Spotts, Stevens and McCoy
1047 N. Park Road > Reading PA 19610
610.621.2000 > F. 610.621.2001 > SSMGROUP.COM

November 26, 2024

Mr. Duane Elsasser
Carbon Lehigh Intermediate Unit #21
4210 Independence Drive
Schnecksville, PA 18078
[elsasserd@cliu.org]

RE: State of Pennsylvania
AHERA Management Plan
Life House (Jacob's Church)
SSM File 100146.0013

Dear Mr. Elsasser:

The following individual is the designated Asbestos Coordinator for the Carbon Lehigh Intermediate Unit #21 and shall be contacted for matters pertaining to asbestos in the Life House (Jacob's Church) for the Carbon Lehigh Intermediate Unit #21:

Mr. Duane Elsasser
Carbon Lehigh Intermediate Unit #21
4210 Independence Drive
Schnecksville, PA 18078

Information pertinent to the AHERA Building Inspection is included in the following sections of this letter and a "Glossary of Terms" is attached which explains terms used in this Management Plan. Also attached is a checklist showing where items are located which comply with the Pennsylvania guidelines given for AHERA Management Plans.

EXECUTIVE SUMMARY OF AHERA BUILDING INSPECTION

The Life House (Jacob's Church) is located at 8373 Kings Hwy, New Tripoli, Pennsylvania. The building will function for educational purposes. The AHERA asbestos investigation was performed on March 11, 2020, by Mr. David L. Kuchinski, following the procedures outlined in EPA 40 CFR, Part 763, which is commonly referred to as AHERA. Mr. Kuchinski is an EPA accredited AHERA Building Inspector and AHERA Management Planner and is also licensed in the same capacity by the Pennsylvania Department of Labor and Industry (PaDLI). The following is a summary of asbestos containing materials (ACM), both determined as well as suspect items which were determined not to be ACM.

Items Assumed to be ACM:

- No items were assumed to be ACM

Suspect Items Determined to be ACM:

- White Linoleum
- Pebble Pattern Linoleum
- Wall (Soffit) Plaster

Suspect Items Determined Not to be ACM:

- Red/Black Linoleum
- Top Layer of White Linoleum
- 1'x1' Spline ceiling Tile
- Drywall Seam Tape
- Wall Plaster

Sincerely,
Spotts, Stevens and McCoy, Inc.

David L. Kuchinski
Industrial Hygienist

dave.kuchinski@ssmgroup.com

AHERA Management Plan and Inspection Report for the Life House (Jacob's Church)

Carbon Lehigh Intermediate Unit #21

Inspection Date: March 2020
Report Issue Date: November 2024

SPOTTS | STEVENS | McCOY

AHERA Management Plan and Inspection Report for the Life House (Jacob's Church)

Prepared for: Carbon Lehigh Intermediate Unit #21

Inspection Date: March 2020
Report Issue Date: November 2024

Prepared by: SPOTTS | STEVENS | McCOY

David L. Kuchinski

SSM File 100146.0013

AHERA Management Plan and Inspection Report for the Life House (Jacob's Church)

Carbon Lehigh Intermediate Unit #21

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List of Tables

Appendix

Section 1, Subsection A: Asbestos Coordinator

The designated Asbestos Coordinator for the Carbon Lehigh Intermediate Unit #21 is:

Mr. Duane Elsasser

who will ensure that the duties of the Carbon Lehigh Intermediate Unit #21 as defined by the Asbestos Hazard Emergency Response Act are carried out.

I hereby certify that the general local education agency responsibilities as defined in 40 CFR §763.84 (Table 1-1), have been met or will be met by the Carbon Lehigh Intermediate Unit #21.

Dave S. Ebersole

Asbestos Coordinator

Table 1-1: 40 CFR §763.84 General Local Education Agency Responsibilities

Each local education agency shall:

(a) Ensure that the activities of any persons who perform inspections, re-inspections, and periodic surveillance, develop and update management plans, and develop and implement response actions, including operations and maintenance, are carried out in accordance with Subpart E of this part.

(b) Ensure that all custodial and maintenance employees are properly trained as required by this Subpart E and other applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration asbestos standard for construction, the EPA worker protection rule, or applicable State regulations).

(c) Ensure that workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress.

(d) Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may come in contact with asbestos in a school are provided information regarding the locations of ACBM and suspect ACBM assumed to be ACM.

(e) Ensure that warning labels are posted in accordance with §763.95.

(f) Ensure that management plans are available for inspection and notification of such availability has been provided as specified in the management plan under §763.93(g).

(g) (1) Designate a person to ensure that requirements under this section are properly implemented.

(2) Ensure that the designated person receives adequate training to perform duties assigned under this section. Such training shall provide, as necessary, basic knowledge of:

(i) Health effects of asbestos.

(ii) Detection, identification, and assessment of ACM.

(iii) Options for controlling ACBM.

(iv) Asbestos management programs.

(v) Relevant Federal and State regulations concerning asbestos, including those in this Subpart E and those of the Occupational Safety and Health Administration, U.S.

Department of Labor, the U.S. Department of Transportation and the U.S. Environmental Protection Agency.

(h) Consider whether any conflict of interest may arise from the interrelationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under this subpart.

Section 1, Subsection B: Accreditation Information

The Carbon Lehigh Intermediate Unit #21 has used (or will use) to inspect for ACBM and who will design or carry out response actions (other than operations and maintenance), persons who have been accredited by a State which has adopted a contractor accreditation plan under Section 206(b) of Title II of the Act or is accredited by an EPA-approved course under Section 206(c) of Title II of the Asbestos Hazard Emergency Response Act.

Section 1, Subsection C: Consultant Accreditation Information

The Management Plan for the Life House (Jacob's Church) was written by:

Spotts, Stevens and McCoy, Inc.
1047 North Park Road
PO Box 6307
Reading, PA 19610-0307
(610) 621-2000

The EPA accredited Management Planner utilized by Spotts, Stevens and McCoy, Inc. received accreditation through Access Training, Inc. and subsequent refresher training through Allsafe Environmental, Inc. Copies of certificates follow this page.

This report was prepared by: Mr. David L. Kuchinski

Signature

Section 2, Subsection A: Schools under Carbon Lehigh Intermediate Unit #21 Jurisdiction

Building	Contains* Friable Asbestos	Contains Non-Friable ACBM	Contains Assumed ACM	No ACM Present
Life House (Jacob's Church) 8373 Kings Highway, New Tripoli, PA		X		
Carbon Learning Achievement School 770 State Road, Parryville, PA				X
Lehigh Learning Achievement School 2936 Corporate Court, Orefield, PA				X
Lehigh County Enhanced Autism 2881 Tycolia Court, Orefield, PA				X
Liberty Lane Early Learning Center (LLELC) 4949 Liberty Lane, Allentown, Pa				X
Whitehall-Coplay Early Learning Center (WCELC) 2932 Zephyr Blvd., Whitehall, Pa				X
Transportation Center 4850 W Mountain View Drive, Walnutport, Pa				X
Allentown Learning Achievement School 1633 Hanover Ave., Allentown, Pa				X
Carbon County Enhanced Autism 770 Interchange Road, Lehighton, Pa				X
Community Music School Early Learning Center 1544 Hamilton Street, Allentown Pa				X
Carbon County Early Learning Center 750 Interchange Road, Lehighton, Pa				X
Central Office 4210 Independence Drive, Schnecksville, Pa				X

SSM performed an AHERA 3-Year Re-Inspection on March, 2020. This AHERA Management Plan has been developed for the Life House (Jacob's Church) located in New Tripoli, PA. The Life House is the only remaining building under the jurisdiction of the Carbon Lehigh IU #21 that still has known ACM in it.

*Section 763.85(c) of the Asbestos Hazard Emergency Response Act states "Thermal insulation that has retained its structural integrity and that has an undamaged protective jacket or wrap that prevents fiber release shall be treated as non-friable and therefore is subject only to periodic surveillance and preventative measures as necessary". This Management Plan adheres to the stated guideline given by EPA for purposes of reporting the existence of friable ACM in a building. Further, this Management Plan utilizes the same general guidelines when determining whether Miscellaneous ACM should be listed as friable ACM or non-friable ACM.

Section 3, Subsection A: Inspections Conducted Prior to December 14, 1987

No known prior reports or information were used in developing this Management Plan.

Section 4, Subsection A: Inspections/Re-inspections

An initial AHERA building inspection by Spotts, Stevens and McCoy, Inc. was conducted on:

AHERA Inspection - March, 2020

The actual personnel involved are identified in the following statements and certificates which provide the name, signature, address, phone number, accrediting agency and a copy of the certificate that includes the accreditation number. These persons took samples and utilized a proprietary algorithm to assess the condition of any suspected ACBM or ACM encountered. The actual field survey sheets used give:

* exact description of the location where each bulk sample was collected
* dates of collection

In addition, Table 4-1 "SUMMARY OF AHERA BUILDING INSPECTION FINDINGS" gives general locations of known ACM by type and gives estimated quantities which were found.

The following portions of the AHERA Building Inspection can be found at the pages listed below.

Table 4-1 "SUMMARY OF AHERA BUILDING INSPECTION FINDINGS"
Methodology Statement
Inspector Certificates and Statements

Table 4-1: Asbestos Building Inspection and Assessment Summary of Findings (Life House)

Location of ACM	Material	Type	Approximate Quantity
Kitchen	White Linoleum- Bottom Layer	M	200 S.F.
Kitchen Bathroom	White Linoleum- Bottom Layer	M	60 S.F.
2nd Floor Bathroom	Pebble Pattern Linoleum	M	100 S.F.
Kitchen Closet	Plaster Soffit	M	20 S.F.

M= Miscellaneous Material

S.F. = Square Feet

Methodology

Samples were obtained following the guidelines of EPA 40 CFR Part 763 published Friday, October 30, 1987. This is commonly referred to as the AHERA regulations. Per these regulations, sampling is done by homogeneous areas with homogeneous areas being areas identical in appearance and installed by the same contractor at the same time. Categories of homogeneous areas are:

- Friable Surfacing Material such as sprayed-on fireproofing and acoustical plasters.
- Thermal System Insulation such as pipe, boiler and tank insulation.
- Miscellaneous Material such as suspended 2 foot by 4 foot ceiling panels.

When available, client drawings are used as an initial guide to the location of homogeneous areas. These drawings are particularly useful when Finish Schedules are available to assist in locating various types of hard plasters used in a building. When such drawings are not available, the SSM AHERA Inspector utilized personal experience, the experience of client personnel and visual differences in areas to determine homogeneous sampling areas.

Once homogeneous areas were defined, the SSM investigator followed the sampling guidelines in 763.88 to obtain samples for future analysis by polarized light microscopy (PLM). These guidelines are specific for Friable Surfacing Material and Thermal Insulation, but require samples "in a manner sufficient to determine whether material is ACM or not ACM" for Miscellaneous Material and for Non-friable Suspected ACBM.

Many times there are pipes, fittings or other suspect ACM which is hidden in walls or ceilings or is otherwise hidden by permanently installed items such as Univents, ceramic tile or remodeling projects done after the building was built. While these items, such as VAT under carpeting or pipe in walls, will be noted and quantities estimated when possible, it is inevitable that some items of this nature will occasionally be missed. SSM cannot take responsibility for finding such items.

I hereby attest that my inspection, sampling and assessments of material were carried out in accordance with the methodology given in Section 3.0 and in compliance with the AHERA regulations. Further, I am a Certified AHERA Building Inspector and have done this work to the best of my abilities.

David L. Kuchinski	9/10/2024 DATE
031173 Inspector Certificate Number	9/10/2024 Expiration Date

Section 5, Subsection A: Bulk Sampling

Bulk sample analysis was performed by EMSL Analytical, Inc. located in Cinnaminson, New Jersey. The analyses were done by PLM analysis and the laboratory has EPA accreditation to perform such analyses.

Samantha Rundstrom
Laboratory Manager

Table 5-1: Asbestos Building Inspection and Assessment Bulk Sample Analysis Summary (Life House)

Sample Number	Material	Location	Result
LH3-13-1BK	**White Linoleum- Bottom Layer**	**Kitchen Bathroom**	**15% Chrysotile**
LH3-13-2BK	Red/Black Linoleum	Kitchen Closet	None Detected
LH3-13-3BK	White Linoleum- Top Layer	Kitchen Closet	None Detected
LH3-13-4BK	1'x1' Spline Ceiling Tile	Kitchen Closet	None Detected
LH3-13-5BK	White Linoleum	1st Floor Bedroom	None Detected
LH3-13-6BK	**Pebble Pattern Linoleum**	**2nd Floor Bedroom**	**10% Chrysotile**
LH3-13-7BK-Plaster	Wall Plaster	2nd Floor Bedroom	None Detected
LH3-13-7BK-Tape	Seam Tape	2nd Floor Bedroom	None Detected
LH3-13-8BK	Wall Plaster	2nd Floor Bedroom	None Detected
LH3-13-9BK	**Wall Plaster**	**2nd Floor Bathroom Soffit**	**4% Chrysotile**
LH3-13-1BK	**White Linoleum- Bottom Layer**	**Kitchen Bathroom**	**15% Chrysotile**

C = Chrysotile
ND = None Detected

Section 6, Subsection A: Response Action for the Life House

Response actions for removal, repair, enclosure and encapsulation shall be in the planning stage upon submission of the Management Plan. O&M responses shall begin with the implementation of the O&M procedures. No additional cleaning is required unless specifically noted below. Signing of the cover letter signifies acceptance of the below actions by the Carbon-Lehigh Intermediate Unit #21.

Table 6-1: Response Action

Response actions for removal, repair, enclosure and encapsulation shall be in the planning stage upon submission of the Management Plan. O&M responses shall begin with the implementation of the O&M procedures and in no case will begin later than March 2020. No additional cleaning is required unless specifically noted below. Signing of the cover letter signifies acceptance of the below actions by the Carbon Lehigh Intermediate Unit #21.

Table 6-1: Response Action

Material & Location	Quantity	Response Action
Kitchen. Kitchen Bathroom, 2nd Floor Bathroom Linoleum	360 S.F.	Handle Under the O&M Program.
2nd Floor Bathroom Soffit Plaster	20 S.F.	Handle Under the O&M Program.

S.F. = Square Feet

Section 6, Subsection B: Specific Location of Asbestos Removal

No asbestos-containing materials have been removed at the time this report was issued.

Section 6, Subsection C: Follow-up to Response Action

No response actions have been completed at the time this report was issued.

FORM 6-1

LEA EMPLOYEE TRAINING

COMPLETED SINCE DECEMBER 14, 1987

AHERA 2-HOUR AND 14-HOUR TRAINING

Name: DUANE E. LSAGSER

Job Title: MANAGER OF OPERATIONS

Date Training was completed: MARCH 26, 2025

Number of hours completed: 2

Other Training

FORM 6-1

LEA EMPLOYEE TRAINING

COMPLETED SINCE DECEMBER 14, 1987

AHERA 2-HOUR AND 14-HOUR TRAINING

Name: GARY GRAUVOGEL

Job Title: MAINTENANCE COORDINATOR

Date Training was completed: MARCH 26, 2025

Number of hours completed: 2

Other Training

Spotts, Stevens and McCoy
1047 N. Park Road > Reading PA 19610-0307
610.621.2000 > F. 610.621.2001 > SSMGROUP.COM

March 31, 2025

Mr. Duane Elsasser
Carbon Lehigh Intermediate Unit #21
4210 Independence Drive
Schnecksville, PA 18078
[elsasserd@cliu.org]

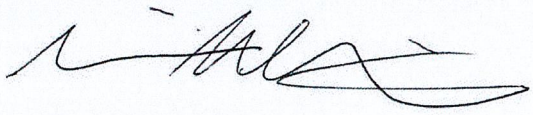
RE: 2-Hour Asbestos Awareness Training
SSM File 100146.0016

Dear Mr. Elsasser:

On Wednesday, March 26, 2025, Spotts, Stevens and McCoy (SSM) conducted a two (2) hour asbestos awareness training session for members of the custodial/maintenance staff of the Carbon Lehigh Intermediate Unit #21. Attached please find the quizzes for those employees who attended the training session. The quizzes should be placed in their personnel files as proof of the annual training. A copy of this letter should be inserted into your central asbestos files as required by AHERA. The session was video recorded and can be used to train other employees.

SSM thanks you for the opportunity to perform these services and for the cooperation of the Carbon Lehigh Intermediate Unit staff. If you have any questions or further training needs, please feel free to call our office.

Very truly yours,
Spotts, Stevens & McCoy



William M. Katinowsky
Industrial Hygienist
bill.katinowsky@ssmgroup.com

Enclosures

FORM 6-2

PERIODIC SURVEILLANCE

Date of Surveillance: _____

Name of Individual: _____

Job Title: _____

Training Completed:

[ ] 2 Hr. [ ] 14 Hr.

Are there any changes in material condition since the last inspection or surveillance? _____

If yes, what changes were seen?

Signature: _____

ASBESTOS EXPOSURE RISK MANAGEMENT OPERATIONS & MAINTENANCE PROCEDURES

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ASBESTOS EXPOSURE RISK MANAGEMENT OPERATIONS & MAINTENANCE PROCEDURES

1.0 PURPOSE

The purpose of these procedures is to provide the basis to minimize potential fiber release from asbestos containing materials during operations and maintenance activities conducted by employees of the local educational agency. These procedures are designed to conform to the requirements specified in 40 CFR 763.91 of the Asbestos Hazard Emergency Response Act (AHERA).

2.0 APPLICABILITY

The local education agency shall implement an operations, maintenance and repair (O&M) programs under this section whenever any friable ACBM is present or assumed to be present in a building that it leases, owns, or otherwise uses as a school building. Any material identified or assumed as non-friable ACBM must be treated as friable ACBM for purposes of this section when the material is about to become friable as a result of activities performed in the school building.

Work practices described herein are limited to small scale, short duration projects.

3.0 REFERENCES

3.1 Asbestos Hazard Emergency Response Act (AHERA)

a. 40 CFR Part 763.91, Subpart E, Asbestos Containing Materials in Schools, 10/30/87

b. 40 CFR part 763, Subpart E, Appendix B Work Practices and Engineering Controls for Small Scale, Short duration Operations and Maintenance and Repair (O&M) Activities Involving ACM, 10/30/87

c. 40 CFR Part 763, Subpart G, Asbestos Abatement Projects

d. 29 CFR Part 1926.58, Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and Actinolite

e. Guide to Respiratory Protection for the Asbestos Abatement Industry, EPA/NIOSH (EPA 560/OPTS-86-001), September 1986.

4.0 DEFINITIONS

ACBM means "asbestos containing building material."

ACM means "asbestos containing material."

Amended Water is water to which surfactant (wetting agent) has been added.

Asbestos means the asbestiform varieties of chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite-frunerite); Tremolite; Anthophyllite, and actinolite.

Asbestos-abatement project means any activity involving the removal, enclosure, or encapsulation of friable asbestos material.

Authorized person means any person authorized by the employer and required by work duties to be present in regulated areas.

Clean room means an uncontaminated room having facilities for the storage of employees' street clothing and uncontaminated materials and equipment.

Competent person means one who is capable of identifying existing asbestos hazards in the workplace and who has the authority to take prompt corrective measures to eliminate them. The duties of the competent person include at least the following: Establishing the negative-pressure enclosure, ensuring its integrity, and controlling entry to an exit from the enclosure; supervising any employee exposure monitoring required by this Subpart, ensuring that all employees working within such an enclosure wear the appropriate personal protective equipment are trained in the use of appropriate methods of exposure control, and use the hygiene facilities and decontamination procedures specified in this Subpart; and ensuring that engineering controls in use are in proper operating condition and are functioning properly.

Decontamination area means an enclosed area adjacent and connected to the regulated area and consisting of an equipment room, shower area, and clean room, which is used for the decontamination of workers, materials, and equipment contaminated with asbestos.

Demolition means the wrecking or taking out of any load-supporting structural member and any related razing, removing, or stripping of asbestos products.

Emergency project means a project involving the removal, enclosure, or encapsulation of friable asbestos-containing material that was not planned but results from a sudden unexpected event.

Employee exposure means that exposure to airborne asbestos would occur if the employee were not using respiratory protective equipment.

Employer means the public department agency, or entity which hires an employee. The term includes, but is not limited to any State, County, city or other local governmental entity which operates or administers schools, a department of health or human services, a library, a police department, a fire department, or similar public service agencies or offices.

Equipment room (change room) means a contaminated room located within the decontamination area that is supplied with impermeable bags or containers for the disposal of contaminated protective clothing and equipment.

Fiber means a particulate form of asbestos, 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to 1.

Friable asbestos material means any material containing more than 1 percent asbestos by weight which, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure.

High-efficiency particulate air (HEPA) filter means a filter capable of trapping and retaining at least 99.97 percent of all monodispersed particles of 0.3 micrometer in diameter or larger.

Permissible Exposure Level means an airborne concentration of asbestos of 0.1 fiber per cubic centimeter (f/cc) of air calculated as an 8-hour time-weighted average.

Regulated area means an area established by the employer to demarcate areas where airborne concentrations of asbestos exceed or can reasonably be expected to exceed the permissible exposure limit. The regulated area may take the form of: A temporary enclosure, or an area demarcated in any manner that minimizes the number of employees exposed to asbestos.

Removal means the taking out or stripping of asbestos or materials containing asbestos.

Renovation means the modifying of any existing structure, or portion thereof, where exposure to airborne asbestos may result.

Repair means overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates where asbestos is present.

Small Scale, Short Duration Activities less than 3 square or linear feet of ACM typically associated with tasks such as, but not limited to:

a. Removal of asbestos-containing insulation on pipes.

b. Removal of small quantities of asbestos-containing insulation on beams or above ceilings.

c. Replacement of an asbestos-containing gasket on a valve.

d. Installation or removal of a small section of drywall.

e. Installation of electrical conduits through or proximate to asbestos-containing materials.

f. Removal of small quantities of asbestos-containing materials (ACM) only if required in the performance of another maintenance activity not intended as asbestos abatement.

g. Removal of asbestos-containing thermal system insulation not to exceed amounts greater than those which can be contained in a single glove bag.

h. Minor repairs to damaged thermal system insulation which does not require removal.

i. Repairs to a piece of asbestos-containing wallboard.

j. Repairs, involving encapsulation, enclosure or removal, to small amounts of friable asbestos-containing material only if required in the performance of emergency or routine maintenance activity and not intended solely as asbestos abatement. Such work may not exceed amounts greater than those which can be contained in a single pre-fabricated mini-enclosure. Such an enclosure shall conform spatially and geometrically to the localized work area, in order to perform its intended containment function.

k. Minor Fiber Release Episode is the falling or dislodging of 3 square or linear feet or less of friable ACBM.

l. Major Fiber Release Episode is the falling or dislodging of more than 3 square or linear feet of friable ACBM.

5.0 PROHIBITIONS

1. Entry into an area wherein a major fiber release episode has occurred (boiler or flue explosion, structural collapse) by local educational personnel is forbidden.

2. Do not drill holes in asbestos-containing materials.

3. Do not hang plants or pictures on structures covered with asbestos-containing materials.

4. Do not sand non-friable ACM.

5. Do not damage asbestos-containing materials while moving furniture or other objects.

6. Do not install curtains, drapes, or dividers in such a way that they damage asbestos-containing materials.

7. Do not dust floors, ceilings, moldings or other surfaces in asbestos-contaminated environments with a dry brush or sweep with a dry broom.

8. Do not use any ordinary vacuum to clean up asbestos-containing debris.

9. Do not remove ceiling tiles below asbestos-containing materials without wearing the proper respiratory protection, clearing the area of other people, and observing asbestos removal waste disposal procedures.

10. Do not remove ventilation system filters dry.

11. Do not shake ventilation system filters.

6.0 EQUIPMENT NEEDED TO PERFORM PROCEDURES

1. High Efficiency Particulate Air (HEPA) Vacuum

2. Tyvek Suits

3. Glove bags

4. 6 mil asbestos disposal bags

5. Duct tape

6. Airless sprayer

7. Amended water

8. Encapsulant

9. HEPA equipped dual cartridge half-face respirator

10. 6-mil thick polyethylene plastic sheeting

11. Danger and Warning signs, labels and barricade tape.

12. Clean rags or large paper towels.

13. Miscellaneous tools such as razor knives, nips, wire brushes, etc.

14. Miscellaneous repair materials, such as lag cloth, non-ACM insulating cement, etc.

15. Miscellaneous construction materials for specific mini-enclosure needs, such as plywood, 2 x 4 studs, nails/screws, etc.

7.0 TRAINING REQUIRED TO PERFORM PROCEDURES

7.1 The LEA shall ensure, prior to the implementation of the O&M provisions of the Management Plan, that all members of its maintenance and custodial staff (custodians, electricians, heating/air conditioning engineers, plumbers, etc.) why may work in a building that contains ACBM receive awareness training of at least 2 hours, whether or not they are required to work with ACBM. New custodial and maintenance employees shall be trained within 60 days after commencement of employment. Training shall include, but not be limited to:

7.1.1 Information regarding asbestos and its various uses and forms.

7.1.2 Information on the health effects associated with asbestos exposure.

7.1.3 Locations of ACBM identified throughout each school building in which they work.

7.1.4 Recognition of damage, deterioration, and delamination of ACBM.

7.1.5 Name and telephone number of the person designated to carry out general local education agency responsibilities under 40 CFR 763.84 and the availability and location of the management plan.

7.2 The local education agency shall ensure that all members of its maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM shall receive training described in Section 7.1 and 14 hours of additional training. Additional training shall include, but not be limited to:

7.2.1 Descriptions of the proper methods of handling ACBM.

7.2.2 Information on the use of respiratory protection as contained in the EPA/NIOSH Guide to Respiratory Protection for the Asbestos Abatement Industry, September 1986 (EPA 560/OPTS-86-001), available from TSCA Assistance Office (TS-799), Office of Toxic Substances, Environmental Protection Agency, Rm. E-543, 401 M St. S.W., Washington, DC 20460, and other personal protection measures.

7.2.3 The provision of Section 7.1 and 40 CFR 763.91, Appendices A, B, C, D of this Subpart E of this part, EPA regulations contained in 40 CFR Part 763, Subpart G, and in 40 CFR Part 61, Subpart M, and OSHA regulations contained in 29 CFR 1926.58.

7.2.4 Hands-on training in the use of respiratory protection, other personal protection measures, and good work practices.

7.3 LEA maintenance and custodial staff who have attended EPA-approved asbestos training or received equivalent training for O&M and periodic surveillance activities involving asbestos shall be considered trained for the purposes of this section.

8.0 PERIODIC SURVEILLANCE

8.1 At least once every 6 months after a management plan is in effect, each local education agency shall conduct periodic surveillance in each building that it leases, owns, or otherwise uses as a school building that contains ACBM or is assumed to contain ACBM.

8.2 Each person performing periodic surveillance shall:

8.2.1 Visually inspect all areas that are identified in the management plan as ACBM or assumed ACBM.

8.2.2 Record the date of the surveillance, his or her name, and any changes in the condition of the materials.

8.2.3 Submit to the person designated to carry out general local education agency responsibilities under 40 CFR 763.84 a copy of such record for inclusion in the management plan.

9.0 WORKER PROTECTION

Engineering controls, work practices and personal protective equipment associated with small-scale, short duration projects are capable of keeping exposures to airborne asbestos well below the OSHA action level of 0.1 fiber/cc.

9.1 Engineering Controls

9.1.1 Enclosure - by glove-bag and/or mini-containment.

9.1.2 HEPA Filtration on vacuums - must be used and handled very precisely.

9.1.3 Amended water - proper use of surfactant.

9.2 Work Practices

9.2.1 Amended water - proper application with sprayer.

9.2.2 Enclosure - proper maintenance of air-tight integrity.

9.2.3 Glove-bag procedure - must be performed meticulously.

9.2.4 Proper entry/exit to mini enclosures.

9.3 Personal Protective Equipment

9.3.1 Respirators - must be HEPA-filtered and properly fitted to the individual.

9.3.2 Tyvek Suits - to be worn to prevent accidental contamination of clothing.

10.0 CLEANING

10.1 Initial cleaning. Unless the building has been cleaned using equivalent methods within the previous 6 months, all areas of a school building where friable ACBM, damaged or significantly damaged thermal system insulation ACM, or friable suspected ACBM assumed to be ACM are present shall be cleaned at least once after the completion of the inspection required by §763.85(a) and before the initiation of any response action, other than O&M activities or repair, according to the following procedures:

10.1.1 HEPA-vacuum or steam-clean all carpets.

10.1.2 HEPA-vacuum or wet-clean all other floors and all other horizontal surfaces.

10.1.3 Dispose of all debris, filters, mop heads, and cloths in sealed, leak-tight containers.

10.2 Additional cleaning. The accredited management planner shall make a written recommendation to the local education agency whether additional cleaning is needed, and if so, the methods and frequency of such cleaning.

11.0 PREPARATION OF THE AREA BEFORE RENOVATION OR MAINTENANCE ACTIVITIES

11.1 If objects have already been contaminated or if friable ACM is in the area, an initial cleaning of the area must be done prior to any abatement action.

11.2 Remove from the work area all objects that are movable to protect them from asbestos contamination. Objects that cannot be removed must be covered completely with 6 mil-thick polyethylene plastic sheeting before the task begins.

11.3 Restrict entry into the area by persons other than those necessary to perform the maintenance project, either by physically isolating the area or by scheduling.

11.4 Post signs to prevent entry by unauthorized persons.

11.5 Shut off or temporarily modify the air-handling system and restrict other sources of air movement.

12.0 REMOVAL OF SMALL AMOUNTS OF ACM

Several methods can be used to remove small amounts of asbestos-containing materials during small-scale, short-duration renovation or maintenance tasks. These include the use of glove bags, the removal of an entire asbestos-covered pipe or structure, and the construction of mini-enclosures. The procedures that employers must use for each of these operations if they wish to avail themselves of the rule's exemptions are described in the following sections.

12.1 Glove Bags. OSHA found that the use of glove bags to enclose the work area during small-scale, short-duration maintenance ore renovation activities will result in employee exposure to asbestos that are below the rule's action level of 0.1 f/cm^3. This section provides requirements for glove-bag procedures to be followed by employers wishing to avail themselves of the rule's exemption for each activity. OSHA has determined that the use of these procedures will reduce the 8-hour time weighted average (TWA) exposure of employees involved in these work operations to levels below the action level and will thus provide a degree of employee protection equivalent to that provided by compliance with all provisions of the rule.

12.1.1 Glove bag installation. Glove bags are approximately 40 inch-wide times 64 inch-long bags fitted with arms through which the work can be performed. When properly installed land used, they permit workers to remain completely isolated from the asbestos material removed or replaced inside the bag. Glove bags can thus provide a flexible, easily installed, and quickly dismantled temporary small work area enclosure that is ideal for small-scale asbestos renovation or maintenance jobs. These bags are single-use control devices that are disposed of at the end of each job. The bags are made of transparent 6-mil thick polyethylene plastic with areas of Tyvek material (the same material used to make the disposable protective suits used in major asbestos removal, renovation, and demolition operations and in protective gloves). Glove bags are readily available from safety supply stores or specialty asbestos removal supply houses. love bags come pre-labeled with the asbestos warning label prescribed by OSHA and EPA for bags used to dispose of asbestos waste.

12.1.2 Glove bag work practices. The proper use of glove bags requires the following steps:

12.1.2.1 Glove bags must be installed so that they completely cover the pipe or other structure where asbestos work is to be done. Glove bags are installed by cutting the sides of the glove bag to fit the size of the pipe from which asbestos is to be removed. The glove bag is attached to the pipe by folding the open edges together and securely sealing them with tape. All openings in the glove bag must be sealed with duct tape or equivalent material. The bottom seam of the glove bag must also be sealed with duct tape or equivalent to prevent any leakage from the bag that may result from a defect in the bottom seam.

12.1.2.2 The employee who is performing the asbestos removal with the glove bag must don at least a half mask dual-cartridge HEPA-equipped respirator; respirators should be worn by employees who are in close contact with the glove bag and who may thus be exposed as a result of

small gaps in the seams of the bag or holes punched through the bag by a razor knife or a piece of wire mesh.

12.1.2.3 The removed asbestos material from the pipe or other surface that has fallen into the enclosed bag must be thoroughly wetted with a wetting agent (applied with an airless sprayer through the precut port provided in most glove bags or applied through a small hole in the bag).

12.1.2.4 Once the asbestos material has been thoroughly wetted, it can be removed from the pipe, beam, or other surface. The choice of tool to use to remove the asbestos-containing material depends on the type of material to be removed. Asbestos-containing materials are generally covered with painted canvas and/or wire mesh. Painted canvas can be cut with a razor knife and peeled away from the asbestos-containing material underneath. Once the canvas has been peeled away, the asbestos-containing material underneath may be dry, in which case it should be re-sprayed with a wetting agent to ensure that it generates as little dust as possible when removed. If the asbestos-containing material is covered with wire mesh, the mesh should be cut with nips, tin snips, or other appropriate tool and removed.

12.1.2.5 A wetting agent must then be used to spray any layer of dry material that is exposed beneath the mesh, the surface of the stripped underlying structure, and the inside of the glove bag.

12.1.2.6 After removal of the layer of asbestos-containing material, the pipe or surface from which asbestos has been removed must be thoroughly cleaned with a wire brush and wet-wiped with a wetting agent until no traces of the asbestos-containing material can be seen.

12.1.2.7 Any asbestos-containing insulation edges that have been exposed as a result of the removal or maintenance activity must be encapsulated with bridging encapsulant to ensure that the edges do not release asbestos fibers to the atmosphere after the glove bag has been removed.

12.1.2.8 When the asbestos removal and encapsulation have been completed, a vacuum hose from a HEPA filtered vacuum must be inserted into the glove bag through the port to remove any air in the bag that may contain asbestos fibers. When the air has been removed from the bag, the bag should be squeezed tightly (as close to the top as possible), twisted, and sealed with tape, to keep the asbestos materials safely in the bottom of the bag. The HEPA vacuum can then be removed from the bag and the glove bag itself can be removed from the work area to be disposed of properly.

12.2. Mini-enclosures. In some instances, such as removal of asbestos from a small ventilation system or from a short length of duct, a glove bag may not be either large enough or of the proper shape to enclose the work area. In such cases, a mini-enclosure can be built around the area where small-scale, short-duration asbestos maintenance or renovation work is to be performed. Such enclosures should be constructed of 6-mil thick polyethylene plastic sheeting and can be small enough to restrict entry to the asbestos work area to one worker.

For example, a mini-enclosure can be built in a small utility closet when asbestos-containing duct covering is to be removed. The enclosure is constructed by:

12.2.1 Affixing plastic sheeting to the walls with spray adhesive and tape.

12.2.2 Covering the floor with plastic and sealing the plastic covering the floor to the plastic on the walls.

12.2.3 Sealing any penetrations such as pipes or electrical conduits with tape.

12.2.4 Constructing a small change room (approximately 3 feet square) made of 6-mil thick polyethylene plastic supported by 2-inch by 4-inch lumber (the plastic should be attached to the lumber supports with staples or spray adhesive and tape).

The change room should be contiguous to the mini-enclosure, and is necessary to allow the worker to vacuum off his protective coveralls and remove them before leaving the work area. While inside mini-enclosure, the worker should; wear Tyvek disposable coveralls and use the appropriate HEPA-filtered dual-cartridge or more protective respiratory protection.

The advantages of mini-enclosures are that they limit the spread of asbestos contamination, reduce the potential exposure of bystanders and other workers who may be working in adjacent area, and are quick and easy to install. The disadvantage of mini-enclosures is that they may be too small to contain the equipment necessary to create a negative pressure within the enclosure; however, the double layer of plastic sheeting will serve to restrict the release of asbestos fibers to the outside of the enclosure.

12.3 Removal of Entire Structures. When pipes are insulated with asbestos-containing materials, removal of the entire pipe may be more protective, easier, and more cost-effective than stripping the asbestos insulation from the pipe.

12.3.1 Before such a pipe is cut, the asbestos-containing insulation must be wrapped with 6-mil polyethylene plastic and securely sealed with duct tape or equivalent. This plastic covering will prevent asbestos fibers from becoming airborne as a result of the vibration created by the power saws used to cut the pipe.

12.3.2 If possible, the pipes should be cut at locations that are not insulated to avoid disturbing the asbestos.

12.3.3 If a pipe is completely insulated with asbestos-containing materials, small sections should be stripped using the glove bag method described above before the pipe is cut at the stripped sections.

12.4 Enclosure. The decision to enclose rather than remove asbestos-containing material from an area depends on the building owner's preference, i.e., for removal or containment.

If the owner chooses to enclose the structure rather than to remove the asbestos-containing material insulating it, a solid structure (air-tight walls and ceilings) must be built around the asbestos covered pipe or structure to prevent the release of asbestos-containing materials into the area beyond the enclosure and to prevent disturbing these materials by casual contact during future maintenance operations.

12.4.1 Such a permanent (i.e., for the life of the building) enclosure should be built of new construction materials and should be impact resistant and air-tight.

12.4.2 Enclosure walls should be made of tongue-and-groove boards, boards with spine joints, or gypsum boards having taped seams. The underlying structure must be able to support the weight of the enclosure. (Suspended ceilings with laid-in panels do not provide air-tight enclosures and should not be used to enclose structures covered with asbestos-containing materials.)

12.4.3 All joints between the walls and ceiling of the enclosure should be caulked to prevent the escape of asbestos fibers.

12.4.4 During the installation of enclosures, tools that are used (such as drills or rivet tools) should be equipped with HEPA-filtered vacuums.

12.4.5 Before constructing the enclosure, all electrical conduits, telephone lines, recessed lights, and pipes in the area to be enclosed should be moved to ensure that the enclosure will not have to be reopened later for routine or emergency maintenance.

12.4.6 If such lights or other equipment cannot be moved to a new location for logistic reasons, or if moving them will disturb the asbestos-containing materials, removal rather than enclosure of the asbestos-containing materials is the appropriate control method to use.

13.0 MAINTENANCE ACTIVITIES OTHER THAN SMALL-SCALE, SHORT-DURATION PROJECTS

The response action for any maintenance activities disturbing friable ACBM, other than small-scale, short-duration maintenance activities, shall be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions.

14.0 FIBER RELEASE EPISODES

14.1 Minor fiber release episode. The local education agency shall ensure that the procedures described below are followed in the event of a minor fiber release episode (i.e., the falling or dislodging of 3 square or linear feet or less of friable ACBM):

14.1.1 Thoroughly saturate the debris using wet methods.

14.1.2 Clean the area, as described in Section 10.0 of these procedures.

14.1.3 Place the asbestos debris in a sealed, leak-tight container.

14.1.4 Repair the area of damaged ACM with materials such as asbestos-free spackling, plaster, cement, or insulation, or seal with latex paint or an encapsulant, or immediately have the appropriate response action implemented as required by 40 CFR 763.90.

14.2 Major fiber release episode. The local education agency shall ensure that the procedures described below are followed in the event of a major fiber release episode (i.e., the falling or dislodging of more than 3 square or linear feet of friable ACBM):

14.2.1 Restrict entry into the area and post signs to prevent entry into the area by persons other than those necessary to perform the response action.

14.2.2 Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas in the building.

14.2.3 The response action for any major fiber release episode must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions.

15.0 PACKAGING AND DISPOSAL OF ASBESTOS-CONTAINING WASTE MATERIAL

Friable asbestos-containing waste material and debris which is packaged in accordance with the provisions of this Section may be disposed of at designated, RCRA licensed, sanitary landfills when certain precautions are taken.

Notice to Appropriate Environmental Protection Agency regional office.

Notice and Permit from Appropriate State and/or Local Agencies

Dispose of non-friable asbestos-containing material in accordance with applicable regulations.

15.1 Disposal Bags: Provide 6-mil thick leak-tight polyethylene bags labeled with two labels with text as follows:

1. First Label:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

2. Second Label:

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID OPENING OR BREAKING CONTAINER
BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH

15.2 Remove saturated asbestos-containing material in small sections from all areas. Do not allow material to dry out. As it is removed, simultaneously pack material while still wet into disposal bags. Evacuate air from disposal bags with a HEPA filtered vacuum cleaner. Twist neck of bags, bend over and seal with minimum three wraps of duct tape. Clean outside and move to wash down station adjacent to material decontamination unit.

15.3 Carefully load containerized waste on sealed trucks or other appropriate vehicles for transport. Exercise care before and during transport, to insure that no unauthorized persons have access to the material.

Do not store disposal bagged material outside of the work area. Take bags from the work area directly to a sealed truck or dumpster.

Do not transport disposal bagged materials on open trucks. Double bagged material may be transported on open trucks if they are first loaded in sealed drums. Label drums with same warning labels as bags. Uncontaminated drums may be reused. Treat drums that have been contaminated as asbestos-contaminated waste.

15.4 Advise the sanitary landfill operator, at least twenty-four hours in advance of transport, of the quantity of material to be delivered.

15.5 Retain receipts form landfill for materials disposed of, along with completed chain of custody forms.

Section 7, Subsection A: Worker/Occupant Notification

To inform workers, building occupants or their legal guardians regarding activities affecting asbestos, these individuals will be notified by one of the following methods:

1. Direct mailing to all individuals.
2. Publishing the activity in the school calendar, newsletter, or other publication sent to all individuals.
3. Notification sent to organizations such as unions and PTO's representing affected individuals.
4. Any other method which will notify all individuals noted in a timely manner.

The LEA reserves the right to notify individuals by the method which is most effective in the judgment of the LEA. The following forms have been developed and are being utilized:

NOTIFICATION OF AHERA INSPECTION AND MANAGEMENT PLAN COMPLIANCE

The purpose of this notification is to inform interested parties such as teachers, school personnel and their representatives, as well as parents, concerning the Asbestos Hazard Emergency Response Act (AHERA) requirements and the actions that the Carbon Lehigh Intermediate Unit #21 have taken to comply with the AHERA regulations. The regulations were published in the October 30, 1987 Federal Register, pp. 41826 to 41898 under the title "Asbestos Containing Materials in Schools" and call for an inspection of the schools to find asbestos containing materials (ACM) with the inspection conducted by EPA accredited Building Inspectors. The regulations also require that a Management Plan be written by an EPA accredited Management Planner for any ACM found and that both the Management Plan and the Inspection Report be available for public inspection.

The Carbon Lehigh Intermediate Unit #21 contracted with Spotts, Stevens and McCoy, Inc. for both the Building Inspection and the Management Plan and this report is being submitted to the State of Pennsylvanian in compliance with the AHERA regulations. Once this report is accepted by the State, the complete district reports will be available for public review at the Administration Office. The individual building report will be available for public review at each building and include the schedule for periodic surveillance of ACM and re-inspections to be conducted by an accredited EPA Building Inspector.

To minimize confusion and in order for the plans to be available to all who wish to see them, review of the reports shall be by appointment and a written request for an appointment is required. The public viewing is at no cost to the individual. Copies of the various reports are available for a fee based upon the copying costs of the individual report requested.

NOTIFICATION OF ASBESTOS RESPONSE ACTION

The following Asbestos Response Action is either currently taking place or is planned to take place:

Building:

Portion of Building Affected:

Reason for Response Action: (e.g., O&M, follow-up to Management Plan, fiber release episode).

Response Action: (Include methods used and reason for selection)

Duration of Response Action:
Projected/Actual Start Date:

Projected/Actual Completion Date:

*Response Action Designed By: (Include Accreditation No. and State)

Response Action Performed By: *(Attach AHERA Accreditation for all supervisors/workers)

*Final Air Sampling: (Include by whom, locations, dates, analytical method - PCM/TEM, lab used and accreditation, attach signed/dated Certificate of Analysis)

*N/A for O&M (Including response to minor fiber release episodes)

CARBON LEHIGH INTERMEDIATE UNIT #21
WORKER NOTIFICATION FORM

I, the undersigned, hereby verify that I have been informed that asbestos containing materials (ACM) exist in the Life House (Jacob's Church). Further, I have had access to the Management Plan for the above named building and have reviewed the general ACM locations shown on page 4-2, Table 4-1, SUMMARY OF AHERA BUILDING INSPECTION REPORT FINDINGS.

Prior to working on or in the vicinity of known or suspected ACM I shall notify the Asbestos Coordinator, obtain his approval and follow procedures designed to protect myself and any other individuals who may otherwise be exposed to airborne asbestos fibers.

Individual (Print Name) _____

Signature _____

Company Name (Print) _____

Company Address (Print) _____

Section 7, Subsection B: Resource Evaluation

COSTS FOR LEA ACTION

The following estimated costs for LEA actions are based upon worker cost of $20 per hour. All costs are given in 2007 dollars.

Training

Cost for 2 hr. training	$200 per individual
Cost for 14 hr. training	$450 per individual
Cost for Worker Supervisor Course and license (Required in PA for asbestos work)	$2,500 per individual
Cost for Building Inspector Course and license	$2,000 per individual
Cost for Management Planner Course and license	$2,000 per individual
Cost for AHERA Refresher Courses	$800 per individual

These costs are estimates and include the actual course cost, the cost of travel, lodging, meals and the salary cost for time lost from LEA duties.

Periodic Surveillance

The cost of Periodic Surveillance is estimated at $0.05 per square foot per year.

AHERA Building Re-inspection

The cost of the AHERA Building Re-inspection is estimated at $0.05 per square foot.

Operations and Maintenance Activities (O&M Activities)

These activities are very difficult to estimate due to the fact that many unforeseen situations can arise and radically change projected costs. The following are general projections for the costs of various actions and the material required to carry out these actions.

Asbestos Coordinator Costs: These costs will run from an estimated minimum cost of $50 per week for small schools or small school districts to $250 per week for large school districts that have an active O&M programs. The actual costs will depend upon the philosophy of the school or school district regarding the extent of activities performed by school personnel. Since the philosophy is subject to change without notice, this range of cost is given.

Materials: The estimated cost of materials given in Section 6.0 of the Operations and Maintenance Procedures is $2,500.

Cost of Actions: The following costs are estimated for LEA personnel performing the following actions. These costs include disposal.

Per section of fitting insulation:	
Removal	$25
Repair	$10
Per linear foot of pipe:	
Removal	$20
Repair	$ 8
Per square foot of surfacing material or duct or vessel insulation:	
Removal	$20
Repair	$10
Per square foot of vinyl asbestos floor tile:	
Removal	$3.50
For initial cleaning, per square foot:	
Area without carpeting, chairs, etc.:	$0.50
Area with carpeting, chairs, etc.:	$1.50
Per square foot of vinyl flooring:	
Removal, not glued	$2.00
Removal, glued	$3.50
Per square foot of transite:	
Removal	$10.00
Per 5 linear foot of Asbestos Wire Insulation:	
Removal	$3.00 to $6.00
For ceiling tile, per tile:	
Removal of 2' x 4', 1' x 2', 2' x 2' Suspended	$3.00
Removal of 1' x 1' Suspended	$2.00
Removal of 1' x 1' Splined	$2.75
Removal of 1' x 1' Glued	$4.00
For boiler gaskets, light shields and other small miscellaneous materials:	
Removal, per cubic foot	$200

COSTS FOR CONTRACTOR ACTIONS

Costs were projected based upon either removing or repairing and encapsulating the ACM located during the AHERA Building Inspection. Costs were based upon the past experience SSM has had with the actual abatement costs associated with asbestos abatement projects. The costs given reflect glove bag removal of pipe and fitting insulation and containment removal of tank, boiler and surfacing ACM. The response action costs do not include the cost of gaining access to the material or for replacement of the materials removed.

Table 7-1, BUDGETARY COSTS BY HAZARD RANKING, shows response action costs based upon the health hazard of the ACM. The hazard rankings are based upon use of the SSM Hazard Potential Algorithm used by the AHERA Building Inspector to assess the condition of any ACM found. By using the Hazard Priorities, the School District can utilize available monies most effectively to reduce the asbestos hazard in the affected building. AHERA regulations do not require remedial action for ACM which is not damaged.

Generally, the following Hazard Ranking Values initiate the following actions:

HAZARD RANKING	RESPONSE ACTION
6	Schedule for immediate removal
5	Schedule for immediate action (repair/encapsulation or removal)
4	Monitor. Schedule for near term action. (This is the lowest value damaged friable ACM can have.)
3	Monitor. Schedule for future removal.
2	Monitor. As long as ACM condition does not change or use of area in which ACM exists does not change, schedule for removal later when monies are available.
1	Monitor. Generally no other action is required unless the building is renovated or demolished.

Table 7-1: Budgetary Costs by Hazard Ranking

A. Damaged ACM, Hazard Categories 4, 5, 6 No damaged ACM was found in Hazard Categories 4, 5 or 6			
B. Undamaged ACM, Hazard Categories 1, 2, 3 and 4 Hazard Category 1			
MATERIAL	**QUANTITY**	**ESTIMATED REPAIR COST**	**ESTIMATED REMOVAL COST**
Linoleum	360 S.F.	$75/hr.	$1,440*
Soffit Plaster	20 S.F.	$75/hr.	$200*

* Includes an $850 mobilization fee, which is typical for small removal projects. If all ACM materials are planned for removal under the same project and site visit, the total estimated removal costs would be lower.

Management Planner Inspector Certification

Number 758376

Expiration Date:
09/10/2025

Certificate of Training

CRITERION LABORATORIES, INC.

HEREBY CERTIFIES THAT

David L. Kuchinski

HAS SUCCESSFULLY COMPLETED A 4 HOUR TELECONFERENCE COURSE ENTITLED

Asbestos Management Planner Refresher

INCLUDING CLASSROOM INSTRUCTION

on this 10th day of September 2024

Approved for AHERA Accreditation Under TSCA Title II

400 Street Road
Bensalem, PA 19020
(215) 244-1300 - Phone
(215) 244-4349 - Fax
www.criterionlabs.com

Course is conducted in English

DIRECTOR: Andrew O. Ward, Jr.

Andrew O. Ward, Jr., Training Manager

Appendix A

EMSL Lab Report

Polarized Light Microscopy (PLM)

EMSL Analytical, Inc.
200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
http://www.EMSL.com / cinnasblab@EMSL.com

EMSL Order:	042007046
Customer ID:	SPOT50
Customer PO:	
Project ID:	

Attention: Asbestos Division
Spotts Stevens and McCoy, Inc.
1047 North Park Road
Reading, PA 19610

Phone:	(610) 621-2000
Fax:	
Received Date:	03/14/2020 10:00 AM
Analysis Date:	03/17/2020
Collected Date:	

Project: Carbon Lehigh IU#21 / Ahera Insp / 100146-0003 / Life House

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
LH3-13-1BK *042007046-0001*		White Fibrous Homogeneous		85% Non-fibrous (Other)	15% Chrysotile
LH3-13-2BK *042007046-0002*		Red/Black Fibrous Homogeneous	30% Cellulose	70% Non-fibrous (Other)	None Detected
LH3-13-3BK *042007046-0003*		White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
LH3-13-4BK *042007046-0004*		Brown/Tan Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
LH3-13-5BK *042007046-0005*		White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
LH3-13-6BK *042007046-0006*		Tan/White Fibrous Homogeneous	5% Cellulose	85% Non-fibrous (Other)	10% Chrysotile
LH3-13-7BK-Plaster *042007046-0007*		Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
LH3-13-7BK-Tape *042007046-0007A*		Yellow Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
LH3-13-8BK *042007046-0008*		Gray Fibrous Homogeneous	5% Hair	95% Non-fibrous (Other)	None Detected
LH3-13-9BK *042007046-0009*		White Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile

Analyst(s)
Kyle DeKarski (10)

Samantha Rundstrom, Laboratory Manager
or Other Approved Signatory

Initial report from: 03/17/2020 10:14:09

SPOTTS | STEVENS | MCCOY

ssmgroup.com

READING
1047 North Park Road
Reading PA 19610-0307
P. 610.621.2000 | F. 610.621.2001

LEHIGH VALLEY
Roma Corporate Center
1605 North Cedar Crest Boulevard; Suite 106
Allentown PA 18104
P. 610.849.9700 | F. 610.621.2001

LANCASTER
701 Creekside Lane
Lititz PA 17543
P. 717.568.2678 | F. 610.621.2001

WEST CHESTER
101 East Evans Street, Suite #2
West Chester, PA 19380
P. 610.430.1382