

March 21, 2024

Anthony Breen
Director of Facilities
SAU 93, Monadnock Regional School
District
600 Old Homestead Highway
Swansey NH 03446

Re: 3-Year AHERA Reinspection
RPF File No.: 240041

Dear Mr. Breen,

RPF Environmental (RPF) conducted an asbestos reinspection for the Monadnock Regional School District on February 21, 2024, in accordance with New Hampshire Department of Environmental Services CH. ENV-A 1800 and EPA Asbestos Hazard Emergency Response Act (AHERA) AHERA 40 CFR 763.83. The reinspection included a visual inspection of the areas known to contain asbestos-containing materials (ACM) and assumed ACM, as stated in the AHERA inspection records provided to RPF for review.

In general, the ACM inspected by RPF during this reinspection was observed to be in good to fair condition and the School should continue to manage the materials in accordance with the AHERA Management Plan.

It is important to note that RPF observed locations that have damaged ACM present, for example, floor tiles in some classrooms of several schools. The areas with damaged ACM should be repaired and undergo O&M level cleaning starting as soon as possible and no later than August 2024. Care must be used to prevent further disturbance and to avoid the creation of dust. Cleaning should be completed throughout each entire room marked (or as otherwise indicated on the attached room-by-room inventory) as having damaged or friable ACM present and include as stated in AHERA and included in the management plan update document included with this report.

Records used to conduct the reinspection included the initial AHERA survey listings provided in the 2018 and 2021 RPF Asbestos 3-Year Re-inspection Reports.

This reinspection report should be filed with the AHERA plans for each school building, as well as the central facilities office.

Appendix A contains a listing of the ACM reinspected during this project and the AHERA assessment and minimum recommended actions for each area of ACM in the school. Appendix C includes management plan recommendations and updates to be used in conjunction with your original management plan for each building. RPF understands that this document has been misplaced or moved and the school is endeavoring to obtain this document within the archive records of the school. If this document cannot be located, a new plan must be prepared for the school.

The Asbestos Program Manager (AHERA-designated person) for the school is required, pursuant to the AHERA Rule, to review this report and the appendices and to then develop a written plan to implement recommendations for management, abatement, or additional testing work, as applicable.

If you have any questions or comments, or if you would like assistance with the recommendations provided herein, please do not hesitate to call me.

Sincerely,
RPF ENVIRONMENTAL



Sean Smith
Environmental Health & Safety Technician
Licensed Inspector #AI103045I



Allan D. Mercier, CMC
Operations Manager
Licensed Management Planner #AM1029661

Enclosures:

Appendix A: ACM Inventory
Appendix B: Management Plan Updates
Appendix C: Reinspection Accreditation
Appendix D: Methodology and Limitations

24.0041 MRSD AHERA 3 Year reinspection

APPENDIX A

CODE DESCRIPTIONS

(Index sheet for use with room by room listings in this appendix)

EPA Assessment Codes:

1. Damaged or significantly damaged thermal systems insulation asbestos containing material (ACM)
2. Damaged friable surfacing ACM
3. Significantly damaged friable surfacing ACM
4. Damaged or significantly damaged friable miscellaneous ACM
5. ACBM with the potential for damage
6. ACBM with the potential for significant damage
7. Any remaining ACBM or friable suspected ACBM
- NF. Material is nonfriable and assessments are not required by AHERA.

Response Summary Codes: (Summary of minimum recommendations only, please reference text of report and Appendix for additional recommendations.)

Code	Description
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- | | |
|----|---|
| 1. | Continue to manage this ACBM under the buildings Management Plan, Operations and Maintenance (O&M) Program and AHERA. Conduct spot maintenance repairs of any minor damage present (nonfriable ACBM) or that occurs in accordance with AHERA and the School O&M Program. Complete periodic cleaning with HEPA vacuums and wet wiping in all areas with friable ACBM on a 6 month basis, at a minimum. |
| 2. | Conduct repair, surface cleaning, encapsulation or enclosure response actions for this ACBM in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage this ACBM under the building Management Plan, O&M Program and AHERA (See Summary Code 1). A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. Some small-scale maintenance work (<3 linear/square feet) can be completed by the school's maintenance staff if they qualify for the licensing exemption and they possess adequate training, current refresher training, and the necessary personal protective equipment and safety programs in place. It recommended that pricing for removal also be obtained as an option for consideration. Complete periodic cleaning with HEPA vacuums and wet wiping in all areas with friable ACBM on a 6 month basis at a minimum. |
| 3. | Remove the ACBM and conduct surface decontamination as recommended by accredited/licensed project designer in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage any remaining ACBM under the building Management Plan, O&M Program and AHERA (See Summary Code 1). All assumed ACBM should be properly tested by a licensed inspection prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. All abatement activities must be conducted by properly accredited and licensed personnel/companies. |
| 4. | Complete verification of AHERA Inspection documentation. A Licensed inspector must assume materials are ACBM or properly test additional suspect ACBM. Exterior materials, except under certain circumstances, are not covered under AHERA but still must be inspected and handled as ACBM in accordance with other State, local, and federal regulations. Licensed inspector and management planner must update ACBM listings and Management Plans as needed. Obtain architectural statements for new construction/renovation areas in accordance with AHERA. Confirm that proper numbers of samples have been collected. |
| 5. | Accessible ACBM Removed. Removed material may be deleted from the ACBM listings. Abatement records should be reviewed to verify that all required records are on file at the school. RPF did not audit records for completeness or accuracy. |
| 6. | Material could not be located and may have been removed or enclosed, or it was not possible to confirm if the materials observed were in fact newer replacement materials. Verify abatement records and, if all records are obtained and complete, update the ACBM listings to reflect the abatement work. If an MNO listing is due to an inaccessible area or locked room, such areas should be inspected when feasible. |

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Wilcox Elementary School								
Basement Area near Boiler Room	12" Floor Tiles and mastic	105 sq. ft	MISC	MNO	MNO	MNO	1	Material is covered over with carpet.
Room 3	12" Floor Tiles and mastic	105 sq. ft	MISC	MNO	MNO	MNO	1	Material is covered over with carpet.
Front Entrance/landing	12" Floor Tiles	50 sq. ft	MISC	No	Good	NF	1,4	Materials appear newer and may be covering older floor tiles.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.							
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
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Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

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Location	ACBM	Approximate Quantity	Category	Friable	Good	5	1,4	Assessment	Response	Notes
Emerson Elementary School										
Ground Floor										
Boiler Room	Fire Door	1	MISC	No	Good	5	1,4			
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.									
							4			See further discussion in report.
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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Gilsun Elementary School								
Book storage next to Grade 6, Room 1	12" Floor Tile	70 sq. ft	MISC	No	Good	NF	1, 4	Floor tiles are assumed to be ACBM, needs testing. 1/2 of the area is covered over with carpet.
Principal's Storage Room	12" Floor Tile	100 sq. ft	MISC	No	Good	NF	1, 4	Floor tiles are assumed to be ACBM, needs testing.
Secretaries Bathroom	12" Floor Tile	30 sq. ft	MISC	No	MNO	MNO	1, 4	Floor tiles are assumed to be ACBM, needs testing.
Hall outside Classroom 3	12" Floor Tile	32 sq. ft	MISC	No	Good	NF	1, 4	Materials have been covered over with carpet.
Music/art	12" Floor Tile	32 sq. ft	MISC	No	Good	NF	1	Floor tile are assumed to be ACBM, needs testing. Ny sink and bathroom
Music/art	Sink basin undercoat	2 sq. ft.	MISC	No	Good	NF	1, 4	Material is assumed to be ACBM, test prior to removal.
OT/PT Office prviously listed as Library Office	12" Floor Tile	120 sq. ft	MISC	No	Good	NF	1, 4	Floor tiles are assumed to be ACBM, needs testing.
Classroom 3	12" Floor Tile	906 sq. ft	MISC	No	Good	NF	1, 4	Floor tiles are assumed to be ACBM, needs testing.
Kindergarten Classroom #4	12" Floor Tile	856 sq. ft	MISC	No	Good	NF	1, 4	Floor tiles are assumed to be ACBM, needs testing. 1/4 of the area is covered over with carpet.
Stairwell landing to Basement	12" Floor Tile	18 sq. ft	MISC	No	Good	NF	1, 4	Floor tiles are assumed to be ACBM, needs testing.
Throughout original section	Flooring Mastic	-----	MISC	No	MNO	MNO	1, 4	1999 test results on file indicate mastic contains 10% asbestos; however locations are unclear.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	See discussion in report.

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Gilsun Elementary School								
Note:	New additions need to have an Architectural/Engineering Statement stating there was no asbestos containing building materials used in the newer addition. In lieu of architectural engineering statement, initial AHERA Reinspections are required.					See discussion in report.		
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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Monadnock Regional High School								
Room 209 previously listed as Room 23-Classroom	9" Floor Tile	792 sq. ft	MISC	MNO	MNO	MNO	5	Materials were removed by Catamount in 2018
Room 208/209 previously listed as Tech Ed Office. Formerly listed as Room between 22 & 24	9" Floor Tile	140 sq. ft	MISC	MNO	MNO	MNO	5	Materials were removed by Catamount in 2018
Room 204B and office	9" Floor Tile	768 sq. ft	MISC	No	Fair	NF	1	Floor tiles at entrance to room were observed to be cracking and worn and areas of missing floor tiles.
Boy's Bath by Auditorium	Pipe Fitting Insulation	3 observed	TSI	Yes	Good	5	1	Material is located above the ceiling.
Room 202 previously listed as Room 12-Classroom	9" Floor Tile	792 sq. ft	MISC	MNO	MNO	MNO	1	Accessible materials were removed in 2010 by A-Best; however, floor tiles remain underneath the cabinets.
Room 100 Nurse's Office	9" Floor Tile	460 sq. ft	MISC	MNO	MNO	MNO	5	Materials were removed by Catamount.
Room 101 previously listed as School Resource office	9" Floor Tile	400 sq. ft	MISC	MNO	MNO	MNO	1,6	Materials appear to be concrete underneath the carpet.
Principal's Office	9" Floor Tile	520 sq. ft	MISC	MNO	MNO	MNO	1	Area has been covered over with newer flooring.
Conference Room	9" Floor Tile	384 sq. ft	MISC	MNO	MNO	MNO	1	Area has been covered over with newer flooring.
Special Services Room 104 and 104B	9" Floor Tile	400 sq. ft	MISC	MNO	MNO	MNO	5	Materials were removed by Catamount in 2018.
Room 702 previously listed as Rm. Between 30/31 & 32	12" Floor Tile	646 sq. ft	MISC	No	Good	NF	1	
Boy's Bathroom near room 600	Pipe Fittings inside Pipe Chase	5 listed	TSI	Yes	MNO	MNO	1	Enclosed casing no access to pipe chase.

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Monadnock Regional High School								
Girl's bath near Rm 500	Pipe Fittings inside Pipe Chase	5 listed	TSI	Yes	MNO	MNO	1	Enclosed casing no access to pipe chase.
Room 607A	9" Floor Tile	200 sq. ft	MISC	No	Good	NF	1	
Room 510/511 previously listed as Room 78/79	Flooring Mastic (under 12" Floor tiles)	828 sq. ft.	MISC	MNO	MNO	MNO	1	RPF conducted testing in 2010 and the flooring mastic was found to be ACBM.
Room 512 previously listed as Room 77	Flooring Mastic (under 12" Floor tiles)	828 sq. ft	MISC	MNO	MNO	MNO	1	RPF conducted testing in 2010 and the flooring mastic was found to be ACBM.
Room 514 previously listed as Room 76	Flooring Mastic (under 12" Floor tiles)	864 sq. ft	MISC	MNO	MNO	MNO	1	RPF conducted testing in 2010 and the flooring mastic was found to be ACBM.
Storage Room between Rm. 51 & 53	9" Floor Tile	864 sq. ft	MISC	MNO	MNO	MNO	5	Materials were removed by Catamount in 2016.
Connector rooms between 22 & 23	9" Floor Tile	336 sq. ft	MISC	MNO	MNO	MNO	1,5	Accessible materials were removed in 2010 by A-Best, however floor tiles remain underneath the cabinets.
Note:	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	See further discussion in report
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. Please reference AHERA and the school management plan for discussion on assessment codes.								
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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Troy Elementary School								
Classroom 1 adjacent to kitchen	12" Floor Tile	883 sq. ft	MISC	No	Fair	NF	1	Some minor damaged/chipped and worn floor tiles were observed throughout.
Kitchen	Transite Panels	72 sq. ft	MISC	MNO	MNO	MNO	1	Materials have been covered over with gypsum wallboard according to the school records.
Kitchen Pantry/Office	12" Floor tiles and mastic	130 sq. ft	MISC	No	Good	NF	1	
Hallway near gymnasium and rooms 1, 2, and 3	12" Floor tile and mastic	777 sq. ft	MISC	No	Good	NF	1	
Gymnasium	12" Floor tile and mastic	5, 658 sq. ft	MISC	No	Fair	NF	1	Spot replacement tiles are present.
Dry Food Storage Room	Transite Ceiling Panels	65 sq. ft	MISC	MNO	MNO	MNO	1	Materials have been covered over with gypsum wallboard.
Rooms 6, 7, 8, 9, & 10	9" Floor tiles and mastic	3,3 75 sq. ft	MISC	MNO	MNO	MNO	1	Materials have been covered over with newer tiles.
Rooms 11,12,13,14 &15	9" Floor tiles and mastic	3,375 sq. ft	MISC	MNO	MNO	MNO	1	Materials have been covered over with newer tiles.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	See discussion in report.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. Please reference AHERA and the school management plan for discussion on assessment codes. Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Mount Caesar Elementary School								
Room D across from Room A Custodial Closet	Ceiling Plaster	150 sq. ft	MISC	Yes	Good	5	1	Materials repaired by Catamount in 2012
Staff office/room	Ceiling Plaster	120 sq. ft	MISC	Yes	Good	5	1	Materials repaired by Catamount in 2012
Boiler Room	Ceiling Plaster	500 sq. ft	MISC	Yes	Good	5	1	Materials repaired by Catamount in 2012
North-West Pipe Trench (Room 4)	Pipe Insulation	1, 064 lf	TSI	Yes	Enclosed	MNO	1	Area has been blocked off and no access is allowed.
North-West Pipe Trench (Room 4)	Pipe Fittings	55 previously observed	TSI	Yes	Enclosed	MNO	1	Area has been blocked off and no access is allowed.
South Pipe Trench	Pipe Insulation	300 lf	TSI	Yes	MNO	MNO	1	Materials have been enclosed and sealed within the trench following the construction in the boiler room.
South Pipe Trench	Pipe Fittings	15 previously observed	TSI	Yes	MNO	MNO	1	
Room 4	Glue Daubs	500 sq. ft	MISC	MNO	MNO	MNO	1	Materials are enclosed under ceiling.
Throughout	Glue Daubs	-----	Misc.	MNO	MNO	MNO	1,6	RPF conducted testing in 2009 in the PUPS room and the glue daubs were removed however it is possible that additional materials are present in other locations of the school behind original chalkboards and bulletin boards.
Entrance to East Annex	Transite Ceiling Panels	20 sq. ft	MISC	MNO	MNO	MNO	6	Material was not observed, may be covered over with plywood. Further review is required.

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	See discussion in report
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
S.A.U. 93 Business Office (Wyman House)								
First Floor								
Payroll Office previously listed as accounts payable office	Pipe Insulation	8 lf.	TSI	Yes	MNO	MNO	5	Materials have been removed.
Work room and Hall	9" Floor Tiles	10 sq. ft	MISC	MNO	MNO	MNO	1	Materials have present underneath the addition walls.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	See further discussion in report.
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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Cutler Elementary School								
Computer Lab	12" Floor Tiles	90 sq. ft	MISC	No	Good	NF	1	
Staff room previously listed as Rm. 221	Pipe Insulation	50 sq. ft	TSI	Yes	Damaged	1	2	Materials were observed to have exposed ends and joints above ceiling. Repair. Conduct O&M
Staff room previously listed as Rm. 221	Pipe Fitting Insulation	8 observed	TSI	Yes	Damaged	1	2	cleaning within 15' of all surfaces with ACBM insulation.
Hall outside library previously listed as Hall-221	12" Tan Floor Tile	100 sq. ft	MISC	No	Good	NF	1	
Hall outside room #8 previously listed as Hall-212	12" White Floor Tile	100 sq. ft	MISC	No	Good	NF	1	
Hall between room #1 & 2 previously listed as Hall-201	12" White Floor Tile	475 sq. ft	MISC	MNO	MNO	MNO	1	
Classroom Room #1 previously listed as 203	12" Tan Floor Tile	910 sq. ft	MISC	MNO	MNO	MNO	1	Materials have been covered over with newer flooring and plywood.
Classroom Room #2 previously listed as 202	12" Tan Floor Tile	900 sq. ft	MISC	MNO	MNO	MNO	1	
Custodian closet previously listed as Room 204	12" White Floor Tile	25 sq. ft	MISC	No	Fair	NF	1	Materials were observe to be cracking at the entrance and lifting.
Girls Bath	12" Grey Floor Tiles	170 sq. ft	MISC	No	Good	NF	1	
Teacher's room	12" Tan Floor Tile	250 sq. ft	MISC	MNO	MNO	MNO	1,6	Materials have been covered over with newer flooring per site representative.
Closet room #3 previously listed as Room 209	9" Floor Tiles	16 sq. ft	MISC	MNO	MNO	MNO	1	Materials are covered over with carpet.

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Cutler Elementary School								
Classroom #3 previously listed as Room 210	12" Tan Floor Tile	1,386 sq. ft	MISC	No	Fair	NF	1	Floor tiles were observed to have minor wear throughout.
Stairwell outside classroom #5/6	12" White Floor Tile	120 sq. ft	MISC	No	Fair	NF	1	Floor tiles were observed to have minor wear throughout.
Hall outside classroom 5/6 previous listed as Hall-214	12" White Floor Tile	225 sq. ft	MISC	No	Fair	NF	1	Floor tiles were observed to have minor wear throughout
Classroom #6 previously listed as Room 219	12" White Floor Tile	748 sq. ft	MISC	No	Fair	NF	1	Floor tiles were observed to have minor wear throughout.
Classroom #5 previously listed as Room 218	12" White Floor Tile	934 sq. ft	MISC	No	Fair	NF	1	Floor tiles were observed to have minor wear throughout.
Girl's Bath	12" Grey Floor Tiles	100 sq. ft	MISC	No	Good	NF	1	
Boy's Bath	12" Grey Floor Tiles	72 sq. ft	MISC	No	Good	NF	1	
Custodial	12" Grey Floor Tiles	20 sq. ft	MISC	No	Good	NF	1	
Basement Storage	12" Tan Floor Tile	1,059 sq. ft	MISC	No	Fair	NF	1	Normal wear throughout.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	See further discussion in report.
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APPENDIX B

AHERA Management Plan – 2024 Update Recommendations

The following comments and recommendations should be reviewed in conjunction with the findings and discussions contained in the text of the report, attachments, the school's 1989 initial AHERA Report and Management Plan, and the federal standard 40 CFR Part 763. In particular, the existing Operations and Maintenance program should be referenced for additional work methods, minimum requirements and procedures, and safety and health.

Documentation review during the reinspection consisted of only those specific documents which list ACBM and were provided by the school for RPF to review. A full review or audit of the AHERA Plans for each building (including abatement records), other record-keeping requirements, or AHERA implementation records was not completed as part of this service. Except as otherwise noted, the reinspection work only included ACBM's identified in the inspection report provided to RPF by the school. During the reinspection and initial inspections, abatement documentation and other record-keeping items were not completely reviewed or audited for accuracy and completeness. This type of review was beyond the scope of services for the project.

A full inspection (for confirmation of previous inspection results) was also not completed during this project. In the event that other readily accessible suspect materials were observed by the inspector during the course of the reinspection (materials that may have been missed during the initial inspection or may require confirmation testing), the inspector provided preliminary notation on the reinspection reports to make the school aware that additional inspection or review may be required. Based on the RPF preliminary review of the records provided to RPF, it is RPF's opinion that the AHERA Plans may not address all of the possible ACBM present. However, in accordance with AHERA reinspection requirements, the inspector did not conduct full initial inspection during the course of the reinspection work.

Asbestos Program Manager

The school must maintain a current true and correct statement, signed by the individual designated by the school (the Asbestos Program Manager) that certifies that the general, local education agency responsibilities, as stipulated by the AHERA regulation, have been met or will be met. It is important to update this as personnel changes occur and that a copy is maintained with the current Management Plan documentation. The Asbestos Program Manager must be sure to receive and maintain adequate training and to obtain and file all necessary recordkeeping requirements pursuant to AHERA and the Management Plan, including but not limited to: training, reinspections, surveillance, O&M activity, abatement design and final reports, annual notifications, and other related asbestos management information and documentation.

Resources

Below is an estimated cost for various training and requirements of the AHERA management plan with reasonable cost assumptions over the next three years:

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Task/Description	Estimated Costs
Annual 2-hour Awareness Training	\$800-\$1,000
O&M Initial Training - up to 4	\$1,750-\$2,100
O&M Refresher Training	\$825-\$1,050
6-month Periodic Surveillance (if outsourced and not performed by the trained in-house staff)	\$750-\$950
3-year AHERA Reinspection 2027	\$1,950-\$2,700
Additional Inspection, Lab Work, Updates	\$6,500-\$8,500

In addition, it is anticipated that some of the repair and cleaning work (small-scale and of short duration) that is recommended will be completed by in-house O&M level trained facilities staff, in accordance with the school's existing O&M Program and AHERA requirements. As such, the incremental increase in cost will likely be approximately \$1,500 for various materials and disposal.

3-Year Reinspection

The school must continue to have a reinspection completed by a licensed inspector and management planner at least once during every three-year period from the inception of the Management Plan.

6-Month Surveillance

The school must continue to have periodic surveillance of all ACBM at least every 6 months, by either an adequately trained O&M level staff member or an outside licensed inspector.

Maintenance and Custodial Staff Training

The school shall ensure that all custodial and maintenance employees are properly trained in accordance with AHERA and other applicable rules and regulations.

2 Hour Awareness: All janitorial, custodial and maintenance staff shall have a minimum of 2-hour asbestos awareness training upon hiring and each year.

O&M Level Training: Maintenance staff who may come in contact or who may disturb asbestos shall have a minimum of 16-hours of training upon hire and annual refresher training per State and EPA/OSHA requirements.

O&M Level Activity

The school must continue to ensure that all appropriate procedures are taken to protect building occupants for any O&M activity undertaken, including but not limited to:

- Restrict entry into the area by persons other than those necessary to perform the maintenance project, either by physically isolating the area or by scheduling.

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- Post signs to prevent entry by unauthorized persons.
- 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 materials in a sealed, leak-tight container for proper disposal at a permitted site.

O&M activity is typically limited to small-scale, short duration work where the primary intent is building maintenance, repair, or renovation where the removal of ACBM is not the primary goal of the job; and the amount of ACBM to be disturbed or repaired is less than 3 linear or 3 square feet. Larger projects or activities cannot be broken up or scheduled in groups to minimize the quantity of ACBM for the purposes of classifying work as small-scale, short duration O&M activity.

Worker Protection

The school must comply with either the OSHA Asbestos Construction Standard at 29 CFR 1926.1101 (or for public employees the Asbestos Worker Protection Rule at 40 CFR 763.120) including proper training, personal protective equipment, respiratory protection programs, medical surveillance, proper equipment and engineering controls, and other relevant work and safety requirements.

General O&M Cleaning

Cleaning should be completed through each entire room marked (or as otherwise indicated on the attached room-by-room inventory) as having damaged ACBM or friable ACBM present, as stated in AHERA, on a semi-annual basis.

- (i) HEPA-vacuum or steam-clean all carpets.
- (ii) HEPA-vacuum or wet-clean all other floors and all other horizontal surfaces.
- (iii) Dispose of all debris, filters, mop heads, and cloths in sealed, leak-tight containers

Fiber Release Episodes

In the event of the falling or dislodging of small amounts, less than 3 square or 3 linear feet of ACBM, ensure the following is completed by O&M level trained, qualified staff:

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- Immediately restrict access and thoroughly saturate the debris using wet methods.
- Clean the area using appropriate O&M level methods.
- Place the asbestos debris in a sealed, leak-tight container for proper disposal
- Repair the area of damaged ACBM as applicable according to the AHERA rule.

In the event of the falling or dislodging of more than 3 square or 3 linear feet of ACBM:

- Immediately restrict entry to the area and post signs to prevent entry into the area by persons 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.
- Contact the school's outside consultant for assistance with testing and design of the appropriate response action. Use the design plan to obtain pricing from qualified abatement contractors to complete the response action.

Other Specific ACBM Updates

Flooring and Mastic

The floor tile and mastic are present in most of the school buildings and is nonfriable ACBM with the potential for damage. No immediate response action is required, as these materials can safely be managed in place. The materials were in good condition with some minor wear and tear observed. Care should be taken not to disturb the underlying flooring (i.e. drilling or cutting holes for electrical/plumbing work). Regarding the flooring that is not covered with carpeting and/or newer 12" floor tile, care should be taken to avoid activities which will abrade the surface of the floor tile. Buffing, stripping, and other flooring maintenance activities should be completed in accordance with the most current guidelines for ACBM flooring. High speed buffing or use of abrasive pads must not be conducted on the ACBM floors. (References the Draft EPA Region I Guidance Document enclosed herein.)

The flooring ACBM must be managed properly in accordance with AHERA and this management plan until they are completely removed.

Flooring mastic, along with any floor tile or linoleum that is, was, or may have been assumed to be ACBM, should continue to be classified as ACBM and properly tested prior to any flooring removal work (as applicable). It should be noted that a recent EPA advisory statement recommends that flooring which was previously tested as asbestos-free be confirmed using electron microscopy prior to any removal or other activities that may results in the disturbance of the flooring.

Pipe Fitting Insulation

The insulation was documented at the Mt. Caesar trench and the Cutler staff room. These materials were largely not accessible as they are enclosed within the

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trench with no access allowed. The materials are assumed to be damaged with exposed ends, and are classified as damaged or significantly damaged ACBM, and repairs/removal is required by licensed and trained personnel. Special care should be taken when accessing areas above ceilings or within walls to avoid accidental disturbance to the ACBM insulation or any possible debris and contaminated dust. It is also likely that additional material is present in locations not accessed for the reinspection work or in concealed locations.

Initial and periodic cleaning of the adjacent surfaces should be performed on an annual basis at a minimum, using wet-wiping and HEPA vacuuming.

Glue Daubs

No immediate response action is required. The ACBM is nonfriable with the potential for damage. The ACBM must be managed properly in accordance with AHERA and this management plan until they are completely removed. In the event that any renovation work or other construction, repairs or maintenance is to be completed, then the APM must review the work to determine that the ACBM will not be impacted either directly or indirectly by the work. If there exists a potential that the ACBM may be disturbed, then an accredited project designer/management planner should review the project and prepare abatement specification as required.

Fire Doors

No immediate response action is required. The ACBM is nonfriable with the potential for damage. The ACBM must be managed properly in accordance with AHERA and this management plan until they are completely removed. In the event that any renovation work or other construction, repairs or maintenance is to be completed, then the APM must review the work to determine that the ACBM will not be impacted either directly or indirectly by the work. If there exists a potential that the ACBM may be disturbed, then an accredited project designer/management planner should review the project and prepare abatement specification as required.

Transite Panels

No immediate response action is required. The ACBM is nonfriable with the potential for damage. The ACBM must be managed properly in accordance with AHERA and this management plan until they are completely removed. In the event that any renovation work or other construction, repairs or maintenance is to be completed, then the APM must review the work to determine that the ACBM will not be impacted either directly or indirectly by the work. If there exists a potential that the ACBM may be disturbed, then an accredited project designer/management planner should review the project and prepare abatement specification as required.

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Assumed ACBM

Based on the RPF preliminary review of the records provided to RPF, it is RPF's opinion that the AHERA Plans may not address all of the possible ACBM present. For example, although not directly regulated by AHERA, various exterior suspect materials are present, as well as possible interior hidden ACBM. Based on the types and conditions of the listed assumed ACBM in this school building, it is recommended that all the assumed nonfriable ACBM be managed in-place accordance with the requirements of AHERA and the operations and maintenance program.

Assumed ACBM that does not require any immediate response actions includes the following materials:

- Sink basin undercoat
- Building seam caulk throughout the buildings
- Ceramic tile mastic and grout (2 types) in bathrooms
- Covebase, stair treads and adhesive throughout the building
- Gypsum board with joint compound
- Interior Door Caulk/Glaze
- Various exterior materials.

The gypsum board with joint compound throughout the building also requires initial testing and is assumed ACBM. Care should be used not to disturb the materials during the interim including notification and facilities staff, faculty and others that may disturb the gypsum or joint compound materials.

The non-friable assumed ACBM listed above are classified under AHERA as ACBM with the potential for damage. However, it should be noted that nonfriable ACBM and nonfriable assumed ACBM can be rendered friable when, for example, they are subjected to certain forces such as cutting, grinding, sawing, sanding, drilling, high-speed buffing, and other abrasive forces. This is particularly true during demolition or removal of nonfriable ACBM.

Under normal building conditions, the assumed nonfriable ACBM does not pose an immediate hazard. The materials are in good to fair condition in general, with some minor wear and tear. Care should be taken to ensure that the chalkboards are not broken or chipped. The exterior roofing, caulking, and glazing materials should not be subjected to grinding, cutting, abrasion, or other forces which would result in the production of dust.

The assumed nonfriable ACBM must be managed properly in accordance with AHERA and this management plan until they are completely removed. In the event that any renovation work or other construction, repairs or maintenance is to be completed, then the APM must review the work to determine that the ACBM

AHERA Management Plan – 2024 Update Recommendations

will not be impacted, either directly or indirectly. If there exists a possibility that the ACBM may be disturbed, then an accredited project designer/management planner should review the project and prepare abatement specification as required.

Testing of the interior, accessible assumed ACBM should be completed as soon as feasible by a licensed inspector and the management plan be updated accordingly by a licensed management planner.

Exterior Suspected ACBM

Exterior ACBM (in many cases) is not directly regulated by AHERA but are regulated by other State and federal regulations. Prior to any disturbance, renovation, or demolition, a licensed inspector must inspect for and sample any suspect exterior ACBM to be impacted or disturbed. If ACBM is found, a licensed project designer should prepare abatement plans as needed to facilitate work.

Warning Labels

The schools must ensure warning labels are and continue to be immediately adjacent to any friable and nonfriable ACBM, suspected ACBM, and assumed to be ACM located in routine maintenance areas (such as boiler rooms, mechanical space and maintenance areas) at each school building. The warning label must read (in print which is readily visible because of large size or bright color) as follows: CAUTION: ASBESTOS. HAZARDOUS. DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT.

Asbestos Abatement Activity

Asbestos response actions, as defined by AHERA, must be detailed in a specification (project design) prepared by a licensed asbestos abatement project designer in accordance with AHERA and State regulations. Licensed personnel/contractors must carry out the response actions. Abatement activity itself is beyond the scope of the management plan/O&M program.

New Construction, Additions and Renovated Space

For any new buildings or renovated space, obtain architectural/engineering (A/E) statements for new construction/renovation areas in accordance with AHERA, certifying that no asbestos was specified or used. In lieu of A/E statements, all newly installed buildings materials must be tested pursuant to the AHERA inspection requirements.

Prior to any renovation or demolition activity, additional inspection and testing by a licensed inspector is required to satisfy current state, EPA and OSHA requirements that may exceed the inspection requirements under AHERA and the existing inspection documentation for the school buildings.

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In the event that any renovation work or other construction, repairs or maintenance is to be completed, then the APM must review the work to determine that the ACBM will not be impacted, either directly or indirectly. If there exists a potential that the ACBM may be disturbed, then an accredited project designer/management planner should review the project and prepare abatement specification as required. Only properly accredited and licensed personnel should complete the work.

Conflict of Interest

Pursuant to the EPA AHERA requirements and industry standards, abatement contractors should be engaged for inspection, testing, lab work, design or oversight, and clearance testing services. These services must be performed by qualified, certified firms completely independent of any abatement contractors used to complete work for the school.

**Note: Also reference the 2024 Reinspection Report for additional comments and recommendations.*

APPENDIX C

STATE of NEW HAMPSHIRE
Department of Environmental Services
Asbestos Management & Control Program
ASBESTOS MANAGEMENT PLANNER



AM102966 I
ALLAN D MERCIER

EFF. Date: 12/5/2023 EXP. Date: 12/4/2024

Air Resources Division Director
Craig A. Wright

Craig A. Wright

RPF ENVIRONMENTAL, INC.

320 First NH Turnpike, Northwood, NH 03261 (603) 942-5432
Class Located in Northwood, NH

This is to certify that

Allan Mercier

*has completed the requisite training and
has passed an examination for accreditation as:*

Asbestos Management Planner – Initial Training

Pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

November 10, 2023
Examination Date

230563 – 02 – 04/20/73
Certificate Number/DOB

November 10, 2023
Course Date

November 10, 2024
Expiration Date



Brianna Ham, Instructor

STATE of NEW HAMPSHIRE
Department of Environmental Services
Asbestos Management & Control Program



ASBESTOS INSPECTOR

AI103045 I

SEAN R SMITH

EFF. Date: 1/30/2024 EXP. Date: 1/29/2025

Air Resources Division Director
Craig A. Wright

Craig A. Wright

RPF ENVIRONMENTAL, INC.

320 First NH Turnpike, Northwood, NH 03261 (603) 942-5432

Class Location: Northwood, NH

This is to certify that

Sean Smith

has completed the requisite training for:

Inspector Initial Training

Pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

November 8, 2023
Examination Date

230562-3/110999
Certificate Number/DOB

November 6, 2023 – November 8, 2023
Course Date

November 8, 2024
Expiration Date



Brianna Ham, Instructor

APPENDIX D

CODE DESCRIPTIONS

(Index sheet for use with room-by-room listings in this Appendix)

Assessment Codes:

1. Damaged or significantly damaged thermal systems insulation asbestos containing material (ACM)
2. Damaged friable surfacing ACM
3. Significantly damaged friable surfacing ACM
4. Damaged or significantly damaged friable miscellaneous ACM
5. ACM with the potential for damage
6. ACM with the potential for significant damage
7. Any remaining ACM or friable suspected ACM

MNO **Material could not be located** and may have been removed or enclosed, or it was not possible to confirm if the material observed was in fact newer replacement materials. Verify abatement records and, if all records are obtained and completed, update the ACM listings to reflect the abatement work. If an MNO listing is due to an inaccessible area or locked room, such areas should be inspected when feasible.

AHERA REINSPECTION METHODS & LIMITATIONS

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Reinspection Methods

The reinspection was completed in accordance with Part 763.85 (b) of 40 CFR Part 763, Subpart E - Asbestos Hazard Emergency Response Act (AHERA). Accessible ACM's which were identified in the existing AHERA reports were visually reinspected in accordance with AHERA, to (a) observe whether the materials are friable, (b) observe the conditions of the ACM and potential for disturbance, and (c) to assess the hazard potential of the ACM. Documentation review consisted of only those specific documents which list ACM which were provided by the school to RPF for review. A full review or audit of the AHERA Plans for the building (including abatement records), other record keeping requirements, and AHERA implementation records were not completed as part of this service. Please note that this reinspection report is intended to comply with the federal regulation regarding reinspections and the report should not be considered or referenced as a detailed, full initial AHERA room-by-room inspection. Please also reference the initial AHERA Inspection Report prepared for the building by RPF and subsequent update records. This reinspection does not meet the requirements for full inspections prior to renovation or demolition activity.

A full inspection (for confirmation of previous inspection results) was also not completed during this project. In the event that other readily accessible suspect materials were observed by the inspector during the course of the reinspections (materials that may have been missed during the initial inspection or may require confirmation testing), the inspector provided preliminary notation on the reinspection reports to make the school aware that additional inspection or review may be required. However, in accordance with the AHERA reinspection requirements, the inspector did not conduct full initial inspection during the course of the reinspection work.

Limitations

- This reinspection only included the school buildings designated in the RPF listing. If other buildings are used as school buildings in accordance with 40 CFR Part 763 and need to be reinspected, please notify our office to make necessary arrangements. This reinspection and report do not meet the requirements set forth by US EPA, OSHA, and State agencies for conducting full asbestos inspections prior to renovation or demolition.
- The observations and conclusions presented in the report were based solely upon the services described herein, and not on scientific tasks or procedures beyond the Scope of Services as discussed in the proposal and text of the report. The conclusions and recommendations are based on visual observations and testing (which was limited as indicated in the report) and were arrived at in accordance with generally accepted standards of industrial hygiene practice and asbestos professionals. In addition, and as applicable, where sample analyses were conducted by an outside laboratory, RPF has relied upon the data provided and has not conducted an independent evaluation of the reliability of this data.
- Observations were made of the designated accessible areas of the site as indicated in the report. While it was the intent of RPF to conduct a survey to the degree indicated, it is important to note that not all suspected ACM material at the site(s) were specifically assessed. Visibility was limited, as indicated, due to the presence of furnishings, equipment, solid walls, and solid or suspended ceilings throughout the facility. Suspect material may have been used and may be present in areas where detection and assessment were difficult until renovation and/or demolition proceeds.
- Although some assumptions may have been stated regarding the potential presence of inaccessible or hidden ACM, a full inspection for all ACM or a destructive inspection for possible inaccessible suspect ACM was not conducted. This inspection did not include a hazard assessment survey or testing to determine current dust concentrations of asbestos in and around the building. The survey was limited

to ACM as indicated herein and a site assessment for other possible environmental health and safety hazards or subsurface pollution was not performed as part of the scope of this initial site inspection.

- Where access to portions of the surveyed area was unavailable or limited, RPF renders no opinion of the condition and assessment of these areas. The survey results only apply to areas specifically accessed by RPF during the site inspection.
- Interiors of mechanical equipment and other building or process equipment may also have ACM gaskets or insulation present and were not included in this inspection. Further inspections would likely be required prior to renovation or demolition activity.
- Existing reports, drawings and analytical results provided by the Client to RPF (as applicable), were not verified and, as such, RPF has relied upon the data provided as indicated and has not conducted an independent evaluation of the reliability of this data.
- All hazard communication and notification requirements, as required by 40 CFR Part 763, U.S. OSHA regulation 29 CFR Part 1926, 29 CFR Part 1910, and other applicable rules and regulations, by and between the Client, general contractors, subcontractors, building occupants, employees, and other affected persons were the responsibility of the Client and Client's abatement contractor and are not part of the Scope of Services to be provided by RPF.
- Results presented in the report are limited to the materials and conditions present at the time that the site inspection was actually performed by RPF. The applicability of the observations and recommendations presented in this report to other portions of the site were not determined as part of this scope of work. Many accidents, injuries and exposures, and environmental conditions are a result of individual employee/employer actions and behaviors, which vary from day to day and with operations being conducted. Changes to the site that occur subsequent to the RPF inspection may result in conditions which differ from those present during the survey and presented in the findings of the report. For example, during construction changes it is possible that previously inaccessible suspect material may be encountered. As such, the contractors, employer's OSHA-competent persons, and other affected staff should be advised of the possible presence of inaccessible ACM and suspect ACM. In the event that newly identified suspect material is encountered, please contact RPF to arrange for proper inspection, assessment and testing as applicable.
- Typically, hazardous building materials such as asbestos, lead paint, PCB's, mercury, refrigerants, hydraulic fluids, and other materials may be present in buildings. The survey performed by RPF only addresses the specific items as indicated in the report. In general, it is recommended that surveys for all accessible hazardous building material be performed. Notify RPF to arrange for additional survey work as needed.