM

Appendix B

Existing Records Checklist

Existing Records Checklist

Local Education Agency (LEA): Fairfield Public Schools
501 Kings Highway East, Suite 210
Fairfield, CT 06825

School Building: Roger Ludlowe Middle School

The following documentation is required to be present in both the LEA's office, as well as in a centralized location in the school administrative office. The information included in this checklist will be verified to be present and complete as part of three-year Re-Inspection.

DOCUMENTATION		LOCATION	
		School	LEA Office
1	Original AHERA Operations and Maintenance Plan/Inspection Report	Yes	Yes
2	Three Year Re-Inspection (First and All Subsequent Inspections)	Yes	Yes
3	Parents and Teachers Notifications (Annually Since Last Re-Inspection)	Yes	Yes
4	Designated Person Identification and Proper Training (Person Must Be Named and Have Appropriate Training)	Yes	Yes
5	Designated Person Periodic Surveillance (Once Every Six Months)	Yes	Yes
6	Maintenance Staff Awareness Training Records	Yes	Yes
7	Outside Vendor Awareness Notification	Yes	Yes
8	Asbestos Warning Signs and Labels (Required Posting in Boiler Rooms and Mechanical Spaces Only)	Not Applicable	Not Applicable
9	Response Action Records (Includes Any Abatement Conducted Since Last 3-Year Re-Inspection)	Not Applicable	Not Applicable

Inspector (LEA Office): James B. Blum

Date: May 24, 2021

Inspector (School): James B. Blum

Date: May 24, 2021

Appendix C

EPA Accreditations and Asbestos Inspector and Management Planner State Licenses

1005448 SP

1564

-C01 P05455-1



JAMES B BLUM
FUSS & O'NEILL LLC
146 HARTFORD RD
MANCHESTER CT 06040-5992

Dear JAMES B BLUM,

Attached you will find your validated certificate for the coming year. Should you have any questions about your certificate renewal, please do not hesitate to write or call:

Department of Public Health
P.O. Box 340308
M.S.#12MQA
Hartford, CT 06134-0308

(860) 509-7603
opl.c.dph@ct.gov
www.ct.gov/dph/license

Sincerely,

DEIDRE S. GIFFORD, MD, MPH, ACTING COMMISSIONER
DEPARTMENT OF PUBLIC HEALTH

EMPLOYER'S COPY		
STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH		
NAME JAMES B BLUM		
VALIDATION NO. 03-856192	CERTIFICATE NO. 000841	CURRENT THROUGH 11/30/21
PROFESSION ASBESTOS CONSULTANT-INSPECTOR		
 SIGNATURE	 ACTING COMMISSIONER	

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

PURSUANT TO THE PROVISIONS OF THE GENERAL STATUTES OF CONNECTICUT

THE INDIVIDUAL NAMED BELOW IS CERTIFIED
BY THIS DEPARTMENT AS A

ASBESTOS CONSULTANT-INSPECTOR

JAMES B BLUM

CERTIFICATE NO.
000841

CURRENT THROUGH
11/30/21

VALIDATION NO.
03-856192

SIGNATURE
ACTING COMMISSIONER

INSTRUCTIONS:

1. Detach and sign each of the cards on this form
2. Display the large card in a prominent place in your office or place of business.
3. The wallet card is for you to carry on your person. If you do not wish to carry the wallet card, place it in a secure place.
4. The employer's copy is for persons who must demonstrate current licensure/certification in order to retain employment or privileges. The employer's card is to be presented to the employer and kept by them as a part of your personnel file. Only one copy of this card can be supplied to you.

WALLET CARD		
STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH		
NAME JAMES B BLUM		
VALIDATION NO. 03-856192	CERTIFICATE NO. 000841	CURRENT THROUGH 11/30/21
PROFESSION ASBESTOS CONSULTANT-INSPECTOR		
 SIGNATURE	 ACTING COMMISSIONER	

CERT#: A-509-V692

**CHEMSCOPE TRAINING DIVISION
ASBESTOS INSPECTOR REFRESHER
4-HOUR TRAINING CERTIFICATE**

James Blum

146 Hartford Road, Manchester CT

Has attended a 4-hour annual refresher course on the subject discipline on
9/1/2020 and has passed a written examination.

"The person receiving this certificate has completed the requisite training for asbestos accreditation as an inspector under TSCA Title II"

Course topics include a review and update on asbestos health hazards, functions of inspectors and management planners, building systems, planning, inspecting for asbestos, sampling and analysis, respiratory protection, government regulations and preparing the inspection report.

This training course has been accredited by the State of Connecticut.

Examination Score: 88%

Exam Date: 9/1/2020

Expiration Date: 9/1/2021



Daniel Sullivan
Training Manager

Chem Scope, Inc.
15 Moulthrop Street
North Haven CT 06473
Phone: 203.865.5605
www.chem-scope.com



EDUARDO M. MARQUES
FUSS & ONEILL ENVIRO SCIENCE LLC
146 HARTFORD ROAD
MANCHESTER CT 06040

Dear EDUARDO M. MARQUES,

Attached you will find your validated certificate for the coming year. Should you have any questions about your certificate renewal, please do not hesitate to write or call:

Department of Public Health
P.O. Box 340308
M.S.#12MQA
Hartford, CT 06134-0308

(860) 509-7603
oplcdph@ct.gov
www.ct.gov/dph/license

Sincerely,

DEIDRE S. GIFFORD, MD, MPH, ACTING COMMISSIONER
DEPARTMENT OF PUBLIC HEALTH

EMPLOYER'S COPY		
STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH		
NAME		
EDUARDO M. MARQUES		
VALIDATION NO.	CERTIFICATE NO.	CURRENT THROUGH
03-866767	000201	02/28/22
PROFESSION		
ASBESTOS CONSULTANT-INSP/MGMT PLANNER		
 SIGNATURE		 ACTING COMMISSIONER

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

PURSUANT TO THE PROVISIONS OF THE GENERAL STATUTES OF CONNECTICUT

THE INDIVIDUAL NAMED BELOW IS CERTIFIED
BY THIS DEPARTMENT AS A

ASBESTOS CONSULTANT-INSP/MGMT PLANNER

EDUARDO M. MARQUES

CERTIFICATE NO.
000201

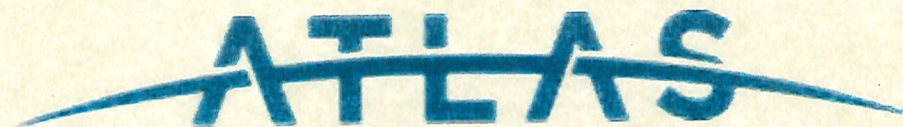
CURRENT THROUGH
02/28/22

VALIDATION NO.
03-866767

SIGNATURE
ACTING COMMISSIONER

INSTRUCTIONS:

1. Detach and sign each of the cards on this form
2. Display the large card in a prominent place in your office or place of business.
3. The wallet card is for you to carry on your person. If you do not wish to carry the wallet card, place it in a secure place.
4. The employer's copy is for persons who must demonstrate current licensure/certification in order to retain employment or privileges. The employer's card is to be presented to the employer and kept by them as a part of your personnel file. Only one copy of this card can be supplied to you.



CERTIFICATE OF ACHIEVEMENT

This certifies that

Eduardo Miguel Marques

has successfully completed the
8 Hour Asbestos Site Inspector/Management Planner Refresher Training
Asbestos Accreditation Under TSCA Title II
40 CFR Part 763 and
CT Department of Public Health Title 20

Training held via a Live
Webinar

Score: 84%

conducted by:

ATC Group Services LLC dba ATLAS Technical
73 William Franks Drive
West Springfield, MA 01089
(413) 781-0070

Principal Instructor: Gregory Morsch

July 22, 2021
Date of Course

July 22, 2022
Expiration Date

Regional Training Director: Gregory Morsch

MPAR-3394
Certificate Number

July 22, 2021
Examination Date