# AHERA THREE-YEAR RE-INSPECTION

Broad Street Elementary School 255 West Broad Street, 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





## TABLE OF CONTENTS

1.0 BA	CKGRO	UND INFORMATION	1
		INSPECTIONS	
1.2	THREE-Y	YEAR RE-INSPECTIONS	1
		TION PROCEDURE	
3.0 CO	NCLUSI	ONS AND RECOMMENDATIONS	3
APPENI	DICES		
APPENI	DIX A:	NJDOH LETTER OF ASSURANCE	
APPENI	DIX B:	INSPECTOR/MANAGEMENT PLANNER CERTIFICATIONS	
APPENI	DIX C:	AHERA THREE-YEAR RE-INSPECTION FORMS	
APPENI	DIX D:	FLOOR PLANS	





## 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 reinspection 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 Broad Street Elementary 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 Broad Street Elementary 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

John of son

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		Telephone Num	nber
GREE	NWICH TOWNSHIP SCHOOL DISTRICT		856-224-4900	
Street	Address			
415 SV	VEDESBORO ROAD			
Town			County	
GIBBS	TOWN		GLOUCESTER	
Name	of Asbestos Program Manager	Affiliation	Telephone Num	ber
GERA	RDO BATISTA	FACILITIES MANAGER	856-224-4920 X	(2129
		FACILITY		
Name	of Facility		Telephone Num	nber
BROAL	STREET SCHOOL		856-224-4900	
Buildin	g Assessed		Asb. Mgt. Plan	Number (if known)
BROAL	STREET SCHOOL			
Street	Address			
255 WI	EST BROAD STREET			
Town			County	
GIBBS			GLOUCESTER	
Date T	hree-year Reinspection Occurred			
Novem	ber 20, 2020			
		INSPECTORS/ASSES	SORS	
	Name	Address 500 HORIZON [	DRIVE, SUITE 540	Telephone Number
1	Eren Boduroglu	ROBBINSVILLE, NEW JER	RSEY 08691	609.890.7277
	Affiliation	Acc. No./State of Accreditat	tion	Signature
	PARS ENVIRONMENTAL, INC.	AHERA Inspector #NAETI 5	58564	Even Bodwogle
	Name	Address 500 HORIZON [	DRIVE, SUITE 540	Telephone Number
2	Julian Fernandez-Obregon	ROBBINSVILLE, NEW JER	RSEY 08691	609.890.7277
	Affiliation	Acc. No./State of Accreditat	tion	Signature O 4 3 4 5 5 60
	PARS ENVIRONMENTAL, INC.	AHERA Management Plann	ner #NYS-MPR-2256	Julin obs an
	Name	Address		Telephone Number
3				
	Affiliation	Acc. No./State of Accreditat	tion	Signature

Return completed form to: NJDOH

ASB-38

ATT: Mr. James A. Brownlee New Jersey Department of Health

Consumer and Environmental Health Services

P.O. Box 369

APR 91 Trenton, NJ 08625-0360





# Appendix B

Inspector/Management Planner Certifications

58564

C. 20 Colo

# CERTIFICATE OF COMPLETION

NAETI Inc.

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 13.2 (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

Phone (732) 531-5571 3321 Doris Avenue, Building B, Ocean, NJ 07712

**ABIH 3 CM POINTS** 

Fax (732) 531-5956

www.naeti.com









# Appendix C AHERA Three-Year Re-Inspection Forms

Facility Name	Broad Street Elementary School	Date of Reinspection	Fall 2020
Facility Address	255 West Broad Street	Date of Previous Reinspection	Fall 2017
	Gibbstown, New Jersey 08027	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
1916 1st Floor Hall	GTBS107	Grey Linoleum	Р	Т	N	800	0 SF	Ň	7	Maintain
(Under Carpet)						SF	ND			O & M
1916 1st Floor Hall	GTBS107	Mastic associated with Grey Linoleum	Р	М	N	800	0 SF	N	7	Maintain
(Under Carpet)						SF	ND			O & M
Auditorium Lobby above Drop	GG10	Pipe Insulation	Р	Т	Υ	20 LF	0 SF	N	7	Maintain
Ceiling		Light Green and Beige Spots				SF	ND			O & M
Auditorium Lobby/ Stage	GG10	Pipe Insulation	Р	Т	N	150	0	N	7	Maintain
above Plaster Celiing		White and Dark Green Spots				LF	ND			O & M
Boiler Room	BG01	Boiler Gasket	Р	Т	N	200	12 SF	N	7	Maintain
						LF	D			O & M
Boy's Locker Room	GG16	Elbows/Joints associated with Fiberglass	Р	Т	Υ	6	0 SF	N	7	Maintain
and Office near Radiator		Pipe Insulation				FTG	ND			O & M
Café Storage/Freezer	FT02	12"x12" Blue Floor Tile	Р	М	N	150	0 SF	N	7	Maintain
						SF	ND			O & M
Café Storage /Freezer	FT02M	Mastic associated with 12"x12"	Р	М	N	150	0 SF	N	7	Maintain
		Blue Floor Tile				SF	ND			O & M
Crawlspace in Faculty Storage	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	180	0 SF	N	7	Maintain
Utility 2		Pipe Insulation				FTG	ND			O & M
Custodial Office near Radiator	GG16	Elbows/Joints associated with Fiberglass	Р	Т	Υ	21	0 SF	N	7	Maintain
		Pipe Insulation				FTG	ND			O & M
Custodial Supply	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	8	0 SF	N	7	Maintain
Room 1 near Room 105		Pipe Insulation				FTG	ND			O & M
Custodial Supply Room 1	A42	Vibration Collar	Р	M	N	8	0 SF	N	7	Maintain
						SF	ND			O & M
Equipment Storage in Gym	FT02	9"x9" Blue Floor Tile	Р	M	N	300	0 SF	N	7	Maintain
						SF	ND			O & M
Equipment Storage in Gym	FT02M	Mastic associated with	Р	М	N	300	0 SF	N	7	Maintain
		Blue Floor Tile				SF	ND			O & M
Equipment Storage in Gym	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	12	0 SF	N	7	Maintain
		Pipe Insulation				FTG	ND			O & M
Faculty Room Storage	FT03	9"x9" Green Floor Tile	Р	M	N	40	0 SF	N	7	Maintain
						SF	ND			O & M

Facility Name	Broad Street Elementary School	Date of Reinspection	Fall 2020
Facility Address	255 West Broad Street	Date of Previous Reinspection	Fall 2017
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		Building I	nspect	ion						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
Faculty Room Storage	FT03M	Mastic associated with 9"x9"	Р	М	N	41	1 SF	N	4	Repair, then Maintain
		Green Floor Tile				SF	ND			O & M
Front Office in Safe	FT03	9"x9" Green Floor Tile	Р	М	N	150	0 SF	N	7	Mainttain
						SF	ND			O & M
Front Office in Safe	FT03	Mastic associated with 9"x9"	Р	М	N	150	0 SF	N	7	Mainttain
		Green Floor Tile				SF	ND			O & M
General Supply (111, Utility 4)	GG11	Compressed Paper Pipe Insulation	Р	Т	Υ	5	0 SF	N	7	Mainttain
						LF	ND			O & M
Girls's Locker Room	GG16	Elbows/Joints associated with Fiberglass	Р	Т	Υ	6	0 SF	N	7	Mainttain
and Office near Radiator		Pipe Insulation				LF	ND			O & M
Ground Floor Room	GG10	Pipe Insulation	Р	Т	Υ	20	0 SF	N	7	Mainttain
1916 above Drop Ceiling						LF	ND			O & M
Gym near 30' Ceiling	GTBS104	Vibration Collar	Р	М	N	10	0 SF	N	7	Mainttain
						SF	ND			O & M
Gym near Ceiling	GG16	Elbows/Joints associated with Fiberglass	Р	Т	Υ	12	0 SF	N	7	Mainttain
		Pipe Insulation				FTG	ND			O & M
Hall A above Tin Drop Celiing	GG10	Pipe Insulation	Р	Т	Υ	140	0 SF	N	7	Mainttain
						LF	ND			O & M
Hall E above Drop Ceiling	GG16	Elbows/Joints associated with Fiberglass	Р	Т	Υ	6	0 SF	N	7	Mainttain
		Pipe Insulation				FTG	ND			O & M
Hall Ground Floor	GG10	Pipe Insulation	Р	Т	Υ	22	0 SF	N	7	Mainttain
						LF	ND			O & M
Kitchen Crawl Space	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	50	0 SF	N	7	Mainttain
w/ Access Door across 11,12		Pipe Insulation				FTG	ND			O & M
Room back	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	4	0 SF	N	7	Mainttain
Storage		Pipe Insulation				FTG	ND			O & M
Lamination Room	FT04	9"x9" Red Floor Tile	Р	М	N	50	0 SF	N	7	Mainttain
						SF	ND			O & M
Lamination Room	FT04M	Mastic associated with 9"x9"	Р	М	N	50	0 SF	N	7	Mainttain
		Red Floor Tile				SF	ND			O & M
Carpet and linoleum)	GG14	9"x9" Floor Tile and Mastic	Р	Т	N	250	0 SF	N	7	Maintain
						SF	ND			O & M
Nurse's Office	GG9	12"X12" White with Brown Floor Tile	Р	М	N	198	10 SF	N	4	Repair, then Maintain
8, 9		and Mastic	1			SF	ND			O & M
Gymnasium)	GTBS105	Transite Panels	Р	М	N	4,600	0 SF	N	7	Maintain
			+			Ea	ND		_	O & M
Classrooms in	GG10	Pipe Insulation	Р	Т	Y	140	0 SF	N	7	Maintain
1930 Wing			+			LF	ND		-	O & M
Room 101 (under new flooring)	GG14	9"x9" Floor Tile and Mastic	Р	М	N	672	0 SF	N	7	Maintain
						SF	ND			O & M

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	Management Planning									
Room#	Homogenous	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 102	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	6	0 SF	Ň	7	Maintain
1P		Pipe Insulation				FTG	ND			O & M
Room 104	GG16	Elbows/Joints associated with Fiberglass	Р	Т	Υ	9	0 SF	N	7	Maintain
		Pipe Insulation				FTG	ND			O & M
Room 105 Library	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	50	0 SF	N	7	Maintain
		Pipe Insulation				FTG	ND			O & M
Room 105 Library	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	20	0 SF	N	7	Maintain
		Pipe Insulation				FTG	ND			O & M
Room 105A Library	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Υ	8	0 SF	N	7	Maintain
2		Pipe Insulation				FTG	ND			O & M
Room 106	GG10	Pipe Insulation	Р	Т	Υ	20	0 SF	N	7	Maintain
						LF	ND			O & M
Room 106	GG11	Compressed Paper Pipe Insulation	Р	Т	Υ	30	0 SF	N	7	Maintain
		With Grey Spots				LF	ND			O & M
Room 107	FT01	12"X12 White/Tan Floor Tile	Р	М	N	800	0 SF	N	7	Maintain
						SF	ND			O & M
Room 107	FT01M	Mastic assciated with 12"x12"	Р	М	N	800	0 SF	N	7	Maintain
		White /Tan Floor Tile				SF	ND			O & M
Room 108	GG11	Compressed Paper Pipe Insulation	P	Т	Υ	30	0 SF	N	7	Maintain
						LF	ND			O & M
Room 111- Custodial	GG10	Pipe Insulation	P	Т	Υ	12	0 SF	N	7	Maintain
Supply 8' from Floor						LF	ND			O & M
Room 212	L01	Tan Linoleum	Р	М	N	720	0 SF	N	7	Maintain
						SF	ND			O & M
Room 215	L01	Tan Linoleum	P	М	N	720	0 SF	N	7	Maintain
						SF	ND			O & M
Room 216	L02	Tan Linoleum	Р	М	N	721	1 SF	N	4	Repair, then Maintain
						SF	ND			O & M
Room 223 &	GG14GN	9"X9" Green Floor Tile and Mastic	Р	М	N	160	0 SF	N	7	Maintain
Closet (under carpet)						SF	ND		_	O & M
Storage Room Office	GG10	Pipe Insulation	Р	Т	Υ	15	0 SF	N	7	Maintain
1 1 10 1 1 1 1			+			LF	ND		_	O & M
acher's Kitchen next to Lounge	GG9	12"X12" White with Brown Floor Tile	Р	М	N	30	0 SF	N	7	Maintain
The Well ob D O. "	22/2	and Mastic	+			SF	ND			O & M
The Well above Drop Celing	GG16	Elbow/Joints associated with Fiberglass	Р	Т	Y	6	0 SF	N	7	Maintain
Thursday & Dodding		Pipe Insulation	+			FTG	ND			O & M
Throughout Building	A49	Plaster	Р	S	Y	20000+	0 SF	N	7	Maintain
	140	St. 4.41			.,	SF	ND	, , , , , , , , , , , , , , , , , , ,	4	O & M
toom 3, 4, 5, 6, 7, 10, Behind	A49	Plaster (damaged)	Р	S	Υ	200	200 SF	Υ	4	Repair, then Maintain
Stage, Stairwell 6						SF	D			O & M

Facility Name	Broad Street Elementary School	Date of Reinspection	Fall 2020
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	Gibbstown, New Jersey 08027	Date of Next Reinspection	Fall 2023

Building Inspection										Management Planning
				ACM			Current Quantity			
	Homogenous		Status	Type	Friable	Quantity	Damaged SF/LF		Response	Date: Fall 2020
Room #	ID#	Homogenous ID Description	P/C	T/S/M	Y/N	SF/LF	Condition ND/D/SD	Change Y/N	Action	Comments

Inspector Name/# Eren Boduroglu (NAETI#58564) Management Planner Name/# Julian Fernandez-Obregon (NYS-MPR-2256)

Inspector Signature Even Bodwood Management Planner Signature

## **KEY TO CODES:**

## LOCATION

F = Floor

W = Wall

C = Ceiling

AC = Above Ceiling

TSI = Thermal Systems Insulation

O = Other

### **STATUS**

P = Presumed ACM C = Confirmed

## **ACM TYPE**

S = Surfacing Material

T = Thermal Systems Insulation

M = Miscellaneous Material

## CONDITION

ND = No Damage

D = Damage

SD = Significant Damage

## **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 Feasib
- 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

(Should we Add Parking?)

110

