

# AHERA 3 Year Re-inspection and Management Plan

For

Carlisle Public Schools  
83 School Street  
Carlisle, MA 01741

February 22, 2019

Prepared for

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Prepared by

Enviro-Safe Engineering  
203 Prospect Street  
Brockton, MA 02301

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Prepared by:

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## TABLE OF CONTENTS

1.0	INTRODUCTION	4
2.0	SUMMARY OF INITIAL INSPECTION	4
3.0	EPA REQUIRED ASSESSMENT CODES	4
4.0	SUMMARY OF RESPONSE ACTIONS REQUIRED UNDER AHERA	4
4.1	EPA Assessment Code #1	4
4.2	EPA Assessment Codes #2 and #4	5
4.3	EPA Assessment Codes #3 and #4	5
4.4	EPA Assessment Code #5	5
4.5	EPA Assessment codes #6 and #7	5
5.0	ADDITIONAL AHERA REQUIREMENTS	5
6.0	MASSACHUSETTS ASBESTOS REGULATIONS	6
7.0	CURRENT FINDINGS	6
7.1	Corey Building	6
7.2	Robbins Building	7
8.0	CHANGES IN MATERIALS SINCE INITIAL INSPECTION	7
9.0	RECOMMENDED RESPONSES	7
9.1	Training	7
9.2	Recordkeeping	7
9.3	Labeling	7
9.4	Cleaning	8
9.5	Notification	8
9.6	Reinspection and Periodic Surveillance	8
9.7	Worker Protection	9
9.8	Recommended Response Actions - General	9
9.9	Recommended Response Actions – Specific	9

## 1.0 INTRODUCTION

As required by the US Environmental Protection Agency's AHERA regulations, Enviro-Safe Engineering has completed a survey and reassessment of asbestos containing materials at Carlisle Public Schools. The inspection was conducted by Massachusetts licensed asbestos inspector Patricia E Riley, AI60295 on February, 22, 2019. This report summarizes the locations and conditions of materials remaining in the schools and reviews the ongoing responsibilities of the Local Education Agency (LEA).

This latest survey report should be incorporated into the files that the LEA maintains, pertaining to response actions, operations & maintenance activities, six-month reinspection, training, air sampling and major asbestos activities.

## 2.0 SUMMARY OF INITIAL INSPECTION

During the initial inspection of the Carlisle Public Schools, homogeneous areas of Asbestos Containing Building Materials (ACBM) were identified and assessed their conditions as indicated in the original Management Plan. Additional inspections have been conducted, the latest was by Envirotest Laboratory Inc on March 25, 2016. The Enviro-Safe Engineering inspector identified the same homogeneous areas of ACBM as were identified in the inspection report.

Extensive renovations and asbestos abatement have been conducted on the campus since the original inspection was conducted. The reports, abatement records, and six month surveillance reports were available on site for review.

## 3.0 EPA REQUIRED ASSESSMENT CODES

- #1 Damaged or significantly damaged thermal systems insulation ACBM.
- #2 Damaged friable surfacing ACBM.
- #3 Significantly damaged friable miscellaneous ACBM.
- #4 Damaged or significantly damaged friable miscellaneous ACBM.
- #5 ACBM with potential for damage.
- #6 ACBM with potential for significant damage.
- #7 Any remaining friable Asbestos Containing Building Materials (ACBM) or friable suspected ACBM.
- \* EPA - Non-Asbestos (NA).

## 4.0 SUMMARY OF RESPONSE ACTIONS REQUIRED UNDER AHERA

### 4.1 EPA Assessment Code #1

If damaged or significant damage thermal insulation ACBM is present, (EPA Code #1), the LEA must:

Repair the damaged or remove the damaged material if not feasible to repair.

Maintain all undamaged thermal system insulation.

4.2 EPA Assessment Codes #2 and #4

If damaged friable surfacing ACBM or damaged friable miscellaneous ACBM, (EPA Codes #2 and #4), the LEA must:

Remove.

Enclose.

Encapsulate or repair the material in question.

4.3 EPA Assessment Codes #3 and #4

If significant damage friable surfacing ACBM or friable miscellaneous ACBM is present, (EPA Codes #3 and #4), the LEA must:

Immediately isolate and restrict access, unless isolation is not necessary.

Remove the ACBM from the functional space, unless encapsulation or enclosure is sufficient.

4.4 EPA Assessment Code #5

If ACBM has potential for damage (EPA Code #5), the LEA must:

Institute an O&M program.

4.5 EPA Assessment codes #6 and #7

If any ACBM has potential for significant damage or other ACBM not otherwise categorized (EPA Codes #6 and #7), the LEA must either:

Implement an O&M program and institute preventative measures to eliminate likelihood that the ACBM or its cover will become significantly damaged.

Remove the material expeditiously, if preventative measures are not possible, isolate and restrict access if necessary to prevent an imminent and substantial endangerment.

## 5.0 ADDITIONAL AHERA REQUIREMENTS

In addition to the above actions, AHERA regulations require the LEA to take the following actions:

Ensure that all inspection and reinspection are carried out by accredited personal.

Ensure that all custodial and maintenance personal are properly trained in asbestos hazards.

Notify workers, building occupants and parents of students of AHERA activities.

Notify outside contractors of asbestos in the buildings that where any work may be done.

Post Asbestos warning labels in routine maintenance areas.

Notify building occupants that inspection reports and management plans are available for inspection.

Designate a person to ensure AHERA requirements are implemented and provide for adequate training to that person.

## 6.0 MASSACHUSETTS ASBESTOS REGULATIONS

Stringent laws govern asbestos abatement activities in the state of Massachusetts. The laws include the following:

Massachusetts State Law (453 CMR 6.00) requires certification of all persons involved in asbestos abatement activities.

Any employee whose work may require the disturbance of ACM (i.e. plumbers, maintenance workers, etc.) should receive proper training in asbestos work techniques. Massachusetts State Law requires two-day mandatory training for affected individuals.

## 7.0 CURRENT FINDINGS

During the required 3-year reinspection by this Office, the inspector visually examined all accessible areas of the school. Complete inspection found that asbestos-containing materials are located in the following areas.

Any materials not specifically excluded for wall and ceiling plasters, roofing materials, floor coverings, ceiling tiles, window caulking and glazing, HVAC system insulation, fire doors, and materials concealed beneath other building materials are assumed to containing asbestos in all buildings.

### 7.1 Corey Building

Material: Approximately 1550 square feet 12" x 12" floor tile  
Condition: Good EPA Code #5

Location: Hallway outside of gym

Material: Approximately 1550 square feet of associated mastic for 12” x 12” floor tile

Condition: Good EPA Code #5

Location: Hallway outside of gym

## 7.2 Robbins Building

Material: Approximately 95 windows with caulk

Condition: Good EPA Code #5

Location: Exterior of building

## 8.0 CHANGES IN MATERIALS SINCE INITIAL INSPECTION

There have been significant changes in the materials condition since originally inspected. The LEA must assure that all areas noted in CURRENT FINDINGS be addressed per the recommended EPA Code noted for each location.

## 9.0 RECOMMENDED RESPONSES

After having conducted the three-year reinspection at Carlisle Public Schools, Enviro-Safe Engineering has the following recommendations for on-going asbestos management in the school.

### 9.1 Training

In the event that the LEA's Designated Person changes, or new maintenance personnel are hired, the LEA must have 2-hour Asbestos Awareness Training provided for these individuals.

### 9.2 Recordkeeping

Continue to update files pertaining to:

Training/Licensing of school personnel.

Notifications.

Response Actions.

Reinspection.

### **Records were present and organized**

### 9.3 Labeling

All friable asbestos containing materials must be maintained with identifying labels.

The labels, displayed below, can help to prevent the entry of untrained and unprotected personnel into areas which may have been contaminated and can help to protect the material

Example: CAUTION  
ASBESTOS. HAZARDOUS.  
DO NOT DISTURB  
WITHOUT PROPER  
TRAINING AND EQUIPMENT

**No areas which required labels were identified at the time of the inspection.**

#### 9.4 Cleaning

In the case that friable materials become damaged, the materials should be repaired, and debris cleaned by qualified, trained personnel with proper cleaning equipment and protective clothing.

**No areas were identified that require cleaning at the time of the inspection.**

#### 9.5 Notification

The LEA must ensure that all workers and building occupants, or their legal guardians are notified at least once each school year about inspections, response actions, and post-response action activities. Additionally, the same parties must be notified that the school's management plan is on file in the school and available for review.

#### 9.6 Reinspection and Periodic Surveillance

At least every six months the LEA shall conduct periodic surveillance of each building that it uses as a school building that contains or is assumed to contain ACBM. Each person performing periodic surveillance shall:

Visually inspect all areas that are identified in the management plan as ACBM or assumed ACBM.

Record the date of surveillance, his or her name and any changes in the condition of the material.

Submit a copy of such record to the Designated Person for inclusion in the Management Plan.

At least every three years the LEA shall have an accredited inspector conduct a reinspection of all friable and nonfriable known or assumed ACBM in each in building that they use as a school building.



## 9.7 Worker Protection

The LEA shall ensure that all maintenance and custodial employees are properly trained and participate in medical monitoring programs as required by all applicable regulations, including OSHA, EPA and MA DLS asbestos regulations if the worker disturbs ACBM.

## 9.8 Recommended Response Actions - General

Where damage may occur to asbestos-containing floor tile, (VAT), in the future, three observations should be made to determine the proper response action:

- The extent of damage.
- The integrity of the tile or tiles.
- The potential for further damage.

In cases where only minor damage has occurred, such as cracking or chipping of the tile, minimal action is required. If the tile or tiles are still adhered to the underlayment, tile chips should be removed, and remaining tile encapsulated. Maintaining a sufficient coating of wax over the tile will diminish the risk of a fiber release from the damaged edges. In the event that the tile or tiles become loose or dislodged, it is necessary to replace the damaged material with a non-asbestos containing floor tile. When dealing with a large homogenous area of tile, where more than 10% of the tiles are significantly damaged, removal of the entire area should be considered. When assessing the potential for further damage, the following items should be considered:

The amount of tile.

Traffic volumes.

The locations of tile, such as hallway intersections, abutting doorway entrances, or areas where damaged tiles are a chronic problem.

In areas where tiles are missing, non-asbestos containing tile should be installed. This will help minimize further damage to the surrounding tile.

A qualified consultant should be retained to assist in the determination and project design.

## 9.9 Recommended Response Actions - Specific

Throughout the school – continue periodic surveillance.

TIME FRAME:

Periodic surveillance must occur every six months.

## RESOURCES

Periodic surveillance may be conducted by school staff or an AHERA certified consultant. Approximate cost is \$500 every six months.