# AHERA REINSPECTION The Clatskanie Elementary School Building at 815 S. Nehalem Street Clatskanie, Oregon 97016

Prepared For:
Paul Simmons, Facility Manager
Clatskanie School District SD 6J
555 S. W. Bryant
Clatskanie, Oregon 97016

EIS Job No. 2019088. Clatskanie Elementary School

#### **Prepared By:**

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Charles A. Spear, Partner

October 12, 2019



#### TABLE OF CONTENTS

DESCRIPTION	PAGE NO
EXECUTIVE SUMMARY	1-5
ACCREDITATION / RESUME	6-9
REGULATIONS (BACKGROUND)	. 10-12
ACTIVITY (BACKGROUND)	13
REINSPECTION REPORT	14
REINSPECTION SCOPE OF WORK	14
SUMMARY OF FRIABLE / NONFRIABLE ACBM	15-16
RECOMMENDATIONS AND CONCLUSIONS	17
LIMITATIONS	18

#### **APPENDIX 1.0**

#### SITE PLAN

#### **APPENDIX 2.0**

#### RECORDING FORMS FOR ASSESSMENT DATA

**APPENDIX 3.0** 

**REGULATIONS** 



October 12, 2019 EIS JOB No. 2019088. Clatskanie Elementary School Building

Paul Simmons, Facility Manager Clatskanie School District SD 6J 815 S. Nehalem Street Clatskanie, Oregon 97016

RE: Asbestos 2019 AHERA 3-year Reinspection of the Clatskanie School District Elementary school Building located at 815 S. Nehalem Street in Clatskanie, Oregon

Dear Mr. Simmons & The Clatskanie School District,

The Federal Asbestos Hazard Emergency Response Act (commonly referred to as AHERA) was signed into law in 1986. AHERA requires both private and public non-profit primary and secondary schools buildings that are leased, owned, or otherwise used as school buildings for the presence of asbestos-containing building materials (ACBM). The U.S. Environmental Protection Agency (EPA) published regulations and enforces AHERA.

EIS is pleased to present the October, 2019, AHERA reinspection for The Clatskanie School District Elementary School Building located at 815 S. Nehalem Street in Clatskanie, Oregon. The Clatskanie school district elementary building is an original brick and wood frame lathe and plaster structure built in 1927; the bus garage was built in 1940; and the gymnasium class room was built in 1965. The building is completely utilized as a student educational building. Asbestos related work has been performed in the building. Sheet rock and wall board surfacing; 9" and 1' vinyl floor tile; transite board and surfacing materials were observed on-site in 2019. The materials were or observed to be intact and in good condition. Functional areas include classrooms, offices, libraries, cafeterias, vestibules, hallways, storage and supply rooms.

The Clatskanie Elementary school is listed as built in 1927. The building is described as a wood and concrete building heated by steam heat. The entire elementary school building was examined to include the classrooms and offices were examined for the presence of asbestos-containing building materials. All representative functional spaces and relative homogeneous sampling areas were examined during the inspection process. No bulk samples were collected from the elementary school building.

A total of eighteen (18) asbestos material data sheets of actual and presumed asbestos-containing building materials (ACBM) were completed to described suspect ACBM observed throughout the buildings. The data sheets summarize the amount, location, description, accessibility, condition and potential for disturbance of identified confirmed and/or suspect asbestos-containing building materials (ACBM) observed throughout the Clatskanie Elementary and Cardiff school buildings.

The following eighteen (18) data sheets are submitted and summarized:

SHEET NO.	MATERIAL DESCRIPTION	LOCATION	CONDITION
1	Ceiling tiles & mastic	c classrooms	Good
2	1' blue/red tile	Staff	Good
3	CAB	Bus barn	Good
4	9" tan tile	Stage prop	Good
5	Mastic	Throughout	Good
6	Transite board	Boiler room	Good
7	9" Tan tile	Custodian	Fair
8	9" tan tile	Gym	Good
9	9"tan tile	Old café	Good
10	1' white tile	Kitchen	Good
11	Moulding mastic	Café	Good
12	Ceiling tile	Café	Good
13	1' tan red tile	Classes	Good
14	Tan linoleum	Music closet	Good
15	9" ceiling tiles	Stage	Good
16	Ceiling tile	Gym	Good
17	1' green tile	Hall	Good
18	Tan linoleum	Shop office	Good

All identified ACBM are candidate materials for in-place operations and maintenance and asbestos abatement is not recommended or required at this time. Minor damaged items may be sealed and repaired as low priority items. The condition of the existing suspect ACBM is good to excellent and considered to protective of student safety and health. Very minor damaged ACBM may be repaired in accordance with standard operations and maintenance procedures.

#### THERMAL SYSTEM INSULATION (TSI)

No thermal system insulation considerations were noted in the elementary building based on reconnaissance data. Cement asbestos board (transite) was observed in the maintenance room, boiler room, and bus barn exterior siding panels. TSI was observed in boiler jackets and flanges. Any embedded or exposed TSI encountered during remodeling or renovation should be sealed and encapsulated as a repair effort in accordance with standard operations and maintenance recommendations. Asbestos abatement is not required for intact and well maintained TSI. Refer to sheet No.s 3 &6 for details.

# RESILIENT FLOOR COVERINGS (VINYL FLOOR TILE & SHEET FLOOR LINOLEUM)

Several varieties of nine-inch square and one-foot square vinyl asbestos tile (VAT) of various colors were observed in the hallways, cafeteria, classrooms, office, shop floor, bathrooms, and computer lab. The existing VAT is generally in good condition and all VAT are candidate materials for in-place operations and maintenance. Any covered VAT is considered sealed and encapsulated and no VAT concerns were noted. Refer to sheet No.s 14,18,2,13,10,17,4,7,8,9 for vinyl floor surfacing details.

Additional Asbestos abatement of VAT is not recommended at this time. All examined floor coverings observed in the hallways, classrooms, etc. are in good to excellent condition, well maintained, accessible, and intact. No significant floor covering condition or damage concerns were noted. New vinyl floor coverings were also noted.

#### COVE-BASE ADHESIVE

Cove-base mastic adhesive was observed on floor moulding within various functional spaces throughout the building. The moulding is intact and in good condition. Refer to sheet No.s 5 & 11 for details.

#### TAPE JOINT COMPOUND

This compound is typically applied to taped joints applied between sheet rock wall surfaces. Tape joint compound exists on sheet rock panels throughout the subject building and some hallways have exposed tape joint edges. The compound usage was extensive and is likely throughout the entire structure original pre-1980 wall panel tape joints. The compound is in good condition, sealed and or encapsulated, and a candidate building material for operations and maintenance. The edge compound was observed throughout the buildings.

#### ACOUSTIC CEILING TILES

Large perforation ceiling tiles were observed on ceiling surfaces in the copy room, and classrooms. Some ceiling tiles are damaged such as ceiling tiles. The ceiling tiles are considered a cellulosic material and are not problematic. The adhesive glue tabs are suspect ACBM. No specific ceiling tile quality concerns were noted. Refer to sheet No.s 1,12,15,16 for details.

#### PLASTER (SKIM COAT)

Suspect ACBM as plaster was observed throughout the buildings. EIS does recommend sampling of wall surfaces if damages are planned by remodeling or renovation.

The wall plaster surfaces were noted to be in good condition and candidate building materials for in-place operations and maintenance. The existing plaster surfaces are sealed and coated in latex paint applications and considered to be in good condition. No concerns were noted.

All suspect and previously analytically confirmed ACBM were noted to be in good to excellent condition. All ACBM are considered candidate building materials for operations and maintenance in accordance with the standard O&M recommendations stated in The AHERA Management Plan and the EPA Manual known as Managing Asbestos in Place - A Builder Owners Guide to Operations and Maintenance Programs for Asbestos-Containing Materials per EPA Manual No. 20T 2003 dated July, 1990.

Candidate ACBM include skim coat applications on wall surfaces; acoustic ceiling tiles adhesive tabs; moulding mastic adhesive; and vinyl asbestos tiles. No asbestos containing debris or other related asbestos material concerns were noted at the aforementioned building.

No asbestos containing debris, significantly damaged and disturbed ACBM or other related asbestos material concerns were noted at the aforementioned materials. Exposed TSI ends and damaged VAT tiles and ceiling tiles should be replaced as necessary. Asbestos abatement is not recommended or necessary at this time.

This reinspection of the Clatskanie Elementary School Building and outbuildings was performed on Friday, October 4, 2019 by Charles A. Spear. AHERA Inspector Certification No. IR-16-2439A. The AHERA Inspector expiration date is March, 2020. All inspection / assessment activities were performed in accordance with the reinspection requirements of Part III 40 CFR Part 763. Asbestos-Containing Materials in Schools; Final Rule and Notice.

Thank you for the opportunity to perform the October, 2019 asbestos reinspection. Progress has been made since the AHERA Management Plan issuance and initial inspections. The Clatskanie elementary school building is well maintained and all suspect and confirmed ACBM are candidate materials for in-place operations and maintenance. If there are any questions feel free to contact us at (503) 680-6398.

Respectfully,
Charles of Spe

Charles A. Spear, President AHERA Inspector IR-19-2439A

#### RESUME

# CHARLES ARTHUR SPEAR REGISTERED ENVIRONMENTAL ASSESSOR REA - 01241

#### AHERA INSPECTOR (EPA CERTIFICATION NO. IR-19-2439A)

#### CERTIFIED ENVIRONMENTAL INSPECTOR CEI - 10364

#### **Professional Background**

Charles A. Spear, President and founder of Environmental Inspection Services has over 20 years technical experience ranging from facility food technologist to hazardous waste site remediation at Federal SUPERFUND sites from California to Maryland. Mr. Spear has successfully performed over 2,000 Phase One, Phase Two, and Phase Three Environmental Site Assessment inspections on properties from California to Alaska and east to Maryland. Mr. Spear has managed such projects as spilled mustard gas and organophosphate remediation as a sergeant of the U.S. Army Chemical Corps Technical Escort Unit Drill & Transfer Unit at Umatilla Army Depot and removal of leaking solvent underground storage tanks in California and Oregon.

Specifically, Mr. Spear has worked with clients such as: the International Fabric Care Industry (IFI), the U.S. Environmental Protection Agency, The U.S. Department of Defense, The Oregon Department of Environmental Quality (ODEQ), The Oregon Department of Forestry, INTEL, Sun Microsystems, IBM, Rohm & Haas, General Electric, AT&T, Texaco, Unocal, BP, Lockheed Missile and Space Center, FMC Corporation, Oregon Department of Fish & Wildlife, Washington Department of Fish & Wildlife, City of Beaverton, City of Hillsboro, City of Corvallis, Housing Authority of Portland, Northwest Oregon Housing Authority, Washington County Department of Housing, Housing & Urban Development, numerous lenders and mortgage companies, many private development and site remedial site projects, and many attorneys and investors.

Mr. Spear managed complex tank farm removals at Xidex Corporation in Sunnyvale, California and was the site cleanup manager at the Rose City Plating Site currently developed as the Oregon Convention Center. Mr. Spear is a certified hazardous waste professional who has coupled military experience as a Nuclear, Biological and Chemical Specialist (U,S. Army MOS 54E20) with experience as a professional research engineer in both the corrugated paper and petroleum industries.

Mr. Spear has managed food industry quality control as an inplant food technologist and prepared cost reduction programs as a corrugated box board industrial engineer in Dallas, Texas. He is currently registered with the states of California, Washington, and Oregon and is an active member of the national respected Environmental Assessment Association. Due diligence projects have been performed throughout the United States from Fairbanks, Alaska to San Diego, California.

Professional experience includes the following:

#### **Professional Experience**

- \* Dry Cleaner Inspections
- \* Environmental Consultation
- \* Waste Reduction Audits
- \* Regulatory Compliance Audits
- \* Drum Yard Clearances
- \* Tank Farm Removals/Replacements
- \* Lab Packaging & Supervision
- \* Environmental Site Assessments
- \* Superfund Site Remediation
- \* Hazardous Waste site Project Design & Management
- \* Habitat/Wetlands Restoration
- \* AHERA asbestos inspections for school districts
- \* Landfill Remediation
- \* Agricultural assessments
- \* Indoor air quality inspections

#### **Professional Employment/Consultation**

- \* C.F.S. Continental Coffee, Inc., Food technologist, Chicago, Illinois
- \* Holiday Industries, Research Engineer, Grand Prairie, Texas
- \* Alton Packaging Corporation, Industrial Engineer, Dallas, Texas
- \* U,S. Army Chemical Corps., Nuclear, Biological, Chemical Specialist Special assignment Umatilla Army Depot (DATS)
  - U.S. Army Chemical Corps. Technical Escort Unit in Edgewood, Maryland
- \* Rollins Environmental Services, Remedial Project Manager
- \* Crown Environmental Services, Technical Director, Redmond, California
- \* Dames & Moore, Design Engineer, Portland, Oregon
- \* Pegasus Environmental Management Services, Director of Technical Services
- \* Pacific Tank & Construction, Manager of Estimation, Portland, Oregon
- \* Enviro-Logic Inc., Director of Environmental Site Assessment Division
- \* Environmental Inspection Services Inc., Founder/President

#### **Professional Education**

- \* Bachelor of Science, Chemistry, Northeastern Illinois University, 1978
- \* U.S. Army Chemical School, Ft. McClellan, Alabama, 1983
- \* U.S. Army Technical Escort Unit, Accident/Incident Response Training Center 1983
- \* Registered Environmental Assessor REA 01241
- \* Certified Environmental Inspector CEI 10364
- \* AHERA Certified Asbestos Inspector IR-16-2439A
- \* ODEO Soil Matrix Assessor & UST Decommission Supervisor
- \* Washington DOE Registered Environmental Assessor
- \* Wetland Specialist Training Wetlands Institute 1997
- \* EPA/HUD Lead-Based Paint (LBP) Inspector & Risk Assessor
- \* ASTM Certification Training, May, 2004

#### Additional Education

- \* Joint Military Material Packaging & Transportation
- \* Asbestos Abatement Seminar attendance 1987
- \* Thin Layer Chromatography, 1989
- \* Oregon Registered Underground storage Tank Supervisor, 1998
- \* Oregon Registered Soil Matrix Assessor, 1998
- Washington Registered Assessor, 1991
- \* Washington Registered Underground Storage Tank Supervisor, 1991
- \* Wetland Training Institute Delineation Course Study University of Portland March 1997
- \* 40-Hour HAZMAT Certified
- \* AHERA-Certified Inspector

#### **Special Skills**

- \* Facility Environmental Compliance Audits
- \* ASTM standard Environmental Site Assessments
- \* Computer Programming
- \* Organic surfactant chemical synthesis and analysis
- \* Hazardous Waste Site remediation/ estimating/ standards development
- \* Design of filtration systems, batch and continuous process optimization studies
- \* QA/QC Procedures
- \* SUPERFUND Site Management
- \* Industrial/ Research Engineering
- \* Hazardous Waste Site Remediation/ Consultation
- \* Wetlands Delineation and Habitat Restoration

#### Certification

- \* U.S. Army MOS 54E20 U.S. Army Chemical Corps.
- \* International Fire Code Institute (IFCI) Certified UST Supervisor
- \* International Fire Code Institute (IFCI) Certified Soil Matrix Assessor
- \* Certified Hazardous Waste Manager
- \* 40-hour OSHA Training
- \* 40-hour OSHA Supervisor Training
- \* Registered Environmental Assessor (DOE)
- \* DEQ Registered UST Supervisor
- \* DEQ Registered Soil Matrix Assessor
- \* Resolution Trust Corporation (RTC) approved Environmental Assessor
- \* California Registered Environmental Assessor (REA-01241)
- \* Department of Ecology (DOE) Registered Environmental Assessor
- \* Environmental Assessment Association, Certified Environmental Inspector & Transaction Specialist (CEI-10364)
- \* AHERA Certified Asbestos Inspector
- \* Wetland Delineator Graduate Wetland Training Institute, University of Portland 1997
- \* EPA/HUD LBP Inspector & Risk Assessor
- \* ASTM certification

#### **REGULATIONS**

#### Asbestos - Background

Asbestos is generally referred to as six naturally occurring fibrous minerals found in certain types of rock formations. The minerals Chrysotile, Amosite, and Crocidolite have been most commonly utilized in building materials. Asbestos is typically separated into very thin fibers. Asbestos is strong, incombustible, and corrosion resistant and was utilized early in the century into the 1970's. Asbestos may cause substantial health problems when it is inhaled in sufficient quantities.

Asbestos is considered to be a hazardous air contaminant and a known human carcinogen. Once used extensively as an insulation material, asbestos has been banned from most construction and manufacturing since the mid-1970's. The most dangerous forms of asbestos are those materials containing asbestos which can be easily crushed or crumbled known as "friable asbestos". Friable asbestos is dangerous since asbestos fibers can be easily released into the air. Such activities as remodeling and demolition projects are likely to disturb asbestos. If asbestos-containing building materials (ACBM) are not handled properly then these types of projects can pose as a serious threat to workers and the general public.

#### Regulatory Background

In 1986, Congress enacted the Asbestos Hazard Emergency Response Act (AHERA or TSCA Title II) which mandated a regulatory program to address asbestos hazards in schools. A copy of the Environmental Protection Agency Asbestos Model Accreditation Plan interim Final Rule (59FR2236-5260) is enclosed for reference. President Reagan signed into law the Asbestos Hazard Emergency Response Act (AHERA) on October 22, 1986. This law enacted, among other provisions, Title 2 of the Toxic Substances control Act (TSCA) 15 U.S.C. Section 2641 through 2654; Section 203 of Title II, 15 U.S.C. 2643. Copies of AHERA 40 CFR Part 763 are enclosed for reference.

#### AHERA requires the following:

- (1.0) Perform an original inspection and periodic reinspections every three years for asbestos containing material;
- (2.0) Develop, maintain, and update an asbestos management plan. A copy must be kept in the school building, as well as in the districts administrative office;
- (3.0) Provide an annual written notification to parent, teacher, and employee organizations regarding the availability of the school's asbestos management plan for review and any asbestos abatement actions taken or planned in the school;
- (4.0) Designate a contact person (also known as the asbestos designee) to ensure the responsibilities of the local education agency are properly implemented. Details on the asbestos designee's responsibilities may be found at: www.epa.gov/region02/ahera/ampauditchecklist.pdff

Note: If a building has never been inspected for asbestos, a new AHERA inspection must be completed as soon as possible. Pursuant to AHERA Section 763.85(a), any building leased or acquired on or after October 12, 1988, that is used as a school building shall be inspected for asbestos prior to use as a school building. In the event that the emergency use of an uninspected building as a school building is necessitated, such building must be inspected for asbestos within 30 days after the commencement of such use.

Section 112 of the Clean Air Act (CAA) requires EPA to develop emission standards for hazardous air pollutants. In response to this section the EPA published a list of hazardous air pollutants and promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations.

The asbestos NESHAP (40 CFR 61, Subpart M) addresses milling, manufacturing and fabricating operations, demolition, and renovation activities, waste disposal issues, active and inactive waste disposal sites and asbestos conversion processes.

In the initial Asbestos NESHAP rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed and those materials that were unlikely to result in significant fiber release. The terms "friable and non-friable" were used to make this distinction. EPA has since determined that, if severely damaged, or otherwise non-friable materials can release significant amounts of asbestos fibers.

Friable asbestos-containing material (ACM) is defined by the Asbestos NESHAP as any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure (section 61.141). Non-friable material is ACM not reduced to powder by similar circumstances.

#### **ACTIVITY**

#### Background

It is the responsibility and primary mission of the AHERA inspector to determine whether ACBM is present in a building and to assess the physical characteristics of the ACBM in the structure. The inspection process includes an investigation of available records; an inspection of the functional spaces; an assessment of the condition of observed ACBM; reviews of available architectural and as built plans; review of work change orders; examination of material specifications indicating the presence of ACBM; examination of friable and non-friable ACBM; delineation of homogenous sample areas; collection of samples; and information on ACBM conditions.

The Clatskanie Elementary building gymnasium, library, cafeteria, boiler room, classrooms, vestibules, offices, storage rooms, and hallways were examined for suspect ACBM during the AHERA reinspection. Suspect ACBM data was entered into a field log; recorded on specific recording forms; and conditions such as accessibility, condition, and estimated quantities were entered into a total of eighteen (18) discreet sampling recording forms based on functional space and potential homogeneous sampling areas.

The completed forms were edited for completeness and potential problem areas or areas requiring abatement or extensive repair were noted. Copies of the forms are attached for review and reference and generally represent a condition evaluation and summary of the potential homogeneous sampling areas and functional space areas. No concerns were noted regarding all examined ACBM.

#### **REINSPECTION**

Charles A. Spear conducted a triennial asbestos reinspection of the Clatskanie Elementary School buildings on Friday, October 4, 2019. Actual field activities included blueprint and/or facility floor plan review; an interview with the maintenance supervisor; and a physical reinspection examination of all suspect and confirmed friable and non-friable asbestos-containing building materials at the subject Clatskanie Elementary school buildings to include the Cardiff building.

The accredited EIS inspector performed a preliminary examination of the subject admin structure and bus barn building. The AHERA inspector confirmed the existence of suspect asbestos-containing building materials (ACBM) such as vinyl asbestos floor tiles; moulding mastic adhesives; skim coat plaster applications on sheet rock; thermal system insulation (TSI); cement asbestos board (CAB), acoustic ceiling tiles; ceiling tile adhesives; and miscellaneous and cementitious materials.

All accessible areas to include The Clatskanie elementary school classroom units, gymnasium, cafeteria, storage rooms, hallways, original kitchen, museum, galleries, vestibules, and offices were examined for suspect ACBM during the AHERA reinspection. All the aforementioned functional areas were visibly inspected during this AHERA reinspection. No significantly damaged ACBM was observed during there inspections. The confirmed VAT is in good condition and may be maintained. Worn vinyl floor surfaces in the custodian room and damaged ceiling tiles may be replaced as required. Any exposed mastic should be sealed and encapsulated.

The Clatskanie Elementary Building walkover revealed all asbestoscontaining materials to be candidate building materials for Operations and Maintenance. The original AHERA Management Plan confirmed asbestos in several forms. Operations and Maintenance is recommended for all confirmed and suspected asbestos-containing materials to include vinyl asbestos tiles (VAT); and miscellaneous materials. No ACBM concerns were noted for the aforementioned materials. Asbestos abatement is not recommended for the subject facility ACBM at this time.

Minor repair of damaged areas is adequate and protective. All the aforementioned materials are in good condition and candidate materials for Operations and Maintenance. No noteworthy damages or disturbances of ACBM were observed. These materials have low potential for damage with no influence of vibration or potential for air erosion. No samples were collected from suspect ACBM.

#### SUMMARY OF FRIABLE / NONFRIABLE ACBM

Staff and maintenance personnel are encouraged to consult the forms prior to maintenance activities planned for suspect ACBM.

Description - a nonfriable vinyl material with vinyl filler and binder. An adhesive mastic is utilized to adhere to the vinyl floor surfacing to another substrate. The VAT asbestos content is described as a separate matrix from the adhesive mastic. VAT subject to removal must be removed in whole pieces by using the proper tools with wetting and proper handling, wrapping and disposal procedures. No poor condition floor coverings were noted.

#### AHERA Classification-Miscellaneous

Products not utilized as TSI or surfacing materials are classified as miscellaneous materials. Materials such as transite pipe, ceiling tiles, fire doors, gaskets, vinyl floor coverings, duct work flexible connections, roofing felt, roofing flashing, and fume hood ducting and paneling are miscellaneous materials. These miscellaneous materials were noted observed in the Elementary building. Samples were collected from skim coat applications of sheet rock panels.

ACM sprayed or troweled onto surfaces for acoustical, decorative, or fireproofing purposes. Asbestos is blended in to spray-applied and troweled-on products to include structural fireproofing, stucco, plaster, acoustical and decorative surfaces, and joint compounds.

#### 2.0 Thermal System Insulation (TSI)

Transite siding and cement asbestos board was observed on-site. No TSI material concerns were observed on-site.

AHERA Classification - TSI

Insulation used on mechanical systems to prevent heat ,loss or gain and condensation. Seam and hot water lines, boiler tanks, expansion joints, fittings and other mechanical systems are commonly insulated with pre-fabricated asbestos-containing magnesium silicate. The material is typically white in color and is encased in a plaster-impregnated canvas wrapping. Asbestos containing mud compounds are often used on elbows, valves, identification plates, miscellaneous fittings, and for other special applications on mechanical systems.

#### 3.0 Acoustic ceiling Tiles, Suspect - Non Friable Miscellaneous

#### ACOUSTIC CEILING TILES

Large perforation ceiling tiles were observed on ceiling surfaces in the copy room, and classrooms. Some ceiling tiles are damaged such as ceiling tiles. The ceiling tiles are considered a cellulosic material and are not problematic. The adhesive glue tabs are suspect ACBM. No specific ceiling tile quality concerns were noted.

Fibrous acoustical ceiling tiles, varying in size from one foot square to two by four foot lengths. Fibrous material integrated with cellulose binder and directly adhered to ceiling surfaces. The material in most classrooms is in good condition. Ceiling tiles are easily damaged and may create a dust hazard if the material is broken, abraded, cut, or drilled. Acoustical ceiling tiles were observed on ceiling surfaces in the airplane shop. The adhesive tabs to the tiles are suspect ACBM and are candidate building materials for in-place operations and maintenance. Some damaged ceiling tiles and exposed mastic was observed. Repair and replacement is the prudent response to damaged ceiling tiles.

#### 4.0 Adhesive mastic

Typical to adhere ceiling acoustic panels to underlying substrate. Material is non-problematic and non-friable.

ACM sprayed or troweled onto surfaces for acoustical, decorative, or fireproofing purposes. Asbestos is blended in to spray-applied and troweled-on products to include structural fireproofing, stucco, plaster, acoustical and decorative surfaces, and joint compounds.

#### (5.0) - Sprayed-on acoustic popcorn ceiling materials

No suspect popcorn ceiling materials were observed within the subject building. Popcorn ceiling materials are an acoustic sprayed-on application spray applied to ceiling sheet rock surfaces as an acoustic material. Popcorn typically contain five (5) to ten (10) percent friable chrysotile asbestos in a plastic binding. Popcorn is extremely friable and does require special control and should not be removed by scraping, peeling or other forms of bulk removal. A specialty asbestos abatement contractor is required for popcorn ceiling removal or abatement. No popcorn applications were noted in the Clatskanie Elementary building.

#### RECOMMENDATIONS AND CONCLUSIONS

All vinyl asbestos tiles flooring materials, acoustic ceiling tiles, ceiling tile mastics, cement asbestos board materials, transite board, and miscellaneous skim coat plaster applications on sheet rock wall panels materials are candidate building materials for Operations and Maintenance. Asbestos abatement of confirmed asbestos-containing building materials is not recommended at this time.

In all areas where work or work-related activities are planned materials must be properly tested and classified as non-asbestos. If confirmed, all asbestos containing building materials must be handled, managed, or removed in accordance with state and federal regulations. Asbestos abatement is not recommended or required at this time. No environmental concerns regarding ACBM at the Clatskanie School were noted at this time.

All confirmed ACBM scheduled for material damage or disturbance by renovation, remodeling, or demolition must be properly abated in accordance with EPA and ODEQ recommendations and procedures.

All maintenance workers and related staff must handle ACBM in accordance with the protective provisions of the Oregon Occupational Safety and Health Elementary (OSHA) requirements. Maintenance and staff personnel are encouraged to follow the management recommendations of the AHERA management plan and related operations and maintenance procedures as outlined in the appendix of this letter.

#### **LIMITATIONS**

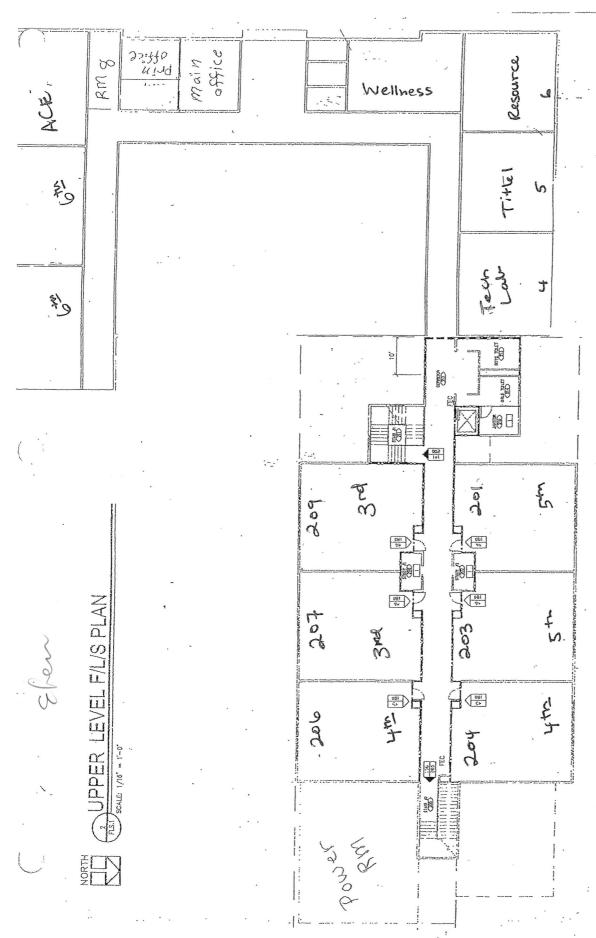
This report was prepared in accordance with generally accepted AHERA standards of environmental reinspection practice at the time this investigation was performed. Evaluations of the conditions at the site for the purpose of this investigation are made from a limited number of observation points and may be subjective in some cases. The subject school district is solely responsible for providing any notices or disclosures to concerned public agencies or to the public.

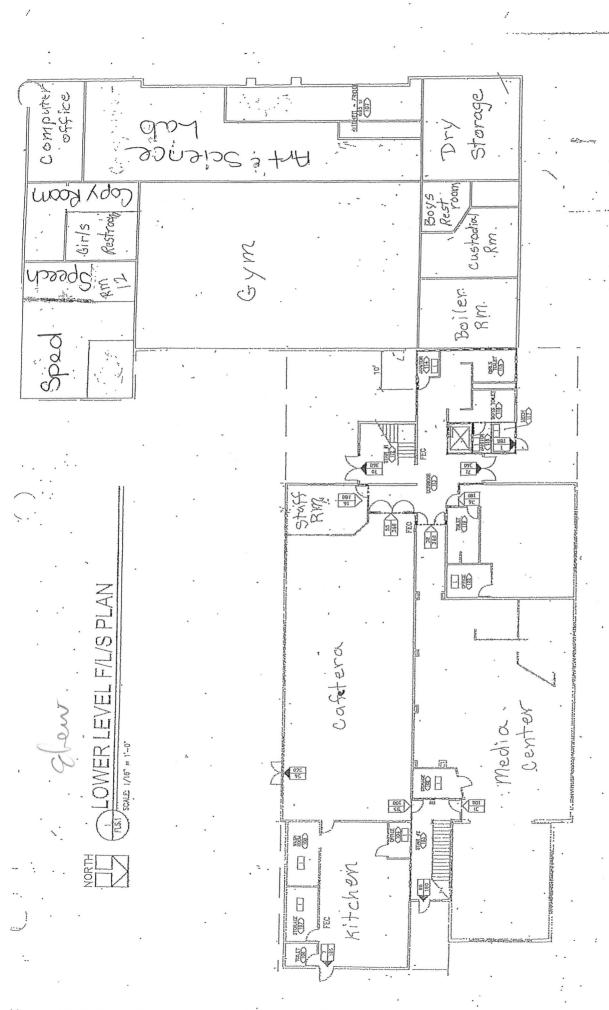
Environmental Inspection Services has prepared this report based on information collected from available records and files. The scope of this investigation is limited and did not include subsurface exploration or chemical screening of soil and groundwater beneath the site. No bulk material samples were collected from the subject elementary school suspect ACBM for the purposes of this reinspection.

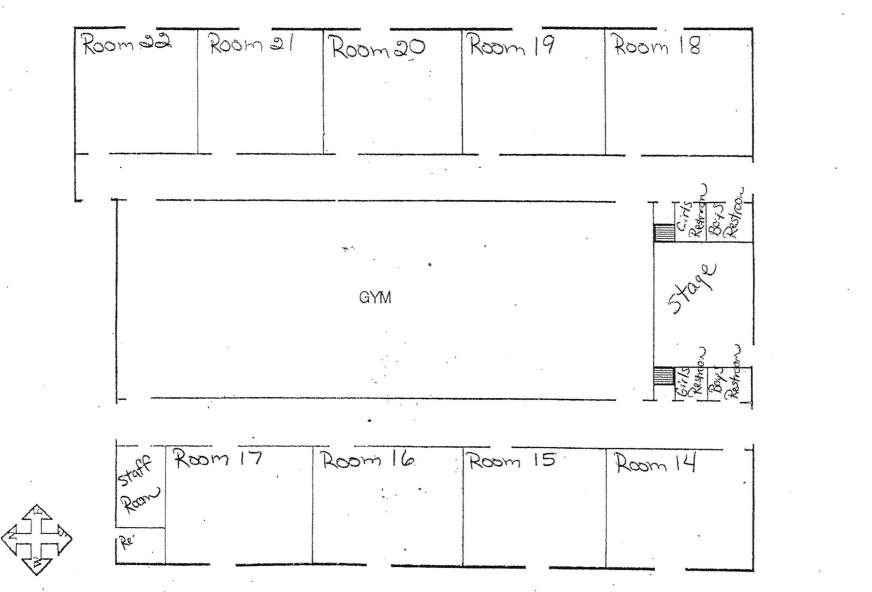
The findings and conclusions are not to be regarded as scientific certainties. Findings are based on professional judgement concerning data significance. Evaluation of the presence of asbestos-containing building materials in the subject school is based upon actual analytical test results, EIS gathered data initially furnished in previous reinspection and the site specific AHERA Management Plans prepared by others. This report is an expression of professional opinion and is not a warranty express or implied.

**APPENDIX 1.0** 

SITE PLAN







Clatskanie Elem. School-Cardiff Bldg

# APPENDIX 2.0 RECORDING FORMS FOR ASSESSMENT DATA

	/	18
PAGE		F

BUILDING COT EVEN FLOOR MAIN
FUNCTIONAL AREA Olasses a HOMOGENEOUS MATERIAL Caster thes mage
TYPE OF SUSPECT MATERIAL SURFACING TSI
FLOORING CEILING WALLS OTHER
DESCRIPTION OF MATERIAL 1 cacy Like 1 MASTE
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR CEILING_>
DESCRIPTION Cooling Aslace how
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
FRIABLE: (YES) (NO)
NON-FRIABLE (YES) (NO)
WARNING LABELS (YES) (NO)
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
PHYSICAL CONDITION:
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE _ EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED *
PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100%
OVERALL RATING: GOOD FAIR POOR DESCRIPTION:
POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE
POTENTIAL FOR CONTACT: HIGH MODERATE LOW X
INFLUENCE OF VIBRATION: HIGH MODERATE LOW X
POTENTIAL FOR AIR EROSION: HIGH MODERATE LOW
OVERALL RATING: HIGH MODERATE LOW
DESCRIPTION OF M
LOCATION IN AIR PLENUM: YES Y NO
COMMENTS OF M
INSPECTOR: Charles Speed ACCREDITATION NO. IR-19-2429 A
SIGNATURE: DATE: DATE:

	2		12
PAGE		OF	

#### RECORDING FORM FOR ASBESTOS ASSESSMENT DATA BUILDING Cat Elem FLOOR MAIN HOMOGENEOUS MATERIAL OC BAR LOCAL MATERIAL FUNCTIONAL AREA TYPE OF SUSPECT MATERIAL SURFACING \_\_\_\_\_ TSI \_\_\_\_ FLOORING\_\_\_\_\_ CEILING \_\_\_\_\_ WALLS \_\_\_\_ OTHER DESCRIPTION OF MATERIAL APPROXIMATE AMOUNT OF MATERIAL (SF) REINSPECTION DATA : ACBM TYPE: SURFACING\_\_\_\_ TSI\_\_\_ MISC\_\_ FLOOR\_ CEILING\_\_\_ DESCRIPTION (SF) 4() (LF) APPROXIMATE AMOUNT OF MATERIAL FRIABLE: (YES) (NO) NON-FRIABLE (YES)\_\_\_\_ (NO) WARNING LABELS (YES)\_\_\_\_(NO) CHANGE FROM INITIAL AHERA REPORT (YES) \_\_\_\_ (NO) PHYSICAL CONDITION: TYPE OF DAMAGE: DETERIORATION\_\_\_ PHYSICAL \_\_ WATER \_\_ FIRE \_ EXTENT OF DAMAGE: LOCALIZED\_\_\_\_ DISTRIBUTED\_\_/ PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100% OVERALL RATING: GOOD FAIR POOR\_ DESCRIPTION: POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE POTENTIAL FOR CONTACT: MODERATE LOW\_\_\_ \_\_\_\_HIGH INFLUENCE OF VIBRATION: HIGH MODERATE LOW POTENTIAL FOR AIR EROSION: HIGH MODERATE LOW OVERALL RATING: HIGH MODERATE LOW DESCRIPTION OPU LOCATION IN AIR PLENUM: YES NO COMMENTS INSPECTOR: Charles ACCREDITATION NO. IR-19-24399 SIGNATURE: Charle Con DATE: 10/4/19

	2		18
PAGE	_/_	OF	10

BUILDING CO Sur FLOOR MAIN
FUNCTIONAL AREA Bus bow HOMOGENEOUS MATERIAL CARS
TYPE OF SUSPECT MATERIAL SURFACING TSI
FLOORING CEILING WALLS OTHER
DESCRIPTION OF MATERIAL CONDITY OF THE DESCRIPTION OF MATERIAL
APPROXIMATE AMOUNT OF MATERIAL(SF) 200 + (LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR CEILING
DESCRIPTION
APPROXIMATE AMOUNT OF MATERIAL (SF) 2 (LF)
FRIABLE: (YES) (NO)
NON-FRIABLE (YES) (NO) WARNING LABELS (YES) (NO) CHANGE FROM INITIAL AMERA PERCORE (YES)
WARNING LABELS (YES) (NO)
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
PHYSICAL CONDITION:  TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE _  EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED  PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100%
OVERALL RATING: GOOD X FAIR POOR
DESCRIPTION: GAR POR LOW - OX
DOMENTAL TOP PERSON
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE
POTENTIAL FOR CONTACT:  INFLUENCE OF VIBRATION:  HIGH MODERATE LOW X
POTENTIAL FOR ALE EDUCATION MIGH MODERATE LOW
OVERALL PARTIES.
DESCRIPTION HIGH MODERATE LOW
DESCRIPTION
LOCATION IN AIR PLENUM: YES <u>×</u> NO
INSPECTOR: Charles spead ACCREDITATION NO. In 19-2139

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BUILDING Clar Gar FLOOR MAIN	
FUNCTIONAL AREA TAGE OF HOMOGENEOUS MATERIAL A	
TYPE OF SUSPECT MATERIAL SURFACING TSI	
FLOORINGCEILINGWALLS _OTHER_	
DESCRIPTION OF MATERIAL	_
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)	
REINSPECTION DATA :	
ACBM TYPE: SURFACING TSI MISC FLOOR_Y CEILING	
DESCRIPTION of the part the	
APPROXIMATE AMOUNT OF MATERIAL (SF) /004 (LF)	
FRIABLE: (VES) ~ (NO)	-
NON-FRIABLE (YES) (NO)	
WARNING LABELS (YES) (NO)	
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)	
PHYSICAL CONDITION:	
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE	
EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED	
PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100%	
OVERALL RATING: GOOD FAIR POOR DESCRIPTION:	
	_
POTENTIAL FOR DISTURBANCE: ACCESSIBLE \( \) INACCESSIBLE	-
	-
TWELTHENCE OF THE LOW	ning.
POTENTIAL FOR ATP FROCTOM:	
OVERALL RATING:	100
DESCRIPTION HIGH MODERATE LOW	-
LOCATION IN AIR PLENUM: YES V NO	-
COMMENTS OF A	
	-
INSPECTOR: Charles Speed ACCREDITATION NO. 710 10 10 10	•
ACCREDITATION NO.	-
DATE: DATE:	

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RECORDING FORM FOR ASBESTOS ASSESSMENT DATA
BUILDING CAT GOVERNOR FLOOR MAIN
BUILDINGFLOORFLOOR
FUNCTIONAL AREA TOO DEST HOMOGENEOUS MARIETTAT OF AGAIN
TITE OF BUSECI MATERIAL SURFACTNG MCT
FLOORING CEILING WALLS OTHER DESCRIPTION OF MATERIAL ///
TOUR OF MATERIAL W
APPROXIMATE AMOUNT OF MATERIAL(SF)(LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR CEILING
THE PROOF CEILING
DESCRIPTION
APPROXIMATE AMOUNT OF MATERIAL(SF)(LF)
(YES) (NO)
NON-EXTABLE (YES) (NO)
WARNING LABELS (YES) (NO) CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
PHYSICAL CONDITION: - PASSO PASSO
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE
EXIENT OF DAMAGE: LOCALIZED DISTRIBUTED
PERCENT OF DAMAGE: 0% (1-10% / 10-25% 25-100%
OVERALL RATING: GOOD FAIR POOR
DESCRIPTION: Horse Godel
POTENTIAL FOR CONTROLS: ACCESSIBLE INACCESSIBLE
POTENTIAL FOR CONTACT:  HIGH MODERATE LOW  INFLUENCE OF VIBRATION:  HIGH MODERATE LOW
INFLUENCE OF VIBRATION: HIGH MODERATE

POTENTIAL FOR AIR EROSION: OVERALL RATING: DESCRIPTION				HIGH	MODERATE MODERATE MODERATE	LOW	
	IN AIR PL		ES <u>V</u> NO	)			
INSPECTOR SIGNATURE		S Specy	ACCREDI	TATION 1	vo. 1 1/2	19-2037	

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PAGE	0	OF	

RECORDING FORM FOR A	SBESTOS AS	SESSMENT DA	TA
BUILDING F. FUNCTIONAL AREA DOLLAR HO	T.OOB	Mainl	
FUNCTIONAL AREA PORTON HE	OMOCENEOUS	1117/10	. 1
TYPE OF SUSPECT MATERIAL SURFACE	OMOGENEOUS	MATERIAL	EWS ( HP
DESCRIPTION OF MATERIAL Trung de	rrs	OTHER	
1 000000 140	Done		
APPROXIMATE AMOUNT OF MATERIAL (S	SF)	(LF)	
REINSPECTION DATA :			
ACBM TYPE: SURFACING TSI	MISC_Y	_ FLOOR	EILING
			-
DESCRIPTION descrite hoods			
APPROXIMATE AMOUNT OF MATERIAL _	/CE)	2112 + 1	
FRIABLE:	(SE)	(LF)_	
NON-FRIABLE	(YES)_/	(NO)	
WARNING LABELS	(YES)	(NO) ×	
CHANGE FROM INITIAL AHERA REPORT	(YES)	_ (NO) _	
THE REPORT	(YES)	(NO)	
PHYSICAL CONDITION:			
TYPE OF DAMAGE: DETERIORATION	Dilliaras		
			FIRE
SERCENT OF DAMACE. OF 1 100	V 40 0		
OVERALL RATING: GOOD FAIR	10-25%	_ 25-100%	
DESCRIPTION: Sources of wer	R POOR_		
Total in Cas, in View			
POTENTIAL FOR DISTURBANCE:	ACCESSTRI.E	TNACCECCT	) T ==
OTTALITATION CONTACT:	HIGH	MODERATE	
NFLUENCE OF VIBRATION:	HIGH	MODERATE	_ LOW_
OTENTIAL FOR AIR EROSION:	HIGH	-	_ LOW_
VERALL RATING:	HIGH	MODERATE MODERATE	_ LOW_
ESCRIPTION transite were ( sur	7(03)	MODERATE	_ LOW
OCAUTON THE ATE	NO		
OCATION IN AIR PLENUM: YES	_ 110		
OCATION IN AIR PLENUM: YES X			
OMMENTER	- /oge \		
NSPECTION	REDITATION 1		

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BUILDING COT FLOOR MAIN
FUNCTIONAL AREA COSTOS HOMOGENEOUS MATERIAL 9 VOT (PACO PSU
TYPE OF SUSPECT MATERIAL SURFACING TSI
FLOORING CEILING WALLS OTHER
DESCRIPTION OF MATERIAL S' He (encapeul)
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR_X CEILING
DESCRIPTION G' Lite Cerror.
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
FRIABLE: (YES) (NO)
NON-FRIABLE (YES) (NO)
WARNING LABELS (YES) (NO)
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
PHYSICAL CONDITION:
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED
PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100%
OVERALL RATING: GOOD FAIR POOR
DESCRIPTION: See till engues ha rea del
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE
DOMENTAL EOD COMPAGE.
THE HEAD OF MEDDALION
DOMESTICATE TOO SEE TO
OVERALL PATING.
DESCRIPTION DEW HIGH MODERATE LOW
DESCRIPTION OF ON
LOCATION IN AIR DIENERS
LOCATION IN AIR PLENUM: YES NO
COMMINTS TO W
INSPECTOR: Charles Select ACCREDITATION NO. 10 19-2025
ACCREDITATION NO.
SIGNATURE: DATE: 1010 19

	17		12
PAGE		OF	10

BUILDING Per FLOOR WAIN
FUNCTIONAL AREA GIVESTONE HOMOGENEOUS MATERIAL 9
TYPE OF SUSPECT MATERIAL SURFACING TSI
FLOORING CEILING WALLS OTHER
FLOORING/_ CEILING WALLS OTHER DESCRIPTION OF MATERIAL
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR / CEILING
DESCRIPTION of the put tole
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF) FRIABLE: (YES) (NO)
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
NON-FRIABLE (YES) (NO)
WARNING LABELS (YES) (NO)
FRIABLE: (YES) (NO)  NON-FRIABLE (YES) (NO)  WARNING LABELS (YES) (NO)  CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
CHARGE FROM INTITAL AMERA REPORT (IES) (NO)
PHYSICAL CONDITION:
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE _
EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED
PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100%
OVERALL RATING: GOOD FAIR POOR
DESCRIPTION:
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE
POTENTIAL FOR CONTACT: HIGH MODERATE LOW
INFLUENCE OF VIBRATION: HIGH MODERATE LOW POTENTIAL FOR AIR EROSION: HIGH MODERATE LOW
POTENTIAL FOR AIR EROSION: HIGH MODERATE LOW
OVERALL RATING: HIGHMODERATE LOW
DESCRIPTION OP M
TOG1 = 100 =
LOCATION IN AIR PLENUM: YES NO
COMMENTS OF W
INSPECTOR: Charles need ACCREDITATION NO. IA-19-24394

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BUILDING Oct Elev.	FT.OOR	basent	
FUNCTIONAL AREA of coste	HOMOGENEOUS	матертат 9	150 1
TYPE OF SUSPECT MATERIAL SU	REACTNG	TOT	ten fal tuo
FLOORING X CEILING	WALLS		
DESCRIPTION OF MATERIAL	The Mark Late	OTHER	
	100		
APPROXIMATE AMOUNT OF MATERIA	AL(SF) \V+	(LF)	
	The state of the s		Market and the Control of the Contro
REINSPECTION DATA :			
ACBM TYPE: SURFACING TS	SIMISC	FLOOR > CE	ILING
DESCRIPTION			
G ten pat Ist	£		
APPROXIMATE AMOUNT OF MATERIA	AL(SF)	LT (LF)	
FRIABLE:	(YES)	× (NO)	
NON-FRIABLE	(YES)		
WARNING LABELS	(YES)	(NO)	
CHANGE FROM INITIAL AHERA REI	ORT (YES)	(NO)>	
		,	*
PHYSICAL CONDITION:			
TVDE OF DAYS OF			
TYPE OF DAMAGE: DETERIORAT	ION PHYSIC	AL Z WATER _	_ FIRE _
EXTENT OF DAMAGE: LOCALIZED	DISTRIBUTI	ED	
PERCENT OF DAMAGE: 0% 1-1	0% 10-25%	25-100%	
OVERALL RATING: GOOD DESCRIPTION:	FAIRPOOR_		
DESCRIPTION:			
POTENTIAL FOR DISMIRRANCE		-	
POTENTIAL FOR DISTURBANCE: POTENTIAL FOR CONTACT:	ACCESSIBLE	INACCESSIB	LE
INFLUENCE OF VIBRATION:	HIGH_	MODERATE	TOM X
POTENTIAL FOR AIR EROSION:		MODERATE	LOW
OVERALL RATING:	HIGH_	MODERATE	LOW
	HIGH_	MODERATE	LOW
DESCRIPTION IN FOCT			
LOCATION IN AIR PLENUM: YES	× 170		
COMMENTS YES	<u>х</u> ио		
11/00/			
INSPECTOR: Charles Speak	ACCREDITATION	10 T.0 - 10 -	7:001.
STONAMIDE.	DATE: 10 4		075711
	11/	1 - 1 - 1 - 1 - 1	

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PAGE	10	OF	

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RECORDING FORM FOR ASBESTOS ASSESSMENT DATA	A
BUILDING CON STATE FLOOR MAIN HOMOGENEOUS MATERIAL	
BUILDING FLOOR MAIN	
FUNCTIONAL AREA OVE HOMOGENEOUS MATERIAL	Y whele
TIES OF SUSPECT MATERIAL SUPERCTNC MOT	
WALLS OTHER	
DESCRIPTION OF MATERIAL with participation	
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)	
REINSPECTION DATA :	
REINSPECTION DATA :	
ACBM TYPE: SUPERCING TO	
ACBM TYPE: SURFACING TSI MISC FLOOR_X CE	ILING
APPROXIMATE ANOTHER AN	
APPROXIMATE AMOUNT OF MATERIAL	
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)	
NON-FRIABLE (YES) (NO) WARNING LABELS (YES) (NO)	
WARNING LABELS (YES) (NO) CHANGE FROM INITIAL AHERA REPORT (YES) (NO)	
AMERICA REPORT (YES) (NO)	*1
PHYSICAL CONDITION:	
TYPE OF DAMAGE: DETERIORATION_ PHYSICAL WATER _	
	_ FIRE _
PARTOCINA OF DAMACES. ()> 1-100 - 10 0-0	
OVERALL RATING: GOOD FAIR POOR	
DESCRIPTION: DOM	
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE	
HICH MODERATE	
INFLUENCE OF VIBRATION:	_ LOW
POTENTIAL FOR AIR EROSION:	LOW
OVERALL RATING: HIGH MODERATE	LOW
DESCRIPTION HIGHMODERATE	LOW_>
LOCATION IN AIR PLENUM: YES NO	
COMMENTS OFM	
TNCDECHOR	
SIGNATURE ACCREDITATION NO. 11-19-2	4396
SIGNATURE: Oncole, Com DATE: 10 10 10	

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PAGE	- 11	OF	10

BUILDING FLOOR WAN	
BUILDING CAREA COSE OF HOMOGENEOUS MATERIAL WAY	Ca Ma
TYPE OF SUSPECT MATERIAL SURFACING TSI	
FLOORINGCEILING WALLS OTHER	
DESCRIPTION OF MATERIAL MOSTE Maste	
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)	-
REINSPECTION DATA :	
ACBM TYPE: SURFACING TSI MISC FLOOR CEII	ING
DESCRIPTION	
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)	2.
FRIABLE: (YES) (NO)	
NON-EXTABLE (YES) (NO)	
WARNING LABELS (YES) (NO) CHANGE FROM INITIAL AHERA REPORT (YES) (NO)	
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)	
PHYSICAL CONDITION:	
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED  PERCENT OF DAMAGE: O% 1-10% 10-25% 25-100% OVERALL RATING: GOOD FAIR POOR DESCRIPTION:	FIRE
POTENTIAL FOR DISTURBANCE.	
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE POTENTIAL FOR CONTACT: HIGH MODERATE	
	Chargest Street on Street Street Street
OVERALL DARLING.	LOW
DESCRIPTION HIGHMODERATE	LOW
LOCATION IN AIR PLENUM: YES NO	

	17		18
PAGE	16	OF	

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA
BUILDING Cat Efen FLOOR MAN HOMOGENEOUS MATERIAL CONSTITUTIONAL AREA COSE KEY HOMOGENEOUS MATERIAL CONSTITUTION
FLOORINGCEILING _X WALLS OTHER
FLOORING CEILING WALLS OTHER  DESCRIPTION OF MATERIAL COLLEGE MACKET
APPROXIMATE AMOUNT OF MATERIAL(SF) (LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR CEILING
DESCRIPTION g'acc. celes tibes
APPROXIMATE AMOUNT OF MATERIAL(SF)/ C(LF)
FRIABLE: (YES) (NO)
FRIABLE: (YES) (NO) (NO) WARNING LARFIE
WARNING LABELS (YES) (NO)
WARNING LABELS (YES) (NO) CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
PHYSICAL CONDITION:
TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE
PERCENT OF DAMAGE: OF 1-10% 10.05%
PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100% OVERALL RATING: GOOD FAIR POOR
DESCRIPTION: POOR
DESCRIPTION.
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE
INFLUENCE OF VIRRATION.
POTENTIAL FOR ALD EDOCTOR
OVERALL RATING:
DESCRIPTION OF HIGH MODERATE LOW
LOCATION IN AIR PLENUM: YES NO
COMMENTS PLENUM: YES NO.
INSPECTOR: Charles Speci ACCREDITATION NO. The 19-24-99
SIGNATURE: Charles C DATE: 1046

	12		18
PAGE	1/	OF	

BUILDING COLOR FI FUNCTIONAL AREA COSSES HO	OOR WAN
FUNCTIONAL AREA COGGGG HO	MOGENEOUS MATERIAL
TYPE OF SUSPECT MATERIAL SURFAC	ING TST
FLOORING_X CEILING WAL	LS OTHER
DESCRIPTION OF MATERIAL	Len/Her John to le med
APPROXIMATE AMOUNT OF MATERIAL (S	(LF) (LF)
REINSPECTION DATA :	
ACBM TYPE: SURFACING TSI	MISC FLOOR CEILING
DESCRIPTION	
APPROXIMATE AMOUNT OF MATERIAL	(SF) (LF)
NON-FRIABLE	(YES) (NO)
WARNING LABELS	(YES) (NO)
CHANGE FROM INITIAL AHERA REPORT	(YES) (NO)
PHYSICAL CONDITION:	
TYPE OF DAMAGE: DETERIORATION	PHYSICAL WATER FIRE
EXTENT OF DAMAGE: LOCALIZED	DISTRIBUTED
PERCENT OF DAMAGE: 0% 1-10%	10-25% 25-100%
OVERALL RATING: GOOD FAIR	R POOR
DESCRIPTION:	
POTENTIAL FOR DISTURBANCE:	
POTENTIAL FOR CONTACT:	HIGH MODERATE LOW
INFLUENCE OF VIBRATION:	HIGH MODERATE LOW
POTENTIAL FOR AIR EROSION:	HIGH MODERATE LOW
OVERALL RATING: DESCRIPTION	HIGHMODERATELOW
LOCATION IN AIR PLENUM: YES	NO
INSPECTOR: Charles Thear ACCE	REDITATION NO. IR-9-24896
SIGNATURE:DATE	19/19-19

	14		16
PAGE		OF	

BUILDING COT CAYOUTH FLOOR MAIN  FUNCTIONAL AREA MUSIC CLOSE HOMOGENEOUS MATERIAL La function
ETINCTIONAL ADEA MARIC COOP HOMOGENEOUS MATTERIAL & 140/10
TYPE OF SUSPECT MATERIAL SURFACING TSI
FLOORING CEILING WALLS OTHER
DESCRIPTION OF MATERIAL
1 00.00
APPROXIMATE AMOUNT OF MATERIAL(SF)(LF)
REINSPECTION DATA :
ACBM TYPE: SURFACING TSI MISC FLOOR CEILING
DESCRIPTION
APPROXIMATE AMOUNT OF MATERIAL (SF) (LF)
FRIABLE: (YES) (NO)
NON-FRIABLE (YES) (NO) WARNING LABELS (YES) (NO)
WARNING LABELS (YES) (NO)  CHANGE FROM INITIAL AMERA PERCORT (YES)
CHANGE FROM INITIAL AHERA REPORT (YES) (NO)
PHYSICAL CONDITION:  TYPE OF DAMAGE: DETERIORATION PHYSICAL WATER FIRE _
EXTENT OF DAMAGE: LOCALIZED DISTRIBUTED
PERCENT OF DAMAGE: 0% 1-10% 10-25% 25-100%
OVERALL RATING: GOOD FAIR POOR
DESCRIPTION:
POTENTIAL FOR DISTURBANCE: ACCESSIBLE INACCESSIBLE
POTENTIAL FOR CONTACT: HIGH MODERATE LOW INFLUENCE OF VIBRATION: HIGH MODERATE LOW
POTENTIAL FOR AIR EROSION: HIGH MODERATE LOW
OVERALL RATING: HIGH MODERATE LOW
DESCRIPTIONOFM
LOCATION IN AIR PLENUM: YES X NO
INSPECTOR: ACCREDITATION NO. IN-18-2430/
SIGNATURE: Thale Spe DATE: 10 Mig - FR.

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RECORDING FORM FOR A	SBESTOS ASSE	SSMENT D	ATA	
BUILDING det 9 Cordiff FUNCTIONAL AREA Stage Misic H	T OOP	stor mo	a / my Ca	MARP, S
BUILDING	CMOCENTEOLIS MA	TERTAT.	9 000	al he
FUNCTIONAL AREA H	CINC	TEXTAL		
TYPE OF SUSPECT MATERIAL SURFACE FLOORING CEILING WA	TIS · O	HER		
DESCRIPTION OF MATERIAL 9 00	. 1.01			
DESCRIPTION OF MATERIAL	1-176 1			
APPROXIMATE AMOUNT OF MATERIAL (	(SF) 10 KT	(LF)		-
REINSPECTION DATA :				
ACBM TYPE: SURFACING TSI_	MISC	FLOOR	CEILING	
DESCRIPTION  account coly	Her			ng constants
APPROXIMATE AMOUNT OF MATERIAL	(SF)_	(LF)		espitado.
TTTTTTT.	(YES)	(NO)		
RIABLE: NON-FRIABLE WARNING LABELS CHANGE FROM INITIAL AHERA REPOR	(YES)	_ (NO)		
WARNING LABELS	(YES)	_ (NO)		
CHANGE FROM INITIAL AHERA REPOR	RT (YES)	_ (NO)		
PHYSICAL CONDITION:  TYPE OF DAMAGE: DETERIORATION	ON PHYSICA	L × WATE	R FIRE	
EXTENT OF DAMAGE: LOCALIZED_	DISTRIBUTE	D <		_
PERCENT OF DAMAGE: 0%1-10°	₹ 10-25%	25-100%		
OVERALL RATING: GOOD FA	AIR POOR			
DESCRIPTION:	CALCULATION AND ADDRESS OF THE PARTY OF THE			
				-
POTENTIAL FOR DISTURBANCE:	ACCESSIBLE_	INACCES	SIBLE	TO DESCRIPTION OF THE PARTY OF
POTENTIAL FOR CONTACT:		MODERATE	TOM	23.00000000
INFLUENCE OF VIBRATION:	HIGH_	_ MODERATE	CONTRACTOR CONTRACTOR OF THE PERSON NAMED IN PARTY OF THE PERSON NAMED IN	20/3/20/4/44
POTENTIAL FOR AIR EROSION:	HIGH_	MODERATE	CONTRACTOR OF THE PERSON NAMED IN COLUMN TWO	-
OVERALL RATING:	HIGH	MODERATE	LOW	
DESCRIPTION OF W				-
LOCATION IN AIR PLENUM: YES	NO			
COMMENTS OF W				arcadomenta.
		170 7 17-7	7-20-5-12	
	CCREDITATION ATE: 10 4 0			NO STATE OF THE PARTY OF THE PA
STENATURE: Chroke Spe D.	ATE: /0/4/19			

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PAGE	16	OF	10
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BUILDING Clat Elm (careff) FLOOR	7	
FLOOR FUNCTIONAL AREA Wes Gum HOMOGI	M.ACL	
FUNCTIONAL AREA Men Quinc HOMOGI	ENEOUS MATERIAL	20/20 11/20
TYPE OF SUSPECT MATERIAL SURFACING	TSI	
FLOORING CEILING WALLS	OTHER	
DESCRIPTION OF MATERIAL	lege .	
APPROXIMATE AMOUNT OF MATERIAL (SF)	(LF)	
REINSPECTION DATA :		
ACBM TYPE: SURFACING TSI	MISC FLOOR (	CEILING
DESCRIPTION Coole file		
APPROXIMATE AMOUNT OF MATERIAL	(SF) >/ ) \ (LF)	
FRIABLE: (	YES) (NO)	_
NON-RRIABITE /	YES) (NO)	
WARNING LABELS (	YES) (NO)	_
CHANGE FROM INITIAL AHERA REPORT (	YES) (NO)	
PHYSICAL CONDITION:		
TYPE OF DAMAGE: DETERIORATION	DHVQTCAT WAMED	HTDE
		FIRE _
PERCENT OF DAMAGE: 0% 1-10% 1	0-25% 25-100%	
OVERALL RATING: GOOD FAIR	POOR	•
DESCRIPTION:		
POTENTIAL FOR DISTURBANCE: ACCES	SSIBLE INACCESSI	BLE
POTENTIAL FOR CONTACT:	HIGH MODERATE	LOW
INFLUENCE OF VIBRATION:	HIGH MODERATE	LOW
POTENTIAL FOR AIR EROSION:	HIGHMODERATE_	LOW
OVERALL RATING:	HIGHMODERATE	LOW
DESCRIPTION DEM		
LOCATION IN AIR PLENUM: YES Y NO		
COMMENTS OF M		
INSPECTOR: Charles They ACCREDIT	ATION NO. IV-19	-2030A
TANK MICHAEL	11/1/0 - 5	7 -
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PAGE		OF	1 0

RECORDING FORM FOR ASBES	TOS ASSESSMI	ENT DATA
BUILDING 6 9 FLOOR FUNCTIONAL AREA 6 HOMOG	<i>A</i>	(C 12-0
FLOOR	-anit	The Proof
TYPE OF CUCPECE NAMEDIAL CUPPEDIAL	ENEOUS MATER	AL 9 gyen / the
TYPE OF SUSPECT MATERIAL SURFACING	TSI	
FLOORING CEILING WALLS DESCRIPTION OF MATERIAL	OTHER_	
DESCRIPTION OF MATERIAL		
ADDDOUTMAND AMOIDIN OF MANDETS (CT)	= 1210 /	
APPROXIMATE AMOUNT OF MATERIAL (SF)	2/0\\ (LF)	
REINSPECTION DATA :	s 7 691	
ACBM TYPE: SURFACING TSI	MISCFLOC	R CEILING
DESCRIPTION	-	
APPROXIMATE AMOUNT OF MATERIAL	(SF) 7/0	(LF)
FRIABLE:	(YES) _ X (NO	)
NON-FRIABLE WARNING LABELS	(YES) (NO	))
WARNING LABELS	(YES) (NO	
CHANGE FROM INITIAL AHERA REPORT	(YES) (NO	)
PHYSICAL CONDITION:		
TYPE OF DAMAGE: DETERIORATION	DUVCTONT	Waller Tree
EXTENT OF DAMAGE: LOCALIZED DIS	FUISICAL	WATER FIRE _
PERCENT OF DAMAGE: 0% 1-10% 1	0-25% 25	1000
OVERALL RATING: GOOD FAIR	.U-25% 25-	100%
DESCRIPTION: GOOD FAIR_	POOR	
POTENTIAL FOR DISTURBANCE: ACCE	SSIBLE IN	ACCESSIBLE
POTENTIAL FOR CONTACT:		ERATE LOW
INFLUENCE OF VIBRATION:		ERATE LOW
POTENTIAL FOR AIR EROSION:	HIGH MOD	ERATE LOW
OVERALL RATING:	HIGH MOD	ERATE LOW
DESCRIPTION		
LOCATION IN AIR PLENUM: YES NO		
COMMENTS	and the same of th	
	TATION NO.	12-19-50506
SIGNATURE: DATE:	10/4/5-	

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PAGE	10	OF	10

BUILDING GO GO DOG TUNCTIONAL AREA STORY OF TYPE OF SUSPECT MATERIAL SILE	FLOOR	WACO	
FUNCTIONAL AREA Shop of	HOMOGENEOUS	MATERIAL COLOR	+ Heal
THOORING (EILLING	MATTE		
DESCRIPTION OF MATERIAL	en brow not	Lywelin	
APPROXIMATE AMOUNT OF MATERIA	L(SF) 2004	(LF)	
REINSPECTION DATA :			
ACBM TYPE: SURFACING TS	IMISC	_ FLOOR/_ CEI	LING
DESCRIPTION Jan pot umb	1 / Ino of	fee / book or	
APPROXIMATE AMOUNT OF MATERIA	L (SF)	20) (I.F)	
EKTABLE:	(YES)	(NO)	
NON-FRIABLE	(YES)	(NO)	
MERNING THRET?	(YES)	(NO)	
CHANGE FROM INITIAL AHERA REP	ORT (YES)	(NO)	
PHYSICAL CONDITION:			
TYPE OF DAMAGE: DETERIORATE EXTENT OF DAMAGE: LOCALIZED PERCENT OF DAMAGE: 0% 1-10 OVERALL RATING: GOOD X DESCRIPTION:		25-100%	FIRE _
POTENTIAL FOR DISTURBANCE:	ACCESSIBLE	× INACCESSIBL	E
		MODERATE	
INFLUENCE OF VIBRATION:		MODERATE	
POTENTIAL FOR AIR EROSION:	HIGH	MODERATE	LOW
OVERALL RATING:	HIGH_	MODERATE	LOW
DESCRIPTION OR MANAGEMENT			
LOCATION IN AIR PLENUM: YES COMMENTS			
THOREGION			
	CCREDITATION ATE: 10/4/	NO. <u>IR-19-8</u>	14351
The same of the sa	MIE: _ /0/7///	/	

APPENDIX 3.0 REGULATIONS

An official website of the United States government.

We've made some changes to EPA.gov. If the information you are looking for is not here, you may be able to find it on the EPA Web Archive or the January 19, 2017 Web Snapshot.

Close



### **Asbestos Laws and Regulations**

This page provides a listing of the laws and regulations pertaining to asbestos implemented by the EPA and certain other federal agencies. See more information on U.S. Federal Bans on Asbestos.

#### **EPA Asbestos-Related Laws**

- The Asbestos Hazard Emergency Response Act (AHERA)
- The Asbestos Information Act (AIA)
- The Asbestos School Hazard Abatement Reauthorization Act (ASHARA)
- The Clean Air Act (CAA)
- Safe Drinking Water Act (SDWA)
- <u>The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)</u>

#### **EPA Asbestos Regulations**

- <u>Asbestos-Containing Materials in Schools Rule (40 CFR Part 763, Subpart E)</u>
- Asbestos Worker Protection Rule (40 CFR Part 763, Subpart G)
- Asbestos Ban and Phaseout Rule (Remanded) (40 CFR Part 763, Subpart I)
- <u>Asbestos National Emission Standard for Hazardous Air Pollutants</u> (NESHAP) Regulations (40 CFR Part 61, Subpart M)
- CERCLA Hazardous Substances and Reportable Quantities

#### Other Federal Agencies with Asbestos Regulations

- Occupational Safety and Health Administration (OSHA)
- Consumer Product Safety Commission (CPSC)
- Mine Safety and Health Administration (MSHA)

#### **EPA Asbestos-Related Laws**

# The Asbestos Hazard Emergency Response Act (AHERA) (Toxic Substances Control Act (TSCA) Title II)

This law required EPA to promulgate regulations (e.g., the Asbestos-Containing Materials in Schools Rule) requiring local educational agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked EPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools. The Toxic Substances Control Act defines asbestos as the asbestiform varieties of: chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite/grunerite); anthophyllite; tremolite; and actinolite.

• TSCA Subchapter II: Asbestos Hazard Emergency Response (15 U.S.C. § 2641-2656)

#### **Asbestos Information Act (Public Law 100-577)**

This law helped to provide transparency and identify the companies making certain types of asbestos-containing products by requiring manufacturers to report production to the EPA.

• 15 U.S.C. § 2607(f)

#### Asbestos School Hazard Abatement Reauthorization Act (ASHARA)

This law extended funding for the asbestos abatement loan and grant program for schools. ASHARA also directed EPA to increase the number of training hours required for the training disciplines under the Asbestos Model Accreditation Plan (MAP) and to expand the accreditation requirements to cover asbestos abatement projects in all public and commercial buildings in addition to schools.

Docket ID: OPTS-62048E; FRL-3269-8

- Asbestos School Hazard Abatement Reauthorization Act of 1990
- Asbestos Model Accreditation Plan
- <u>February 3, 1994 Federal Register Notice: Asbestos Model Accreditation</u> Plan

#### Clean Air Act (CAA) (42 USC § 7401 et seq.)

This law defines the EPA's responsibilities for protecting and improving the nation's air quality and the stratospheric ozone layer and includes provisions for the EPA to set national emission standards for hazardous air pollutants, including asbestos.

• Section 112- National Emission Standards for Hazardous Air Pollutants

#### Safe Drinking Water Act (SDWA)

The Safe Drinking Water Act (SDWA) is the federal law that helps ensure the quality of Americans' drinking water. Under the SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards.

See more on asbestos in drinking water

# <u>Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)</u>

This law, also known as Superfund, was enacted to address abandoned hazardous waste sites in the U.S. The law has subsequently been amended, by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and the Small Business Liability Relief and Brownfields Revitalization Act of 2002. CERCLA authority may be appropriate to respond to the release or potential release of asbestos into the environment.

#### **EPA Asbestos Regulations**

#### Asbestos-Containing Materials in Schools Rule

Pursuant to the Asbestos Hazard Emergency Response Act (AHERA), the Asbestos-Containing Materials in Schools rule requires local education agencies to inspect their school buildings for asbestos-containing building material, prepare asbestos management plans and perform asbestos response actions to prevent or reduce asbestos hazards. Public school districts and non-profit private schools, including charter schools and schools affiliated with religious institutions (collectively called local education agencies) are subject to the rule's requirements.

Docket ID: OPTS-62048E; FRL-3269-8

- Asbestos-Containing Materials in Schools Rule (40 CFR Part 763, Subpart <u>E</u>)
  - Interim Transmission Electron Microscopy (TEM) Analytical Methods (Appendix A to Subpart E of 40 CFR Part 763)
  - <u>Asbestos Model Accreditation Plan (Appendix C to Subpart E of 40</u> CFR Part 763)
  - <u>Transport and Disposal of Asbestos Waste (Appendix D to Subpart E</u> of 40 CFR Part 763)
  - Interim Method of the Determination of Asbestos in Bulk Insulation Samples (Appendix E to Subpart E of 40 CFR Part 763)

#### **EPA Asbestos Worker Protection Rule**

Through the authority of Section 6 of the Toxic Substances Control Act (TSCA) the EPA extended worker protection requirements to state and local government employees involved in asbestos work who were not previously covered by the the Occupational Safety and Health Administration's (OSHA) asbestos regulations.

Docket ID: OPPTS-62125B; FRL-6751-3

• 40 CFR Part 763, Subpart G – Asbestos Worker Protection

#### Asbestos Ban and Phaseout Rule (Remanded )

On July 12, 1989, the EPA issued a final rule banning most asbestos-containing products. In 1991, this regulation was overturned by the Fifth Circuit Court of Appeals. However, as a result of the Court's decision, only a few asbestos-containing products remain banned.

See Asbestos Ban and Phase-out Federal Register notices.

Docket ID: OPTS-62048E; FRL-3269-8

 40 CFR Part 763, Subpart I -- Prohibition of the Manufacture, Importation, Processing and Distribution in Commerce of Certain Asbestos-Containing Products; Labeling Requirements

# **Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP)**

The asbestos NESHAP regulations specify work practices for asbestos to be followed during demolitions and renovations of all structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require the owner of the building or the operator to notify the appropriate state agency before any demolition, or before any renovations of buildings that could contain a certain threshold amount of asbestos or asbestos-

containing material. In addition, particular manufacturing and fabricating operations either cannot emit visible emissions into the outside air or must follow air cleaning procedures, as well as follow certain requirements when removing asbestos-containing waste.

Docket ID: OAR-2002-0082, FRL-7561-2

- 40 CFR Part 61, Subpart M (Complete Rule)
  - 40 CFR §61.145—Standard for demolition and renovation
  - <u>40 CFR §61.150—Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations</u>

#### **CERCLA Hazardous Substances and Reportable Quantities**

Asbestos is designated as a hazardous substance with a reportable quantity in the Superfund regulations.

• <u>40 CFR Part 302.4 - Designation of Hazardous Substances and Reportable</u> Ouantities

#### Other Federal Agencies with Asbestos Regulations

#### Occupational Safety and Health Administration (OSHA)

OSHA oversees the working conditions for U.S. workers by implementing and managing occupational safety and health standards. The following regulations pertain to handling asbestos in the workplace.

- Asbestos General Standard—Specification of permissible exposure limits, engineering controls, worker training, labeling, respiratory protection, and disposal of asbestos waste
  - o 29 CFR 1910.1001
- Asbestos Construction Standard—Covers construction work involving asbestos, including work practices during demolition and renovation, worker training, disposal of asbestos waste, and specification of permissible exposure limits
  - o 29 CFR 1926.1101

#### Consumer Product Safety Commission (CPSC)

The CPSC protects consumers and families from consumer products that pose a fire, electrical, chemical, or mechanical hazard or can injure children. Below are the following CPSC bans or restrictions on asbestos-containing products:

- Emberizing Materials
  - o 16 CFR Part 1305
- Patching Compounds
  - 16 CFR Part 1304
- Asbestos Containing Garments for General Use
  - 16 CFR § 1500.17(a)(7)

#### Mine Safety and Health Administration (MSHA)

MSHA is responsible for overseeing the safety and health of miners in the U.S. The following MSHA regulations apply to asbestos in mines:

- <u>Surface Mines: exposure limits, engineering controls, and respiratory protection measures for workers in surface mines</u>
  - 30 CFR part 56, subpart D
- <u>Underground Mines: exposure limits, engineering controls, and respiratory protection measures for workers in underground mines</u>
  - 30 CFR part 57, subpart D

LAST UPDATED ON SEPTEMBER 1, 2016