

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:
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PARS PROJECT NO. 257-75



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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 ACBM both confirmed and presumed was developed. Each ACBM 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 ACBM, 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 ACBM previously identified in the Asbestos Management Plan.
- Visual inspection of material that was previously considered non-friable ACBM 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 ACBM 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 ACBM. 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
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AHERA Building Inspector/Management Planner



Appendix A

NJDOH Letter of Assurance



Appendix B

Inspector/Management Planner Certifications



Appendix C

AHERA Three-Year Re-Inspection Forms



Appendix D

Floor Plans