

June 24th, 2021

Martin Couch
Tawas Area Schools
245 West M-55
Tawas City, MI 48763

RE: 2021 AHERA Management Plan Update

Dear Martin,

Enclosed is the 2021 update of the Asbestos Hazard Emergency Response Act (AHERA) management plan for asbestos-containing materials. It is the result of the most recent 3-year re-inspection of school buildings conducted by DeLisle Associates LTD (DeLisle) on June 24, 2021. The following is a list of areas of response actions, which DeLisle recommends.

SCHOOL	AREA	SPECIFIC MATERIAL	RESPONSE ACTION
Tawas Elementary	Room #1	9"x9" floor tile (VAT)	Repair/Replace
Tawas Elementary	Kitchen	9"x9" floor tile (VAT)	Repair/Replace
Tawas Elementary	Room #15	9"x9" floor tile (VAT)	Repair/Replace
Tawas High School	Room 7	9"x9" floor tile (VAT)	Removed with Unknown Date – Remove from Management Plan
Tawas High School	Room 5	9"x9" floor tile (VAT)	Removed with Unknown Date – Remove from Management Plan
Tawas High School	Room 3	9"x9" floor tile (VAT)	Removed with Unknown Date – Remove from Management Plan
Tawas High School	Kitchen	9"x9" floor tile (VAT)	Removed with Unknown Date – Remove from Management Plan
Tawas High School	Storage	9"x9" floor tile (VAT)	Removed with Unknown Date – Remove from Management Plan

The Environmental Protection Agency (EPA) has indicated in guidance documents provided by the agency, that asbestos-containing materials (ACM) not previously assessed by the original building inspection is not required to be documented in the most recent management plan update. However, the EPA *strongly* suggests that this material be included into the management plan update. DeLisle agrees with the EPA recommendation, and suggests the Designated Person for this School District review the management plan update, and incorporate the new inspection findings into the original plan. By signing the enclosed document (Page 6 of this submittal), Tawas Area Schools agrees with the recommendations of this management plan update for inclusion of newly discovered material (where applicable). Asbestos containing material as it exists must be assessed, quantified and removed prior to the start of any demolition or renovation activities as outlined by the National Emissions Standards for Hazardous Air

Pollutants (NESHAP). Therefore, if Tawas Area Schools is ever to update, renovate, or alter the aforementioned schools in any fashion, the asbestos-containing material should be acknowledged and dealt with according to all state and local regulations. Keep in mind that the building exteriors were not required to be inspected and invasive sampling was not typically conducted on the interior materials in the initial inspections. DeLisle recommends before any renovation and/or demolition activities, a Michigan accredited asbestos building inspector conduct a comprehensive asbestos inspection in the affected areas.

As a component of this re-inspection requirement, DeLisle inspectors reviewed the present status of the school's management plan. Components of the plan that were reviewed included training documentation, community notification and periodic surveillance data as well as abatement records from past abatements since the most recent three-year inspection.

Tawas Area Schools was required to produce the following documentation during DeLisle's Management Plan review:

- 1) Training documentation – Not Current
- 2) Six-month periodic surveillance inspections– Not Current
- 3) Community notification – Not Current
- 4) Abatement Records – Not Current

AHERA states this information must be kept current to remain in compliance with the regulation.

The EPA passed a Formal Rule amendment to the EPA Worker Protection Rule of 1982 and the AHERA regulation (1986-87, as amended) in November of 2000. This regulation amended previous requirements for schools to train maintenance and custodial personnel. The new standard incorporates an annual component to the training requirement and, as a result, Tawas Area Schools must now train their affected employees each year on asbestos related issues and maintain appropriate documentation.

If you have any further questions regarding this three-year re-inspection report, please call DeLisle at (269) 373-4500. In the event that the schools management plan maintenance is needed, DeLisle can also assist in its annual requirements.

Sincerely,

DeLisle ASSOCIATES LTD



André DeLisle
Asbestos Building Inspector
Michigan Accreditation Number A40887

Encl.

STATEMENTS

AHERA INSPECTION

Company Statement

This Re-inspection Report and Management Plan Update was prepared by DeLisle Associates LTD (DeLisle) to help Tawas Area Schools evaluate asbestos hazards associated with maintaining their facilities. In the preparation of this living document, every attempt has been made to recommend the least burdensome response actions consistent with protecting human health and the environment as specified by the Environmental Protection Agency's (EPA) Asbestos Hazard Emergency Response Act (AHERA). AHERA states that the management plan is the ultimate responsibility of the owner/operator of the facility. The owner/operator has the authority to make reasonable changes to the management plan. It is the responsibility of the owner/operator to read and understand the response actions, their obligations, timetables, and to determine if these actions are reasonable actions prior to signing the owner/operator statement. Any changes or additions to this document without written authorization from DeLisle will automatically void the inspection and management plan statements for year.

If the owner/operator decides to make changes to this report without authorization from DeLisle or decides to make changes, which conflict with the advice and/or professional judgment of DeLisle, a separate statement should accompany the management plan and should specify which recommended actions the owner/operator has decided to change, the actual changes, and rationale for the changes. Should this occur, DeLisle will not accept any responsibility for changes to any response actions that DeLisle did not previously state.

Please insert these pages into the existing Management Plan. If you have any questions, please contact us at (269) 373-4500.

AHERA INSPECTION SIGNATURE PAGE


Inspection Statement

The person(s) listed below hereby attest(s) that he did inspect, assess, and perform sampling of suspect ACBM at the buildings listed in the inspection report for Tawas Area Schools on June 24th,2021 in accordance with EPA AHERA regulations set forth in 40 CFR Section 763.85(a):

Name	Accreditation #	Signature	Date
	A40887		06/24/2021

Management Plan Statement

The person(s) listed below hereby attest(s) that he did review data which may have updated the management plan for Tawas Area Schools. Any recommendations are based on the above referenced inspection report and completed on June 24th,2021 in accordance with EPA AHERA regulations herein set forth in 40 CFR Section 763.93(12), (ii).

Name	Accreditation #	Signature	Date
Greg Millgard	A16422		7/2/2021

AHERA INSPECTION

Local Education Agency statement

I, being the Local Education Agency "Designated Person", as defined by 40 CFR Section 763.84(g), Tawas Area Schools, hereby attest that I have reviewed the update (3 year re-inspection) of the management plan conducted by DeLisle Associates LTD and further attest that it is acceptable to Tawas Area Schools and meets the general LEA responsibilities as stipulated in 40 CFR Section 763.84. In addition, all person(s) who inspect for ACBM and who will design or carry out response actions, except O & M, are or will be accredited by the State of Michigan.

D.P. Name: _____

Title: _____

Phone: _____

Address: Tawas Area Schools
245 West M-55
Tawas City, MI 48763

Signature: _____

Date: _____

Original Management Plan Implementation Date: April 1989

Inspection Date: 06-24-2021

Next Re-inspection Before: June 24, 2024

PLEASE SIGN AND RETURN A COPY OF THIS PAGE TO:

DeLisle Associates
5050 S. Sprinkle Road
Portage, MI 49002

OR

andred@delisleassoc.net

QUALIFICATIONS

 DeLisle Associates LTD

Certificate of Training

Presented to

André DeLisle

for successful completion of

Asbestos Inspector Refresher

*in compliance with the United States Environmental Protection Agency's Asbestos Model Accreditation Plan,
40 CFR Part 763 (AHERA), Subpart E, Appendix C, and with Michigan P.A. 440 of 1988, as amended*

Student Identification 6411

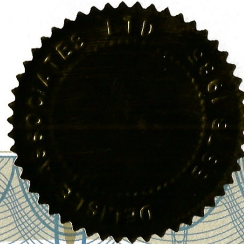
Certificate Number IR-1982

Course Completion Date February 10, 2021

Certificate Expiration Date February 10, 2022


Mark A. DeLisle, Instructor

DeLisle Associates LTD
5050 S. Sprinkle Rd., Portage, Michigan 49002
delisleassoc.net 269.373-4500



 DeLisle Associates LTD

Certificate of Training

Presented to

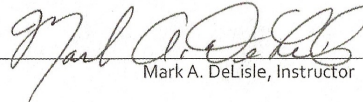
Gregory Millgard

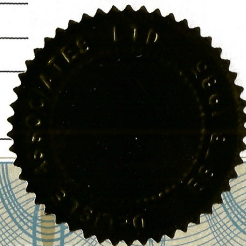
for successful completion of

Asbestos Management Planner Refresher Course

This Course fulfills the requisite training of TSCA Title II and is in compliance with the United States Environmental Protections Agency's Asbestos Model Accreditation Plan, 40 CFR part 763 (AHERA), Subpart E, Appendix C, and is in compliance with Michigan P.A. 440 of 1988, as amended.

Student Identification 9848
Exam Date February 10, 2021
Certificate Number MPR-1158
Course Date(s) February 10, 2021
Certificate Expiration Date February 10, 2022


Mark A. DeLisle, Instructor



INSPECTION DATA

Job #: IH21-089

Tawas Area Schools

DeLisle Associates LTD

Name of Building: Tawas City Elementary School

Date: 06/24/2021

Address: 825 Second Street

<i>FUN_DESC</i>	<i>T,S,M</i>	<i>SF</i>	<i>LF</i>	<i>MAT_DESC</i>	<i>DAM</i>	<i>Reason For Change</i>	<i>RA</i>	<i>SAM #</i>	<i>Y,N,A</i>
Room #1	M	812	0	9" x 9" floor tile (VAT)	M	Repair/Replace	2,5		Y
Room #2	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #4	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #6	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #8	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #10	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #11	M	741	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Kitchen	M	743	0	9" x 9" floor tile (VAT)	M	Repair/Replace	2,5		Y
Kitchen Restroom	M	55	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		A
Room #12	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #14	M	812	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		Y
Room #15	M	741	0	9" x 9" floor tile (VAT)	M	Repair/Replace	2,5		Y
South hallway near Kitchen on wall	M	45	0	9" x 9" floor tile (VAT)	L	No Change / Continue O&M	1		A
Room 25	M	48	0	Lab Tops	L	No Change / Continue O&M	1		Y
Room 23	M	48	0	Lab Tops	L	No Change / Continue O&M	1		A

School not in use since 2016

(RA) Response Action

- 1) Operations and Maintenance
- 2) Repair
- 3) Encasement
- 4) Enclosure
- 5) Removal