

# AHERA 3-YEAR REINSPECTION

**PROJECT LOCATION:**

Delta-Peach Bottom Elementary  
1081 Adam Road  
Delta, Pennsylvania

**AHERA REINSPECTION PERFORMED BY:**

Mr. Brad A. Shultz, PA Asbestos Inspector ##053409

**AHERA REINSPECTION DATE:**

March 6, 2019

**PREPARED FOR:**

Mr. Brian McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

**CALI PROJECT NUMBER:**

19-1080-001

**AHERA REINSPECTION REPORT DATE:**

March 7, 2019

**AHERA REINSPECTION REPORTED REVIEWED BY:**



Richard E. Roush, Asbestos Management Planner

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**CUMBERLAND ANALYTICAL LABORATORIES, INC.**

125 Frytown Road  
Carlisle, Pennsylvania 17015

**Phone:** (717) 379-3782

**Fax:** (717) 776-6436

E-Mail: [rich.roush@c-analytical.com](mailto:rich.roush@c-analytical.com) [www.cumberlandanalyticalabs.com](http://www.cumberlandanalyticalabs.com)

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**AHERA 3-Year Reinspection Letter**

March 7, 2019

Mr. Brain McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

Dear Mr. McCleary:

The AHERA 3-Year Reinspection of the Delta-Peach Bottom Elementary School was performed on March 6, 2019, by Mr. Brad Shultz of this office PA Asbestos Inspector ##053409.

The condition of the asbestos-containing materials (ACM) are as listed on Page 3 of this report. The condition(s) of the ACM has not changed since the last reinspection and the ACM should continue to be monitored under the School Operations and Maintenance Program (O&M).

If you have any with any questions, comments, or need additional information please do not hesitate to contact this office.

Thank you.

Sincerely,



Richard E. Roush, Manager Planner

**Executive Summary:**

In February 2019, Cumberland Analytical Laboratories, Inc. (CALI) was contracted by the South Eastern School District to conduct an AHERA 3-Year Reinspection of the Delta-Peach Bottom Elementary School. In accordance with Code of Federal Regulations as listed in 40 CFR Part 763.85(b), this AHERA Regulation mandates that an asbestos reinspection of all school facilities covered by this act be performed by an EPA AHERA Certified Building Inspector at least once every 3-years after an Asbestos Management Plan has been established. This report details the results of the reinspection performed by CALI and the assessment of the facility to document changes in the location, condition, quantity, and potential friability of known or assumed asbestos containing materials. No additional suspect materials were sampled.

Results of CALI's accredited inspector's assessment of all friable known or assumed asbestos-containing building materials (ACBM) are as listed below in the Asbestos Data Table. Specific changes in condition, friability and location/quantity (i.e., where abatement has occurred since the previous reinspection) will also be summarized.

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**Asbestos Data Table:**

Location	Material/Location	Change in Condition
Throughout	Caulk Board Mastic	The condition of caulk board mastic has not changed since the last AHERA 3-Year Reinspection and this material should continue to be monitored under the School's Operations and Maintenance Program (O&M).

---

**Recommendations:**

Based upon the observations made by CALI during the survey, all exposed Asbestos-Containing Materials are in good condition and no abatement and/or stabilization are warranted at this time. All Asbestos-Containing Building Materials (ACBM) should be maintained in good condition, with any areas of future observed damage being addressed appropriately. The facility should maintain an Asbestos Operations and Maintenance Plan (O&M), with periodic inspections to observe damage to asbestos-containing materials, and maintain records of any abatement that is performed. An AHERA Reinspection will be required within the next three (3) year period.

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**Methods:**

In accordance with 40 CFR Part 763.85(b), CALI's reinspection included friable and non-friable, known or assumed "previously identified" ACBM in each school building that they lease, own or otherwise use as a school building.

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

1. Visually reinspected and re-assessed under 763.88, the condition of all "previously identified" friable known or assumed ACBM.
2. Visually inspected material that was previously considered non-friable ACBM and touched the material to determine whether it had become friable since the last inspection or reinspection.

3. Identified any homogeneous areas with material that had become friable since the last inspection or reinspection.
  4. Re-assessed, under 763.88, the condition of friable known or assumed ACBM previously identified.
- 

**Additional Bulk Sampling:**

Sampling during the reinspection process is only performed where assumed ACBM has become a newly friable homogeneous material. Where required, CALI's AHERA accredited inspector will collect samples in accordance with 40 CFR 763.88 (sampling guidelines). These guidelines are specified for friable surfacing material and thermal insulation but require samples "in a manner sufficient to determine whether the material is ACM or not ACM" for miscellaneous material and for non-friable suspected ACBM. **NO** additional bulk samples were collected as a part of the School District's 3-Year Reinspection.

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**Restrictions:**

1. The scope of CALI's services for this 3-Year Reinspection was to visually reinspect and assess "previously identified" ACBM detailed in the original AHERA inspection and subsequent reinspection. A resurvey of the entire school facilities to identify materials NOT "previously identified" was not performed.
  2. No sampling was performed of assumed ACBM unless the condition of the material changed significantly resulting in this homogeneous area being designated as newly friable.
- 

**Limitations:**

1. The condition of the ACBM identified during this reinspection 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 previous AHERA 3-Year Reinspection Report. This report relied on a visual assessment of exposed materials located throughout 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 cannot be verified. Hence, CALI's recommends that specific inspection be performed by a PA certified building inspector to review materials which may be impacted in the event of any major renovations requiring demolition within the school facilities.
- 

**Notes:**

Additional material suspects as containing asbestos may be uncovered during renovation or demolition activities. In that event, work that would disturb that material must be discontinued until an asbestos building inspector determines the asbestos content of the material or until an asbestos project designer designs the procedures to be followed.

Any activities that may disturb asbestos-containing materials causing them to release fibers, must be designed and conducted by U.S. EPA and Pennsylvania Labor and Industry certified asbestos professionals.

All maintenance and custodial workers must receive 2-hour asbestos awareness training within 60 days of their hire date, and a minimum of 1 time during each 12-month period.

All maintenance workers, whom may disturb asbestos during the normal performance of their duties, must be appropriately trained and certified to perform such occupational functions, and must also be appropriately licensed by the Commonwealth of Pennsylvania Department of Labor and Industry (PA DOLI) to perform relative abatement activities. Please also note that additional training and documentation for respiratory protection, respirator use, and medical approval is also mandated and required.

The condition of all assumed confirmed asbestos-containing materials must be determined a minimum of 1 time during each 6-month period. The person performing these 6-month periodic surveillance activities is not required to possess an asbestos certification, but is required to be knowledgeable concerning asbestos. A written record of these 6-month periodic surveillance activities must be maintained as a part of the School District's Asbestos Management Plan.

The School District is required to have the 3-year asbestos reinspection and asbestos management plan update performed a minimum of 1 time during each 3-year period by a U.S. EPA and Pennsylvania Labor and Industry Certified Asbestos Building Inspector and Management Planner.

For asbestos abatement projects, the School District must maintain as a part of their Asbestos Management Plan Records of the project. Those records must include, at a minimum:

- A copy of all asbestos notifications,
- The name of the Asbestos Project Designer and a copy of the project design,
- A copy of the Asbestos Project Designer's Training Certificate,
- A copy of the Asbestos Project Designer's Commonwealth of Pennsylvania Labor and Industry Certification; and
- A copy of the Asbestos Contractor's Training Certificate.

---

**Reinspection Date/Building Inspector:**

<b>Date of Reinspection:</b>	March 6, 2019
<b>Conducted By:</b>	Mr. Brad A. Shultz Cumberland Analytical Laboratories, Inc. 125 Frytown Road Carlisle, Pennsylvania 17015
<b>State of Accreditation:</b>	Pennsylvania

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**Management Plan – Revised Response Action:**

Response actions were determined utilizing the same protocol initiated by the original AHERA Management Plan. Response actions are based upon the assessed condition of the ACBM identified during the inspection. Included in this assessment are physical condition, friability, air movement and accessibility.

**General methods implemented for response actions include:**

- ◆ Isolate area and restrict access; remove as soon as possible.
- ◆ Continue and/or implement Operations and Maintenance. Repair or remove as soon as possible or reduce potential for disturbance.
- ◆ Repair, enclose or encapsulate and continue and/or implement Operations and Maintenance.
- ◆ Continue and/or implement Operations and Maintenance until major renovation or demolition requires removal under NESHAP or until the hazard assessment factor changes.

**NOTE:** An Operations and Maintenance Program may include enclosure and/or encapsulation where appropriate to increase effectiveness of the program.

Response actions were determined by CALI's ASHERA Certified Management Planner based on information obtained during the reinspection and comparison with the initial 3-Year ASHERA Inspection Report.

**Brad A. Shultz PA Asbestos Building Inspector Certificate:**

**Allsafe Environmental, Inc.**  
*Environmental Safety Consulting & Training*

*This is to certify that*

**BRAD A. SHULTZ**

6 LARCH DR SHIPPENSBURG PA 17257

Social Security No. **XXXXXXXXXX**

in the 4-hour Course conducted in English from 05-02-18 to 05-02-18.

*has satisfied the requirements and passed the examination*

**for TSCA Title II Recertification: ASBESTOS BUILDING INSPECTOR**

40 CFR 763 (ASHERA/ASHARA M.A.P.) / Asbestos Occupations Accreditation and Certification Act (PA Act 1990-194, as amended.)

*This certification shall expire on* **05-02-19**

Training for U.S. E.P.A. Asbestos Hazard Emergency Response Act (ASHERA, 40 C.F.R. 763) as amended by ASHARA and subsequent amendments (including the U.S. EPA Worker Protection Rule), and the Asbestos NESHAP, 40 CFR 61. Course fulfills O.S.H.A. 29 CFR 1926.1101 (Construction) and 1910.1001 (General Industry) asbestos training for Classes III through IV and fulfills requirements for respirator/PPE retraining (29 CFR 1910.132-3-4, as amended, 1926.28,103). This program also reviews the U.S. D.O.T. HazMat Shipping rules, the OSHA Hazard Communication Standard and the UN Globally Harmonized System of Classification and Labeling of Chemicals, as revised.

Certificate No. **RAPA24506**

Instructor: REINHARD  
Test Score: 100

*TLK. R. R.*  
Allsafe Environmental, Inc.  
Thomas K. Reinhard, President  
375 Criswell Drive  
Bolling Springs, PA 17007  
(717) 258-4109



# AHERA 3-YEAR REINSPECTION

**PROJECT LOCATION:**

Fawn Area Elementary School  
504 Main Street  
Fawn Grove, Pennsylvania

**AHERA REINSPECTION PERFORMED BY:**

Mr. Brad A. Shultz, PA Asbestos Inspector ##053409

**AHERA REINSPECTION DATE:**

March 6, 2019

**PREPARED FOR:**

Mr. Brian McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

**CALI PROJECT NUMBER:**

19-1080-002

**AHERA REINSPECTION REPORT DATE:**

March 7, 2019

**AHERA REINSPECTION REPORTED REVIEWED BY:**



Richard E. Roush, Asbestos Management Planner

---

**CUMBERLAND ANALYTICAL LABORATORIES, INC.**

125 Frytown Road  
Carlisle, Pennsylvania 17015

**Phone:** (717) 379-3782

**Fax:** (717) 776-6436

E-Mail: [rich.roush@c-analytical.com](mailto:rich.roush@c-analytical.com) [www.cumberlandanalyticallabs.com](http://www.cumberlandanalyticallabs.com)



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**AHERA 3-Year Reinspection Letter**

March 7, 2019

Mr. Brain McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

Dear Mr. McCleary:

The AHERA 3-Year Reinspection of the Fawn Area Elementary School was performed on March 6, 2019, by Mr. Brad Shultz of this office PA Asbestos Inspector ##053409.

The condition of the asbestos-containing materials (ACM) are as listed on Page 3 of this report. The condition(s) of the ACM has not changed since the last reinspection and the ACM should continue to be monitored under the School Operations and Maintenance Program (O&M).

If you have any with any questions, comments, or need additional information please do not hesitate to contact this office.

Thank you.

Sincerely,



Richard E. Roush, Manager Planner

**Executive Summary:**

In February 2019, Cumberland Analytical Laboratories, Inc. (CALI) was contracted by the South Eastern School District to conduct an AHERA 3-Year Reinspection of the Fawn Area Elementary School. In accordance with Code of Federal Regulations as listed in 40 CFR Part 763.85(b), this AHERA Regulation mandates that an asbestos reinspection of all school facilities covered by this act be performed by an EPA AHERA Certified Building Inspector at least once every 3-years after an Asbestos Management Plan has been established. This report details the results of the reinspection performed by CALI and the assessment of the facility to document changes in the location, condition, quantity, and potential friability of known or assumed asbestos containing materials. No additional suspect materials were sampled.

Results of CALI's accredited inspector's assessment of all friable known or assumed asbestos-containing building materials (ACBM) are as listed below in the Asbestos Data Table. Specific changes in condition, friability and location/quantity (i.e., where abatement has occurred since the previous reinspection) will also be summarized.

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**Asbestos Data Table:**

Location	Material/Location	Change in Condition
Throughout Behind Drywall	Caulk Board Mastic	The condition of caulk board mastic has not changed since the last AHERA 3-Year Reinspection and this material should continue to be monitored under the School's Operations and Maintenance Program (O&M).

---

**Recommendations:**

Based upon the observations made by CALI during the survey, all exposed Asbestos-Containing Materials are in good condition and no abatement and/or stabilization are warranted at this time. All Asbestos-Containing Building Materials (ACBM) should be maintained in good condition, with any areas of future observed damage being addressed appropriately. The facility should maintain an Asbestos Operations and Maintenance Plan (O&M), with periodic inspections to observe damage to asbestos-containing materials, and maintain records of any abatement that is performed. An AHERA Reinspection will be required within the next three (3) year period.

---

**Methods:**

In accordance with 40 CFR Part 763.85(b), CALI's reinspection included friable and non-friable, known or assumed "previously identified" ACBM in each school building that they lease, own or otherwise use as a school building.

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

1. Visually reinspected and re-assessed under 763.88, the condition of all "previously identified" friable known or assumed ACBM.
2. Visually inspected material that was previously considered non-friable ACBM and touched the material to determine whether it had become friable since the last inspection or reinspection.

3. Identified any homogeneous areas with material that had become friable since the last inspection or reinspection.
  4. Re-assessed, under 763.88, the condition of friable known or assumed ACBM previously identified.
- 

**Additional Bulk Sampling:**

Sampling during the reinspection process is only performed where assumed ACBM has become a newly friable homogeneous material. Where required, CALI's AHERA accredited inspector will collect samples in accordance with 40 CFR 763.88 (sampling guidelines). These guidelines are specified for friable surfacing material and thermal insulation but require samples "in a manner sufficient to determine whether the material is ACM or not ACM" for miscellaneous material and for non-friable suspected ACBM. **NO** additional bulk samples were collected as a part of the School District's 3-Year Reinspection.

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**Restrictions:**

1. The scope of CALI's services for this 3-Year Reinspection was to visually reinspect and assess "previously identified" ACBM detailed in the original AHERA inspection and subsequent reinspection. A resurvey of the entire school facilities to identify materials NOT "previously identified" was not performed.
  2. No sampling was performed of assumed ACBM unless the condition of the material changed significantly resulting in this homogeneous area being designated as newly friable.
- 

**Limitations:**

1. The condition of the ACBM identified during this reinspection 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 previous AHERA 3-Year Reinspection Report. This report relied on a visual assessment of exposed materials located throughout 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 cannot be verified. Hence, CALI's recommends that specific inspection be performed by a PA certified building inspector to review materials which may be impacted in the event of any major renovations requiring demolition within the school facilities.
- 

**Notes:**

Additional material suspects as containing asbestos may be uncovered during renovation or demolition activities. In that event, work that would disturb that material must be discontinued until an asbestos building inspector determines the asbestos content of the material or until an asbestos project designer designs the procedures to be followed.

Any activities that may disturb asbestos-containing materials causing them to release fibers, must be designed and conducted by U.S. EPA and Pennsylvania Labor and Industry certified asbestos professionals.

All maintenance and custodial workers must receive 2-hour asbestos awareness training within 60 days of their hire date, and a minimum of 1 time during each 12-month period.

All maintenance workers, whom may disturb asbestos during the normal performance of their duties, must be appropriately trained and certified to perform such occupational functions, and must also be appropriately licensed by the Commonwealth of Pennsylvania Department of Labor and Industry (PA DOLI) to perform relative abatement activities. Please also note that additional training and documentation for respiratory protection, respirator use, and medical approval is also mandated and required.

The condition of all assumed confirmed asbestos-containing materials must be determined a minimum of 1 time during each 6-month period. The person performing these 6-month periodic surveillance activities is not required to possess an asbestos certification, but is required to be knowledgeable concerning asbestos. A written record of these 6-month periodic surveillance activities must be maintained as a part of the School District's Asbestos Management Plan.

The School District is required to have the 3-year asbestos reinspection and asbestos management plan update performed a minimum of 1 time during each 3-year period by a U.S. EPA and Pennsylvania Labor and Industry Certified Asbestos Building Inspector and Management Planner.

For asbestos abatement projects, the School District must maintain as a part of their Asbestos Management Plan Records of the project. Those records must include, at a minimum:

- A copy of all asbestos notifications,
- The name of the Asbestos Project Designer and a copy of the project design,
- A copy of the Asbestos Project Designer's Training Certificate,
- A copy of the Asbestos Project Designer's Commonwealth of Pennsylvania Labor and Industry Certification; and
- A copy of the Asbestos Contractor's Training Certificate.

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**Reinspection Date/Building Inspector:**

<b>Date of Reinspection:</b>	March 6, 2019
<b>Conducted By:</b>	Mr. Brad A. Shultz Cumberland Analytical Laboratories, Inc. 125 Frytown Road Carlisle, Pennsylvania 17015
<b>State of Accreditation:</b>	Pennsylvania

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**Management Plan – Revised Response Action:**

Response actions were determined utilizing the same protocol initiated by the original AHERA Management Plan. Response actions are based upon the assessed condition of the ACBM identified during the inspection. Included in this assessment are physical condition, friability, air movement and accessibility.

**General methods implemented for response actions include:**

- ◆ Isolate area and restrict access; remove as soon as possible.
- ◆ Continue and/or implement Operations and Maintenance. Repair or remove as soon as possible or reduce potential for disturbance.
- ◆ Repair, enclose or encapsulate and continue and/or implement Operations and Maintenance.
- ◆ Continue and/or implement Operations and Maintenance until major renovation or demolition requires removal under NESHAP or until the hazard assessment factor changes.

**NOTE:** An Operations and Maintenance Program may include enclosure and/or encapsulation where appropriate to increase effectiveness of the program.

Response actions were determined by CALI's AHERA Certified Management Planner based on information obtained during the reinspection and comparison with the initial 3-Year AHERA Inspection Report.

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**Brad A. Shultz PA Asbestos Building Inspector Certificate:**

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<b>Allsafe Environmental, Inc.</b> <i>Environmental Safety Consulting &amp; Training</i>	
<i>This is to certify that</i>	
<b>BRAD A. SHULTZ</b>	
6 LARCH DR SHIPPENSBURG PA 17257	
Social Security No. <b>XXXXXXXXXX</b>	
in the 4-hour Course conducted in English from 05-02-18 to 05-02-18	
<i>has satisfied the requirements and passed the examination</i>	
<b>for TSCA Title II Recertification: ASBESTOS BUILDING INSPECTOR</b>	
40 CFR 763 (AHERA/ASHARA M.A.P.) / Asbestos Occupations Accreditation and Certification Act (PA Act 1990-194, as amended.)	
<i>This certification shall expire on</i> <b>05-02-19</b>	
<small>Training for U.S. E.P.A. Asbestos Hazard Emergency Response Act (AHERA, 40 C.F.R. 763) as amended by ASHARA and subsequent amendments (including the U.S. EPA Worker Protection Rule), and the Asbestos NESHAP, 40 CFR 61. Course fulfills O.S.I.A. 29 CFR 1926.1101 (Construction) and 1910.1001 (General Industry) asbestos training for Classes III through IV and fulfills requirements for respirator/PPE retraining (29 CFR 1910.132-3-4, as amended, 1926.28.103). This program also reviews the U.S. D.O.T. HazMat Shipping rules, the OSHA Hazard Communication Standard and the UN Globally Harmonized System of Classification and Labeling of Chemicals, as revised.</small>	
<div style="border: 1px solid black; padding: 5px;"><b>Certificate No.</b> <b>RAPA24506</b> <b>Instructor:</b> REINHARD <b>Test Score:</b> 100</div>	 <b>Allsafe Environmental, Inc.</b> <small>Thomas K. Reinhard, President 375 Criswell Drive Bolling Springs, PA 17007 (717) 258-4109</small>



# AHERA 3-YEAR REINSPECTION

**PROJECT LOCATION:**

South Eastern Intermediate School  
417 Main Street  
Fawn Grove, Pennsylvania

**AHERA REINSPECTION PERFORMED BY:**

Mr. Brad A. Shultz, PA Asbestos Inspector ##053409

**AHERA REINSPECTION DATE:**

March 6, 2019

**PREPARED FOR:**

Mr. Brian McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

**CALI PROJECT NUMBER:**

19-1080-003

**AHERA REINSPECTION REPORT DATE:**

March 7, 2019

**AHERA REINSPECTION REPORTED REVIEWED BY:**



Richard E. Roush, Asbestos Management Planner

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**CUMBERLAND ANALYTICAL LABORATORIES, INC.**

125 Frytown Road  
Carlisle, Pennsylvania 17015

**Phone:** (717) 379-3782

**Fax:** (717) 776-6436

E-Mail: [rich.roush@c-analytical.com](mailto:rich.roush@c-analytical.com) [www.cumberlandanalyticalabs.com](http://www.cumberlandanalyticalabs.com)

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Brad A. Shultz PA Asbestos Building Inspector Certificate:.....	6

**AHERA 3-Year Reinspection Letter**

March 7, 2019

Mr. Brain McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

Dear Mr. McCleary:

The AHERA 3-Year Reinspection of the South Eastern Intermediate School was performed on March 6, 2019, by Mr. Brad Shultz of this office PA Asbestos Inspector ##053409.

The condition of the asbestos-containing materials (ACM) are as listed on Page 3 of this report. The condition(s) of the ACM has not changed since the last reinspection and the ACM should continue to be monitored under the School Operations and Maintenance Program (O&M).

If you have any with any questions, comments, or need additional information please do not hesitate to contact this office.

Thank you.

Sincerely,



Richard E. Roush, Manager Planner

**Executive Summary:**

In February 2019, Cumberland Analytical Laboratories, Inc. (CALI) was contracted by the South Eastern School District to conduct an AHERA 3-Year Reinspection of the South Eastern Intermediate School. In accordance with Code of Federal Regulations as listed in 40 CFR Part 763.85(b), this AHERA Regulation mandates that an asbestos reinspection of all school facilities covered by this act be performed by an EPA AHERA Certified Building Inspector at least once every 3-years after an Asbestos Management Plan has been established. This report details the results of the reinspection performed by CALI and the assessment of the facility to document changes in the location, condition, quantity, and potential friability of known or assumed asbestos containing materials. No additional suspect materials were sampled.

Results of CALI's accredited inspector's assessment of all friable known or assumed asbestos-containing building materials (ACBM) are as listed below in the Asbestos Data Table. Specific changes in condition, friability and location/quantity (i.e., where abatement has occurred since the previous reinspection) will also be summarized.

---

**Asbestos Data Table:**

Location	Material/Location	Change in Condition
Throughout	Caulk Board Mastic	The condition of caulk board mastic has not changed since the last AHERA 3-Year Reinspection and this material should continue to be monitored under the School's Operations and Maintenance Program (O&M).

---

**Recommendations:**

Based upon the observations made by CALI during the survey, all exposed Asbestos-Containing Materials are in good condition and no abatement and/or stabilization are warranted at this time. All Asbestos-Containing Building Materials (ACBM) should be maintained in good condition, with any areas of future observed damage being addressed appropriately. The facility should maintain an Asbestos Operations and Maintenance Plan (O&M), with periodic inspections to observe damage to asbestos-containing materials, and maintain records of any abatement that is performed. An AHERA Reinspection will be required within the next three (3) year period.

---

**Methods:**

In accordance with 40 CFR Part 763.85(b), CALI's reinspection included friable and non-friable, known or assumed "previously identified" ACBM in each school building that they lease, own or otherwise use as a school building.

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

1. Visually reinspected and re-assessed under 763.88, the condition of all "previously identified" friable known or assumed ACBM.
2. Visually inspected material that was previously considered non-friable ACBM and touched the material to determine whether it had become friable since the last inspection or reinspection.

3. Identified any homogeneous areas with material that had become friable since the last inspection or reinspection.
  4. Re-assessed, under 763.88, the condition of friable known or assumed ACBM previously identified.
- 

**Additional Bulk Sampling:**

Sampling during the reinspection process is only performed where assumed ACBM has become a newly friable homogeneous material. Where required, CALI's AHERA accredited inspector will collect samples in accordance with 40 CFR 763.88 (sampling guidelines). These guidelines are specified for friable surfacing material and thermal insulation but require samples "in a manner sufficient to determine whether the material is ACM or not ACM" for miscellaneous material and for non-friable suspected ACBM. **NO** additional bulk samples were collected as a part of the School District's 3-Year Reinspection.

---

**Restrictions:**

1. The scope of CALI's services for this 3-Year Reinspection was to visually reinspect and assess "previously identified" ACBM detailed in the original AHERA inspection and subsequent reinspection. A resurvey of the entire school facilities to identify materials NOT "previously identified" was not performed.
  2. No sampling was performed of assumed ACBM unless the condition of the material changed significantly resulting in this homogeneous area being designated as newly friable.
- 

**Limitations:**

1. The condition of the ACBM identified during this reinspection 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 previous AHERA 3-Year Reinspection Report. This report relied on a visual assessment of exposed materials located throughout 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 cannot be verified. Hence, CALI's recommends that specific inspection be performed by a PA certified building inspector to review materials which may be impacted in the event of any major renovations requiring demolition within the school facilities.
- 

**Notes:**

Additional material suspects as containing asbestos may be uncovered during renovation or demolition activities. In that event, work that would disturb that material must be discontinued until an asbestos building inspector determines the asbestos content of the material or until an asbestos project designer designs the procedures to be followed.

Any activities that may disturb asbestos-containing materials causing them to release fibers, must be designed and conducted by U.S. EPA and Pennsylvania Labor and Industry certified asbestos professionals.

All maintenance and custodial workers must receive 2-hour asbestos awareness training within 60 days of their hire date, and a minimum of 1 time during each 12-month period.

All maintenance workers, whom may disturb asbestos during the normal performance of their duties, must be appropriately trained and certified to perform such occupational functions, and must also be appropriately licensed by the Commonwealth of Pennsylvania Department of Labor and Industry (PA DOLI) to perform relative abatement activities. Please also note that additional training and documentation for respiratory protection, respirator use, and medical approval is also mandated and required.

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- A copy of all asbestos notifications,
- The name of the Asbestos Project Designer and a copy of the project design,
- A copy of the Asbestos Project Designer's Training Certificate,
- A copy of the Asbestos Project Designer's Commonwealth of Pennsylvania Labor and Industry Certification; and
- A copy of the Asbestos Contractor's Training Certificate.

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**Reinspection Date/Building Inspector:**

<b>Date of Reinspection:</b>	March 6, 2019
<b>Conducted By:</b>	Mr. Brad A. Shultz Cumberland Analytical Laboratories, Inc. 125 Frytown Road Carlisle, Pennsylvania 17015
<b>State of Accreditation:</b>	Pennsylvania

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**Management Plan – Revised Response Action:**

Response actions were determined utilizing the same protocol initiated by the original AHERA Management Plan. Response actions are based upon the assessed condition of the ACBM identified during the inspection. Included in this assessment are physical condition, friability, air movement and accessibility.



**General methods implemented for response actions include:**

- ♦ Isolate area and restrict access; remove as soon as possible.
- ♦ Continue and/or implement Operations and Maintenance. Repair or remove as soon as possible or reduce potential for disturbance.
- ♦ Repair, enclose or encapsulate and continue and/or implement Operations and Maintenance.
- ♦ Continue and/or implement Operations and Maintenance until major renovation or demolition requires removal under NESHAP or until the hazard assessment factor changes.

**NOTE:** An Operations and Maintenance Program may include enclosure and/or encapsulation where appropriate to increase effectiveness of the program.

Response actions were determined by CALI's AHERA Certified Management Planner based on information obtained during the reinspection and comparison with the initial 3-Year AHERA Inspection Report.

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**Brad A. Shultz PA Asbestos Building Inspector Certificate:**

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<b>Allsafe Environmental, Inc.</b> <i>Environmental Safety Consulting &amp; Training</i>				
<p><i>This is to certify that</i></p> <p><b>BRAD A. SHULTZ</b></p> <p>6 LARCH DR SHIPPENSBURG PA 17257</p> <p>Social Security No. <b>XXXXXXXX</b></p> <p>in the 4-hour Course conducted in English from 05-02-18 to 05-02-18</p> <p><i>has satisfied the requirements and passed the examination</i></p>				
<p><b>for TSCA Title II Recertification: ASBESTOS BUILDING INSPECTOR</b></p> <p>40 CFR 763 (AHERA/ASHARA M.A.P.) / Asbestos Occupations Accreditation and Certification Act (PA Act 1990-194, as amended.)</p> <p><b>This certification shall expire on 05-02-19</b></p> <p><small>Training for U.S. E.P.A. Asbestos Hazard Emergency Response Act (AHERA, 40 C.F.R. 763) as amended by ASHARA and subsequent amendments (including the U.S. EPA Worker Protection Rule), and the Asbestos NESHAP, 40 CFR 61. Course fulfills O.S.H.A. 29 CFR 1926.1101 (Construction) and 1910.1001 (General Industry) asbestos training for Classes III through IV and fulfills requirements for respirator PPE retraining (29 CFR 1910.132-3-4, as amended, 1926.28.103). This program also reviews the U.S. D.O.T. HazMat Shipping rules, the OSHA Hazard Communication Standard and the GHS Globally Harmonized System of Classification and Labeling of Chemicals, as revised.</small></p>				
<table border="1" style="width: 100%; border-collapse: collapse;"><tr><td style="padding: 2px;">Certificate No. <b>RAPA24506</b></td></tr><tr><td style="padding: 2px;">Instructor: REINHARD</td></tr><tr><td style="padding: 2px;">Test Score: 100</td></tr></table>	Certificate No. <b>RAPA24506</b>	Instructor: REINHARD	Test Score: 100	 <b>Allsafe Environmental, Inc.</b>  Thomas K. Reinhard, President 375 Criswell Drive Bolling Springs, PA 17007 (717) 258-4109
Certificate No. <b>RAPA24506</b>				
Instructor: REINHARD				
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# AHERA 3-YEAR REINSPECTION

**PROJECT LOCATION:**

South Eastern Middle School East  
375 Main Street  
Fawn Grove, Pennsylvania

**AHERA REINSPECTION PERFORMED BY:**

Mr. Brad A. Shultz, PA Asbestos Inspector ##053409

**AHERA REINSPECTION DATE:**

March 6, 2019

**PREPARED FOR:**

Mr. Brian McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

**CALI PROJECT NUMBER:**

19-1080-004

**AHERA REINSPECTION REPORT DATE:**

March 7, 2019

**AHERA REINSPECTION REPORTED REVIEWED BY:**



Richard E. Roush, Asbestos Management Planner

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**CUMBERLAND ANALYTICAL LABORATORIES, INC.**

125 Frytown Road  
Carlisle, Pennsylvania 17015

**Phone:** (717) 379-3782

**Fax:** (717) 776-6436

E-Mail: [rich.roush@c-analytical.com](mailto:rich.roush@c-analytical.com) [www.cumberlandanalyticalabs.com](http://www.cumberlandanalyticalabs.com)

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**AHERA 3-Year Reinspection Letter**

March 7, 2019

Mr. Brain McCleary  
South Eastern School District  
377 Main Street  
Fawn Grove, Pennsylvania 17321

Dear Mr. McCleary:

The AHERA 3-Year Reinspection of the South Eastern Middle School East was performed on March 6, 2019, by Mr. Brad Shultz of this office PA Asbestos Inspector ##053409.

The condition of the asbestos-containing materials (ACM) are as listed on Page 3 of this report. The condition(s) of the ACM has not changed since the last reinspection and the ACM should continue to be monitored under the School Operations and Maintenance Program (O&M).

If you have any with any questions, comments, or need additional information please do not hesitate to contact this office.

Thank you.

Sincerely,



Richard E. Roush, Manager Planner

**Executive Summary:**

In February 2019, Cumberland Analytical Laboratories, Inc. (CALI) was contracted by the South Eastern School District to conduct an AHERA 3-Year Reinspection of the South Eastern Middle School East. In accordance with Code of Federal Regulations as listed in 40 CFR Part 763.85(b), this AHERA Regulation mandates that an asbestos reinspection of all school facilities covered by this act be performed by an EPA AHERA Certified Building Inspector at least once every 3-years after an Asbestos Management Plan has been established. This report details the results of the reinspection performed by CALI and the assessment of the facility to document changes in the location, condition, quantity, and potential friability of known or assumed asbestos containing materials. No additional suspect materials were sampled.

Results of CALI's accredited inspector's assessment of all friable known or assumed asbestos-containing building materials (ACBM) are as listed below in the Asbestos Data Table. Specific changes in condition, friability and location/quantity (i.e., where abatement has occurred since the previous reinspection) will also be summarized.

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**Asbestos Data Table:**

Location	Material/Location	Change in Condition
Roof Deck Gym Partition Guide	Transite	The condition of transite has not changed since the last AHERA 3-Year Reinspection and this material should continue to be monitored under the School's Operations and Maintenance Program (O&M).

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**Recommendations:**

Based upon the observations made by CALI during the survey, all exposed Asbestos-Containing Materials are in good condition and no abatement and/or stabilization are warranted at this time. All Asbestos-Containing Building Materials (ACBM) should be maintained in good condition, with any areas of future observed damage being addressed appropriately. The facility should maintain an Asbestos Operations and Maintenance Plan (O&M), with periodic inspections to observe damage to asbestos-containing materials, and maintain records of any abatement that is performed. An AHERA Reinspection will be required within the next three (3) year period.

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**Methods:**

In accordance with 40 CFR Part 763.85(b), CALI's reinspection included friable and non-friable, known or assumed "previously identified" ACBM in each school building that they lease, own or otherwise use as a school building.

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

1. Visually reinspected and re-assessed under 763.88, the condition of all "previously identified" friable known or assumed ACBM.
2. Visually inspected material that was previously considered non-friable ACBM and touched the material to determine whether it had become friable since the last inspection or reinspection.

3. Identified any homogeneous areas with material that had become friable since the last inspection or reinspection.
  4. Re-assessed, under 763.88, the condition of friable known or assumed ACBM previously identified.
- 

**Additional Bulk Sampling:**

Sampling during the reinspection process is only performed where assumed ACBM has become a newly friable homogeneous material. Where required, CALI's AHERA accredited inspector will collect samples in accordance with 40 CFR 763.88 (sampling guidelines). These guidelines are specified for friable surfacing material and thermal insulation but require samples "in a manner sufficient to determine whether the material is ACM or not ACM" for miscellaneous material and for non-friable suspected ACBM. **NO** additional bulk samples were collected as a part of the School District's 3-Year Reinspection.

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**Restrictions:**

1. The scope of CALI's services for this 3-Year Reinspection was to visually reinspect and assess "previously identified" ACBM detailed in the original AHERA inspection and subsequent reinspection. A resurvey of the entire school facilities to identify materials NOT "previously identified" was not performed.
  2. No sampling was performed of assumed ACBM unless the condition of the material changed significantly resulting in this homogeneous area being designated as newly friable.
- 

**Limitations:**

1. The condition of the ACBM identified during this reinspection 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 previous AHERA 3-Year Reinspection Report. This report relied on a visual assessment of exposed materials located throughout 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 cannot be verified. Hence, CALI's recommends that specific inspection be performed by a PA certified building inspector to review materials which may be impacted in the event of any major renovations requiring demolition within the school facilities.
- 

**Notes:**

Additional material suspects as containing asbestos may be uncovered during renovation or demolition activities. In that event, work that would disturb that material must be discontinued until an asbestos building inspector determines the asbestos content of the material or until an asbestos project designer designs the procedures to be followed.

Any activities that may disturb asbestos-containing materials causing them to release fibers, must be designed and conducted by U.S. EPA and Pennsylvania Labor and Industry certified asbestos professionals.



All maintenance and custodial workers must receive 2-hour asbestos awareness training within 60 days of their hire date, and a minimum of 1 time during each 12-month period.

All maintenance workers, whom may disturb asbestos during the normal performance of their duties, must be appropriately trained and certified to perform such occupational functions, and must also be appropriately licensed by the Commonwealth of Pennsylvania Department of Labor and Industry (PA DOLI) to perform relative abatement activities. Please also note that additional training and documentation for respiratory protection, respirator use, and medical approval is also mandated and required.

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This is to certify that	
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Social Security No.	XXXXXXXXXX
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has satisfied the requirements and passed the examination	
for TSCA Title II Recertification: <b>ASBESTOS BUILDING INSPECTOR</b>	
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