

# AHERA ASBESTOS MANAGEMENT PLAN

August 31st, 2025

Harbor Lights Middle School  
390 9th St SW,  
Bandon, OR 97411  
Coos County

Job No. 2515

Prepared For:

Bandon School District #54  
C/O Brent Robertson, Executive Director of Operations  
455 9th St. SW  
Bandon, OR 97411  
Phone: (509) 760-8639  
E-mail: [brobertson@bandon.k12.or.us](mailto:brobertson@bandon.k12.or.us)

Prepared By:

Spear Environmental  
Matthew C. Spear, Asbestos Inspector & Management Planner  
10480 SW Eastridge St. #2  
Portland, OR 97225  
Cell: (503) 944-9818  
E-mail: [matthewspear@speardraftingdesign.com](mailto:matthewspear@speardraftingdesign.com)



*ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS*

**SPEAR**  
**ENVIRONMENTAL**



*LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING*



## TABLE OF CONTENTS

### **PART I INTRODUCTION**

1.1	DISCLAIMER.....	1-2
1.2	BACKGROUND.....	2-3
1.3	CONTACT INFORMATION.....	3-4
1.3.1	LOCAL EDUCATION AGENCY (LEA) INFORMATION.....	3
1.3.2	LEA DESIGNATED PERSON INFORMATION.....	3
1.3.3	MANAGEMENT PLANNER INFORMATION.....	4
1.4	SCHOOL BUILDING LIST.....	4
1.5	DESIGNATED PERSON ASSURANCES.....	4-5
1.6	EVALUATION OF RESOURCES.....	6

### **PART II INSPECTION/RE-INSPECTION/PERIODIC SURVEILLANCE**

2.1	INITIAL INSPECTION.....	7
2.2	3-YEAR RE-INSPECTIONS.....	7
2.3	6-MONTH PERIODIC SURVEILLANCES.....	7

### **PART III RESPONSE ACTIONS**

3.1	SELECTING A RESPONSE ACTION OR OTHER ACTION.....	8-10
3.2	COMPLETION OF RESPONSE ACTIONS.....	11



## **PART IV OPERATIONS AND MAINTENANCE**

4.1	PLAN FOR OPERATIONS AND MAINTENANCE (O&M).....	12
4.2	CLEANING PROCEDURES.....	13-14
4.3	HOUSEKEEPING PREVENTATIVE MEASURES.....	14
4.4	OTHER PREVENTATIVE MEASURES.....	14-15
4.5	MAINTENANCE ACTIVITIES.....	15
4.6	FIBER-RELEASE EPISODES.....	15-16
4.7	TRANSPORT & DISPOSAL OF ASBESTOS WASTE.....	16
4.8	RECORDKEEPING.....	16-17

## **PART V PLAN TO INFORM - NOTIFICATIONS**

5.1	ANNUAL NOTIFICATION.....	17
5.2	OCCUPANTS.....	17
5.3	SHORT-TERM WORKERS AND CONTRACTORS.....	17-18

## **PART VI GLOSSARY**

6.1	DEFINITIONS.....	19-23
6.2	ACRONYMS.....	23-24

## **APPENDICES**

### **CURRENT ASBESTOS INSPECTION INFORMATION**

- A BUILDING FLOOR PLAN(S)**
- B AHERA 3-YEAR RE-INSPECTION(S)**
- C MANAGEMENT PLANNER GENERAL RECOMMENDATIONS**
- D 6-MONTH PERIODIC SURVEILLANCE FORM(S)**



## TRAINING INFORMATION

- E MANAGEMENT PLANNER TRAINING RECORDS
- F DESIGNATED PERSON TRAINING RECORDS
- G EMPLOYEE TRAINING RECORDS

## FORMS

- H BLANK PREVENTATIVE MEASURES AND RESPONSE ACTION  
ACTIVITIES FORM
- I COMPLETED PREVENTATIVE MEASURES AND RESPONSE ACTION  
ACTIVITIES FORM
- J BLANK MAJOR/MINOR FIBER RELEASE FORM
- K COMPLETED MAJOR/MINOR FIBER RELEASE FORMS
- L BLANK O&M FORMS
- M COMPLETED O&M FORMS
- N BLANK CERTIFICATE OF WORKERS ACKNOWLEDGEMENT FORM
- O COMPLETED CERTIFICATE OF WORKERS ACKNOWLEDGEMENT  
FORMS

## MISCELLANEOUS INFORMATION

- P ANNUAL NOTIFICATIONS



## PART I INTRODUCTION

### 1.1 DISCLAIMER

In drafting this Asbestos Management Plan, the Management Planner has attempted to inspect all areas of any building or structure where Asbestos might be located. In conducting each inspection, the Management Planner has relied on information provided by employees and/or agents of the school district. The Management Planner, therefore, disclaims any responsibility for failing to mention in the Management Plan any area or areas that remain unknown to the Management Planner for any of the following reasons:

1. Inaccessible areas such as structural voids, pipe chase, and/or tunnel accesses which are nailed shut, covered over, or located under or behind heavy equipment (i.e., shop equipment, cabinets, etc.).
2. Sub-flooring or other materials located under the existing floor covering, including adhesives and mastics.
3. Any thermal system insulation that may be hidden under the outer pipe wrap.
4. Exterior materials, structural materials, and building materials not covered under AHERA, which may be regulated by the National Emission Standards for Hazardous Air Pollutants (NESHAP) in the event of renovation or demolition.
5. Areas behind walls resulting from remodeling or renovation.
6. Entire length of tunnel or crawl space due to significant contamination, presence of water, or insufficient headspace.
7. Any material above the ceiling not visually inspected due to the ceiling construction, such as interlocking metal squares or panels.
8. Miscellaneous materials which may be present within the school, such as a boiler gaskets and fittings, interior components of ductwork and/or plenum work, kitchen exhaust hoods, etc.

The above list is not intended to be conclusive but is representative of instances where the detection of possible areas of asbestos contamination is outside the control of the Management Planner and could not be detected through standard inspection practices.



**AHERA management plans apply only to certain assessable areas of the school buildings, including interior areas, tunnels, crawlspaces, porticos, covered exterior hallways or walkways, and any portion of a mechanical system used to condition interior spaces. Most building materials located on exterior portions of the building and inaccessible interior areas of the building are not covered by this management plan; therefore, this Management Plan does not meet the requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP), This requires a thorough asbestos inspection before any renovation or demolition activity, including selective demolition. Please contact Spear Environmental before starting any renovation or demolition activity so that a thorough asbestos inspection can be carried out.**

Third-party use of this Management Plan shall be at their own risk. Spear Environmental places no restrictions on the reproductions of this Management Plan, other than reproductions must be of the entire document to avoid disseminating out-of-context information. Spear Environmental does not warrant or guarantee its product and/or professional opinion. Spear Environmental does not assume liability for using any information, methods, or materials contained herein, or for damages arising from such use. Spear Environmental does not assume responsibility for any injury to individuals or property or any financial loss sustained because of the use or application of this Management Plan.

## **1.2 BACKGROUND**

The Clean Air Act of 1977 required the United States Environmental Protection Agency (USEPA) to develop standards to address the potential health aspects associated with the adverse effects of asbestos exposure as an indoor contaminant. In October 1986, the USEPA promulgated the Asbestos Hazard Emergency Response Act (AHERA), which was signed into law by President Reagan.

The AHERA regulations require that all local education agencies conduct inspections of each school building that they lease, own, or otherwise use as a school building to identify all locations of friable and non-friable asbestos-containing building materials (ACBM). The original inspections must have been completed before October 12, 1988.

Any building leased or acquired on or after October 12, 1988, to be used as a school building shall be inspected for friable and non-friable ACBM before 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 the commencement of such use.



AHERA requirements are very comprehensive in scope. Schools are required to appoint a designated person who is trained to oversee asbestos activities within the school district and ensure compliance with this new rule. These rules require that only accredited personnel be used by the schools to conduct inspections and develop management plans, design and carry out response action, and conduct surveillance of school buildings at six-month intervals; provide proper training and awareness for custodians, maintenance staff, and short-term workers; provide annual notifications to building occupants and parents; and maintain records. An annual update of the plan is also required.

This document is the Management Plan for this school building and provides the information, recommendations, and responses required under the law. It was the authors' intent who developed this plan, to present a useful and meaningful text for the readers and users of the plan. A glossary of terms and acronyms that appear in the text of this plan is, therefore, provided to the reader. An index to the Management Plan is provided, also provided. For further information regarding this Management Plan, contact your Local Educational Agency (LEA) Designated Person.

### **1.3 CONTACT INFORMATION**

#### 1.3.1 – Local Education Agency (LEA) and School Information

Local Education Agency: Bandon School District  
Address: 455 9th St. SW, Bandon, OR 97411  
Telephone Number: (541) 347-4411

School: Harbor Lights Middle School  
Address: 390 9th St. SW, Bandon, OR 97411  
Telephone Number: (541) 347-4411

#### 1.3.2 – LEA Designated Person Information

Name of Designated Person: Brent Robertson  
Address: 455 9th St. SW, Bandon, OR 97411  
Telephone Number: (509) 760-8639  
Course Name:  
Training Agency:  
Date:  
Hours of Training:



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

### 1.3.3 – Management Planner Information

Name: Matthew C. Spear  
Firm: Spear Environmental  
Address: 10480 SW Eastridge St. #2 Portland, OR 97225  
Telephone Number: (503) 944-9818  
State of Accreditation: Oregon  
Accreditation Number: MPR-25-0717C

**By signing below, I confirm that I am fully accredited by the State of Oregon and the United States Environmental Protection Agency (USEPA) under 40 CFR Part 763 Subpart E to carry out the functions of an AHERA management planner.**

Signature:   
Date: 8/31/25

### **1.4 SCHOOL BUILDING LIST**

Name of Building: Harbor Lights Middle School – Main Building  
Construction Type: Original Construction w/ Remodels  
Address: 390 9th St. SW, Bandon, OR 97411  
Construction Date: 1974 (Original Construction); 2017 (Seismic Retrofit)  
ACBM Status: **The building has friable and nonfriable ACBM confirmed to be ACM.**

Name of Building: Harbor Lights Middle School – Gym Building  
Construction Type: Original Construction w/ Remodels  
Address: 390 9th St. SW, Bandon, OR 97411  
Construction Date: 1956 (Original Construction); 2017 (Seismic Retrofit)  
ACBM Status: **The building has friable and nonfriable ACBM confirmed to be ACM.**

### **1.5 DESIGNATED PERSON ASSURANCES**

In accordance with 40 CFR ' 763.93(i) of the Environmental Protection Agency Asbestos-Containing Material in Schools regulation, the undersigned Local Education Agency (LEA) Designated Person (DP) hereby certifies that the following general Responsibilities of the LEA under 40 CFR ' 763.84 have been or will be met:

1. Ensure that the activities of any person who performs inspections, re-inspections, and periodic surveillance, develops and updates management plans, and develops and implements response actions, including operations and maintenance, are carried out per Part 763, Subpart E.



2. Ensure that all custodial and maintenance employees are properly trained as required by Part 763, Subpart E, and other applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration asbestos standard for construction, the EPA worker protection rule, or applicable State regulations).
3. Ensure that workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress.
4. Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may encounter asbestos in a school are provided with information regarding the locations for Asbestos-Containing Building Materials (ACM) and suspected ACM assumed to be Asbestos-Containing Materials (ACM).
5. Ensure that warning labels are posted per ' 40 CFR 763.95.
6. Ensure that management plans are available for inspection and notification of such availability has been provided as specified in the management plan under ' 40 CFR 763.93(g).
7. Designate a person to ensure that requirements under ' 763.84 are properly implemented and ensure that the designated person receives adequate training to perform duties assigned under ' 763.84. Such training shall provide, as necessary, basic knowledge of the health effects of asbestos; detection, identification, and assessment of ACM; options for controlling ACBM; asbestos management programs; relevant Federal and State regulations concerning asbestos, including those in Part 763, Subpart E, and those of the Occupational Safety and Health Administration, U.S. Department of Transportation, and the U.S. Environmental Protection Agency.
8. Consider whether any conflict of interest may arise from the inter-relationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under Part 763, Subpart E.

Name of Designated Person:

Signature:

Date:



## **1.6 EVALUATION OF RESOURCES**

The following resources are necessary for the school district to comply with the requirements under AHERA:

- A person or persons to conduct periodic surveillance activities
- Two-hour awareness training for all maintenance and custodial employees
- An additional 14-hour training and medical clearances for employees will be involved in the implementation of operations and maintenance activities, and will respond to minor fiber release episodes
- Accredited asbestos inspector/management planner
- Accredited asbestos project designer if removal, encapsulation, or enclosure of ACBM is necessary
- Accredited abatement contractor and abatement workers if removal, repair, encapsulation, enclosure, and operations and maintenance activities (not conducted by school personnel) of ACBM are necessary
- Operations & Maintenance Budget
- Personal Protection Budget
- Costs associated with future re-inspections



## **PART II INSPECTION/REINSPECTION/PERIODIC SURVEILLANCE**

### **2.1 INITIAL INSPECTION**

Spear Environmental has reviewed the existing management plan and initial inspection as provided by the Bandon School District. These files are now considered archived and are incorporated within the August 2025 management plan update by Spear Environmental.

### **2.2 3-YEAR RE-INSPECTIONS**

AHERA requires that at least once every three years, after a management plan has been in effect, a re-inspection must be made by an accredited inspector of all friable and non-friable known or assumed ACBM in each school building that the LEA leases, owns, or otherwise uses as a school building (40 CFR ' 763.85(b)(1)-(2)).

- **The next 3-year re-inspection must be completed no later than August 2028**

### **2.3 6-MONTH PERIODIC SURVEILLANCE**

At least once every six (6) months after a management plan is in place, the LEA shall conduct periodic surveillance in the school that contains ACBM or is assumed to contain ACM. The person conducting periodic surveillance shall visually inspect all areas in the school that have been identified in the management plan as having ACBM, record the date of surveillance, his/her name, and any changes in the condition of the materials, and submit the record to the LEA Designated Person for inclusion in the management plan. The periodic surveillances will be conducted under the following schedule:

- **1<sup>st</sup> periodic surveillance due February 2026**
- **2<sup>nd</sup> periodic surveillance due August 2026**
- **3<sup>rd</sup> periodic surveillance due February 2027**
- **4<sup>th</sup> periodic surveillance due August 2027**
- **5<sup>th</sup> periodic surveillance due February 2028**



## PART III RESPONSE ACTIONS

### 3.1 SELECTING A RESPONSE ACTION OR OTHER ACTION

AHERA requires that an accredited management planner recommend an appropriate response action for all areas of thermal system insulation (TSI) and friable ACBM remaining in the school. The final decision, on which action should be taken, however, rests with the LEA.

AHERA identifies five possible response actions for managing asbestos in schools, as listed below. Activities that create a high probability that ACBM will be damaged or weakened to such an extent that it would be rendered friable are also considered response actions. Small-scale, short-duration activities are not considered response actions.

- **Operations and Maintenance (O&M) Program** - This is a program of work practices designed to maintain friable ACBM in good condition and ensure the cleanup of asbestos fibers previously released. An effective O&M program can prevent further release by minimizing and controlling friable ACBM disturbance or damage. An O&M program is not appropriate as an initial response action for any damaged or significantly damaged material.
- **Repair** - This involves returning the damaged ACBM to an undamaged condition or to an intact state by replacing limited sections or patching damaged areas.
- **Encapsulation** - This involves the treatment of ACBM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers. The encapsulant either creates a membrane over the surface (Bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant). Both types of encapsulants are applied to the material surface using airless spray equipment at low pressure to reduce the release of fibers during the application.
- **Enclosure** - This involves creating an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air. The barrier is typically attached physically or sprayed on. For example, materials such as PVC or corrugated metal may be fastened around insulated piping, or a barrier may be constructed around asbestos fireproofing on structural members by spraying material that cures into a hard shell.
- **Removal** - This involves the taking out or the stripping of substantially all ACBM from a damaged area, a functional space, or a homogeneous area in a school building.



Under AHERA, the response action to be taken must be "sufficient to protect human health and the environment." Once it is determined which response actions meet these criteria, the LEA may choose the action that is the "least burdensome." ACBM is reassessed and recommended response actions, reviewed every three years as part of the re-inspection process.

The LEA is required to implement an O&M program whenever any friable ACBM is present or assumed to be present in a building.

Response actions, other than small-scale, short-duration repairs, must be designed and conducted by an accredited Asbestos Hazard Abatement Project Designer.

To determine if a response action is required and, if so, what response actions are available to the School District to address damaged ACBM or the prevention of damage to friable ACBM in the school buildings, the following Hazard Assessment Table will be used:

<b>AHERA HAZARD RANKING</b>	<b>ACM CONDITION</b>	<b>DISTURBANCE POTENTIAL</b>
1	Good	Low
2	Good	Moderate
3	Good	High
4	Fair	Low
5	Fair	Moderate
6	Fair	High
7	Poor	Any

Once a Hazard Rank has been assessed and selected for suspect friable/non-friable ACBM, the following response actions must be implemented.



HAZARD RANK	AHERA CLASSIFICATION	DESCRIPTION	RESPONSE ACTION OPTIONS
6 or 7	1	Damaged or significantly damaged thermal system insulation (TSI) ACBM	<ul style="list-style-type: none"> <li>• Repair the damaged area</li> <li>• Remove the damaged material if it is not feasible, due to technological factors, to repair the damage</li> <li>• Maintain all thermal system insulation ACM and its covering in an intact state and undamaged condition</li> </ul>
4, 5, or 6	2	Damaged friable surfacing ACBM	<ul style="list-style-type: none"> <li>• Encapsulate</li> <li>• Enclose</li> <li>• Remove</li> <li>• Repair</li> </ul>
6 or 7	3	Significantly damaged friable surfacing ACBM	<ul style="list-style-type: none"> <li>• Immediately isolate the functional space and restrict access, unless isolation is not necessary to protect human health and the environment</li> <li>• Remove the material in the functional space or, depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclose or encapsulate.</li> </ul>
4, 5, 6, or 7	4	Damaged or significantly damaged friable miscellaneous ACBM	<ul style="list-style-type: none"> <li>• Immediately isolate the functional space and restrict access, unless isolation is not necessary to protect human health and the environment</li> <li>• Remove the material in the functional space or, depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclose or encapsulate.</li> </ul>
2	5	ACBM with a potential for damage	<ul style="list-style-type: none"> <li>• At least implement an Operations and Maintenance (O&amp;M) program</li> </ul>
3	6	ACBM with the potential for significant damage	<ul style="list-style-type: none"> <li>• Implement an O&amp;M program</li> <li>• Institute preventative measures appropriate to eliminate the reasonable likelihood that the ACBM or its covering will become significantly damaged, deteriorated, or delaminated</li> <li>• Remove or enclose the material as soon as possible if appropriate preventative measures cannot be effectively implemented</li> <li>• Consider isolating the area and restricting access to the ACBM if necessary to avoid imminent and substantial endangerment to human health or the environment</li> </ul>
1	7	Any remaining friable ACBM or friable suspected ACBM	<ul style="list-style-type: none"> <li>• Should at least implement an Operations and Maintenance (O&amp;M) program</li> </ul>



### **3.2 COMPLETION OF RESPONSE ACTIONS**

Upon the conclusion of any response action, an accredited person designated by the school district will perform final clearance activities within each functional space where the response action was completed, to determine whether the action has been properly completed. Final clearance activities include both a visual inspection and final air sampling and analysis.

- **Visual Inspection** - A visual inspection involves visually examining the asbestos removal area for evidence that the abatement has been completed, including thorough clean-up. The inspection should be conducted as rigorously as possible, with all spaces and surfaces where the abatement was conducted being extensively examined for residual ACBM debris.

The presence of any visible residue on surfaces within the abatement area indicates a need for additional cleaning of the surfaces. Only after visual inspection clearance has been completed may final air sampling be done. The results of the visual inspection shall be documented and signed by the person conducting the visual inspection. If an area passes visual inspection but then fails to meet air sampling and analysis requirements after that inspection, the site must be re-cleaned, and an additional visual inspection must be conducted to detect any material that may have been uncovered or released during re-cleaning.

- **Final Air Sampling and Analysis** - Section 763.90 of the AHERA Rule requires that the LEA accomplishes final air sampling and analysis of all removal, encapsulation, or enclosure projects by using the transmission electron microscopy (TEM) method unless the project involves no more than 160 square feet or 260 linear feet of ACBM, in which case phase contrast microscopy (PCM) may be used. Note that no final air clearance is required for small-scale, short-duration O&M projects.

Sampling operations for airborne asbestos following an asbestos abatement action must be performed by qualified individuals completely independent of the abatement contractor to avoid possible conflict of interest. EPA recommends that The LEA obtained professional assistance to perform the sampling and analysis.

Response Action documentation is kept in an abatement project manual that is specific to the abatement activity. The list of response actions conducted in the building since the inception of AHERA is to be included in Appendix I of this Management Plan. Small-scale short-duration activities are also included on this list for completeness, even though they are not considered response actions.



## **PART IV OPERATIONS AND MAINTENANCE**

### **4.1 PLAN FOR OPERATIONS AND MAINTENANCE (O&M)**

All maintenance and custodial staff who work in buildings that contain ACM or assumed ACBM have received the required two-hour Awareness Training. In addition, maintenance and custodial staff whose duties may cause them to come into contact with asbestos-containing materials have received an additional 14 hours of training, as specified in Paragraph 763.92 (a) (2).

The School District has made its decision that its employees will only be involved with Small-scale, short-duration projects.

The School District ensures that the following procedures will be followed for any O&M Activities that disturb friable ACBM:

- Restrict entry into the area to people other than those necessary to perform the maintenance project, either by physically isolating the area or by scheduling.
- Post signs to prevent entry by unauthorized people.
- Shut off or temporarily modify the air-handling system and restrict other sources of air movement.
- Use work practices or other controls such as wet methods, protective clothing, HEPA vacuums, mini-enclosures, and glove bags as necessary to inhibit the spread of any released fibers.
- Clean all fixtures or other components in the immediate work area.
- Place the asbestos debris and other cleaning material in a sealed, leak-tight container.

The School District intends to comply with the provisions of Appendix A to Subpart E of 40 CFR Part 763 when performing small-scale, short-duration O&M activities. The School District also intends to comply with all applicable EPA, OSHA, and ODEQ regulations. The School District is responsible for implementing a medical surveillance program and a respiratory protection program. Additionally, the School District shall provide the proper personal protective equipment to each staff member performing small-scale, short-duration O&M activities.



## 4.2 CLEANING PROCEDURES

The initial cleaning is required at least once in all areas in a school building where friable ACM, damaged or significantly damaged thermal system insulation ACM, or friable assumed ACM is present, following inspection of the building and before the initiation of any response action, other than O&M activities or repair. Initial cleaning of these areas will be performed by maintenance and custodial staff who have received the Two-Hour Awareness Training.

The following practices are established for these cleaning activities:

- Avoid bumping pipes, walls, and other surfaces with brooms, mops, and vacuum cleaners, and other cleaning equipment.
- Do not use dry brooms, mops, dust cloths, or standard vacuum cleaners, which will simply re-suspend fibers.
- All dusting and mopping shall be conducted using wet cleaning techniques (mops or cloths dampened with water or a dust suppressant) or with vacuum cleaners equipped with HEPA filters:
- All curtains, books, upholstered furniture, carpets, and other irregular surfaces shall be cleaned with a HEPA vacuum cleaner.
- All non-carpeted floors shall be wet-mopped, and all other horizontal surfaces such as the tops of light fixtures and file cabinets, shall be wiped with damp cloths or HEPA-vacuumed.
- Spray bottles of water or a dust suppressant shall be used to keep the mops and cloths damp.
- Cleaning materials (mop heads, cloths, and HEPA filters) shall be washed after each cleaning. When these materials must be discarded as asbestos waste and placed in 6-mil plastic bags, the bags sealed and labeled: "DANGER – CONTAINS ASBESTOS FIBERS – AVOID CREATING DUST – CANCER AND LUNG DISEASE HAZARD," and the bags were deposited in a landfill approved by Ohio EPA to accept asbestos waste. Small quantities of waste could also be stored in labeled drums or other durable containers, in secured areas on-site, and a disposal company could then transport the waste to an appropriate landfill periodically.
- HEPA filters should be removed from vacuum cleaners with great care. Consult The manufacturer's instructions for filter removal. Workers should wear at least air-purifying respirators and shall mist the filters with water as they are removed.



- Ladders, mops, buckets, vacuum cleaners, and all cleaning equipment shall be washed or wiped with damp cloths when the cleaning is finished.
- Whenever filters change in the HVAC system of the building containing friable materials ACM, the filters must be misted with water or amended water as they are removed, placed in plastic bags, sealed, and discarded as asbestos waste. Workers should wear at least an air-purifying respirator.

#### **4.3 HOUSEKEEPING PREVENTATIVE MEASURES**

- **Vacuuming** - Where vacuuming methods are selected, HEPA-filtered vacuuming equipment must be used and emptied in a manner that minimizes the reentry of asbestos into the workplace.
- **Waste Disposal** - Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal shall be collected and disposed of in sealed, labeled, and impermeable bags or other closed, labeled, impermeable containers.
- **Care of Asbestos-Containing Flooring Material** - All vinyl and asphalt flooring material shall be maintained under the following work practices unless it is demonstrated that the material does not contain asbestos:
  - Sanding of flooring material is prohibited.
  - Stripping of finishes shall be conducted using low-abrasion pads at a speed lower than 300 rpm and wet methods.
  - Burnishing or dry buffing may be used only on flooring that has sufficient finish so that the pad cannot contact the flooring material.
- **Dust and debris in an area containing accessible thermal system insulation or surfacing material, or visibly deteriorated ACM:**
  - Shall not be dusted, swept dry, or vacuumed without using a HEPA filter.
  - Shall be promptly cleaned up and disposed of in leak-tight containers.

#### **4.4 OTHER PREVENTATIVE MEASURES**

Employees shall be informed of the following activities that are prohibited when asbestos-containing materials are involved:

- Not to drill holes in asbestos-containing materials.



- Not to hang plants or pictures on structures covered with asbestos-containing materials.
- Not to sand asbestos-containing floor tile.
- Do not damage asbestos-containing materials such as pipe wrap while moving furniture or other objects.
- Not to install curtains, drapes, or dividers in such a way that they damage asbestos-containing materials.
- Not to dust floors, ceilings, moldings, or other surfaces in asbestos-contaminated environments with a dry brush or sweep with a dry broom.
- Do not use an ordinary vacuum cleaner to clean up asbestos-containing debris.
- Not to remove ceiling tiles below asbestos-containing materials without wearing the proper respiratory protection, clearing the area of other people, and observing asbestos removal waste disposal procedures.
- Do not remove ventilation system filters dry.
- Do not shake ventilation system filters.

#### **4.5 MAINTENANCE ACTIVITIES**

- Small-scale, Short Duration activities (projects involving 3 square feet or less or 3 linear feet or less), as defined in Appendix B to Subpart E of 40 CFR Part 763<sub>s</sub>, will be performed only by those maintenance and custodial staff who have received sixteen hours of training. The work practice procedure described above will be followed as indicated before; these projects will be limited in scope, dealing primarily with minor repairs of materials that do not require removal.
- Large projects (projects requiring more than three square feet or three linear feet) will be conducted by outside contractors (utilizing fully trained and accredited workers, project designers, and contractor supervisors). Air clearance and site inspection by the LEA will be made following these projects to determine if the action has been properly completed.

#### **4.6 FIBER-RELEASE EPISODES**

Custodial and maintenance workers must report to the LEA Designated Person the presence of asbestos debris on the floor, water, or physical damage to the ACM, or any other evidence of possible fiber release. Note that fiber-release episodes can also occur during maintenance or renovation projects.



Each fiber release episode must be documented and included in the updated management plan.

• **Minor Episodes (involving the falling or dislodging of 3 square or linear feet or less of friable ACBM)** - Only maintenance and custodial staff who have received the Sixteen hours of training will be utilized using standard wet cleaning and HEPA vacuuming techniques described above; this personnel will follow the Small-scale, Short-duration guidelines are outlined in Appendix B to Subpart E of 40 CFR Part 763.

• **Major Episodes (involving the falling or dislodging of more than 3 square or linear feet of friable ACM)** - If more than 3 square feet of surfacing ACM or more than 3 linear feet of thermal system, ACM delaminates or dislodges from its substrate, the episode must be considered major. A large breach in the containment barrier for a maintenance or abatement project should also be considered a major episode. Should major fiber release episodes occur, the following procedures shall be immediately implemented:

- Restrict entry into the area and post signs to prevent entry into the area by people other than those necessary to perform the response action
- Shut off, or temporarily modify, the air-handling system to prevent the distribution of fibers to other areas in the building
- The response action for any major fiber release episode must be designed by people accredited to design response actions and conducted by people accredited to conduct response actions
- Only accredited project designers and contractors will be utilized in the event of a major fiber release episode. Air clearance and site inspection by the LEA will be made to determine if the action has been properly completed.

#### **4.7 TRANSPORT & DISPOSAL OF ASBESTOS WASTE**

The School District intends to comply with the provisions of Appendix D to Subpart E of 40 CFR Part 763 regarding the transport and disposal of asbestos waste. A chain-of-custody recordkeeping procedure will be utilized to ensure proper containerization, transport, and disposal of asbestos waste.

#### **4.8 RECORDKEEPING**

Section 763.84 of CFR Part 763 required that all schools ensure that (1) inspections, re-inspections, periodic surveillance, and response action activities are properly carried out; (2) custodial and maintenance employees are properly trained; (3) workers and building occupants are informed each year about inspections, response action activities, including re-inspection and periodic surveillance.



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

(4) short-term workers (e.g., telephone repair workers, and pest control operators) who may encounter asbestos in a school are provided information about locations of asbestos-containing building material; (5) warning labels are posted as required; and (6) management plans are available for review, and that parent, teacher, and employee organizations are notified of the availability of the plan. Extensive records are required to be kept to support compliance with these regulations.

Under 40 CFR ' 763.94(h), for each major and minor fiber release episode occurring as a result of operations and maintenance activities under 40 CFR ' 763.91(f), the asbestos management plan must include a record of the following information: date and location of the episode, method of repair, preventive measure or response action is taken, and if ACBM is removed, the name and location of the storage and disposal site of the ACM.

The Preventive Measures and Response Action Activities form will be used to document the name, signature, and accreditation number of the persons performing major asbestos activities, copies of state accreditations, start and completion dates, the location where the activity occurred, description of preventative measures used, and name and location of the disposal site, if ACBM was removed.

Following a response to a fiber release episode, the Preventive Measures and Response Action Activities Report form will be completed and placed under Appendix I of this Management Plan.



## PART V PLAN TO INFORM - NOTIFICATIONS

### 5.1 ANNUAL NOTIFICATION

AHERA requires, at least once each school year, the LEA must notify parents, teachers, and employee organizations of the availability of the AMP and must include in the AMP a description of the steps taken to notify such organizations and a dated copy of the notification. In the absence of any such organizations for parents, teachers, or employees, the LEA must provide written notice to that relevant group of the availability of the AMP and must include in the AMP a description of the steps taken to notify such groups and a dated copy of the notification. Copies of these letters shall be kept in Appendix P.

### 5.2 OCCUPANTS

AHERA requires the LEA to take steps to inform workers and building occupants, or their legal guardians, about inspections, re-inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress. Under 40 CFR ' 763.84(c), the LEA must inform them about these activities at least once each school year.

As applicable with AHERA, OSHA, and other regulations, workers and building Occupants will also be notified about planned or ongoing inspections, periodic surveillance, response actions, and post-response action activities in the respective school buildings.

Warning labels are to be attached immediately adjacent to any friable and non-friable ACM and assumed ACM located in routine maintenance areas of each school building.

The labels shall be prominently displayed in a readily visible location and remain posted until the ACM is abated. The label will be in print of large print or bright color and read:

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

### 5.3 SHORT-TERM WORKERS AND CONTRACTORS

Contractors entering the school property and conducting work on the interior of the buildings will be required to review the Management Plan before starting work at the site to ensure that ACM will not be damaged during work activities. The contractor will be required to sign a "Certificate of Worker's Acknowledgement" form located in Appendix N acknowledges that they have reviewed the Management Plan and that there



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS



LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

activities will not disturb ACM in any of the buildings. Completed Certificate of Worker's Acknowledgement forms will be placed in Appendix O of this Management Plan. If ACM is required to be disturbed to fulfill the contractor's scope of work, the designated person should be notified before the start of work.



## PART VI GLOSSARY

### 6.1 DEFINITIONS

Unless otherwise noted with an asterisk (\*), the following definitions are contained in this The glossary can be found under 40 CFR ' 763.83:

**Act** means the Toxic Substances Control Act (TSCA), 15 U.S.C. 2601, et seq.

**Accessible** when referring to asbestos-containing material (ACM) means that the material is subject to disturbance by school building occupants or custodial or maintenance personnel during their normal activities.

**Accredited or accreditation**, when referring to a person or laboratory, means that such person or laboratory is accredited per section 206 of Title II of the Act.

**Air erosion** means the passage of air over friable asbestos-containing building material (ACBM) which may result in the release of asbestos fibers.

**Asbestos** means the asbestiform varieties of Chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite grunerite); anthophyllite; tremolite; and actinolite

**Asbestos-containing material (ACM)**, when referring to school buildings, means any material or product that contains more than 1 percent asbestos.

**Asbestos-containing building material (ACBM)** means surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on the interior structural members or other parts of a school building.

**Asbestos debris** means pieces of ACBM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

**Damaged friable miscellaneous ACM** means friable miscellaneous ACM that has deteriorated or sustained a physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, has delaminated such that its bond to the substrate (adhesion) is inadequate or for any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars, or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.



**Damaged friable surfacing ACM** means friable surfacing ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or which has delaminated such that its bond to the substrate (adhesion) is inadequate, or which, for any other reason, lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers. separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars, or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

**Damaged or significantly damaged thermal system insulation ACM** means thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal systems insulation equipment where the insulation has lost its structural integrity or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges, or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets, or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage.

**Designated Person** means a person appointed by the Local Education Agency (LEA), under 40 CFR ' 763.84 (g), who is trained to ensure the proper implementation of AHERA in school buildings. \*

**Encapsulation** means the treatment of ACBM with a material that surrounds or embeds its asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).

**Enclosure** means an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air.

**Fiber release episode** means any uncontrolled or unintentional disturbance of the ACBM resulting in visible emission.

**Friable**, when referring to material in a school building, means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously non-friable material after such previously non-friable material becomes damaged to the extent that when dry, it may be crumbled, pulverized, or reduced to powder by hand pressure.

**Functional space** means a room, group of rooms, or homogeneous area, including crawl spaces or the space between a dropped ceiling and the floor or roof deck above, such as classroom(s), a cafeteria, gymnasium, hallway(s), designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.



**High-efficiency particulate air (HEPA)** refers to a filtering system capable of trapping and retaining at least 99.97 percent of all monodispersed particles 0.3  $\mu\text{m}$  in diameter or larger.

**Homogeneous area** means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

**Local education agency (LEA)** means: (1) Any local educational agency as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 3381). (2) The owner of any nonpublic, nonprofit elementary or secondary school building. (3) The governing authority of any school operated under the defense dependent's education system provided for under the Defense Dependents' Education Act of 1978 (20 U.S.C. 921, et seq.).

**Miscellaneous ACM** means miscellaneous material that is ACM in a school building.

**Miscellaneous material** means interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.

**Non-friable** means material in a school building that, when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure.

**The operations and maintenance program** means a program of work practices to maintain friable ACM in good condition, ensure clean-up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACM disturbance or damage.

**Phase contrast microscopy (PCM)** refers to the procedure outlined in the NIOSH Method 7400 for the evaluation of fibers in air samples.\*

**Polarized light microscopy (PLM)** refers to the method outlined in 40 CFR ' 763, Appendix E to Subpart E, for the identification of asbestos in bulk samples.\*

**Potential damage** means circumstances in which: (1) Friable ACM is in an area regularly used by building occupants, including maintenance personnel, during their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

**Potential significant damage** means circumstances in which: (1) Friable ACM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable



likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. (3) The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration, or air erosion.

**Preventive measures** mean actions are taken to reduce the disturbance of the ACBM in Otherwise, eliminate the reasonable likelihood of the material becoming damaged or significantly damaged.

**Removal** means the taking out or the stripping of substantially all ACBM from a damaged area, functional space, or a homogeneous area in a school building.

**Repair** means returning the damaged ACBM to an undamaged condition or to an intact state to prevent fiber release.

**Response action** means a method, including removal, encapsulation, enclosure, repair, operations, and maintenance that protect human health and the environment from friable ACBM.

**Routine maintenance area** means an area, such as a boiler room or mechanical room, that is not normally frequented by students, and in which maintenance employees or contract workers regularly conduct maintenance activities.

**School** means any elementary or secondary school as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 2854).

**School building** means (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food. (2) Any gymnasium or other facility that is specially designed for athletic or recreational activities for an academic course in physical education. (3) Any other facility used for the instruction or housing of students or for the administration of educational or research programs. (4) Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described in this definition of "school building" under paragraphs (1), (2), or (3). (5) Any portico or covered exterior hallway or walkway. (6) Any exterior portion of a mechanical system used to condition interior space.

**Significantly damaged friable miscellaneous ACM** means damaged friable miscellaneous ACM where the damage is extensive and severe. Significantly damaged friable surfacing ACM means damaged friable surfacing ACM in a functional space where the damage is extensive and severe.



**State** means a State, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Northern Marianas, the Trust Territory of the Pacific Islands, and the Virgin Islands.

**Surfacing ACM** means surfacing material that is ACM. Surfacing material means the material in a school building that is sprayed on, troweled on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustic, fireproofing, or other purposes.

**Thermal system insulation (TSI)** means material in a school building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, water condensation, or other purposes.

**Thermal system insulation ACM** means thermal system insulation that is ACM.

**Transmission electron microscopy (TEM)** refers to the method outlined in 40 CFR 763, Appendix A to Subpart E, for the identification of asbestos in air samples.\*  
**Vibration** means the periodic motion of friable ACBM, which may result in the release of asbestos fibers.

## 6.2 ACRONYMS

**ACM** -Asbestos-containing material

**ACBM** -Asbestos-containing building material

**AHERA** -Asbestos Hazard Emergency Response Act

**DOT** -Department of Transportation

**DP** -AHERA Designated Person

**EPA** -U.S. Environmental Protection Agency

**HEPA** -High-efficiency particulate air

**LEA** -Local Education Agency

**NIOSH** -National Institute for Occupational Safety and Health

**NIST** -National Institute of Standards and Technology

**NVLAP** -National Voluntary Laboratory Accreditation Program

**O&M** -Operations and maintenance



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS



LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

**OSHA** -Occupational Safety and Health Administration

**PCM** -Phase contrast microscopy

**PLM** -Polarized light microscopy

**TEM** -Transmission electron microscopy

**TSI** -Thermal system insulation

**APPENDIX A**

**BUILDING FLOOR PLAN(S)**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**APPENDIX B**

**AHERA 3-YEAR RE-INSPECTION(S)**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR**  
**ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

## 1.0 EXECUTIVE SUMMARY

### AHERA 3-Year Re-inspection Report

August 31st, 2025

Subject Location(s):

Harbor Lights Middle School  
390 9th St. SW  
Bandon, OR 97411  
Coos County

Prepared For:

Bandon School District #54  
C/O Brent Robertson, Executive Director of Operations

Dear Mr. Brent Robertson, or to whom it may concern,

As required by the Asbestos Hazard Emergency Response Act (AHERA), Spear Environmental has completed the 3-year re-inspection of the Harbor Lights Middle School buildings located at 390 9th St. SW in Bandon, Oregon (school building). Spear Environmental Senior Project Manager and AHERA-accredited Asbestos inspector and management planner Matthew C. Spear conducted the AHERA asbestos reinspection of the school building on Friday, August 15th, 2025.

AHERA requires that local education agencies have an accredited Asbestos Inspector conduct a re-inspection at least once every 3 years after a management plan and an initial inspection have been established for each "School Building" that they lease, own, or otherwise use as a school building for asbestos-containing building material (ACBM). AHERA defines "School Building" as; (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food, (2) Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education, (3) Any other facility used for the instruction or housing of students or the administration of educational or research programs, (4) Any maintenance, storage, or utility facility, including the hallway, essential to the operation of any facility described in (1), (2), or (3) of this paragraph, (5) Any portico or covered exterior hallway or walkway, and (6) Any exterior portion of a mechanical system used to condition interior space.



During the inspection of the school buildings, Spear Environmental considered the following for the suspect ACBMs:

- Visual re-inspection and re-assessment of the condition of all friable known or assumed ACBM
- Visual inspection of material that was previously considered non-friable ACBM, and physically touching the material to determine whether it has become friable since the last inspection or re-inspection
- Identification of any homogeneous areas with material that has become friable since the last inspection or re-inspection
- Assessment of the condition of the newly friable materials in areas where samples are collected, and newly friable materials in areas that are assumed to be ACBM
- Re-assessment of the condition of the friable known or assumed ACBM previously identified

During the inspection, Spear Environmental routinely assessed friable and non-friable known or assumed ACBM within the building. Building floor plans are included in Appendix A of the AHERA Asbestos Management Plan. The findings of the re-inspection are detailed in the Material Summary of this re-inspection. This summary includes the type, description, location, estimated quantity, estimated cost, friability, current condition, the potential for damage, and recommended response actions, if any, for each friable and non-friable known or assumed ACBM within the building. The general recommendations of the management planner are provided in Appendix C of the AHERA Asbestos Management Plan.

The re-inspection process under the AHERA rules states that a school building must be reinspected by an accredited inspector at least every three years. Every six months, a periodic assessment is required for the identified materials under the three-year reinspection. See the recommended activity schedule below:

**Recommended Activity Schedule:**

8/31/2025 – Reinspection End Date

2/28/2026 – Periodic Surveillance

8/31/2026 – Periodic Surveillance

2/28/2027 – Periodic Surveillance

8/31/2027 – Periodic Surveillance

2/28/2028 – Periodic Surveillance

**8/31/2028 – Reinspection Due Date**



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

Please note that this asbestos inspection was conducted to meet the requirements of AHERA. This inspection does not meet the requirements of NESHAP; therefore, a thorough asbestos inspection is required before any renovation or demolition activity.

The inspection of ACMs was reasonably non-destructive. Therefore, materials located behind walls, above solid ceilings, or in other inaccessible areas may not have been identified, assessed, or quantified. If, during demolition or renovation, additional suspect materials are discovered, these materials should be documented and treated as asbestos-containing, unless tested otherwise.

All suspected asbestos materials that were not sampled or otherwise determined to be non-ACM are assumed to be asbestos-containing unless or until tested and shown otherwise. All activities involving these materials should be in strict compliance with the requirements stipulated in AHERA & NESHAP.

Respectfully submitted,  
Spear Environmental  
Matthew C. Spear,  
AHERA Inspector #: IR-24-0717C  
AHERA Management Planner #: MPR-25-0717C



## 2.0 MATERIAL SUMMARY

Known non-asbestos-containing building materials are listed below. These materials are generally homogeneous throughout the entire school building and are in areas accessible to the public. Additional materials may be discovered during future remodel activities and should be verified to conform to the list below. If not, the materials should be sampled to verify their material contents.

Material	Location
Middle School – Main Building & Gym Building	
Brown Wall Base w/ Mastic	Classroom / Library / Office Wall Base (Typical)
12" x 12" Ceiling Tile w/ Mastic	Ceiling Tile (Typical)
Gypsum Wallboard	Interior Wall Paneling (Typical)
Blue Wall Base w/ Mastic	Hallway Wall Base (Typical)
Middle School – Gym Building Only	
Blue Wall Base w/ Mastic	Classroom 3 & 4 Wall Base
12"x12" Tan Floor Tile w/ Mastic	Gym Entry & Classroom 1-6 Repair Area Flooring



Known asbestos-containing building materials are listed below in order of hazard priority. The priorities established by the Accredited Inspector are based on the assessments. Material may be listed more than once if its location varies and if the assessment criteria also dramatically change.

Priority	Material	Location	Category	Quantity	Removal Cost
1	12" x 12" White Floor Tile w/ Mastic	<b>(Main Building)</b> Flooring (Typ.)	Miscellaneous Nonfriable ACBM or Assumed ACBM	10,000+ SF	\$10-20/SF
2	9" x 9" Grey VAT w/ Mastic	<b>(Gym Building)</b> Room 1-6 & Gym Stage Flooring	Miscellaneous Nonfriable ACBM or Assumed ACBM	7,000+ SF	\$10-20/SF
3	Wall / Ceiling Texture	<b>(Main &amp; Gym Building)</b> Interior Wall Finish (Typ.)	#2 (Damaged Friable Surfacing ACBM)	18,000+ SF	\$10-20/SF
4	Tape & Joint Compound	<b>(Main Building)</b> Wall Base (Hallways & Office)	#4 (Damaged and Significantly Damaged Friable Miscellaneous ACBM)	18,000+ LF	\$10-20/SF

The quantities and removal costs provided in this report are estimates. While these estimates provide a usable depiction, actual amounts may vary. In addition, where small quantities are involved, a higher minimum cost may be charged by an asbestos abatement contractor.

All analytical results and sample logs have been included for review, both analytically confirmed asbestos-containing materials and analytically confirmed non-asbestos-containing materials. See the attached sample log for the details of the sampling survey.



### **Priority #1:**

Homogeneous area – 12” x 12” Tan Floor Tile w/ Mastic

Functional Space – **(Main Building)** Flooring (Typ.)

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 10,000+ SF (Estimated)

Description – Manufactured 12” by 12” floor tiles composed of a dense vinyl matrix that contains asbestos and are adhered to the substrate with a mastic that also contains asbestos.

Sample Results – 2% Chrysotile (Floor Tile); 2% Chrysotile (Mastic)

### **Assessment:**

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Moderate Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Damage)

Accessibility – High (Primary Floor Surface)

The vinyl floor tile and mastic contain asbestos. Drilling, grinding, sanding, etc., will create friability. At a minimum, establish an operations and maintenance program. If removed, use full isolation. Other methods may be acceptable; contact the local air pollution authority and worker protection division. Carpeting and reflooring are permitted if the existing material remains undisturbed. Polarized light microscopy (PLM) analysis is considered conclusive for this material.

### **Response:**

Maintain O&M program. Do not disturb without proper training. Remove or encapsulate if possible.



## **Priority #2:**

Homogeneous area – 9” x 9” Grey VAT w/ Mastic

Functional Space – (**Gym Building**) Room 1-6 & Gym Stage Flooring

Type – Miscellaneous

F/NF – Non-Friable

Quantity – 7,000+ SF (Estimated)

Description – Manufactured 9” by 9” floor tiles composed of a dense vinyl matrix that contains asbestos and are adhered to the substrate with a mastic that also contains asbestos.

Sample Results – 4% Chrysotile (Floor Tile); 2% Chrysotile (Mastic)

## **Assessment:**

AHERA Classification – Miscellaneous Non-friable ACBM or Assumed ACBM

Concern Category – Moderate Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Damage)

Accessibility – High (Primary Floor Surface)

The vinyl floor tile and mastic contain asbestos. Drilling, grinding, sanding, etc., will create friability. At a minimum, establish an operations and maintenance program. If removed, use full isolation. Other methods may be acceptable; contact the local air pollution authority and worker protection division. Carpeting and reflooring are permitted if the existing material remains undisturbed. Polarized light microscopy (PLM) analysis is considered conclusive for this material.

## **Response:**

Maintain O&M program. Do not disturb without proper training. Remove or encapsulate if possible.



### **Priority #3:**

Homogeneous area – Wall & Ceiling Texture

Functional Space – **(Main & Gym Building)** Interior Wall Finish (Typ.)

Type – Surfacing

F/NF – Friable

Quantity – 18,000+ SF **(Main & Gym Building)**

Description – A spray-on or paint-on wall treatment with a textured surface often created by tiny particles, which gives the wall sound-deadening properties and a consistent finish. Mixtures are available in fine, medium, and coarse grades.

Sample Results – 2% Chrysotile

### **Assessment:**

AHERA Classification – #2 (Damaged Friable Surfacing ACBM or Assumed ACBM)

Concern Category – Moderate Concern

Current Damage – Fair (< 10% Distributed; < 25% Localized Damage)

Accessibility – Moderate (Primary Wall Finish)

The wall texture contains 2% chrysotile asbestos. Direct contact will worsen friability. At a minimum, establish an operations and maintenance program. If removed, use full isolation. Other methods may be acceptable; contact the local air pollution authority and worker protection division. Polarized light microscopy (PLM) analysis is considered conclusive for this material.

### **Response:**

Maintain O&M program. Do not disturb without proper training. Encapsulate if possible.



#### **Priority #4:**

Homogeneous area – Gypsum Wallboard Tape & Joint Compound

Functional Space – **(Main Building)** Wall Base (Hallways & Office)

Type – Miscellaneous

F/NF – Friable

Quantity – 18,000+ LF (Estimated)

Description – Manufactured wallboard panel seams are covered with tape and joint compound, and nail or screw locations are covered with joint compound only.

Sample Results – Trace <1% Chrysotile

#### **Assessment:**

AHERA Classification – #4 (Damaged and Significantly Damaged Friable Miscellaneous ACM)

Concern Category – Moderate Concern

Current Damage – Good (< 1% Distributed; < 1% Localized Damage)

Accessibility – Moderate (Wall Panel Joint Compound)

It is very difficult to determine all possible varieties of gypsum wallboard and tape & Joint compound systems in each building because the material is obscured by paint and other finishes. An accredited inspector should take full-depth samples before repair, remodeling, demolition, or other activities that would impact any wallboard systems. If the sample tests are positive (asbestos-containing), remove them using current regulatory guidelines. An accredited project designer should determine an appropriate method before abatement to prevent friability. Polarized light microscopy (PLM) analysis is considered conclusive for this material. All trace sample results of this material should be verified through scanning or transmission electron microscopy (SEM or TEM).

#### **Response:**

Maintain O&M program. Do not disturb without proper training. Remove if possible.

Sample #	Material	Location	Description	LF/SF/EA
Note: All room descriptions to be verified.				
Main Building & Gym Building				
A001	Misc	Flooring (Typ.)	12"x12" White Floor Tile w/ Mastic	10,000+ SF
A002	Misc	Classroom / Library / Office Wall Base (Typ.)	Brown Wall Base w/ Mastic	14,000+ LF
A003	Misc	Ceiling (Typ.)	12"x12" Ceiling Tile w/ Mastic	15,000+ SF
A004	Misc	Interior Wall Paneling (Typ.)	Gypsum Wallboard w/ Tape & Joint Comp.	18,000+ SF
A005	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A006	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A007	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A008	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A009	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A010	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A011	Surfacing	Interior Wall Finish (Typ.)	Wall / Ceiling Texture	18,000+ SF
A012	Misc	Hallway Wall Base (Typ.)	Blue Wall Base w/ Mastic	2,000+ LF
Gym Building Only				
A013	Misc	Room 1-6 & Gym Stage Flooring	9"x9" Grey VAT w/ Mastic	7,000+ SF
A014	Misc	Classroom 3 & 4 Wall Base	Blue Wall Base w/ Mastic	2,000+ LF
A015	Misc	Gym Entry & Classroom 1-6 Repair Area Flooring	12"x12" Tan Floor Tile w/ Mastic	500+ SF



# Asbestos Bulk Analysis Report

7469 Whitepine Rd  
 North Chesterfield, VA 23237  
 Telephone: 800.347.4010

Report Number: 25-08-04152

Client: Spear Drafting & Design  
 10480 SW Eastridge St.  
 APT 2  
 Portland, OR 97225

Received Date: 08/20/2025  
 Analyzed Date: 08/22/2025  
 Reported Date: 08/26/2025

Project/Test Address: Harbor Lights Middle School; 390 Ninth St SW

Client Number:  
 202489

Fax Number:

## Laboratory Results

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
25-08-04152-001A	A001	Tile	Gray Vinyl; Homogeneous	2% Chrysotile	98% Non-Fibrous
				Total Asbestos: 2%	
25-08-04152-001B	A001	Mastic	Yellow/Black Adhesive; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
				Total Asbestos: 2%	
Unable to cleanly separate materials					
25-08-04152-002A	A002	Cove Base	Brown Vinyl; Homogeneous	NAD	100% Non-Fibrous
25-08-04152-002B	A002	Mastic	Brown Adhesive; Homogeneous	NAD	100% Non-Fibrous
25-08-04152-003A	A003	Ceiling Tile	Gray/White Fibrous; Inhomogeneous	NAD	55% Cellulose 35% Fibrous Glass 10% Non-Fibrous

# Environmental Hazards Services, L.L.C

Client Number: 202489

Report Number: 25-08-04152

Project/Test Address: Harbor Lights Middle School; 390 Ninth St  
SW

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
25-08-04152-003B	A003	Mastic	Yellow Brittle Adhesive; Homogeneous	NAD	3% Cellulose 97% Non-Fibrous
25-08-04152-004	A004		White Powdery; Brown Fibrous; Beige Chalky; Inhomogeneous	Trace <1% Chrysotile	15% Cellulose 2% Fibrous Glass 83% Non-Fibrous
Total Asbestos: Trace <1%					
Chrysotile present in joint compound material. This material alone contains <1% Chrysotile.					
25-08-04152-005	A005		White Textured; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					
25-08-04152-006	A006		White Textured; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					
25-08-04152-007	A007		Beige Chalky; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					
25-08-04152-008	A008		Beige Chalky; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					
25-08-04152-009	A009		Beige Textured; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					

# Environmental Hazards Services, L.L.C

Client Number: 202489  
 Project/Test Address: Harbor Lights Middle School; 390 Ninth St  
 SW

Report Number: 25-08-04152

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
25-08-04152-010	A010		White Textured; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					
25-08-04152-011	A011		White Textured; Beige Paint-Like; Inhomogeneous	2% Chrysotile	98% Non-Fibrous
Total Asbestos: 2%					
Chrysotile present throughout sample					
25-08-04152-012A	A012	Cove Base	Blue Vinyl; Homogeneous	NAD	100% Non-Fibrous
25-08-04152-012B	A012	Mastic	Brown Brittle Adhesive; Homogeneous	NAD	100% Non-Fibrous
25-08-04152-013A	A013	Tile	Gray Vinyl; Homogeneous	4% Chrysotile	96% Non-Fibrous
Total Asbestos: 4%					
25-08-04152-013B	A013	Mastic	Black Adhesive; Gray Granular; Inhomogeneous	2% Chrysotile	3% Cellulose 95% Non-Fibrous
Total Asbestos: 2%					
Unable to cleanly separate materials					
25-08-04152-014A	A014	Cove Base	Blue Vinyl; Homogeneous	NAD	100% Non-Fibrous
25-08-04152-014B	A014	Mastic	White Adhesive; Homogeneous	NAD	100% Non-Fibrous

# Environmental Hazards Services, L.L.C

Client Number: 202489  
Project/Test Address: Harbor Lights Middle School; 390 Ninth St  
SW

Report Number: 25-08-04152

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
25-08-04152-015A	A015	Tile	Tan Vinyl; Homogeneous	NAD	100% Non-Fibrous
25-08-04152-015B	A015	Mastic	Yellow Adhesive; Homogeneous	NAD	2% Cellulose 98% Non-Fibrous

QC Sample: 94-M12018-4  
QC Blank: SRM 1866 Fiberglass  
Reporting Limit: 1% Asbestos  
Method: EPA Method 600/R-93/116, EPA Method 600/M4-82-020  
Analyst: Kathy Fletcher

Reviewed By Authorized Signatory: Melissa Kanode  
Melissa Kanode  
QA/QC Clerk

These results are based on a comparative visual estimate. The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Each distinct component in an inhomogeneous sample was analyzed separately and reported as a composite. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. All information concerning sampling location, date, and time can be found on Chain-of-Custody. Environmental Hazards Services, L.L.C. does not perform any sample collection. . NVLAP #101882-0 VELAP 460172

Environmental Hazards Services, L.L.C. recommends reanalysis by point count (for more accurate quantification) or Transmission Electron Microscopy (TEM), (for enhanced detection capabilities) for materials regulated by EPA NESHAP (National Emission Standards for Hazardous Air Pollutants) and found to contain less than ten percent (<10%) asbestos by polarized light microscopy (PLM). Both services are available for an additional fee.

400 Point Count Analysis, where noted, performed per EPA Method 600/R-93/116 with a Reporting Limit of 0.25%.

LEGEND: NAD = no asbestos detected

# ENVIRONMENTAL HAZARDS SERVICES, LLC

## Asbestos Chain of Custody Form

Company Name <b>Spear Drafting &amp; Design</b>	Account #
Company Address <b>10480 SW Eastridge St. Apt. 2</b>	City/State/Zip <b>Portland, OR 97225</b>
Phone <b>503 - 944-9818</b>	Email <b>MatthewSpear@SpearDraftingDesign.com</b>
Project Name/Test Address <b>Harbor Lights Middle School; 390 Ninth St. SW</b>	
PO Number	Collected By <b>Matthew Spear</b>
Turn-Around Time <input checked="" type="radio"/> 5 Day <input type="radio"/> 3 Day <input type="radio"/> 2 Day <input type="radio"/> 1 Day <input type="radio"/> Same Day / Weekend - Must Call Ahead	

PLM New York Protocol     
  PLM New Jersey Protocol     
  PLM South Carolina Protocol

LAB NUMBER	Client Sample ID	Homogeneous Area	Positive Stop	Collection Date & Time	BULK				AIR				COMMENTS	
					PLM	Point Count 400	Point Count 1000	TEM Bulk	PCM	TEM AHERA	NIOSH 7402	Time In Total Minutes		Flow Rate In L/Min
1	A00 1	✓		8/15/25 9am	✓									
2	A00 2													
3	A00 3													
4	A00 4													
5	A00 5													
6	A00 6													
7	A00 7													
8	A00 8													
9	A00 9													
10	A010													
11	A011													
12	A012													
13	A013													
14	A014													
15	A015	▼		▼	▼	▼								

Released By: <b>Matthew Spear</b>	Date: <b>8/17/25</b>	Time: <b>12 pm</b>
Signature: <i>[Handwritten Signature]</i>		


LAB USE ONLY - BELOW THIS LINE

Received By: **D Bowen**  
 Signature: *[Handwritten Signature]*

Date: **8.20.25**    Time: **1240**     AM     PM

Portal Contact Added

25-08-04152



Due Date:  
**08/27/2025**  
 (Wednesday)  
 AE                      P  
**B PLM**

**APPENDIX C**

**MANAGEMENT PLANNER GENERAL RECOMMENDATIONS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**



## MANAGEMENT PLANNER'S GENERAL RECOMMENDATIONS

The following represents the recommendations for asbestos within the LEA school buildings:

All ACBM in the school shall be managed in place following the Spear Environmental AHERA Operations and Maintenance (O & M) Program. The condition of such materials will be monitored until all the ACBM have been removed from the building. A successful O&M program includes the following elements:

**A. Cleaning** - All areas of the school where friable ACBM or suspected ACBM are assumed to be ACM are present shall be cleaned at least once after the completion of the initial inspection. Additional cleaning may be necessary if the Management Planner makes a written recommendation indicating the methods and frequency of such cleaning.

**B. O & M Activities** - The LEA shall ensure that the procedures described below are followed to protect building occupants from any O & M activities that may disturb known or assumed ACM:

1. Restrict entry into the area either by physically isolating or by scheduling.
2. Post warning signs to prevent entry by unauthorized persons.
3. Shut off or temporarily modify the air-handling system.
4. Shut off or temporarily modify the air-handling system.
5. Use proper work practices and engineering controls such as wet methods, protective clothing, HEPA-vacuums, mini enclosures/glove bags, etc., to inhibit the spread of fibers.
6. Place all asbestos debris and other contaminated materials in a sealed, leak-tight container for disposal.

**C. Minor Fiber Release Episodes** - The LEA shall ensure that the procedures described below are followed in the event of a minor fiber release episode (i.e., disturbance of 3 linear/square feet or less of friable ACM):

1. Saturate the debris using the wet method.
2. Place the debris in a sealed, leak-tight container and clean the area.
3. Repair the area of damaged ACBM with materials such as asbestos-free spackling, plaster, insulation, or seal with an encapsulant.

**D. Major Fiber Release Episode** - The LEA shall ensure that the procedures described below are followed in the event of a major fiber release episode (i.e., disturbance of more than 3 linear/square feet of friable ACBM):

1. Restrict entry into the area and post warning signs.
2. Shut off or temporarily modify the air handling system to prevent the spread of fibers to other areas of the school.



3. The response for any major fiber release episode must be designed by people accredited to design response actions and conducted by people accredited to conduct response actions.

**E. Periodic Surveillance** - At least once every six (6) months after a management plan is in place; the LEA shall conduct periodic surveillance in the school that contains ACBM or is assumed to contain ACM. The person conducting periodic surveillance shall visually inspect all areas in the school that have been identified in the management plan as having ACBM, record the date of surveillance, his/her name, and any changes in the condition of the materials, and submit the record to the LEA Designated Person for inclusion in the management plan.

**F. Renovation and Demolition Activities** - The EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulation requires that a facility conduct a thorough asbestos inspection to determine the presence, condition, and quantity of ACM before any renovation or demolition activity. Thorough inspections require identifying asbestos in both interior and exterior parts of the building, including inaccessible areas (requiring selective demolition inspection techniques). **AHERA management plans do not satisfy the requirements of NESHAP for a thorough asbestos inspection. Please contact Spear Environmental before any renovation or demolition activity so that a thorough asbestos inspection can be carried out.**

**G. Preventive Measures for Typical ACM** - The LEA shall institute appropriate preventive measures to eliminate the reasonable likelihood that all ACBM within the building will become damaged, deteriorated, or delaminated. Below are typical recommended preventive measures. If your building has a type of ACBM that is not covered below, please contact Spear Environmental for further guidance with preventive measures:

**1. SURFACING MATERIALS** - "Surfacing Materials" means materials in a school building that are sprayed on, troweled on, or otherwise applied to surfaces. These include sprayed-on fireproofing materials on structural members, acoustical plaster, hard plaster on walls and ceilings, or other materials applied to surfaces for acoustical, fireproofing, or other purposes.

Surfacing Materials are generally considered friable and can release asbestos fibers if damaged by impact, air erosion, vibration, and/or water intrusion. The following procedures, when properly implemented, will reduce the potential for fiber release:

- Maintain the materials in an intact state and undamaged condition. Reduce the likelihood of fiber release by ensuring that the surfacing materials are not damaged by impact, scraping, dusting, use of leaf blowers, etc.



- Prevent water leakage. If the material is significantly damaged, removal is the best option. For minor damage, an enclosure is a temporary solution. Encapsulation of damaged sprayed-on fireproofing material is not recommended.

- Train the custodial people who are responsible for the care and maintenance of surfacing materials.

**2. THERMAL SYSTEM INSULATION (TSI)** - Thermal System Insulation (TSI)" means insulating materials applied to pipes, pipe fittings, boilers, breechings, tanks, ducts, or other components to prevent process heat loss or gain, water condensation, or for other purposes.

TSI is generally considered a friable ACM. This means it can be easily damaged, increasing the potential for fiber release. The following procedures, when properly implemented, will reduce the potential for fiber release:

- Identify the locations and label TSI. Warning signs should be posted outside locations of TSI.
- Reduce the likelihood of fiber release by ensuring that the insulation is not damaged or otherwise disturbed. Avoid storing/stacking on/near TSI to reduce contact damage.
- Maintain the TSI in an intact state and undamaged condition. Repair damaged areas as soon as possible to prevent further deterioration. If repair is not feasible due to extensive damage/deterioration, the material will need to be properly removed.
- Train the custodial people who are responsible for the care and maintenance of TSI.

**3. MISCELLANEOUS MATERIALS** - "Miscellaneous Materials" are all other asbestos-containing materials in a school building that do not fall under the categories of Surfacing Materials or TSI. These include floor tiles, floor tile and carpet mastic, gypsum wallboard, and joint compound, ceiling tiles and associated mastics, transite panels, laboratory countertops, cove base and associated mastic, window caulking, and glazing compounds, etc. The following maintenance procedures are recommended for these materials:

- Maintain these materials in an intact state and undamaged condition. Reduce the likelihood of fiber release by ensuring that the miscellaneous materials are not damaged by sanding, grinding, abrading, or other activities that may cause asbestos fibers to be released from the material. Below are additional recommendations for certain miscellaneous materials:

**Vinyl Asbestos Floor Tiles (VAT)** - are considered non-friable; however, routine maintenance procedures such as spray-buffing, burnishing, wet scrubbing, and stripping can generate asbestos fibers.



Following procedures, when properly implemented, will reduce the potential of fiber release:

- Do not sand, grind, or abrade the tiles. Stripping of VAT should be done as infrequently as possible. When stripping becomes necessary, follow the appropriate work practices. Never perform dry stripping.
- During spray-buffing or burnishing the floor, operate the machine at the lowest workable speed and use the least abrasive pad. Use a wet mop for routine cleaning whenever possible.
- Routinely check whether chair and desk glides are in good condition and replace them when necessary. Worn glides can gouge the floor and cause fiber release.
- Place carpets/floor mats in all entrances to reduce the abrasion of floor tiles by sand and pebbles. During winter, parking lots and walkways are swept to the extent possible to avoid the tracking of salt and ice-melting compounds into the school by the students.
- Train the custodial people who are responsible for the care and maintenance of VAT.

### **Ceiling Tiles, and if applicable, Associated Mastic**

- Reduce the likelihood of fiber release by limiting access to the area above the ceiling tiles. Maintain the ceiling tiles in an undamaged condition.

### **Fire doors and other Insulated Doors**

- Since there may be a few different types of doors throughout the building, door cores must be considered to have asbestos-containing interior insulation unless sample results prove otherwise. Before performing any maintenance on any door (lock change, drilling, etc.), the door should be surveyed by qualified personnel to rule out the existence of an asbestos core.

### **Crawlspace, Attic Space, and Tunnel Areas**

- Reduce the likelihood of fiber release by limiting access to these areas. Entrances to these areas should remain sealed with an airtight covering. Entry should only be made for essential maintenance work by properly trained and authorized people with proper personal protective equipment.

**APPENDIX D**

**6-MONTH PERIODIC SURVEILLANCE FORM(S)**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**LEA NAME:**

**SCHOOL NAME:**

(Number \_\_\_ of \_\_\_, make copies as necessary)

**AMP FORM 18 - PERIODIC SURVEILLANCE PLAN/REPORT**

Periodic Surveillance Plan: At least once every six months after the AMP is in effect, periodic surveillance will be conducted in each building that the LEA leases, owns, or otherwise uses as a school building that contains ACBM or is assumed to contain ACBM. At a minimum, surveillance is planned to be conducted during the fall and spring (insert alternate time frames and other details, as needed). Each person performing periodic surveillance must: visually inspect all areas that are identified in the AMP as ACBM or assumed ACBM, record the date of the surveillance, his or her name, and any changes in the condition of the materials, and submit a copy of the record to the DP for inclusion in the AMP.

			1 <sup>st</sup> six months Date_____	2 <sup>nd</sup> six months Date_____	
HA No.	Description of ACBM	Area Inspected	ACBM Condition*	ACBM Condition*	Date ACBM Removed

\* If no change in condition, write N/C

<b>Surveillance Inspector's Name</b>	<b>Surveillance Inspector's Signature</b>	<b>Date</b>
--------------------------------------	---	-------------

**APPENDIX E**

**MANAGEMENT PLANNER TRAINING RECORDS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

THIS IS TO CERTIFY THAT  
**MATTHEW SPEAR**  
HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE  
for  
**ASBESTOS INSPECTOR REFRESHER**

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 09/04/2024  
Course Location: Online  
Certificate: IR-24-0717C



**CCB #SRA0615 4-Hr Training**

4-Hour AHERA Inspector Refresher Training; AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

**Expiration Date:** 09/04/2025

For verification of the authenticity of this certificate contact:  
PBS Engineering and Environmental Inc.  
4412 S Corbett Avenue  
Portland, OR 97239  
503.248.1939

A handwritten signature in black ink, reading 'Andy Fridley', is written over a horizontal line.

Andy Fridley, Instructor

THIS IS TO CERTIFY THAT  
**MATTHEW SPEAR**  
HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE  
for  
**ASBESTOS MANAGEMENT PLANNER REFRESHER**

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 04/24/2025

Course Location: Online

Certificate: MPR-25-0717C



AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

**Expiration Date:** 04/24/2026

For verification of the authenticity of this certificate contact:  
PBS Engineering and Environmental Inc.  
4412 S Corbett Avenue  
Portland, OR 97239  
503.248.1939

  
\_\_\_\_\_  
David Kahn, Instructor

APPENDIX F

DESIGNATED PERSON TRAINING RECORDS



*ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS*

**SPEAR**  
**ENVIRONMENTAL**



*LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING*

## LEA DESIGNATED PERSON TRAINING RECORD

The person designated by \_\_\_\_\_ to ensure that Section 763.84 of the AHERA regulation (40 CFR Part 763) is properly implemented will be:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Course Name:

Course Location: \_\_\_\_\_ Course

Dates: \_\_\_/\_\_\_/\_\_\_ and \_\_\_/\_\_\_/\_\_\_

A Designated Person/O&M Worker Training course was designed to train persons to serve as the school's Designated Person as well as perform maintenance duties which may disturb asbestos-containing building materials. This course provided an in-depth discussion of the following topics.

- Health effects associated with asbestos exposure.
- Detection, identification, and assessment of ACM.
- Options for controlling ACM.
- Relevant Federal and State regulations (including those specified in AHERA).
- Information regarding asbestos and its various uses and forms.
- Locations of ACM identified throughout each building in which they work.
- Recognition of damage, deterioration, and delamination of ACM.
- The location and availability of the management plan.
- Descriptions of the proper methods of handling of ACM.
- Information on the use of respiratory protection (as specified in AHERA).
- Hands-on trains in the use of respiratory protection, other personal protection measures, and good work practices.

**APPENDIX G**

**EMPLOYEE TRAINING RECORDS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

LEA NAME:

SCHOOL NAME:

(Number \_\_\_ of \_\_\_, make copies as necessary)

**AMP FORM 5 - TRAINING RECORD FOR MAINTENANCE AND CUSTODIAL STAFF**

Every member of the maintenance and custodial staff who works in a building that contains ACBM must receive awareness training of at least 2 hours whether or not they are required to work with ACBM. Maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM must receive an additional 14 hours of training (total 16 hours of training). A record of the aforementioned training is required to be included in the AMP under 40 CFR §§ 763.93(h) and 763.94(c) of the EPA Asbestos-Containing Materials in Schools regulation, 40 CFR Part Subpart E.

Employee Name (Please Print)	Job Title	Course Name	Training Agency	Date	Location of Training	Number of Hours Completed

**ATTACHMENT**

- Copies of training certificates suggested, but not required by EPA

**APPENDIX H**

**BLANK PREVENTATIVE MEASURES AND  
RESPONSE ACTION ACTIVITIES FORM**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

## Preventative Measures and Response Action Activities Form

School \_\_\_\_\_

Project Name \_\_\_\_\_ Date \_\_\_\_\_

Contractor's Name \_\_\_\_\_

Contractor's Address \_\_\_\_\_

Disposal Facility Name \_\_\_\_\_

Disposal Facility Location \_\_\_\_\_

Location of the preventative measures and response action:

Description of the preventative measures and response action:

Was an abatement design/specification prepared for this activity?  
 Yes. If yes, attach specifications created to complete the activity  
 No.

Attach to this document accreditation certificates, disposal certificates and results of air sampling report. The air sampling report shall include the following:

- name and signature of the person collecting the air samples,
- the location where the air samples were collected,
- date air samples were collected,
- name and address of the laboratory,
- date and method of analysis (attach laboratory report),
- name and signature of analyst,
- statement that laboratory meets applicable requirements

Please maintain a copy of this completed form and required attachments in Appendix J of the Management Plan.

**APPENDIX I**

**COMPLETED PREVENTATIVE MEASURES AND  
RESPONSE ACTION ACTIVITIES FORM**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**APPENDIX J**

**BLANK MAJOR/MINOR FIBER RELEASE FORM**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

# ASBESTOS FIBER RELEASE EPISODE

DATE \_\_\_/\_\_\_/\_\_\_

(ACCIDENTAL OR UNCONTROLLED)

## 1) AMOUNT OF MATERIAL INVOLVED:

\_\_\_ Less than three (3) square or three (3) linear feet. ( MINOR )

\_\_\_ Greater than three (3) square or three (3) linear feet. ( MAJOR )

(EPISODES INVOLVING MORE THAN THREE (3) SQUARE OR THREE LINEAR FEET MAY NOT BE RESPONDED TO BY 16 HR. O&M TRAINED PERSONNEL )

## 2) DATE AND TIME OF EPISODE:

DATE: \_\_\_/\_\_\_/\_\_\_

TIME: \_\_\_\_\_

3) LOCATION: SCHOOL NAME \_\_\_\_\_ BUILDING NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_  
\_\_\_\_\_

BASEMENT \_\_\_ GROUND FLOOR \_\_\_ 2ND \_\_\_ 3RD \_\_\_ 4TH \_\_\_

CLASSROOM ___ (# )	STAIRWELL ___	LIBRARY ___	HALLWAY ___
CAFETERIA ___	KITCHEN ___	AUDITORIUM ___	LOUNGE ___
GYMNASIUM ___	LOCKER RM.(B) ___	LOCKER RM.(G) ___	OFFICE ___
MUSIC RM . ___	LAVATORY (B) ___	LAVATORY (G) ___	CUSTODIAL RM . ___
TUNNEL ___	BOILER RM . ___	STORAGE RM . ___	OTHER _____

## 4) TYPE OF MATERIAL:

Thermal \_\_\_  
(pipe, boiler, etc.)

Surfacing \_\_\_  
(sprayed or troweled)

Miscellaneous \_\_\_  
(floor tile, ceiling tile, etc.)

5) EPISODE DESCRIPTION AND RATIONALE: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## 6) EPISODE RESPONSE:

Evacuated Area \_\_\_  
Posted Signs \_\_\_

Sealed Off Area \_\_\_  
Shut Down or Modified Ventilation Systems (heat, AC, etc.) \_\_\_

Restricted Access \_\_\_

7) ISSUED WORK PERMIT: O & M \_\_\_

Contractor \_\_\_\_\_  
( If the episode involves more than three (3) feet of material, a certified asbestos contractor must be used.)

SIGNATURE \_\_\_\_\_  
(DESIGNATED PERSON)

DATE \_\_\_/\_\_\_/\_\_\_

**APPENDIX K**

**COMPLETED MAJOR/MINOR FIBER RELEASE FORM**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR**  
**ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**APPENDIX L**

**BLANK O&M FORMS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR**  
**ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**OPERATIONS AND MAINTENANCE (O&M) ASBESTOS WORK PERMIT**  
**(in-house asbestos work)**  
(SCHOOLS MUST COMPLETE THIS FORM EACH TIME THEIR EMPLOYEE WORKS WITH ASBESTOS)

**1) TYPE OF ASBESTOS WORK ACTIVITY:**

CLEAN \_\_\_ REPAIR \_\_\_ REMOVE \_\_\_ ENCAPSULATE \_\_\_ ENCLOSE \_\_\_ ISOLATE \_\_\_

**2) AMOUNT OF MATERIAL TO BE DISTURBED:**

\_\_\_ Less than three ( 3) square or three (3) linear feet.  
\_\_\_ Small Scale Repair (individual repairs each less than (3) square or linear feet)  
\_\_\_ Cleaning

**3) EMPLOYEES NAME:**

(THE PERSON DOING THE WORK) \_\_\_\_\_ ( PRINT )

**4) SUPERVISORS NAME:**

(DESIGNATED PERSON) \_\_\_\_\_ ( PRINT )

**5) DATE & TIME OF THE WORK: DATE: \_\_\_/\_\_\_/\_\_\_ TIME: FROM \_\_\_\_\_ TO \_\_\_\_\_**

**6) LOCATION: SCHOOL NAME \_\_\_\_\_ BUILDING \_\_\_\_\_**  
**ADDRESS \_\_\_\_\_**

**BASEMENT** \_\_\_ **GROUND FLOOR** \_\_\_ **2ND** \_\_\_ **3RD** \_\_\_ **4TH** \_\_\_

CLASSROOM ___ (# )	STAIRWELL ___	LIBRARY ___	HALLWAY ___
CAFETERIA ___	KITCHEN ___	AUDITORIUM ___	LOUNGE ___
GYMNASIUM ___	LOCKER RM.(B) ___	LOCKER RM.(G) ___	OFFICE ___
MUSIC RM .___	LAVATORY (B) ___	LAVATORY (G) ___	CUSTODIAL RM ___
TUNNEL ___	BOILER RM .___	STORAGE RM .___	OTHER _____

**7) WORK METHODS: WET METHOD** \_\_\_ **HEPA VACUUM** \_\_\_ **GLOVEBAG** \_\_\_

**CONTAINMENT** \_\_\_ **RESTRICTED ACCESS** \_\_\_ **POSTED SIGNS** \_\_\_  
**SHUT DOWN OR MODIFIED HEATING AND VENTILATING SYSTEM** \_\_\_

**8) TYPE OF MATERIAL: Thermal** \_\_\_ **Surfacing** \_\_\_ **Miscellaneous** \_\_\_  
(pipe, boiler, etc.) (sprayed/troweled) (floor tile, ceiling tile, etc.)

**9) WORK DESCRIPTION AND RATIONALE:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**10) WASTE STORAGE OR DISPOSAL SITE:** \_\_\_\_\_

**11) TRAINING: (there must be a yes answer to these questions to approve work)**

Employee has received asbestos training (2hr Awareness and 14hr O&M)? \_\_\_\_\_  
Employee has had an OSHA asbestos medical exam during the last year? \_\_\_\_\_  
Employee was provided all necessary equipment to work with asbestos? \_\_\_\_\_

**12) WORK PERMIT APPROVED:** \_\_\_ (yes) \_\_\_ (no)

**SIGNATURE** \_\_\_\_\_ **DATE** \_\_\_/\_\_\_/\_\_\_  
(SUPERVISOR /DESIGNATED PERSON)

# CONTRACTED ASBESTOS ABATEMENT PROJECT WORK PERMIT

(Schools must complete this form for each contracted asbestos project)

SCHOOL NAME \_\_\_\_\_ BUILDING NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_

**1) TYPE OF ACTIVITY:**

CLEAN \_\_\_ REPAIR \_\_\_ REMOVE \_\_\_ ENCAPSULATE \_\_\_ ENCLOSE \_\_\_ ISOLATE \_\_\_

**2) AMOUNT OF MATERIAL DISTURBED:** TOTAL FOOTAGE: \_\_\_\_\_ Sq. Ft / Ln. Ft.

Less than ( 3) square or (3) linear feet. \_\_\_ Greater than (3) square or (3) linear feet. \_\_\_

**3) CONTRACTOR:** NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_

**4) CONTRACTOR'S ASBESTOS LICENSE #** \_\_\_\_\_ **EXPIRATION DATE** \_\_\_/\_\_\_/\_\_\_

**5) DATE OF THE WORK ACTIVITY:** START \_\_\_/\_\_\_/\_\_\_ STOP \_\_\_/\_\_\_/\_\_\_

**6) EPA NOTIFICATION COMPLETE** \_\_\_\_\_ **ODH NOTIFICATION COMPLETE** \_\_\_\_\_

(yes) (yes)

**7) LOCATION:** BASEMENT \_\_\_ GROUND FLOOR \_\_\_ 2ND \_\_\_ 3RD \_\_\_ 4TH \_\_\_

CLASSROOM ___ (# )	STAIRWELL ___	LIBRARY ___	HALLWAY ___
CAFETERIA ___	KITCHEN ___	AUDITORIUM ___	LOUNGE ___
GYMNASIUM ___	LOCKER RM.(B) ___	LOCKER RM.(G) ___	OFFICE ___
MUSIC RM. ___	LAVATORY (B) ___	LAVATORY (G) ___	CUSTODIAL RM. ___
TUNNEL ___	BOILER RM. ___	STORAGE RM. ___	OTHER _____

**8) CONTRACTOR'S PROJECT SUPERVISOR:** \_\_\_\_\_ **ODH#** \_\_\_\_\_

**9) CONTRACTOR'S PROJECT WORKERS (ALL):** \_\_\_\_\_

**10) WORK METHODS:** WET METHOD \_\_\_ HEPA VACUUM \_\_\_ GLOVEBAG \_\_\_

CONTAINMENT \_\_\_ RESTRICTED ACCESS \_\_\_ POSTED SIGNS \_\_\_

SHUT DOWN OR MODIFIED HEATING AND VENTILATING SYSTEM \_\_\_

**11) TYPE OF MATERIAL:** Thermal \_\_\_ Surfacing \_\_\_ Miscellaneous \_\_\_

(pipe, boiler, etc.) (sprayed/troweled) (floor tile, ceiling tile, etc.)

**12) WORK DESCRIPTION AND RATIONALE:** \_\_\_\_\_

**13) FINAL CLEARANCE AIR SAMPLING AND VISUAL INSPECTION:**

**Person performing final visual inspection:** \_\_\_\_\_

**Visual inspection date:** \_\_\_/\_\_\_/\_\_\_

(final clearance air samples are required for projects greater than 3 feet)

**Laboratory (name & address)** \_\_\_\_\_

**Person that collected the samples:** \_\_\_\_\_

**Sample collection date:** \_\_\_/\_\_\_/\_\_\_ **Sample analysis date** \_\_\_/\_\_\_/\_\_\_

**SAMPLE TYPE:** PCM \_\_\_ TEM \_\_\_ **Method** NIOSH 7400 AGGRESSIVE

**Sample Results:** 1) \_\_\_ 2) \_\_\_ 3) \_\_\_ 4) \_\_\_ 5) \_\_\_

**14) WASTE DISPOSAL SITE** \_\_\_\_\_

**SIGNATURE** \_\_\_\_\_ **DATE** \_\_\_/\_\_\_/\_\_\_

(School's Designated Person )

# Contracted Asbestos Abatement Project

Date \_\_\_/\_\_\_/\_\_\_

## (PAPERWORK CHECKLIST)

SCHOOL NAME \_\_\_\_\_ BUILDING NAME \_\_\_\_\_  
ADDRESS \_\_\_\_\_

(The school must obtain a copy of the following items from the contractor or laboratory and keep them on file for each and every contracted asbestos project.)

### CONTRACTOR

- 1) Contractor's Liability Insurance \_\_\_\_\_
- 2) Performance Bond (if required) \_\_\_\_\_
- 3) Contractor's Worker Compensation Certificate \_\_\_\_\_
- 4) Contractor's Asbestos Abatement License \_\_\_\_\_
- 5) Ohio Department of Health Notification \_\_\_\_\_
- 6) EPA Notification (NESHAP) \_\_\_\_\_
- 7) Affidavit of Contractor \_\_\_\_\_
- 8) Waste Transport Manifests \_\_\_\_\_
- 9) Landfill Disposal Papers \_\_\_\_\_
- 10) Workers' Training Certificates  
(for each and every worker and supervisor) \_\_\_\_\_
- 11) Workers' Medical Papers  
(for each and every worker and supervisor) \_\_\_\_\_
- 12) Workers' Safety and Health Agreement Forms  
(for each and every worker and supervisor) \_\_\_\_\_
- 13) Contractor's Work-site Entry and Exit Log \_\_\_\_\_
- 14) Contractor's Progress Reports (daily) \_\_\_\_\_
- 15) Contractor's OSHA Air Sampling Reports \_\_\_\_\_
- 16) Certification of Final Visual Inspection  
(This form should include: The location and date of final visual inspection, and signatures of the contractor and laboratory that performed it. \_\_\_\_\_

### LABORATORY

- 17) Independent Clearance Air Sample Reports (applies to all Response Actions)  
**(The school must use an independent laboratory. Do not allow the contractor to hire this lab. The school must hire and pay for the lab. You must have a minimum of FIVE (5) samples each less than 0.01 fibers per cubic centimeter.**  
(This report will come from the lab and must include: The sample results; the dates of collection and analysis; the signatures of the persons that performed sample collection and sample analysis; and the locations of the sampling pumps). \_\_\_\_\_
- 18) Independent Daily Air Monitoring Reports \_\_\_\_\_

## SAFETY AND HEALTH AGREEMENT FORM

(this form or equivalent)

Employee's Name: \_\_\_\_\_ Soc. Sec. No. \_\_\_\_\_

Employer: \_\_\_\_\_

Employee's Training Classification: \_\_\_\_\_

I \_\_\_\_\_, understand that the work  
(employee)  
project at: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

(the "Project") scheduled to begin \_\_\_\_\_ involves the abatement  
(month) (year)

of asbestos-containing material and that asbestos is a hazardous substance. Additionally, I understand that my employer has agreed to supply all the necessary medical monitoring services, training, personal protective equipment and working conditions necessary to protect my health and safety during my employment on the "Project".

Specifically, I represent to \_\_\_\_\_  
(school)

that I have received the necessary safety and health services, as required by Federal, State, local law, prior to my commencement of work at the "Project" including but not limited to the following safety and health services:

1. A free physical examination in the past year by a physician, and a printed copy of the asbestos Medical Surveillance Program.
2. Training in the following subjects:
  - (a) History, properties and uses of asbestos; (b) Recognition of asbestos, including its physical characteristics; (c) Health hazards, including the relationships between asbestos exposure, smoking, and disease; (d) Worker protection, including respirator protection, protective clothing, safety equipment, air monitoring, medical surveillance, and personal hygiene; (e) A detailed description of respirators and their use and care, including the degree of protection afforded, fitting and testing procedures, and maintenance and cleaning; (f) Work practices including area preparation, decontamination and waste disposal; (g) Worker right of access to medical records and records required to be maintained by employer; (h) Requirements, procedures, and standards established by 40 CFR Part 763, and appropriate state, local and Board statutes and regulations;
3. Personal instruction and training on the proper use and fit testing of respirators and instruction on the limitations of their use and a written handout describing the purpose and standard operating procedures for the selection, use, care, and inspection of respirators.

I further represent that I will comply with all Federal, State and local laws and regulations pertaining to the safety and health procedures affecting my work activities on the "Project".

Sign: \_\_\_\_\_ Date \_\_\_\_\_ Sign: \_\_\_\_\_ Date \_\_\_\_\_  
Employee Employer

**CERTIFICATION OF VISUAL INSPECTION**

SCHOOL NAME \_\_\_\_\_

ADDRESS \_\_\_\_\_  
\_\_\_\_\_

WORK AREA LOCATION \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CONTRACTOR'S CERTIFICATION**

In accordance with all federal, state and local laws, regulations, codes, standards and requirements and any more stringent criteria agreed upon, the contractor hereby certifies that they have visually inspected the work area (all surfaces including pipes, beams, ledges, walls, ceiling and floor, Decontamination Unit, sheet plastic, etc.) and have found no dust, debris or residue.

by (Signature) \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_  
(Print Name) \_\_\_\_\_  
(Print Title) \_\_\_\_\_

**INDEPENDENT PROFESSIONAL AIR SAMPLING LABORATORY'S CERTIFICATION**

The Independent Professional Air Sampling Laboratory hereby certifies that they have accompanied the contractor on a visual inspection and verifies that this inspection has been thorough and to the best of their knowledge and belief, the contractor's certification above is a true and honest one.

by (Signature) \_\_\_\_\_ Date \_\_\_/\_\_\_/\_\_\_  
(Print Name) \_\_\_\_\_  
(Print Title) \_\_\_\_\_

**APPENDIX M**

**COMPLETED O&M FORMS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR**  
**ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**APPENDIX N**

**BLANK CERTIFICATE OF WORKERS ACKNOWLEDGEMENT FORM**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

## Certificate of Worker's Acknowledgement

School \_\_\_\_\_

Project Name \_\_\_\_\_ Date \_\_\_\_\_

Contractor's Name \_\_\_\_\_

This school building contains materials that have been identified as asbestos-containing materials.

WORKING WITH ASBESTOS CAN BE DANGEROUS. INHALING ASBESTOS FIBERS HAS BEEN LINKED WITH VARIOUS TYPES OF CANCER. IF YOU SMOKE AND INHALE ASBESTOS FIBERS THE CHANCE THAT YOU WILL DEVELOP LUNG CANCER IS GREATER THAN THAT OF THE NON-SMOKING PUBLIC.

The Owner for the above project requires that prior to initiating any work that would results in disturbance of building materials (i.e. drilling, sanding, removal), it is required that the management plan be referenced to determine if materials associated with work activities contain asbestos.

In the event materials that contain asbestos are to be disturbed, employees must be supplied with the proper respirator, be trained in its use and have received a medical examination. Employees must also be trained in safe work practices and in the use of the equipment found on the job. These things are to have been done at no cost to the employee.

**RESPIRATORY PROTECTION:** You must have been trained in the proper use of respirators, and informed of the type respirator to be used on the above referenced project. You must be given a copy of the written respiratory protection manual issued by your employer. You must be equipped at no cost with the respirator to be used on the above project.

**TRAINING COURSE:** You must have been trained in the dangers inherent in handling asbestos and breathing asbestos dust and in proper work procedures and personal and area protective measures. This training must have been the equivalent in curriculum, training method and length to the EPA Model Accreditation Plan (MAP) asbestos abatement worker training (40 CFR Part 763, Subpart E, Appendix C).

**MEDICAL EXAMINATION:** You must have had a medical examination within the past 12 months at no cost to you. This examination must have included: health history, pulmonary function tests and may have included an evaluation of a chest x-ray.

By signing this document you are acknowledging only that the Owner of the building you are about to work in has advised you of your rights to training and protection relative to your employer. Please maintain a copy of this completed form in Appendix O of the Management Plan.

Signature \_\_\_\_\_

Printed Name \_\_\_\_\_ Witness \_\_\_\_\_

**APPENDIX O**

**COMPLETED CERTIFICATE OF WORKERS  
ACKNOWLEDGEMENT FORMS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR  
ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**

**APPENDIX P**

**ANNUAL NOTIFICATIONS**



**ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS**

**SPEAR**  
**ENVIRONMENTAL**



**LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING**



**SPEAR**  
ENVIRONMENTAL

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

LEAD-IN-WATER TESTING • RADON TESTING • MOLD TESTING • ENVIRONMENTAL SITE ASSESSMENTS • AHERA ASBESTOS INSPECTIONS & SURVEYS

## ANNUAL ASBESTOS NOTIFICATION

TO: Parents/Guardians, Students, Teachers, Staff, and Support Groups

FROM: Brent Robertson, Executive Director of Operations

RE: Annual Notification of Availability of Asbestos  
Management Plan and Update of Activities  
Bandon School District

DATE: January 1st, \_\_\_\_\_

On October 22, 1986, President Reagan signed into law the Asbestos Hazard Emergency Response Act (AHERA, Public Law 99-519). The law required the EPA to develop regulations that provide a comprehensive framework for addressing asbestos problems in public and private elementary and secondary schools. On October 30, 1987, EPA published the Asbestos-Containing Materials in Schools Rule (40 CFR Part 763 Subpart E). This new rule requires all school districts to inspect for friable and non-friable asbestos in school buildings, develop Management Plans that address asbestos hazards in school buildings, and implement response actions in a timely fashion.

One of the requirements of this law is to annually notify parents, teachers, staff, and support groups of the availability and location of the school building's Management Plan. The Management Plan for each school is in the building's Main Office, along with a duplicate copy located in the Program Manager's/Designated Person's Office. Also, please be advised that information regarding any inspections/re-inspections, surveillance, response actions, and post-response action activities, if performed, is also included in the Management Plan and available for your review.

Should you have any questions regarding this notification, please contact Brent Robertson at (509) 760-8639 or by email at [brobertson@bandon.k12.or.us](mailto:brobertson@bandon.k12.or.us).