



Accredited Environmental Technologies, Inc.

ASBESTOS HAZARD EMERGENCY RESPONSE ACT

3 YEAR RE-INSPECTION & ASSESSMENT

INTERBORO SCHOOL DISTRICT

PROSPECT PARK, PENNSYLVANIA

FIELD HOUSE

PREPARED FOR: Mr. William Galloway
AHERA Designated Person
Interboro School District
900 Washington Avenue
Prospect Park, PA 19076
(610) 461-6700 ext.1117

PREPARED BY: Accredited Environmental
Technologies, Inc.
28 North Pennell Road
Media, PA 19063
(610) 891-0114

AET Project #09-21-14203

BUILDING INSPECTOR:



Mr. Hans Kramer
PA # 057877

Fall 2021

Accredited Environmental Technologies, Inc.

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The information presented in the attached report represents a confidential work product between Client and Accredited Environmental Technologies, Inc. (AET) in accordance with the contract documents and or mutual conveyances agreed upon for the performance of said work. Reproduction of this document is permitted in accordance with the EPA AHERA Regulation Section 763.93(g)(2) & (3). Reproduction of this document for any other purpose than which it was intended requires prior approval from AET.

Inquires regarding the work performed or findings made should reference the assigned Project Number.

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EXECUTIVE SUMMARY

Accredited Environmental Technologies, Inc. (AET) was contracted by the Interboro School District to conduct an AHERA 3 year re-inspection and assessment at their designated school facilities in accordance with EPA regulation 40 CFR Part 763.85(b). This re-inspection and assessment report and procedures utilized were performed in accordance with AET's Proposal #11089, dated 1/4/21.

The US EPA AHERA regulations 40 CFR Part 763 were adopted in October of 1987 and mandates an asbestos inspection of all school facilities covered by this Act and that a re-inspection be performed, "at least once every 3 years after a management plan is in effect," by an EPA AHERA Certified Building Inspector.

This report details the 3-Year Re-Inspection & Assessment performed by AET in September 2021 for the following school facility:

Field House
South Avenue & Trites Avenue
Glenolden, PA 19036

Based on the re-inspection and assessment made, no Asbestos Containing Building Materials (ACBM) were identified within the school facility.

No exclusion is being sought for the school facility in accordance with Section 763.99. The facility and the provisions described within the US EPA AHERA regulations are applicable.

Summary results and findings of the 3 Year Re-Inspection & Assessment, along with a description of the methodologies utilized, sample collection process and assessment reporting, can be found attached.

A complete listing of building areas can be found in the Appendix. Designation of building areas were based in accordance with the School District's adopted nomenclature.

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SUMMARY DETERMINATION OF ACBM

A summary listing of identified homogenous ACBM included in the re-inspection and assessment is presented in the table below. Included in this listing, are the current designations regarding the materials friability and whether the asbestos content was assumed.

| Homogenous ACBM - Field House | | | | | |
|-------------------------------|----------------------|--------------|------------------|----------------------|--------------------------|
| ACBM Description | | Friable ACBM | Non-Friable ACBM | Assumed Friable ACBM | Assumed Non-Friable ACBM |
| H-ID* | Material Description | | | | |
| | No ACBM Identified | | | | |

* The "H-ID" designation refers to the assigned homogeneous identification code utilized within the data tables.

Specific changes in ACBM locations and condition (friability) is summarized as follows:

- ◆ ACBM Locations - Based on the previous re-inspection documents and current observed conditions, no additional ACBM was identified.
- ◆ Changes in Condition - No ACBM materials were observed remaining within the field house.

For the purpose of performing the re-inspection and assessment, AET utilized previous asbestos building survey documentation available. Specifically, AET utilized the following document(s):

- ◆ AET: AHERA 3-Year Re-Inspection & Assessment Reports, 2008, 2012 and 2015
- ◆ Management International: AHERA Management Plan dated 9/26/1988
- ◆ Management International: Summary Correspondence dated 3/12/1997

This summary determination does not contain all the information that is detailed in the full report. The report should be read in its entirety, including tabular findings and appendices to obtain a more complete understanding of the information provided, and to aid in any decisions made, or actions taken, based on this information.

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METHODS

In accordance with 40 CFR Part 763.85(b), AET's re-inspection and assessment included friable and non-friable, known or assumed "previously identified" ACBM in each school building that is leased, owned or otherwise used as a school building.

In each school building, the accredited inspector performed the following:

- i. Visually re-inspect and re-assess under 763.88, the condition of all "previously identified" friable known or assumed ACBM.
- ii. Visually inspect material that was previously considered non-friable ACBM and touch the material to determine whether it has become friable since the last inspection or re-inspection.
- iii. Identify any homogeneous areas with material that has become friable since the last inspection or re-inspection.
- iv. For each homogeneous area of newly friable material that is already assumed to be ACBM, bulk samples may be collected for analysis in accordance with 763.88 and 763.87.
- v. Assess, under 763.88, the condition of the newly friable material in areas where samples are collected and newly friable materials in areas that are assumed to be ACBM.
- vi. Reassess, under 763.88, the condition of friable known or assumed ACBM previously identified.
- vii. Record the following and submit to the person designated under 763.84 a copy of such record for inclusion in the management plan within 30 days of re-inspection.
 - A. The date of re-inspection, the name and signature of the person making the re-inspection, State of accreditation, and, if applicable, his or her accreditation number, and any changes in the condition of known or assumed ACBM.
 - B. The exact locations where samples are collected during the re-inspection, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, State of accreditation, and, if applicable, his or her accreditation number.
 - C. Any assessments or re-assessments made of friable material, the name and signature of the accredited inspector making the assessments, State of accreditation, and, if applicable, his or her accreditation number.

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ADDITIONAL BULK SAMPLING

Sampling during the inspection process was performed in accordance with AET's proposal and based upon condition noted by the accredited inspector. Where required, AET's AHERA accredited inspector collected samples in accordance with 40 CFR 763.86 (sampling guidelines). These guidelines specify the sample quantity for both assumed friable surfacing material and assumed thermal system insulation and allow for samples in a manner sufficient to determine whether the assumed material is ACM or not ACM for miscellaneous material and for non-friable suspected ACBM. AHERA requires sampling during the re-inspection process only where assumed ACBM has become a newly friable homogeneous material.

No suspect bulk material samples were collected as a part of re-inspection.

Determination of sampling locations are made by the accredited inspector. In accordance with OSHA regulation 29 CFR 1926.1101, surfacing and troweled on applied building materials installed prior to 1980 are presumed (suspect) to be asbestos containing unless otherwise proven negative by bulk sample collection and analysis.

Collected, bulk samples of suspected ACBM were analyzed by Polarized Light Microscopy (PLM) in accordance with US EPA method 600/R-93/116. The detection limit of this analytical method is 1% asbestos by weight. Specific sample results can be found in the asbestos bulk sample analysis tables within the Appendix. In accordance with the AHERA protocol, if any sample within the homogenous sampling area has more than 1% asbestos by weight, then the entire homogenous sampling area is assumed to contain asbestos.

In accordance with EPA regulations, homogeneous building materials which contain less than, or equal to, 1% asbestos by weight may be considered as non-asbestos. It is however noted that, PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable non-organically bound (NOB) materials. Both the very small fiber size (length & diameter) and the tightly bound matrix of the material are limiting factors in detection by PLM optics. As a result, several states required analysis of these materials by Quantitative Transmission Electron Microscopy. For the purposes of this re-inspection NOB materials with limited samples or results indicating "trace" (i.e. <1%) asbestos are categorized as PACM. AET recommends that representative samples of NOBs demonstrating negative PLM results for asbestos be re-analyzed by TEM due to this limitation prior to disturbance of these materials.

During analysis, where individual layers or components of samples collected are noted, and can be separated in the laboratory, separate results are provided for these layers. Composite sample analysis is permitted for drywall/joint compound systems by the EPA. Bulk analysis for contamination determination (i.e. soil, surface, etc.) is typically based on the identification of the presence of asbestos material. Thus, the 1% criteria is not utilized for this determination. The US Occupational Safety and Health Administration (OSHA) also does not allow for the compositing of bulk samples.

Note: It is AET's policy to dispose of all laboratory samples 30 days after analysis unless otherwise notified by the client.

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RE-INSPECTION & ASSESSMENT FINDINGS

Findings of the 3 Year Re-Inspection & Assessment are summarized in tabular form to facilitate record keeping and updating of material assessment. Re-inspection and assessment forms can be found in the Appendix.

A detailed description of the Appendix forms and presented information is presented below.

AHERA Response Action Flow Chart - Describes the progression of response action determinations.

Homogenous Areas & ACBM Determination - Identifies each suspect material with its AHERA category (surfacing material, thermal system insulation or miscellaneous material), a description of the material, estimated quantity, sampling quantities, ACBM determination and corresponding EPA category for National Emission Standards of Hazardous Air Pollutants for Asbestos. The subsequent form entitled "Prior Homogenous Areas & ACBM Determination" was prepared based on the previous inspection data. Data from the prior reports was included to the extent feasible.

Asbestos Inventory Data - Identifies the functional space where ACBM material is identified, its AHERA material type, description, presence of identifying labels, estimated quantity, previously assessed condition (as available), current assessed condition and friability. For Management Plan purposes, categories for response actions (including priority), estimated removal costs and AHERA assessment category are included.

Asbestos Bulk Sample Analysis Report - Presents the specific location of each sample collected along with the analytical results of the collected samples.



Inspection and Assessment Performed by Mr. Hans Kramer (PA# 057877)



Management Plan Response Actions determined by Mr. Justin Plummer (PA# 058122)

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RESTRICTIONS

1. The scope of AET's services for this 3-Year Re-Inspection & Assessment was to visually re-inspect and assess "previously identified" ACBM as detailed within the most recent AHERA Inspection Report. A re-survey of the entire facility to identify materials not "previously identified" was not included in this scope of work.
2. No sampling was performed of previously assumed ACBM unless the condition of the material changed significantly resulting in this homogeneous area being designated as newly friable or as deemed necessary by the building inspector.
3. Access to materials presented as assumed or suspected to be concealed beyond physical barriers requiring demolition or extraordinary means was not performed.

LIMITATIONS

1. The condition of the ACBM identified during this re-inspection is specific for the inspection dates described herein. ACBM condition can change significantly on a daily basis due to damage from physical contact.
2. ACBM locations described herein are based on the most recent AHERA re-inspection report and knowledge of response actions performed subsequent to that report. This report relied on a visual assessment of exposed materials located within the school facilities as well as available drawings to identify non-exposed materials. The extent of accuracy of drawings in relation to non-exposed materials can not be verified. Hence, AET recommends that additional inspection be performed utilizing demolition protocols to access concealed areas where renovations or repair activities require access to such locations.
3. Quantity determinations of ACBM were prepared by visual estimate and should be used for approximate dimensions only. Colors and assignments to building finish components are also based on visual determination. Due to available lighting, wear factors, maintenance and repair operations, highlighted building finish components may represent dissimilar apparent colors.

Note: EPA AHERA regulations recognizes the above limitations by specifying training and periodic surveillance in Section 763.92. Specifically, 763.92 (a) requires training of maintenance and custodial staff in the locations, hazard awareness and recognition of damage, deterioration, and delamination of ACBM. 763.92 (b) requires periodic surveillance at least every six months in each school building that it leases, owns or otherwise uses as a school building to visually inspect all areas that are identified in the Management Plan as ACBM or assumed ACBM.

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SUPPLEMENTAL INFORMATION - AHERA MANAGEMENT PLAN

3 YEAR RE-INSPECTION & ASSESSMENT

INTERBORO SCHOOL DISTRICT

PROSPECT PARK, PENNSYLVANIA

PREPARED FOR: Mr. William Galloway
AHERA Designated Person
Interboro School District
900 Washington Avenue
Prospect Park, PA 19076
(610) 461-6700 ext.1117

PREPARED BY: Accredited Environmental
Technologies, Inc.
28 North Pennell Road
Media, PA 19063
(610) 891-0114

AET Project #09-21-14203
Field House

MANAGEMENT PLANNER:



Mr. Justin Plummer
PA #058122

Fall 2021

Accredited Environmental Technologies, Inc.

GENERAL RESPONSE ACTIONS

Response actions were determined utilizing the same protocol initiated within the original AHERA Management Plan. Response actions are based upon the assessed condition of the Asbestos Containing Building Material (ACBM) identified during the inspection as provided in 40 CFR Part 763.90 (“Response Actions”). Included in this determination are the assessment factors of; physical condition, friability, air movement, and accessibility.

The AHERA regulations nor this document shall be construed to prohibit removal of ACBM from a school building. Response actions shall be implemented in a timely manner consistent with the assessment conducted as provided in the re-inspection report.

General methods implemented for the specific assessments made include:

1. Damaged or significantly damaged thermal system insulation ACM.
 - a. At least repair the damaged area.
 - b. Remove the damaged material if it is not feasible due to technological factors to repair the damage.
 - c. Maintain all thermal system insulation ACM and its covering in an intact state and undamaged condition.
2. Damaged friable surfacing ACM or damaged friable miscellaneous ACM.
 - a. Encapsulation of the material.
 - b. Enclosure of the material.
 - c. Removal of the material.
 - d. Repair of the damaged material.
3. Significantly damaged friable surfacing ACM or significantly damaged friable miscellaneous ACM.
 - a. Immediately isolate the function space and restrict access, unless isolation is not necessary to protect human health and the environment.
 - b. Remove the material in the functional space or, depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclose or encapsulate.
4. Friable surfacing ACM, thermal system insulation ACM, or friable miscellaneous ACM that has potential for damage.
 - a. At a minimum, implement an Operations & Maintenance program as described in 40 CFR Part 763.91.

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5. Friable surfacing ACM, thermal system insulation ACM, or friable miscellaneous ACM that has potential for significant damage.
 - a. Implement an Operations & Maintenance program as described in 40 CFR Part 763.91.
 - b. Institute preventative measures appropriate to eliminate the reasonable likelihood that the ACM or its covering will become significantly damaged, deteriorated, or delaminated.
 - c. Remove the material as soon as possible if appropriate preventative measures cannot be effectively implemented.
 - d. Immediately isolate the area and restrict access if necessary to avoid an imminent and substantial endangerment to human health or the environment.

In general, the response actions can be summarized as follows:

- ◆ Isolate area and restrict access, perform abatement as soon as possible.
- ◆ Perform abatement as soon as possible or reduce potential for disturbance.
- ◆ Continue and/or implement Operations and Maintenance until major renovation or demolition requires removal under NESHAP or until the hazard assessment factor change.

A flow chart visual rendering of the decision process for determination of AHERA Response Actions can be found in the Appendix.

Response Actions can include removal, enclosure, repair, encapsulation or a combination thereof. An Operations and Maintenance program may include enclosure and/or encapsulation where appropriate to increase effectiveness or the program.

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RECOMMENDED RESPONSE ACTIONS

AHERA Regulations, Section 763.90 (“Response Actions”) indicate an appropriate response action for friable surfacing ACM, thermal system insulation ACM, or friable miscellaneous ACM that has potential for damage is at a minimum, the implementation of an Operations & Maintenance Program as described in Section 763.91 (“Operations and Maintenance”).

Based on the assessments made, the following recommended response actions are presented:

1. Institute preventative measures appropriate to eliminate the reasonable likelihood that ACM or its covering will become damaged, significantly damaged, deteriorated, or delaminated including:
 - ◆ Notify building maintenance personnel and outside contractors of the location of ACBM within school facilities. Precautions must be taken not to disturb, contact or damage these materials such that fiber release would occur. Renovations which directly impact these materials must be restricted or controlled by the LEA or the asbestos materials removed prior to initiation of renovations.

Based on prior inspections and this most recent re-inspection, no ACMB was identified within the school facility.
 - ◆ Maintenance and housekeeping personnel should receive general awareness training, including the necessity to perform periodic surveillance of the ACBM within the facility. Any debris observed where damage has occurred should be treated as asbestos debris and cleaned by properly trained personnel or by a licensed asbestos contractor.
 - ◆ Continue to implement the Operations and Maintenance Program until major renovation or demolition requires removal under the EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) or until the hazard assessment factors change necessitating abatement. Where minor damage occurs, patch and repairs can be employed to stabilize the affected areas.
 - ◆ Where asbestos removal is required, based on change in conditions or renovations, a formal project design must be prepared and approved by an AHERA Certified Project Designer; removal performed by a Commonwealth of Pennsylvania Licenced Contractor and project monitoring performed during the response action to comply with the AHERA Regulations.

Response actions were determined by AET's AHERA certified Management Planner based on information obtained during the re-inspection and comparison with the most recent AHERA re-inspection reports.

The recommended response actions are detailed on the Asbestos Inventory Data forms located in the Appendix.

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RESOURCE ALLOCATION

A general resource allocation budget has been developed based on the total quantity of identified ACBM and applied unit costs for removal of each specific material. This resource allocation is presented for budget purposes only. A more complete resource allocation should be developed in conjunction with the Interboro School District’s capital budget and incorporated in accordance with the Management Plan.

| Field House | |
|--|--------|
| Line Item Summary General Resource Allocation Budget* | |
| Total Estimated Removal Cost | \$ N/A |
| Design Documentation Fees (~5%) | \$ |
| Project Coordination QA/QC (~20%) | \$ |
| SUBTOTAL | \$ |
| Contingency (~10%) | \$ |
| TOTAL ESTIMATE | \$ ** |
| * Note: Dollar values are rounded for presentation purposes. | |

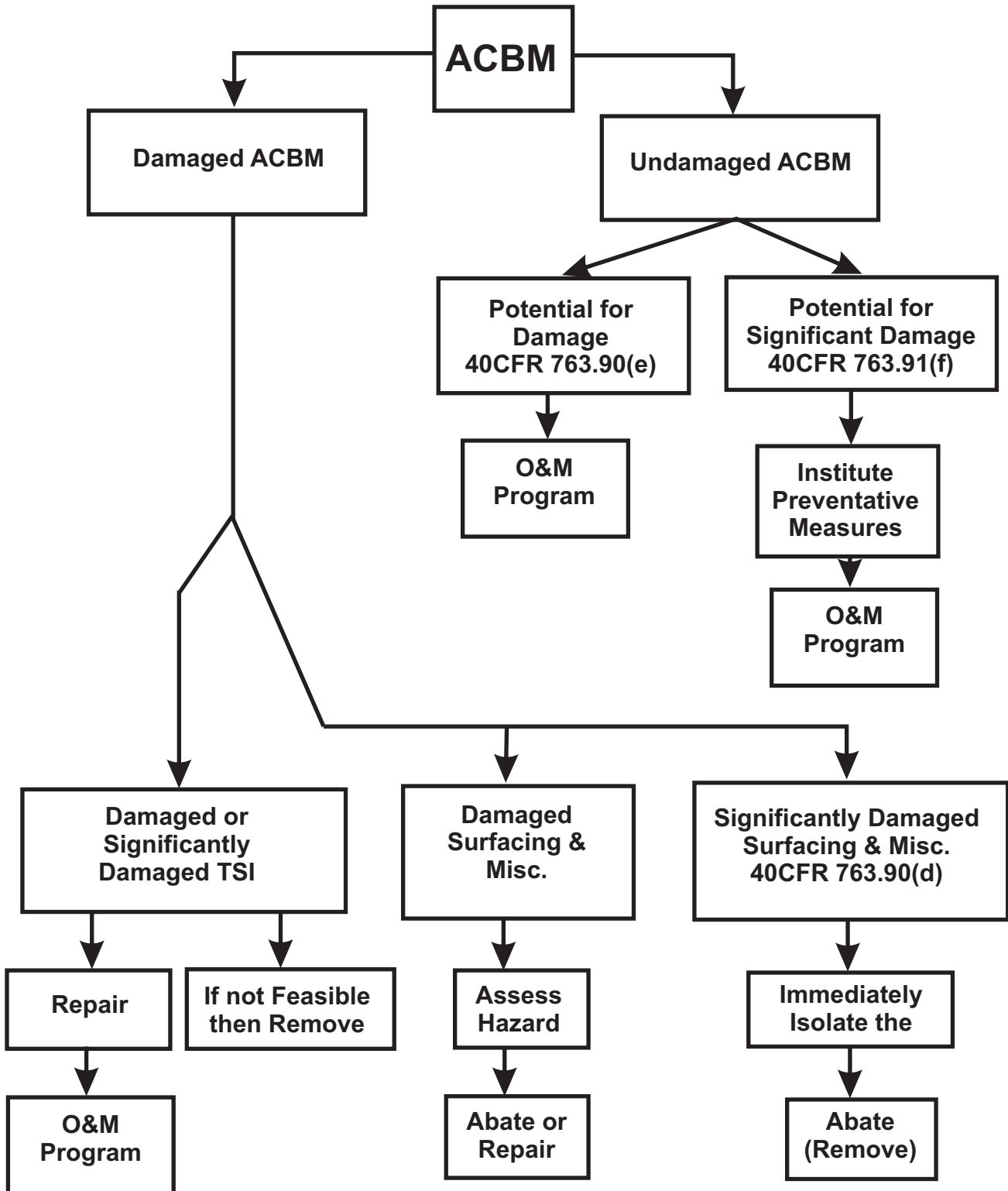
**No ACBM was identified within the Field House. General resource allocation is limited to asbestos awareness training for maintenance and janitorial staff working in multiple school buildings within the district.

The above resource allocations are presented for order of magnitude dollar value only. Specific constraints to actual project dollars include; timing of work, number of work areas and overall scope incorporated. The above costs do not include demolition/de-construction activities for access or replacement materials.

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APPENDIX

ASHERA Response Action Decision Tree



**Accredited Environmental Technologies, Inc.
USEPA AHERA 3 Year Re-Inspection - Asbestos Inventory Data**

Client: Interboro School District

AET Project No.: 9-21-14203

| Functional Space | Material Type | ID/Description | Label | Estimated Quantity | Previously Assessed Condition | Current Assessed Condition | Friable | Priority/Response Action | Removal Cost | AHERA Category |
|------------------|---------------|----------------|-------|--------------------|-------------------------------|----------------------------|---------|--------------------------|--------------|----------------|
|------------------|---------------|----------------|-------|--------------------|-------------------------------|----------------------------|---------|--------------------------|--------------|----------------|

TABLE KEY CODES:

Material Type = Misc. - Miscellaneous; Surf. - Surfacing; TSI - Thermal System Insulation
 Label = No - None Found; Yes - Label/Sign Posted; N/A - Not Required
 Condition = % + Loc. - Localized; Dist. - Distributed
 Friable = Y - Yes; N - No
 Priority = 1 - Restrict Access, Abate ASAP; 2 - Abate ASAP; 3 - O&M
 Response Action = R - Remove; E/R - Encapsulate/Repair; Encl. - Enclosure; O&M - Operations & Maintenance Program
 Removal Cost = Estimated cost for removal of specific material identified, not including design/testing (actual cost will vary).

AHERA CATEGORIES:

Damaged or significantly damaged thermal system insulation ACM.
 Damaged friable surfacing ACM.
 Significantly damaged friable surfacing ACM.
 Damaged or significantly damaged friable miscellaneous ACM.
 ACBM with potential for damage.
 ACBM with potential for significant damage.
 Any remaining friable ACBM or friable suspected ACBM.

MISCELLANEOUS:

Inventory data does not typically include roofing materials, exterior finishes, concealed or inaccessible materials.
 Additional asbestos materials may be present, this data was not prepared for NESHAP renovation/demolition requirements.
 This document (including Asbestos Inventory Data tables) was not prepared for bidding purposes.

**Accredited Environmental Technologies, Inc.
USEPA AHERA 3 Year Re-Inspection - Asbestos Inventory Data**

Client: Interboro School District
Building Name: Field House
Building Address: South Avenue & Trites Avenue, Glenolden, PA 19036

AET Project No.: 9-21-14203
Inspection Date(s): 9/8-10/15

| Functional Space | Material Type | ID/Description | Label | Estimated Quantity | Previously Assessed Condition | Current Assessed Condition | Friable | Priority/Response Action | Removal Cost | AHERA Category |
|------------------|---------------|----------------|-------|--------------------|-------------------------------|----------------------------|---------|--------------------------|--------------|----------------|
|------------------|---------------|----------------|-------|--------------------|-------------------------------|----------------------------|---------|--------------------------|--------------|----------------|

No ACBM Identified

Total Estimated Cost n/a

**Accredited Environmental Technologies, Inc.
USEPA AHERA 3 Year Re-Inspection - Homogenous Areas & ACBM Determination**

Client: Interboro School District
Building Name: Field House
Building Address: South Avenue & Trites Avenue, Glenolden, PA 19036

AET Project No.: 9-21-14203

| H-ID | Material Description | Type | Total Quantity | # of Samples | | Determination | EPA Category |
|------|------------------------|-------|----------------|--------------|------|---------------|--------------|
| | | | | Pos. | Neg. | | |
| A | Plaster | Surf. | 2,088 SF | - | 5 | Non-ACM | - |
| B | Under sink coating | Misc. | 4 SF | - | 1 | Non-ACM | - |
| C | Drywall/joint compound | Surf. | 1,875 SF | - | 5 | Non-ACM | - |
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Specific Survey Restrictions/Notes:

- Refer to the table entitled "USEPA AHERA 3 Year Re-Inspection - Prior Homogenous Areas & ACBM Determination" located in the 2008 Re-Inspection Report for initial inspection data obtained from the AHERA Management Plan prepared by Management International in 9/1988, formal 3 year inspections and periodic inspections.

This summary listing of homogeneous areas represents a portion of the re-inspection work performed. This summary does not contain all the information that is detailed in the full report. The full report should be read in its entirety to obtain a more complete understanding of the information provided, and to aid in any decisions made, or actions taken, based on this information. Of significant importance are the general restrictions and limitations of work performed. Where questions arise concerning the findings present, or methods utilized please contact AET directly at (610) 891-0114.