



Quality Environmental Solutions & Technologies, Inc.

JULY 2019 REINSPECTION, MANAGEMENT PLAN UPDATE & SURVEILLANCES

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1.0 INTRODUCTION

The US EPA issued in the October 30, 1987 Federal Register its final rule and notice for Asbestos-containing Materials (ACM) in schools in response to the Asbestos Hazard Emergency Response Act (AHERA) of 1986. In an effort to comply with this regulation *Rye City School District* retained **Quality Environmental Solutions & Technologies Inc. (QuES&T)** to perform their July 2019 Triennial Reinspection and develop a subsequent Asbestos Management Plan. This Asbestos Management Plan pertains to the following *Rye City School District* building:

Rye CSD Business Office
555 Theodore Fremd Avenue
Suite B-101
Rye, NY 1050

QuES&T assumes no liability for any buildings or areas not identified by the client that may fall under the AHERA regulations. As well, **QuES&T** assumes no liability for inspections and any other surveys not conducted in those buildings or areas not identified, or where access was restricted by the client for any reason. **QuES&T** is not responsible for inspecting, assessing, or otherwise consulting with respect to hidden or inaccessible materials or other materials not directly covered by the regulations.

2.0 INSPECTION SUMMARY

Quality Environmental Solutions & Technologies, Inc. (**QuES&T**) performed the 2019 AHERA Triennial Reinspection of previously identified Asbestos-containing Materials (ACM) within Rye City School District Administrative Office, located at 555 Theodore Fremd Avenue, Suite B-101, Rye, New York 10580. The 2019 AHERA Triennial Reinspection included:

- 1) Incorporation of applicable Local, State and Federal Regulations to ensure regulatory compliance.
- 2) A thorough review of all asbestos-related documentation, including but not limited to: AHERA/Management Plans, Asbestos Inspection Reports, Asbestos Lab Results, etc. provided by.
- 3) A review of recently completed Asbestos Abatement Projects/Designs, etc. provided by *Rye City School District*.
- 4) Physical Onsite Visual Re-inspection of all previously identified Asbestos-containing Materials (ACM).

As part of the 2019 AHERA Triennial Survey, a thorough Onsite Visual Inspection of all previously-identified Asbestos-containing Materials (ACM) was performed to determine the existing ACM-conditions and to assess the impact of environmental factors to determine potential(s) for damage and/or exposure. This 2019 AHERA Triennial Survey included all functional spaces accessible by normal means and, therefore, excluded inaccessible and/or concealed components/areas/materials (i.e. ceiling/wall plenums/chases, mechanical/HVAC/electrical equipment/components, crawlspaces, etc.), unless otherwise noted. No demolition or dismantling of building components or immovable objects was performed as part of this 2019 AHERA Triennial Survey. No additional samples were collected or analyzed. ACM findings from other inspections/surveys, reports/designs, etc., which **QuES&T** was directly involved with, were incorporated into, and listed within, this 2019 AHERA Triennial Survey Report.

The 2019 AHERA Triennial Survey was completed in conformance with applicable Local, State and Federal Regulations and was performed by certified **QuES&T** personnel (Appendix D) Mr. Anthony D. Perre (NYS/DOL Cert. #14-10534) of **QuES&T**, on June 3, 2019. Field observations and associated findings from the 2019 AHERA Triennial Survey(s) were reviewed and approved by licensed NYS/AHERA Asbestos Project Designer(s), NYS/AHERA Asbestos Inspector(s) and NYS/AHERA Asbestos Management Planner(s) Mr. Louis N. Johnson III (Cert. #08-05954), of **QuES&T**.

3.0 INSPECTION PROTOCOL

AHERA Triennial Reinspections begin with licensed NYS/AHERA Asbestos Inspector(s) conducting an initial walkthrough visual inspection throughout the above-referenced *Rye CSD* building to determine the number of areas to be inspected and the types of materials present. Following the initial walkthrough visual inspection, the Inspector(s) assess the location, quantity, and conditions of previously-identified ACM/PACM and quantify all PACM surfacing materials with assumed vermiculite.

3.1 Asbestos Sampling Protocols

Upon completion of initial visual walkthroughs, conducted by an accredited NYS/AHERA Asbestos Inspector, samples of various homogenous areas may be collected in accordance with 40 CFR 763.

- Sampling *Surfacing Materials* (i.e. spray or trowel applied materials, plaster, sprayed-on fireproofing, taping/spackling compound, etc.) requires that a minimum of three (3) samples of each homogenous material type be collected for areas less-than 1000 square feet; a minimum of five (5) samples of each homogenous material type be collected for areas over 1000 square feet but less-than 5000 square feet; and, a minimum of seven (7) samples of each homogenous material type be collected for areas in excess of 5000 square feet. In addition to the defined minimum number of samples required, Inspector interpretation and/or variance in site or material conditions may warrant additional sampling performed and shall be determined only by accredited, licensed personnel.
- Sampling *Thermal System Insulation (TSI)* requires that a minimum of three (3) samples of each homogenous material type be collected (i.e. pipe insulation, mudded joint/elbow, duct insulation, boiler insulation, boiler breaching insulation, etc.); and, a minimum of one (1) sample of each homogenous “patch” be collected. In addition to the defined minimum number of samples required, Inspector interpretation and/or variance in site or material conditions may warrant additional sampling performed and shall be determined only by accredited, licensed personnel.
- Sampling *Miscellaneous Materials* (i.e. ceiling tiles, sheetrock/gypsum, floor/carpet tiles, mastics/glues/adhesives, caulks/glazings, etc.) requires that a minimum of two (2) samples of each homogenous material type be collected. In addition to the defined minimum number of samples required, Inspector interpretation and/or variance in site or material conditions may warrant additional sampling performed and shall be determined only by accredited, licensed personnel.

3.1 Random Sampling Protocols

When using the 3-5-7+1 rule, it is very important that samples are collected from each unified sampling area in a random fashion. In order to maximize the randomness of the sampling process, the field inspectors shall employ a random sampling scheme to ensure the randomness of the samples.

The total square footage of the sampling area shall be calculated, and the appropriate number of samples shall be determined based on the 3-5-7+1 rule, and the requirements of 40 CFR 763 Subpart E. Once the number of samples to be collected is determined, the areas to be sampled shall be listed on individual tabs. These tabs then shall be drawn at random. Whenever possible the samples shall be collected in a manner which causes the least destruction and cosmetic damage to the facility.

Many times, TSI and Misc. Materials do not lend themselves to using a random sampling protocol, in these cases, samples shall be collected from accessible areas and areas that would not disrupt the normal operation of the facility.

4.0 MANAGEMENT PLAN INTRODUCTION

The Asbestos Hazard Emergency Response Act (AHERA) of 1986 required that EPA establish a method by which the Local Education Agency (LEA) can establish a procedure or plan for managing Asbestos-containing Materials (ACM) identified as a result of an inspection undertaken in all buildings under its direction. In its final rule, published October 30, 1987, in 40 CFR 763.93, the EPA mandated that on or before October 12, 1988, each LEA shall develop an Asbestos Management Plan for each school building including all buildings that they lease, own, or otherwise use as school buildings and submit the plan to an agency designated by the Governor of the state in which the LEA is located.

5.0 PLAN FOR PERIODIC SURVEILLANCE

On a semi-annual basis a visual walkthrough inspection of each building that contains ACM or assumed/presumed ACM shall be conducted. The surveillance will be performed either by licensed Third Party personnel, hired directly by the LEA, or by members of the facility's custodial and/or maintenance staff who have been trained in proper methods of handling ACM and recognition of damage, deterioration, and delamination classifications of ACM.

The surveillance program will consist of a visual inspection of all materials in all areas of the facility that are identified in either the AHERA Report(s) and/or the Asbestos Management Plan(s) as ACM and/or assumed/presumed ACM. Materials will be inspected by individual Unified Sampling Areas and comparisons will be made between existing conditions and the conditions of the material at the time of the previous inspection. Whenever a difference is observed to exist, it shall be recorded within the semi-annual inspection form. During the visual inspection, the following conditions and situations will be addressed:

- 1) Location of material (i.e. accessibility).
- 2) Age-related deterioration.
- 3) Physical damage of material due to accidental contact or vandalism.
- 4) Vibration-related deterioration.
- 5) Water-related deterioration.

Detailed notations will also be made of any conditions observed that may have an effect on the ACM in the future. These notes will include observations of roof leaks, physical damage to the structure, or other areas in the vicinity, as well as damage to any previously installed enclosures or encasements on or around the ACM that may increase the potential for damage.

A permanent record (Term of employment or life of building plus 30-years) will be retained, inclusive of all forms, sample results, etc. completed during the surveillance. These records will include the date(s) of re-inspection, name(s) and associated professional titles & licenses, and a detailed summation of all changes in condition of the ACM, as well as other observations or findings made. All records will be incorporated into Asbestos Management Plan files.

When the periodic surveillance indicates the need for some repair or maintenance activity, the LEA designated person will proceed to implement any actions necessary to correct the situation. Records will be maintained (Term of employment or life of building plus 30-years) for all such operations and maintenance activities undertaken as a result of the periodic surveillance.

6.0 OPERATIONS & MAINTENANCE (O&M) PLAN

In accordance with 40 CFR 763.91, *Rye City School District* will implement the Operations and Maintenance (O&M) Plan as set forth in the section "O&M Program" of this document. The O&M Program will begin with initial asbestos cleaning in areas indicated and provisions will be carried out on a continuing basis until all friable and non-friable ACM, as applicable, are removed. The O&M Program may be modified as necessary, or the materials abated as necessary, for the maximum efficiency and functionality of the program.

7.0 NOTIFICATIONS

Under 40 CFR 763.84 the LEA is responsible to notify at least annually all of the workers, building occupants, and children's legal guardians as to the various activities that take place associated with this Asbestos Management Plan. They must be notified as to inspections, reinspections, response actions, and post response action activities, including periodic reinspections and surveillance activities that are planned or are in progress. The LEA must ensure that these notifications are made. Outlined below is a suggested method of complying with this section of AHERA.

1. A letter should be sent to all employees, building occupants, guardians of children, local union office (if applicable), and others as deemed necessary by the LEA. This letter should outline the activities that the LEA has undertaken to comply with AHERA, including the inspection process, management plan development, availability of the management plan, and the plan for future surveillance and reinspection.
2. A public notice posted in the classified section of the local newspaper should also be considered as additional means of notification.
3. Annual notification of the activities that have occurred and activities that are planned to occur should be sent to the aforementioned persons and organizations. This letter should contain information that shows that the periodic surveillance has taken place as per the Asbestos Management Plan, and the results of said surveillances. The letter should also indicate any response actions that took place during the year and the results of the actions.



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LISTING OF IDENTIFIED ASBESTOS- CONTAINING MATERIALS

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DESCRIPTION OF ACM SPREADSHEETS

The following is a listing of Asbestos-containing Materials (ACM) identified within the *Rye CSD Business Office*, as observed by **QuES&T**. The foremost group of spreadsheets is the most updated listing of ACM within the building and incorporates the following from the date of the prior surveillance/reinspection: 1. Inspection findings from asbestos surveys; 2. Abated areas/materials; 3. Observations from the most current periodic surveillance/reinspection. Changes in identified ACM, as observed by **QuES&T** are always reflected on the most recent spreadsheets. Each group of spreadsheets includes the following three (3) sheets:

1. **Current Listing of ACM:** This is the most current listing of ACM present within the building. It incorporates all changes identified in the most recent periodic surveillance/reinspection.
2. **Listing of ACM Changes (by Space ID):** Lists the changes in ACM identified in the most recent periodic surveillance/reinspection. All information is sorted by Space ID #.
3. **Listing of ACM Changes (by AHERA Hazard):** All information in this is similar to the "Listing of ACM Changes" spreadsheet; however, does not include ACM removed from the listing, and is sorted by AHERA Hazard Classification (Potential for disturbance – highest to lowest).

LISTING OF IDENTIFIED ACM

The following corresponds to the listing OF ACM present and/or changed:

(Column 1) Space Number - Number assigned to each space during previous inspections. Corresponding space numbers can be found on drawings located in Appendix A.

(Column 2) Floor – Floor in which the Space is located.

(Column 3) Space Description – Identifies description of current use of each space.

(Column 4) Homogenous Material ID – Corresponds with Materials List.

(Column 5 & 6) Material & Description – Type and defining characteristics of asbestos-containing material within each space.

(Columns 7 & 8) Quantity – Amount of each asbestos-containing material within each space. Listing provided in Linear Footage (LF), Square Footage (SF) or individual unit (i.e. elbow, etc.).

(Column 9) Friable? – States whether identified ACM is Friable or Not.

(Column 10) Condition – Identified current status of identified ACM. Acceptable condition ratings for ACM are as follows: Good, Damaged or Significantly Damaged.

(Column 11) Accessible? – States whether identified ACM is accessible or not.

(Column 12) Change? – Identifies whether change in ACM status and/or condition has occurred since last inspection.

(Column 13) Comments – Field notes or comments pertaining to identified ACM.

(Column 14) Description of Change – Type of change.

(Column 15) AHERA Classification – Classification numbers range from 1 (least hazardous) to 7 (most hazardous). Classification numbers are assigned based on two factors: 1) ACBM condition and 2) ACBM disturbance potential. These two factors are assessed using a "Decision Tree" and the results are reported as a single Classification.

(Column 16) Recommended Response Action – Based on AHERA Classification, a letter A through G is assigned to each ACM material. Recommendations for actions associated with the assigned letters are provided in Section IV. Recommended Response Action.

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HAZARD RANK CLASSIFICATIONS

Hazard Rank Classifications are determined by two factors: 1) ACM Condition and 2) ACM Disturbance potential. A number 1 through 7 is assigned to each ACM material based on these two factors and the utilization of a "Decision Tree" to come up with the singular classification number. The following corresponds to the Listing of ACM Changes Spreadsheets:

Hazard Rank Classification	Material Condition	Disturbance Potential
7	Significantly Damaged	Any
6	Damaged	Potential for Significant Damage
5	Damaged	Potential for Damage
4	Damaged	Low Potential for Damage
3	Good	Potential for Significant Damage
2	Good	Potential for Damage
1	Good	Low Potential for Damage

RECOMMENDED RESPONSE ACTIONS

The following corresponds to the Listing of ACM Changes Spreadsheets:

Letter G:

Evacuate or isolate the area if needed. Remove the ACBM (or enclose or encapsulate if sufficient to contain fibers). Repair of thermal system insulation is allowed if feasible and safe. O & M required for all friable ACBM.

Letter F:

Evacuate or isolate the area if needed. Remove, enclose, encapsulate or repair to correct damage. Take steps to reduce potential for disturbance. O & M required for all friable ACBM.

Letter E:

Remove, enclose, encapsulate or repair to correct damage. O & M required for all friable ACBM.

Letter D:

Same as hazard rank #5.

Letter C:

Evacuate or isolate the area if needed. Take steps to reduce potential for disturbance. O & M required for all friable ACBM and TSI.

Letter B:

O & M required for all friable ACBM and TSI.

Letter A:

O & M required for all friable ACBM, but measures need not be as extensive as above.