

AHERA THREE-YEAR RE-INSPECTION

**Nehaunsey Middle School
415 Swedesboro Road
Gibbstown, New Jersey 08027**

PREPARED FOR:
Greenwich Township Board of Education
415 Swedesboro Road
Gibbstown, New Jersey 08027

PREPARED BY:
PARS Environmental, Inc.
500 Horizon Drive, Suite 540
Robbinsville, NJ 08691

PARS PROJECT NO. 257-75



December 2020



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1.0 BACKGROUND INFORMATION

1.1 INITIAL INSPECTIONS

On October 22, 1986, President Ronald W. Reagan signed Public Law 99-519, the Asbestos Hazard Emergency Response Act (AHERA). This law required the United States Environmental Protection Agency (USEPA) to develop regulations mandating a comprehensive approach to eliminating the health hazards associated with asbestos in public and private elementary and secondary schools.

In response to this mandate, the USEPA published the Asbestos-Containing Materials in Schools Rule (40 CFR Part 763 Subpart E) on October 30, 1987. This rule required the Local Education Agency (LEA) to inspect their public and private elementary and secondary schools for friable and non-friable asbestos-containing building materials (ACBM), assess the physical condition of the ACBM, and develop an Asbestos Management Plan to address any hazards to the occupants posed by the ACBM.

The Asbestos Management Plan was also required to detail the results of all school building inspections and describing any response actions designed to control any asbestos hazards. The USEPA also mandated the designation of an individual responsible for oversight of asbestos issues.

Unless an extension was granted, the deadline for submission of the Asbestos Management Plan to the New Jersey Department of Health (NJDOH) Asbestos Control Service was October 12, 1988. LEAs were required to begin implementation of their Asbestos Management Plans by July 9, 1989.

1.2 THREE-YEAR RE-INSPECTIONS

One of the major provisions of the regulations is the requirement for periodic re-inspections (40 CFR 763.85). At least once every three years after the Asbestos Management Plan was implemented, the LEA must have all known friable and non-friable ACBM and presumed ACBM re-inspected. The primary purpose of the initial inspection was to locate all ACBM. The purpose of the re-inspection is to review the physical condition of the ACBM identified during the initial inspection and to detect any changes that may have occurred. This reassessment of the condition of the ACBM must be performed by an AHERA accredited inspector.

The re-inspection must include all friable and non-friable known or presumed ACBM in each school building. If, during the course of the re-inspection, the LEA becomes aware of any functional spaces and/or suspect materials missed at the time of the initial inspection, they must be inspected and assessed. The LEA has the option of either sampling any newly discovered suspect ACBM or presuming that it contains asbestos.

If the building does not contain ACBM, or if all ACBM was removed following the initial inspection, a re-inspection is not necessary if the removal of all ACBM was fully documented and the records are maintained as a part of the Asbestos Management Plan.

The results of the re-inspection must be incorporated into the existing Asbestos Management Plan. Any recommendations of the management planner based on the re-inspection and any response actions selected by the LEA as a result of these recommendations also must be included.

The NJDOH does not require submission of the Re-inspection Report or a revised Asbestos Management Plan; however, a "Letter of Assurance" must be completed and returned to them once the re-inspection has been completed. A copy of the Letter of Assurance is included in **Appendix A**.



2.0 RE-INSPECTION PROCEDURE

At the request of the Greenwich Township School District (District), PARS Environmental, Inc. (PARS) performed an AHERA re-inspection of the Nehaunsey Middle School in Gibbsboro, New Jersey on November 20, 2020. Prior to the re-inspection, PARS reviewed the existing Asbestos Management Plan, management plan addenda, site inspection data, abatement, and other pertinent records obtained from the District.

The 2020 three-year re-inspection was conducted by Mr. Eren Boduroglu, an AHERA accredited Building Inspector under the supervision of Mr. Julian Fernandez-Obregon, an AHERA accredited Management Planner. The re-inspection was performed in accordance with the requirements of the EPA's Asbestos Containing Building Materials in Schools Rule (40 CFR 763.85[b]). Copies of the inspector/management planner certifications are included in **Appendix B**.

Using the available records, a current inventory of existing ACMB both confirmed and presumed was developed. Each ACMB was previously identified and recorded on the PARS AHERA Three-Year Re-Inspection Form. Each functional space was listed on the re-inspection forms specifying the room number, homogeneous identification number and description, status and type of ACMB, friability, quantity, condition, and appropriate response action.

The areas listed on the forms were then re-inspected as follows:

- Visual re-inspection and reassessment of the condition of all friable known or presumed ACMB previously identified in the Asbestos Management Plan.
- Visual inspection of material that was previously considered non-friable ACMB to determine whether it had become friable since the last inspection.
- Identification of any homogeneous areas with material that had become friable since the re-inspection.
- Assessment of the condition of the newly friable material.

The findings of the re-inspection for all known confirmed and presumed homogeneous materials have been incorporated into PARS AHERA Three-Year Re-Inspection Forms. The re-inspection forms are included in **Appendix C**. Floor plans depicting the locations of confirmed and presumed ACMB area included as **Appendix D**.

Note that details of damage to ABCM, if found during the re-inspection, are included on the re-inspection forms. The damaged materials should be repaired or removed as noted according to Local, State, and Federal regulations. PARS has anticipated that damaged materials found during the re-inspection will be repaired or removed prior to the next six-month periodic surveillance.

The NJDOH adopted amendments regarding the testing and analysis of suspect Category I non-friable and other non-friable organically bound ACMB. These materials must be analyzed by Transmission Electron Microscopy (TEM) when a sample contains one-percent (1%) or less than one percent asbestos by Polarized Light Microscopy (PLM). If building materials have been previously identified as a non-ACBM by PLM, PARS recommends performing additional testing and analysis by TEM prior to disturbance.

This re-inspection report is a supplement to the original Asbestos Management Plan and should be included as part of the plan. The findings of this re-inspection reflect site conditions observed at the time of the re-inspection. The inspection was limited to those materials which were accessible to the re-inspection personnel.



Exploratory demolition, coring, and wall and ceiling dismantlement were not performed at the time of the re-inspection. Any changes in facility use or occupancy characteristics may necessitate a reassessment. This investigation was limited to the review of existing data supplied to PARS by the District.

This re-inspection report should not be used as a specification for an asbestos specification/removal contract. Prior to any building demolition, renovation, or repair activities, additional investigation and/or sampling may be required.

3.0 CONCLUSIONS AND RECOMMENDATIONS

The AHERA Three-Year Re-Inspection completed at the Nehaunsey Middle School indicates that some of the previously identified confirmed ACBM was identified as damaged or newly friable. Repairs should be made, when feasible. PARS then recommends maintaining the existing Operation and Maintenance (O&M) Program.

Our professional services have been performed, our findings obtained, and our conclusions and recommendations prepared in accordance with customary principles and practices in the fields of environmental science and engineering. This statement is in lieu of other statements either expressed or implied. This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions present of a type or at a location not investigated. The scope of services performed in the execution of this evaluation may not be appropriate to satisfy the needs of other users, and use or re-use of this document or the findings, conclusions, or recommendations is at the risk of said user.

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PARS appreciates the opportunity to assist Greenwich Township School District with this project. Should you have any questions or comments please feel free to contact us at (609) 890-7277.

Respectfully Submitted,

PARS ENVIRONMENTAL, INC.

Julian Fernandez-Obregon
Manager, Health & Safety Division
AHERA Building Inspector/Management Planner



Appendix A

NJDOH Letter of Assurance

New Jersey State Department of Health
Division of Occupational and Environmental Health
Environmental Health Service

LETTER OF ASSURANCE
THREE-YEAR REINSPECTION OF SCHOOL BUILDINGS PURSUANT TO AHERA



RESPONSIBLE GOVERNING AUTHORITY

Name of Responsible Governing Authority GREENWICH TOWNSHIP SCHOOL DISTRICT		Telephone Number 856-224-4900
Street Address 415 SWEDSBORO ROAD		
Town GIBBSTOWN		County GLOUCESTER
Name of Asbestos Program Manager GERARDO BATISTA	Affiliation FACILITIES MANAGER	Telephone Number 856-224-4920 X2129

FACILITY

Name of Facility NEHAUNSEY MIDDLE SCHOOL		Telephone Number 856-224-4920
Building Assessed NEHAUNSEY MIDDLE SCHOOL		Asb. Mgt. Plan Number (if known)
Street Address 415 SWEDSBORO ROAD		
Town GIBBSTOWN		County GLOUCESTER
Date Three-year Reinspection Occurred November 20, 2020		

INSPECTORS/ASSESSORS

1	Name Eren Boduroglu	Address 500 HORIZON DRIVE, SUITE 540 ROBBINSVILLE, NEW JERSEY 08691	Telephone Number 609.890.7277
	Affiliation PARS ENVIRONMENTAL, INC.	Acc. No./State of Accreditation AHERA Inspector #NAETI 58564	Signature 
2	Name Julian Fernandez-Obregon	Address 500 HORIZON DRIVE, SUITE 540 ROBBINSVILLE, NEW JERSEY 08691	Telephone Number 609.890.7277
	Affiliation PARS ENVIRONMENTAL, INC.	Acc. No./State of Accreditation AHERA Management Planner #NYS-MPR-2256	Signature 
3	Name	Address	Telephone Number
	Affiliation	Acc. No./State of Accreditation	Signature

Return completed form to:

NJDOH
ATT: Mr. James A. Brownlee
New Jersey Department of Health
Consumer and Environmental Health Services
P.O. Box 369
Trenton, NJ 08625-0360

ASB-38
APR 91



Appendix B

Inspector/Management Planner Certifications

58564

*True Copy
BMM*

NAETI Inc.

CERTIFICATE OF COMPLETION

AHERA/EPA Accredited Per 40 CFR Part 763
Asbestos Accreditation under TSCA Title II

This is to certify that

Eren Boduroglu

Successfully completed the course entitled

**3-Day New York State/EPA/AHERA Asbestos Building Inspector Program on
September 28th -30th, 2020**

Examination passed on September 30th 2020

Expiration Date on September 30th 2021

Lee Wasserman

President, NAETI Inc.

Per 10 NYCRR Part 73.2 (L) (1), DOH 2832 Certificate of Completion of Asbestos
Safety Training is the only official record of training for N.Y.S. students.

Language: English

ABIH 3 CM POINTS

3321 Doris Avenue, Building B, Ocean, NJ 07712

Phone (732) 531-5571

Fax (732) 531-5956

www.naeti.com

ATC GROUP SERVICES LLC

104 East 25th Street, New York, NY 10010
(212) 353-8280

This certifies that

Julian Fernandez-Obregon

*has successfully completed the
4-hour EPA-ASHERA/ASHARA Training, accredited under TSCA Title II 40 CFR 763,
and the New York State Department of Health Approved Course and Examination for*

Asbestos Management Planner Refresher

on

October 9, 2020

**** Please note that the official record of successful completion is the
DOH 2832 Certificate of Asbestos Safety Training****

Course Location: Online Course

Examination Date: October 9, 2020

Certificate#: NYS - MPR - 2256

Expiration Date: October 9, 2021

Signed:


John P. Springston, CIH, CSP, FAIHA

ATC GROUP SERVICES LLC

104 East 25th Street, New York, NY 10010
(212) 353-8280

This certifies that

Julian Fernandez-Obregon

*has successfully completed the
4-hour EPA-AHERA/ASHARA Training, accredited under TSCA Title II 40 CFR 763,
and the New York State Department of Health Approved Course and Examination for*

Asbestos Site Inspector Refresher

on

September 28, 2020

**** Please note that the official record of successful completion is the
DOH 2832 Certificate of Asbestos Safety Training****

Course Location: Online Course

Examination Date: September 28, 2020

Certificate#: NYS - RHUIR - 22550

Expiration Date: September 28, 2021

Signed: _____

John P. Springston, CIH, CSP, FAIHA



Appendix C

AHERA Three-Year Re-Inspection Forms

AHERA Three-Year Re-Inspection Form

Facility Name Neaunsey Middle School
 Facility Address 415 Swedesboro Road
Gibbstown, New Jersey 08027

Date of Reinspection Fall 2020
 Date of Previous Reinspection Fall 2017
 Date of Next Reinspection Fall 2023

Building Inspection										Management Planning
Room #	Homogenous ID#	Homogenous ID Description	Status P/C	ACM Type T/S/M	Friable Y/N	Quantity SF/LF	Current Quantity Damaged SF/LF Condition ND/D/SD	Change Y/N	Response Action	Date: Fall 2020 Comments
HVAC Closet	F01	12"x12" White with Grey Floor Tile	P	M	N	150 SF	0 SF ND	N	7	Maintain O & M
Library Staff Room	F04	12"x12" White with Tan Floor Tile	P	M	N	250 SF	0 SF ND	N	7	Maintain O & M
Room 8 - Library (under carpet)	F04	12"x12" White with Tan Floor Tile	P	M	N	1,800 SF	0 SF ND	N	7	Maintain O & M
Technology Room (under carpet)	F04	12"x12" White with Tan Floor Tile	P	M	Y	500 SF	0 SF ND	N	7	Maintain O & M
Library Storage (under carpet)	F04	12"x12" White with Tan Floor Tile	P	M	N	220 SF	0 SF ND	N	7	Maintain O & M
Throughout	A15	Elbow/Joints associated with Fiberglass Pipe Insulation	P	T	N	12+ FTG	0 SF ND	N	7	Maintain O & M
Room 12	BLT	Black Labtop	P	M	N	30 SF	0 SF ND	N	7	Maintain O & M
Room 12	F01	12"x12" White with Grey Floor Tile	P	M	N	1,200 SF	2 SF D	Y	4	Repair, then Maintain O & M
Room 14	BLT	Black Labtop	P	M	N	10 SF	0 SF ND	N	7	Maintain O & M
Room 14	F01	12"x12" White with Grey Floor Tile	P	M	N	1,200 SF	0 SF ND	N	7	Maintain O & M
Room 16	F01	12"x12" White with Grey Floor Tile	P	M	N	1,152 SF	0 SF ND	N	7	Maintain O & M
Room 2	F09	12"x12" Grey with White Floor Tile	P	M	N	720 SF	6 SF D	Y	4	Repair, then Maintain O & M
Room 26-Maintenance	F02	12"x12" Beige Floor Tile	P	M	N	711 SF	0 SF ND	N	7	Maintain O & M
Room 3	F09	12"x12" Grey with White Floor Tile	P	M	N	712 SF	4 SF D	Y	4	Repair, then Maintain O & M
Room 35 - Kitchen Office	X0	12"x12 Brown Floor Tile	P	M	N	150 SF	0SF ND	N	7	Maintain O & M

AHERA Three-Year Re-Inspection Form


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Date of Reinspection Fall 2020
 Date of Previous Reinspection Fall 2017
 Date of Next Reinspection Fall 2023

Building Inspection										Management Planning
Room #	Homogenous ID#	Homogenous ID Description	Status P/C	ACM Type T/S/M	Friable Y/N	Quantity SF/LF	Current Quantity Damaged SF/LF Condition ND/D/SD	Change Y/N	Response Action	Date: Fall 2020 Comments
Room 36 - Business Office Storage	X1	12"x12" Brown Floor Tile	P	M	N	220 SF	0 SF ND	N	7	Maintain O & M
Room 38 - Cafeteria	F03	12"x12" Tan Floor Tile	P	M	N	2,098 SF	10 SF D	Y	4	Repair, then Maintain O & M
Room 4	F09	12"x12" Grey with White Floor Tile	P	M	N	835 SF	4 SF D	Y	4	Repair, then Maintain O & M
Room 40A - Office Copy Room	F02	12"x12" Beige Floor Tile	P	M	N	220 SF	10 SF D	Y	4	Repair, then Maintain O & M
Room 40 - Main Office (under carpet)	F02	12"x12" Beige Floor Tile	P	M	N	1,500 SF	0 SF ND	N	7	Maintain O & M
Room 46 - Guidance Office	F04	12"x12" White Tan Floor Tile With Grey Spots	P	M	N	150 SF	3 SF D	Y	4	Repair, then Maintain O & M
Room 47 - Teacher's Supply	F04	12"x12" White with Tan Floor Tile	P	M	N	120 SF	0 SF ND	N	7	Maintain O & M
Room 5	F09	12"x12" Grey with White Floor Tile	P	M	N	708 SF	6 SF D	Y	4	Maintain O & M
Room 6	F09	12"x12" Grey with White Floor Tile Light Green & Beige Spots	P	M	N	720 SF	6 SF D	Y	4	Repair, then Maintain O & M
Room 7	F09	12"x12" Grey with White Floor Tile	P	M	N	720 SF	30 SF D	Y	4	Repair, then Maintain O & M

Inspector Name/# Eren Boduroglu (NAETI#58564)

Management Planner Name/# Julian Fernandez-Obregon (NYS-MPR-2256)

Inspector Signature 

Management Planner Signature 

KEY TO CODES:

LOCATION

F = Floor
 W = Wall
 C = Ceiling
 AC = Above Ceiling
 TSI = Thermal Systems Insulation
 O = Other

ACM TYPE

S = Surfacing Material
 T = Thermal Systems Insulation
 M = Miscellaneous Material

CONDITION

ND = No Damage
 D = Damage
 SD = Significant Damage

STATUS

P = Presumed ACM
 C = Confirmed

QUANTITY

SF = Square Feet
 LF = Linear Feet

RESPONSE ACTION

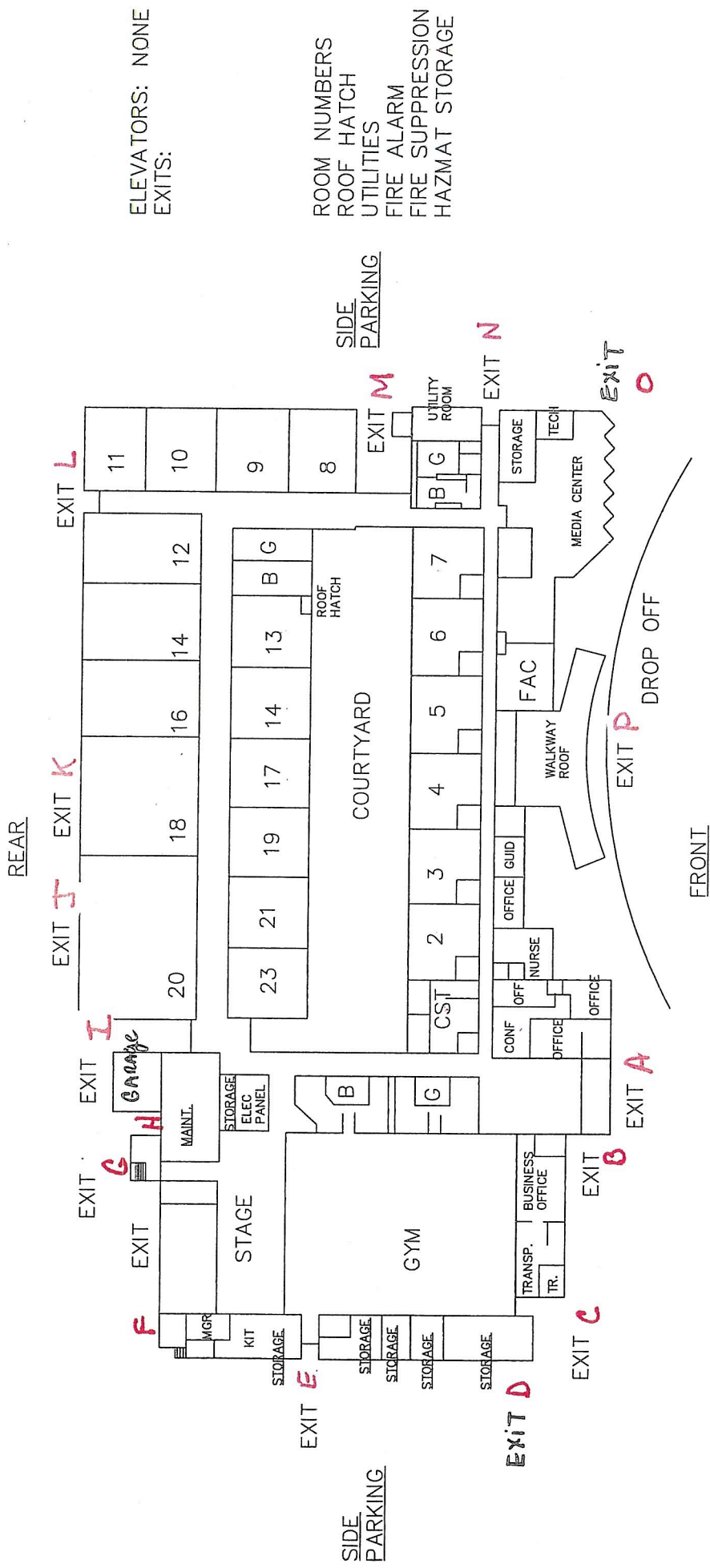
1 = Significantly Damaged - Isolate, Remove Immediately
 2 = Damaged & Potential for Significant Damage - Remove, Enclose, Encapsulate, or Repair when Feasible
 3 = Damaged & Potential for Damage - Remove, Enclose, Encapsulate or Repair when Feasible
 4 = Damaged - Remove, Encapsulate, Enclose, or Repair When Feasible
 5 = Potential for Significant Damage - Reduce Potential for Damage
 6 = Potential for Damage - Maintain O&M
 7 = Intact, low Potential for Damage - Maintain O&M



Appendix D

Floor Plans

NEHAUNSEY SCHOOL



ELEVATORS: NONE
EXITS:

ROOM NUMBERS
ROOF HATCH
UTILITIES
FIRE ALARM
FIRE SUPPRESSION
HAZMAT STORAGE