

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:

Montrose Environmental, Inc.
500 Horizon Drive, Suite 540
Robbinsville, NJ 08691

MONTROSE PROJECT NO. 257-84



February 2024



TABLE OF CONTENTS

1.0 BACKGROUND INFORMATION1
 1.1 INITIAL INSPECTIONS.....1
 1.2 THREE-YEAR RE-INSPECTIONS1
2.0 RE-INSPECTION PROCEDURE2
3.0 CONCLUSIONS AND RECOMMENDATIONS.....3

APPENDICES

- APPENDIX A:** NJDOH LETTER OF ASSURANCE
- APPENDIX B:** INSPECTOR/MANAGEMENT PLANNER CERTIFICATIONS
- APPENDIX C:** AHERA THREE-YEAR RE-INSPECTION FORMS
- APPENDIX 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 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), Montrose Environmental, Inc. (Montrose) performed an AHERA re-inspection of the Nehaunsey Middle School in Gibbsboro, New Jersey on February 7, 2024. Prior to the re-inspection, Montrose reviewed the existing Asbestos Management Plan, management plan addenda, site inspection data, abatement, and other pertinent records obtained from the District.

The 2024 three-year re-inspection was conducted by Mr. Taylor Chapman, 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 ACM both confirmed and presumed was developed. Each ACM was previously identified and recorded on the Montrose 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 ACM, 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 ACM previously identified in the Asbestos Management Plan.
- Visual inspection of material that was previously considered non-friable ACM 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 Montrose AHERA Three-Year Re-Inspection Forms. The re-inspection forms are included in **Appendix C**. Floor plans depicting the locations of confirmed and presumed ACM 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. Montrose 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 ACM. 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, Montrose 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 Montrose 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. Montrose 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.

-000-

Montrose 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,

MONTROSE ENVIRONMENTAL, INC.

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

Taylor Chapman
Staff Health & Safety Specialist
AHERA Building Inspector



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


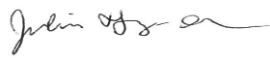
RESPONSIBLE GOVERNING AUTHORITY

Name of Responsible Governing Authority GREENWICH TOWNSHIP SCHOOL DISTRICT		Telephone Number 856-224-4900
Street Address 415 SWEDESBORO 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 SWEDESBORO ROAD		
Town GIBBSTOWN		County GLOUCESTER
Date Three-year Reinspection Occurred November 20, 2020		

INSPECTORS/ASSESSORS

1	Name Taylor Chapman	Address 500 HORIZON DRIVE, SUITE 540 ROBBINSVILLE, NEW JERSEY 08691	Telephone Number 609.890.7277
	Affiliation MONTROSE ENVIRONMENTAL, INC.	Acc. No./State of Accreditation AHERA Inspector #NYSDOH 938760	Signature 
2	Name Julian Fernandez-Obregon	Address 500 HORIZON DRIVE, SUITE 540 ROBBINSVILLE, NEW JERSEY 08691	Telephone Number 609.890.7277
	Affiliation MONTROSE ENVIRONMENTAL, INC.	Acc. No./State of Accreditation AHERA Management Planner #NAETI 64888	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

Big Apple Occupational Safety Inc

505 Eighth Avenue, #2305, New York, NY 10018
(212) 564-7656

This Is To Certify That

Taylor Chapman

SS#: XXX-XXX-XXXX

has successfully completed the New York State Department of Health approved course entitled
This course meets requirements of TSCA Title II

Asbestos Inspector Initial

*(The official record of successful completion is the DOH 2832 Certificate of completion
New York State Department of Health Certificate of Asbestos Safety Training)*

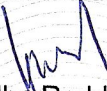
Course Date: 08/07/2023 - 08/09/2023

Examination Date: 08/09/2023

Expiration Date: 08/09/2024

Certificate Number: 938760

Examination Grade: 92%


Radha Reddy
Training Director

NAETI

CERTIFICATE OF COMPLETION

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

This is to certify that

Julian Fernandez-Obregon

Successfully completed the course entitled

**1/2-Day New York State/EPA/AHERA Asbestos Management Planner Annual Refresher on
October 30th, 2023**

Examination Date on October 30th, 2023

Expiration Date on October 30th, 2024

Glenn Neuschwender

Glenn Neuschwender, Greg Krueger
Training Directors, NAETI

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

API# 1/2 GM POINT

106 Apple St., St. 1128 Tinton Falls, NJ 07724

Phone (732) 531-5571

www.naeti.com

Glenn Neuschwender
Greg Krueger

64888



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 Winter 2024
 Date of Previous Reinspection Fall 2020
 Date of Next Reinspection Summer 2027

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: Winter 2024 Comments
HVAC Closet (Generator Room)	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	1 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	2 SF	ND	Y	6	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	0 SF	ND	Y	7	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	0 SF	ND	Y	7	Maintain O & M
Room 35 - Kitchen Office	X0	12"x12 Brown Floor Tile	P	M	N	150 SF	0 SF	ND	N	7	Maintain O & M
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	0 SF	ND	Y	7	Maintain O & M



AHERA Three-Year Re-Inspection Form

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

Date of Reinspection Winter 2024
 Date of Previous Reinspection Fall 2020
 Date of Next Reinspection Summer 2027

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: Winter 2024 Comments
Room 4	F09	12"x12" Grey with White Floor Tile	P	M	N	835 SF	0 SF ND	Y	7	Maintain O & M
Room 40A - Office Copy Room	F02	12"x12" Beige Floor Tile	P	M	N	220 SF	10 SF D	N	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	0 SF ND	Y	7	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	0 SF ND	Y	7	Maintain O & M
Room 6	F09	12"x12" Grey with White Floor Tile Light Green & Beige Spots	P	M	N	720 SF	0 SF ND	Y	7	Repair, then Maintain O & M
Room 7	F09	12"x12" Grey with White Floor Tile	P	M	N	720 SF	0 SF ND	Y	7	Maintain O & M
Room 18	F09	12"x12" Grey with White Floor Tile Light Green & Beige Spots	P	M	N	720 SF	2 SF D	Y	5	Repair, then Maintain O & M

Inspector Name/# Taylor Chapman (NYSDOH #938760)

Management Planner Name/# Julian Fernandez-Obregon (NAETI #64888)

Inspector Signature *Taylor Chapman*

Management Planner Signature *Julian Fernandez-Obregon*

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

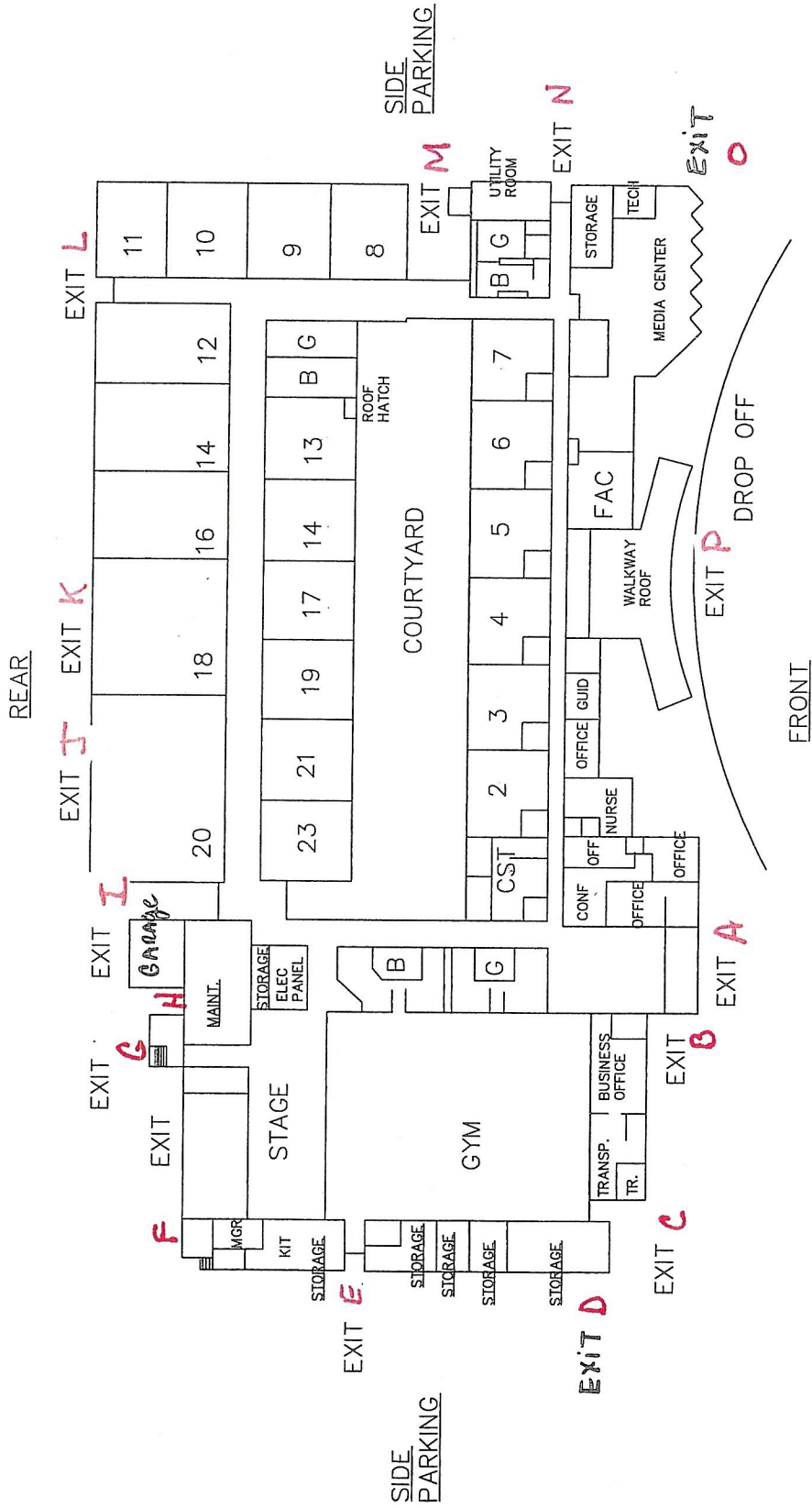
1 = Significantly Damaged - Isolate, Remove Immediately
 2 = Damaged & Potential for Significant Damage - Remove, Enclose, Encapsulate, or Repair when Feasible
 3 = Damaged & Potential for Damage - Remove, Enclose, Encapsulate or Repair when Feasible
 4 = Damaged - Remove, Encapsulate, Enclose, or Repair 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