

**ASBESTOS MANAGEMENT PLAN
AHERA THREE YEAR REINSPECTION**

**CHANDLER TRIPP SCHOOL
780 THORNTON WAY
SAN JOSE, CALIFORNIA**

April 13, 2005

Submitted To:

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Summary of Reinspection and Management Plan Requirements

**Chandler Tripp School
780 Thornton Way
San Jose, California**

I. Reinspection

Under the Asbestos Hazard Emergency Response Act (AHERA 40 CFR 763, Subpart E), the U.S. Environmental Protection Agency (EPA) requires each elementary and secondary school to perform an inspection for asbestos-containing building material (ACBM) and to prepare an asbestos management plan. The AHERA regulations further require a reinspection of the ACBM at least once every three years. Reinspections must be performed by an AHERA accredited building inspector.

Building Inspector: Steve Parpan, SST
Cal/OSHA Site Surveillance Technician #03-3340
IHI Environmental (IHI)

The reinspection period provides an opportunity for schools to reevaluate and update their programs for managing asbestos.

II. Management Plan

Each elementary and secondary school must maintain and update its asbestos management plan to keep it current with ongoing operations and maintenance, periodic surveillance, inspection, reinspection, and response action activities. Management plans must be developed, updated, or revised by an AHERA accredited management planner. In California, consultants must also be state-certified to develop, update, or revise management plans under AHERA.

Management Planner: Michael Benefield, PE, CAC
Cal/OSHA Certified Asbestos Consultant #01-3065
IHI Environmental

III. Recommended Response Actions

If future renovation or demolition activities are to disturb ACM, those materials should be addressed on a case-by-case basis prior to renovation or demolition activities. In some cases where homogenous areas were assumed to contain asbestos, it may be prudent to sample the material in an attempt to determine that it is not ACM, rather than to initiate extensive response actions based on assumptions. Sampling must be conducted according to AHERA and can be performed at any time in the future.

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**Asbestos Management Plan
AHERA Three Year Reinspection**

**Chandler Tripp
780 Thornton Way
San Jose, California**

1.0 INTRODUCTION AND BACKGROUND

Under the Asbestos Hazard Emergency Response Act (AHERA 40 CFR 763, Subpart E), the U.S. Environmental Protection Agency (EPA) requires each elementary and secondary school to perform an inspection for asbestos-containing building material (ACBM) and to prepare an asbestos management plan. The AHERA regulations further require a reinspection of the ACBM at least once every three years. Reinspections must be performed by an AHERA accredited building inspector. In California, consultants must also be state-certified to conduct reinspections under AHERA. The reinspection period provides an opportunity for schools to re-evaluate and update their programs for managing asbestos.

Each elementary and secondary school must maintain and update its asbestos management plan to keep it current with ongoing operations and maintenance, periodic surveillance, inspection, reinspection, and response action activities. Any information that has been obtained to bring the plan up-to-date must be included in the management plan. Management plans must be developed, updated, or revised by an AHERA accredited management planner. In California, consultants must also be state-certified to develop, update, or revise management plans under AHERA.

On March 22, 2005, an AHERA reinspection was conducted for Chandler Tripp School at 780 Thornton in San Jose, California. The main building was reinspected.

The AHERA reinspection was performed at the request of Joe Beretta, Asbestos Coordinator, with the Santa Clara County Office of Education (SCCOE). The AHERA reinspection was managed by Michael Benefield, PE, CAC (Certified Asbestos Consultant #01-3065), of IHI Environmental (IHI), in Emeryville, California. The AHERA reinspection was performed by IHI employee Steve Parpan, SST (Site Surveillance Technician #03-3340).

2.0 REQUIREMENTS FOR AHERA REINSPECTIONS

The following sections describe the requirements for reinspection as outlined in the AHERA regulations (40 CFR Part 763) published October 30, 1987. They are presented to assist readers of this report in performing their duties regarding reinspections under AHERA.

2.1 General LEA Responsibilities

Each local education agency (LEA) must 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 reinspection and surveillance activities that are planned or in progress.

2.2 Inspections and Reinspections

At least once every three years after a management plan is in effect, each local education agency must conduct a reinspection of all friable and nonfriable, known or assumed, ACBM in each school building that they lease, own, or otherwise use as a school building. Reinspections must be performed by an AHERA accredited building inspector. In California, consultants must also be state-certified to conduct reinspections under AHERA.

For each area of a school building, a reinspection must do the following:

- (1) Visually reinspect and reassess the condition of all friable known or assumed ACBM.
- (2) Visually inspect material that was previously considered nonfriable ACBM and touch the material to determine whether it has become friable since the last inspection or reinspection.
- (3) Identify any homogenous areas with material that has become friable since the last inspection or reinspection.
- (4) For each homogenous area of newly friable material that is already assumed to be ACBM, bulk samples may be collected and submitted for analysis.
- (5) Assess the condition of the newly friable material in areas where samples are collected, and newly friable materials in areas that are assumed to be ACBM.
- (6) Reassess the condition of friable known or assumed ACBM previously identified.
- (7) Submit a report or the reinspection to the Asbestos Coordinator for inclusion in the management plan within 30 days of the reinspection.

2.3 Asbestos Coordinator Responsibilities

Each local education agency must designate a person (the Asbestos Coordinator) to ensure that the requirements of AHERA are properly implemented. Training for the Asbestos Coordinator must be adequate to perform the duties assigned under AHERA. Asbestos Coordinators who understand the requirements of AHERA can effectively prevent the release of asbestos fibers through their own actions, as well as their ability to hire and coordinate the work of contract personnel conducting asbestos-related activities at their school buildings.

3.0 REINSPECTION OF ACBM

3.1 Original Inspection Information

An AHERA survey of the Chandler Tripp school was conducted on October 23-24, 2001 by IHI Environmental, Inc. The inspection results were reported in the "Asbestos-Containing Material Field Survey Report" dated January 14, 2002 (the Original Survey). The Original Survey report was used as a basis for the reinspection detailed in this report.

3.2 Reinspection Findings for ACBM

In general IHI observed that the homogeneous areas of ACBM reported in the Original Survey were still present and the condition and friability were unchanged. However there were a few changes in the condition of ACBM or assumed ACBM that were observed in the buildings. These changed conditions are summarized in the Table 1 below.

Table 1 – Materials Exhibiting Change of Condition

Homogeneous Area # – Material Description	Location	Observed Change	Sample ID	Photo ID
19 – Ceiling Acoustic Spray-On	Main Entry, NE area	Damaged friable surfacing ACM.	NA	C-1
19 – Ceiling Acoustic Spray-On	Therapy, NW area on beam	Damaged friable surfacing ACM.	NA	C-2
7 – Vinyl Sheet Flooring	Treatment Classrooms 1,3, 4, 5, 6, 10 22, 25	New condition. Carpet over vinyl sheet flooring.	NA	C-4
15 – Pipe Beige Elbow	Boiler Room, NE area	Damaged thermal system insulation	NA	C-7
15 – Pipe Beige Elbow	Boiler Room, SW area	Damaged thermal system insulation	NA	C-8

3.3 Management Planner Recommendations

Damaged ACBM should be repaired or removed. Materials containing more than 1.0% asbestos are regulated by Fed/EPA, and Cal/EPA. Work that would disturb ACBM or assumed ACBM is regulated by Fed/OSHA and Cal/OSHA. These materials should be removed by a licensed and qualified asbestos abatement contractor prior to the start of renovation or demolition activities which would disturb them. Asbestos removal of these materials should be specifically addressed in construction contract documents/drawings and monitored to ensure compliance with applicable regulations. The findings of this reinspection report must then be included in the overall management plan for the school.

3.4 Damage and Hazard Assessment by Homogeneous Area

Where changed conditions were observed a reassessment of the material was made. Each material with a changed condition was classified into one of the following categories.

- (1) Damaged or significantly damaged thermal system insulation ACM
- (2) Damaged friable surfacing ACM
- (3) Significantly damaged friable surfacing ACM
- (4) Damaged or significantly damaged friable miscellaneous ACM
- (5) ACBM with potential for damage
- (6) ACBM with potential for significant damage
- (7) Any remaining friable ACBM or friable suspected ACBM
- (X) Nonfriable surfacing or miscellaneous ACBM

Damage categories are defined as follows.

- “No Damage” means the material had no visible damage, or extremely minor damage or surface marring. For example, a room full of floor tile with only two or three small corners chipped off one or two tiles.
- “Damaged” means the material had visible damage evenly distributed over less than 10% of its surface, or localized damage over less than 25% of its surface.
- “Significantly Damaged” means the material had visible damage that is evenly distributed over more than 10% of its surface, or localized damage over more than 25% of its surface.

Each homogeneous area of known or assumed ACBM was also assessed for condition, friability, and potential for future disturbance. A list of damage and hazard assessments for the observed changed conditions can be found in Table 2 below.

Table 2 – Damage and Hazard Assessment

Homogeneous Area # – Material Description	Location	Damage	Hazard Assessment
19 – Ceiling Acoustic Spray-On	Main Entry, NE area	Damaged friable surfacing ACM.	2
19 – Ceiling Acoustic Spray-On	Main Entry, NW area	Damaged friable surfacing ACM.	2
15 – Pipe Beige Elbow	Boiler Room, NE area	Damaged thermal system insulation.	1
15 – Pipe Beige Elbow	Boiler Room, SW area	Damaged thermal system insulation.	1

4.0 RECOMMENDED RESPONSE ACTIONS

AHERA requires that the LEA select and implement an appropriate response action for each homogeneous material. The selection must be consistent with the assessments listed in Table 2 of this report and the options permitted under the regulation. AHERA allows the LEA to select the least burdensome option provided that it protects human health and the environment.

Nothing in this report should be construed to dissuade the school from opting to remove ACM at any time. However, removal is generally not necessary for ACM which is not damaged. If the condition of material changes, or other factors such as occupancy affect the hazard assessment ranking, then the response action selection must also be reevaluated. IHI recommends the following response actions for the observed changed conditions.

Table 3 – Recommended Response Actions

Homogeneous Area # – Material Description	Location	Response Action
19 – Ceiling Acoustic Spray-On	Main Entry, NE area	Remove or repair damaged material and manage with O&M program.
19 – Ceiling Acoustic Spray-On	Main Entry, NW area	Remove or repair damaged material and manage with O&M program.
15 – Pipe Beige Elbow	Boiler Room, NE area	Remove or repair damaged material and manage with O&M program.
15 – Pipe Beige Elbow	Boiler Room, SW area	Remove or repair damaged material and manage with O&M program.

If future renovation or demolition activities are to disturb ACM, those materials should be addressed on a case-by-case basis prior to renovation or demolition activities. In some cases where homogenous areas were assumed to contain asbestos, it may be prudent to sample the material in an attempt to determine that it is not ACM, rather than to initiate extensive response actions based on assumptions. Sampling must be conducted according to AHERA and can be performed at any time in the future.

5.0 SURVEY LIMITATIONS AND EXCLUSION OF WARRANTY

This reinspection and assessment was performed using procedures and a level of diligence typically exercised by professional consultants performing similar services. However, ACM, lead-based paint, and other hazardous materials can be present in a structure but not detectable using ordinary investigative procedures. No asbestos-containing material survey can completely eliminate uncertainty regarding the presence of ACM. IHI's level of diligence and investigative procedures are intended to reduce, but not eliminate, potential uncertainty regarding the presence of hazardous materials. The procedures used for this

survey attempt to establish a balance between the competing goals of limiting investigative costs, time, and building damage, and reducing the uncertainty about unknown conditions. Therefore, the determinations in this report should not be construed as a guarantee that all hazardous materials present in the subject property have been included in this report.

This report presents IHI's professional determinations, which are dependent upon information obtained during performance of consulting services. IHI assumes no responsibility for omissions or errors resulting from inaccurate information provided by sources outside of IHI.

No warranty or guarantee, expressed or implied, is made regarding the findings, conclusions or recommendations contained in this report. The limitations presented above supersede the requirements or provisions of all other contracts or scopes of work, implied or otherwise, except those stated or acknowledged herein.

APPENDIX A

Laboratory Analytical Reports

APPENDIX B

Photographs

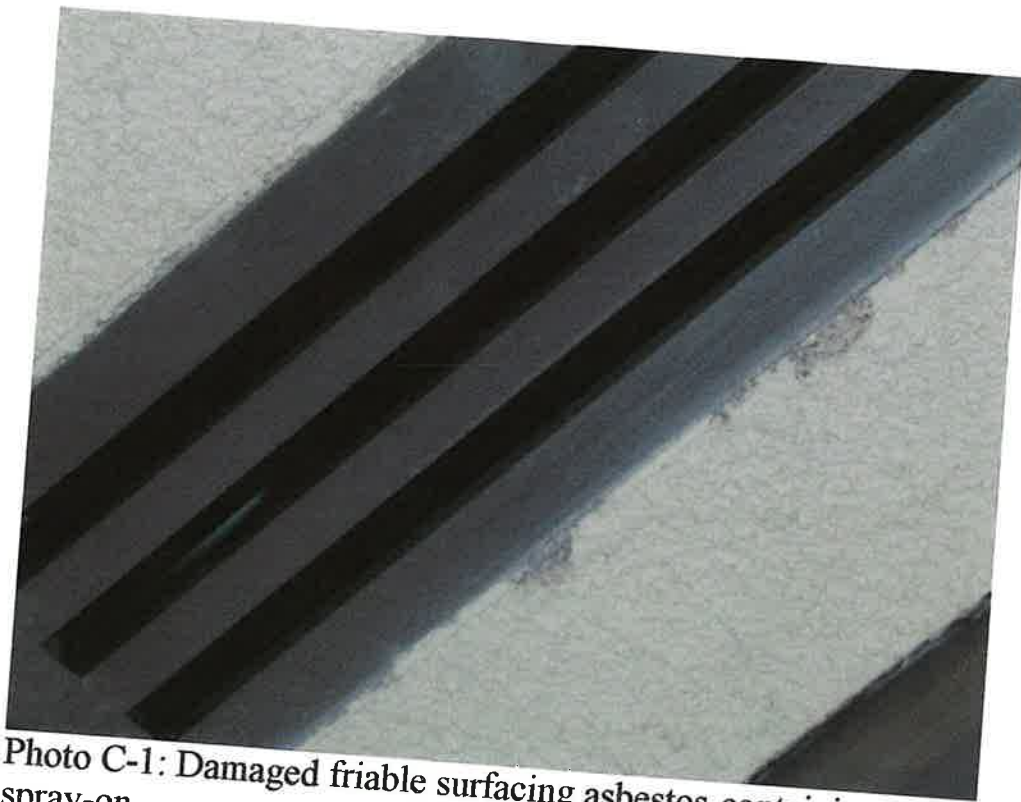


Photo C-1: Damaged friable surfacing asbestos-containing ceiling acoustic spray-on.



Photo C-2: Damaged friable surfacing asbestos-containing ceiling acoustic spray-on.



Photo C-3: New condition. Carpet over asbestos-containing vinyl sheet flooring.



Photo C-4: Damaged friable thermal system insulation asbestos-containing pipe elbow.



Photo C-5: Damaged friable thermal system insulation asbestos containing pipe elbow.

