Asbestos Hazard Emergency Response Act (AHERA)

FOR EDUCATIONAL FACILITIES

Building Specific Inspection Report

for

Brown & Bigelow Leased Space
2012 3rd Year Reinspection

DO NOT discard this report. It must be kept with the Asbestos Management Plan as a permanent record.
Table of Contents

Notice of Intent ........................................................................................................................................... 1
Asbestos Reinspection Report Summary ................................................................................................... 1-2
Key to Inspection Fields ............................................................................................................................ 3
Inspector/Management Planner Certification
Inspection/Reinspection Certificate

Chart A
  — Immediate Response Situations & Recommended Response Actions

Chart B
  — Assessment of Asbestos-Containing Building Materials (ACBM)

Chart C
  — All Materials List by Homogeneous Area

Appendix A
  — Laboratory Analysis
Notice of Intent

The intent of this inspection is to comply with the requirements of the Environmental Protection Agency’s (EPA’s) Asbestos Hazard Emergency Response Act (AHERA) – 40 CFR Part 763.85. It is not intended to fulfill the requirements of the EPA’s National Emissions Standards for Hazardous Air Pollutants (NESHAP) for required pre-construction or pre-renovation inspections. Therefore, it is recommended that an in-depth work area-specific inspection take place by an EPA-Certified Asbestos Building Inspector prior to initiating renovation or demolition work which may disturb previously unidentified ACBM.

It is also required that any asbestos abatement project involving amounts of friable ACBM greater than “small-scale, short-duration”, as defined in AHERA, be designed by an EPA-Certified Asbestos Project Designer

Asbestos Inspection Report Summary

While this inspection report is a stand-alone document, it is only one component of the asbestos management plan. Information contained in this report supersedes previous inspection inventories, assessments and response action recommendations. The District’s AHERA Designated Person, operations and maintenance (O & M) personnel and others should be aware that any subsequent development of new inspection reports will always relate to the original management plan. The asbestos management plan is a living document and may be amended for changes in the building.

The following document contains various lists of materials within the building that may relate to asbestos contamination, and the suggestions for response made by the Institute for Environmental Assessment (IEA) in conjunction with school officials. Three specific charts provided within this report include: Immediate Response Situations (Chart A), Assessment of Asbestos-Containing Materials (Chart B) and All Materials List (Chart C). This document should supplement the District’s Asbestos Management Plan, which guides the ongoing response policy to asbestos throughout the school system.

IEA provided accredited inspectors and management planners to conduct reinspections and provide assessments and recommended response actions consistent with current health risk data.

After the review of the existing management plan and records, accredited inspectors visually inspected all accessible areas of the building and reassessed the condition of all remaining friable known or assumed ACBM. All nonfriable ACBM was visually inspected and physically touched to determine whether it has become friable since the last inspection and assessment provided. Results of the reinspection/assessment were used to recommend response actions.
The EPA requires that all asbestos-containing materials identified within this report are to be inspected on a six-month basis for assurance that their condition has not changed. Administration will direct another formal inspection by a federally-certified inspector within three years, and will maintain an ongoing file for each building. If new, suspect ACBM is uncovered in remodeling or renovation, it will be assumed to contain asbestos until it is appropriately analyzed.

Additionally, a pre-construction inspection is required prior to any general renovation or remodeling to determine if those activities may disrupt building materials that may involve existing or undiscovered asbestos. The federal NESHAP standards explicitly require an asbestos inspection prior to renovation or demolition. NESHAP inspections are typically more invasive and may include materials which were not included in the AHERA inspections.

IEA’s suggestions regarding the maintenance of ACBM are based upon a commitment to advise the school system on how best to protect the safety of building occupants (this is clearly the basic objective of the Federal Act). To accomplish this objective, IEA recommends that school districts take all necessary steps to maintain ACBM in good condition, ensure proper cleanup of asbestos fibers previously released, prevent further release of asbestos fibers, and continuously monitor the condition of the ACBM.
Key to Inspection Fields

1. **IEA Event Number**  
   This is a sorting field with the general intent to identify building materials in the order the inspector encountered them.

2. **IEA Material Type**  
   All materials are grouped by homogeneity: same age, color, pattern, etc. Each homogeneous material is identified with a unique IEA Material Code. In general, Codes A-- through F-- identify thermal system insulation; Codes G-- through H-- identify surfacing material; Codes I-- through Z-- identify miscellaneous material.

   The description for each material is listed after the IEA Material Code.

3. **Location**  
   Functional area(s) where materials were identified.

4. **Estimated Total Amount**  
   A rough estimate of material within a location. Pipe insulation (B--) is measured in linear feet. Pipe joint insulation (A--) estimates reflect the total number of joints observed (i.e., “50” indicates fifty (50) insulated joints were identified). All other materials are measured in square feet.

5. **Estimated Damage Total**  
   Same as above (#4).

6. **Friability**  
   A qualitative distinction between materials which may or may not release asbestos fibers through simple hand pressure, when dry. Friable materials can be expected to release fibers with contact. They are indicated by a “Y” for Yes. Non-friable materials generally pose less risk and are identified with an “N” for No.

7. **% of Asbestos**  
   This field identifies results of laboratory analysis if a sample was analyzed. Asbestos types are abbreviated as follows:

   - CH = Chrysotile
   - CR = Crocidolite
   - AM = Amosite
   - ACT = Actinolite
   - TR = Tremolite
   - ANT = Anthophyllite

   Any material with greater than one percent (>1%) asbestos is considered Asbestos-Containing Material (ACM).

   Some materials have been “Assumed” to contain asbestos. These must be treated as ACM unless appropriate sampling indicates that they do not contain asbestos.

   If sample analysis of all samples collected of a homogeneous material indicate no detectable asbestos, the percent of asbestos indicated will be “None Detected”.

   Some materials, such as fiberglass and vinyl are listed as “NSM” for Nonsuspect Material.

   Materials which are known to be installed since the original AHERA inspection may be listed as “NEW”. While it is unlikely that these materials contain asbestos, it is recommended that an MSDS or a letter from the architect responsible for the specification of the material be obtained which states that asbestos was not specified or used. These materials are required to be sampled under the EPA’s NESHAP Rule prior to renovation or demolition activities.

8. **EPA Assessment Category**  
   See Key in building reports.

9. **Response Action**  
   See Key in building reports.
STATEMENT OF BUILDING ACCESS

On behalf of Saint Paul Public Schools for Brown & Bigelow Leased Space, I certify that I have provided access to all areas within the building to IEA's inspector identified below for the purpose of inspecting for asbestos-containing building materials (ACBM) as mandated by 40 CFR 763.85, "Inspections and Reinspections."

Additionally, I have discussed any concerns I have regarding identified or non-identified ACBM within this building.

Signature  

Date

INSPECTOR

As mandated by 40 CFR 763.85, "Inspections and Reinspections," I certify that I have inspected all accessible areas in Brown & Bigelow Leased Space for the purpose of identifying and assessing asbestos-containing building materials. I have completed an EPA-approved course and all appropriate refresher courses and am an accredited AHERA Inspector. A copy of my certification/accreditation is attached.

Signature  

Date of Inspection

Print Name  

State Certification/Accreditation Number

MANAGEMENT PLANNER

I certify that I have reviewed all of the inspection data for Brown & Bigelow Leased Space and have appropriately provided assessments and response actions for identified asbestos-containing building materials. I have completed an EPA-approved course and all appropriate refresher courses and am an accredited AHERA Management Planner. A copy of my certification/accreditation is attached.

Signature  

Date of Review

Print Name  

State Certification/Accreditation Number
Inspector State Certification/Accreditation

Management Planner State Certification/Accreditation
Chart A
Chart A - Immediate Response Situations

The following is a list of those events that contain damaged asbestos material and should be considered to be potential hazards. It is imperative that the following immediate response situations are corrected as soon as possible but no later than six months from the date of this inspection to avoid increased risk of exposure to airborne asbestos fibers. The District should take extra precaution to ensure that properly trained personnel use appropriate techniques to implement these responses.

Following is an explanation of the Immediate Response Action Codes identified in this report.

<table>
<thead>
<tr>
<th>EPA ASSESSMENT CATEGORY</th>
<th>RESPONSE ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 = Damaged or significantly damaged TSI ACM.</td>
<td>A = Clean-up ACM debris.</td>
</tr>
<tr>
<td>2 = Damaged friable surfacing ACM.</td>
<td>B = Encapsulate slight damage on TSI (i.e. puncture hole or exposed ends of pipe cover).</td>
</tr>
<tr>
<td>3 = Significantly damaged friable surfacing ACM.</td>
<td>C = Patch TSI and/or repair ACM cover.</td>
</tr>
<tr>
<td>4 = Damaged or significantly damaged friable miscellaneous ACM.</td>
<td>D = Enclose or protect accessible sections w/protective barrier.</td>
</tr>
<tr>
<td>5 = ACBM w/potential for damage.</td>
<td>E = Remove section of damaged ACM.</td>
</tr>
<tr>
<td>6 = ACBM w/potential for significant damage.</td>
<td>F = Remove ACM and replace with non-ACM.</td>
</tr>
<tr>
<td>7 = Any remaining friable ACBM or friable suspected ACBM.</td>
<td>G = Isolate area until repaired/removed.</td>
</tr>
<tr>
<td></td>
<td>H = Encapsulate slight damage.</td>
</tr>
<tr>
<td></td>
<td>I = Remove and replace damaged or loose tile section(s).</td>
</tr>
<tr>
<td></td>
<td>J = Monitor condition of material(s).</td>
</tr>
</tbody>
</table>

There were no immediate response actions identified during the inspection of this building.
Chart B
Chart B - Assessment of Asbestos-Containing Building Materials (ACBM)

All asbestos-containing events listed here are to be inspected during each six-month periodic surveillance inspection for changes in condition. The Institute for Environmental Assessment (IEA) highly recommends an in-depth "front end" inspection prior to any general renovation or remodeling to determine if those activities may disrupt building materials that may involve existing or undiscovered asbestos. Potentially inaccessible or exempt asbestos-containing materials not included in this plan may include: adhesives, caulking, putty, woven blankets, curtains, gloves and gaskets, electrical wiring insulation and heat shields above lights, paints and coatings, roofing felts, flashings and shingles, and mineral core fire doors.

Damaged materials which require corrective action to reduce a potential hazard are indicated on Chart A. All non-damaged ACBM identified in Chart B should be monitored through scheduled inspections and removed prior to renovation or demolition activities, or when their condition deteriorates.

District administration will direct another formal inspection by a federally-certified inspector within three (3) years, and will maintain an on-going file for each building. Specific recommendations on how to manage the different types of asbestos-containing material are identified in the Asbestos Management Plan.

**PLEASE NOTE:** Based on EPA recommendations, materials analyzed utilizing PLM and found to contain between 0% and 10% should be assumed asbestos containing unless building owner wishes the laboratory to utilize "point counting." For samples analyzed prior to 1994 containing 1% or less (trace) of asbestos, resampling utilizing the 1993 EPA Test Method or point counting is strongly recommended for purposes of demolition or renovation before treating these materials as non-asbestos containing. Contact your local IEA office for questions or additional information.

**EPA ASSESSMENT CATEGORIES:**

<table>
<thead>
<tr>
<th>IEA Event No.</th>
<th>IEA Material Type</th>
<th>Location</th>
<th>Estimated Total</th>
<th>Friable?</th>
<th>% Asbestos</th>
<th>EPA Assess. Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>11 K2B</td>
<td>12&quot; x 12&quot; Vinyl Floor Tile &amp; Mastic Tan</td>
<td>CAFETERIA</td>
<td>1300 Sq. Ft.</td>
<td>N</td>
<td>5 CH (MASTIC ONLY)</td>
<td>5</td>
</tr>
</tbody>
</table>

Comments: UNDER CARPET. ALSO IN ADJACENT STORAGE ROOM.
Chart C
# Chart C - All Materials List

The following list contains all events observed by the inspector, whether or not they actually contained asbestos, and are grouped by homogeneous area (material type).

<table>
<thead>
<tr>
<th>Homogeneous Area ID Code</th>
<th>IEA Event No.</th>
<th>Location</th>
<th>% Asbestos</th>
<th>Sample No.</th>
<th>Sample Location</th>
<th>Estimated Total Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homogeneous Area ID Code (Material Type)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>I2A 2' x 2' Acoustical Ceiling Tile Glacial w/Revealed Edge</td>
<td>15</td>
<td>HALLWAY NORTH OF CAFETERIA</td>
<td>NONE DETECTED</td>
<td>I10211MV-12</td>
<td></td>
<td>Total Amount: 200 Sq. Ft.</td>
</tr>
<tr>
<td>I3A 2' x 4' Ceiling Tile Sparse Widthwise Fissures &amp; Pin Holes</td>
<td>1</td>
<td>THROUGHOUT SPACE</td>
<td>NONE DETECTED</td>
<td>I10211MV-01</td>
<td></td>
<td>Total Amount: 9,000 Sq. Ft.</td>
</tr>
<tr>
<td>I3B 2' x 4' Ceiling Tile 2' x 2' Look Grubs &amp; Pin Holes</td>
<td>10</td>
<td>CAFETERIA</td>
<td>NONE DETECTED</td>
<td>I10211MV-09</td>
<td></td>
<td>Total Amount: 1,300 Sq. Ft.</td>
</tr>
<tr>
<td>I3C 2' x 4' Ceiling Tile Vinyl-Coated Sheetrock</td>
<td>13</td>
<td>STORAGE ROOM #1 BY CAFETERIA</td>
<td>NSM</td>
<td></td>
<td></td>
<td>Total Amount: 1,000 Sq. Ft.</td>
</tr>
<tr>
<td>I3D 2' x 4' Ceiling Tile Large Grubs, Pockmarks &amp; Pin Holes</td>
<td>2</td>
<td>THROUGHOUT SPACE</td>
<td>NONE DETECTED</td>
<td>I10211MV-02</td>
<td>MV-02: TRAINING ROOM (LARGE)</td>
<td>Total Amount: 3,000 Sq. Ft.</td>
</tr>
<tr>
<td>I3E 2' x 4' Ceiling Tile Small Widthwise Fissures &amp; Pin Holes</td>
<td>3</td>
<td>THROUGHOUT SPACE</td>
<td>NONE DETECTED</td>
<td>I10211MV-03</td>
<td>MV-03: STORAGE #3</td>
<td>Total Amount: 1,500 Sq. Ft.</td>
</tr>
<tr>
<td>I3F 2' x 4' Ceiling Tile Small Pockmarks &amp; Pin Holes</td>
<td>17</td>
<td>MENS &amp; WOMENS RESTROOMS WEST</td>
<td>NONE DETECTED</td>
<td>I10211MV-14</td>
<td></td>
<td>Total Amount: 500 Sq. Ft.</td>
</tr>
<tr>
<td>K2A 12&quot; x 12&quot; Vinyl Floor Tile &amp; Mastic Tan w/Light Tan &amp; Brown Swirls</td>
<td>14</td>
<td>HALLWAY NORTH OF CAFETERIA</td>
<td>NONE DETECTED</td>
<td>I10211MV-11</td>
<td></td>
<td>Total Amount: 300 Sq. Ft.</td>
</tr>
<tr>
<td>Homogeneous Area</td>
<td>IEA Event No.</td>
<td>Location</td>
<td>% Asbestos</td>
<td>Sample No.</td>
<td>Sample Location</td>
<td>Estimated Total Amount</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------</td>
<td>----------</td>
<td>------------</td>
<td>------------</td>
<td>-----------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>K2B</td>
<td></td>
<td>CAFETERIA</td>
<td>5 CH (MASTIC ONLY)</td>
<td>110211MV-10</td>
<td></td>
<td>Total Amount: 1,300 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>CAFETERIA</td>
<td></td>
<td></td>
<td></td>
<td>1300 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>N0A Drywall/Joint Compound</td>
<td></td>
<td>110211MV-06</td>
<td>MV-06: HALLWAY NORTH OF CAFETERIA</td>
<td>Total Amount: 10,000 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q0A Carpet Adhesive</td>
<td></td>
<td>110211MV-07</td>
<td></td>
<td>Total Amount: 500 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q0B Carpet Adhesive</td>
<td></td>
<td>110211MV-08</td>
<td></td>
<td>Total Amount: 200 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q0C Carpet Adhesive</td>
<td></td>
<td>110211MV-10</td>
<td></td>
<td>Total Amount: 1,300 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Q0D Carpet Adhesive</td>
<td></td>
<td>110211MV-04</td>
<td>MV-04: TRAINING ROOM #2</td>
<td>Total Amount: 11,000 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>THROUGHOUT SPACE</td>
<td></td>
<td></td>
<td></td>
<td>11000 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>THROUGHOUT SPACE</td>
<td></td>
<td></td>
<td></td>
<td>500 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td>16</td>
<td>HALLWAY NORTH OF CAFETERIA</td>
<td></td>
<td>110211MV-13</td>
<td></td>
<td>Total Amount: 10 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>X0A Miscellaneous Material</td>
<td></td>
<td>110211MV-15</td>
<td></td>
<td>Total Amount: 500 Sq. Ft.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7 THROUGHOUT BUILDING</td>
<td></td>
<td></td>
<td></td>
<td>500 Sq. Ft.</td>
</tr>
</tbody>
</table>
No additional samples were taken during this reinspecktion.