

AHERA REINSPECTION
The Banks Elementary School Building
at
42350 N.W. Trellis Way
Banks, Oregon 97106

Prepared For:

Superintendent
Banks School District SD 13
12950 N.W. Main
Banks, Oregon 97106

EIS Job No. 2022010. Banks Elementary

Prepared By:

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Charles A. Spear, Partner

February 5, 2022



EIS
ENVIRONMENTAL INSPECTION SERVICES



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REGULATIONS

February 5, 2022
EIS JOB No. 2022010.Banks Elementary

Superintendent
Banks School District
12950 NW. Main Street
Banks, Oregon 97106

RE: Asbestos 2022 AHERA 3-year Reinspection of the Banks elementary school Building located at 42350 N.W. Trellis Way in Banks, Oregon 97106

Dear Superintendent,

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

EIS is pleased to present the February, 2022 AHERA reinspection for The Banks Elementary school building located at 42350 N.W. Trellis Way in Banks, Oregon. The subject elementary school is a modern school. Suspect asbestos-containing building materials (ACBM) includes one foot vinyl tile floor coverings; moulding mastics; and one-foot acoustic ceiling tiles. No problematic conditions were observed. Conditions noted at that time included all suspect ACM in good to excellent condition and no damaged material were observed.

The subject original functional spaces were examined throughout for the presence of confirmed and suspect asbestos-containing building materials (ACBM). All representative functional spaces and relative homogeneous sampling areas were examined during the inspection process.

A total of five (5) data sheets were completed for the elementary school classrooms, hallways, cafeteria, gymnasium, hallways, common rooms, administrative offices and no noteworthy damages were observed. The sheets summarize the accessibility and condition of identified confirmed and/or suspect asbestos-containing building materials (ACBM) observed throughout the original Banks elementary school building areas.

All identified ACBM are candidate materials for in-place operations and maintenance and asbestos abatement is not recommended or required. The condition of the existing suspect ACBM is good to excellent and considered to be protective of student safety and health. No bulk samples were collected from suspect asbestos-containing building materials (ACBM).

THERMAL SYSTEM INSULATION (TSI)

No Thermal system insulation (TSI) was observed on-site.

RESILIENT FLOOR COVERINGS

(VINYL FLOOR TILE & SHEET FLOOR LINOLEUM)

Varieties of suspect resilient floor coverings to include one-foot blue pattern floor tile; one foot brown floor tile; one foot tan floor tile in the cafeteria, common rooms, offices, cafeteria and hallways. No samples were collected from vinyl floor tile. Refer to data sheet No. 4 for additional details.

All examined resilient vinyl flooring were observed in good to excellent condition, well maintained, accessible, and intact. No significant floor covering condition or damage concerns were noted.

COVE-BASE ADHESIVE

Cove-base mastic adhesive was observed on floor moulding within the areas. The moulding is otherwise intact and in good condition. No samples were collected in moulding mastics. (Refer to data sheet No.3 for details).

TAPE JOINT COMPOUND

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

ACOUSTIC CEILING TILES

One foot square ceiling tiles were observed as the ceiling covering in the classrooms. No samples were collected from ceiling tiles or mastics. Minor ceiling tile damages were noted on ceilings of the gymnasium. No specific ceiling tile quality concerns were noted. No problematic ceiling tiles were observed on ceiling surfaces throughout the building. (Refer to datasheet No. 5 for details).

PLASTER (SKIM COAT)

Original wall surfaces have plaster skim coat applications observed within functional areas of the building. No samples were collected. EIS noted no plaster concerns. (Refer to sheet No. 2 for details).

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

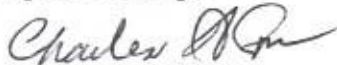
All suspect and previously analytically confirmed ACBM were noted to be in good to excellent condition. All ACBM are considered candidate building materials for operations and maintenance in accordance with the standard O&M recommendations stated in The AHERA Management Plan and the EPA Manual known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

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

No asbestos containing debris, damaged and disturbed ACBM or other related asbestos material concerns were noted at the aforementioned materials. No asbestos-containing thermal system insulation piperuns were observed in the building. Asbestos abatement is not recommended or necessary at this time.

Thank you for the opportunity to perform the January, 2022 asbestos reinspection. Progress has been made since the AHERA Management Plan issuance and initial inspections. The Banks Elementary school areas are modern and new. Building materials are well maintained and no asbestos material safety concerns were noted. If there are any questions feel free to contact us at (503) 680-6398.

Respectfully,



Charles A. Spear
Partner
AHERA Inspector IRO-21-2439A

This reinspection of the Banks Elementary areas were performed on Monday, January 31, 2022 by Charles A. Spear. AHERA Inspector Certification No. IRO-21-2439A. The AHERA Inspector expiration date is March, 2020. All inspection / assessment activities were performed in accordance with the reinspection requirements of Part III 40 CFR Part 763. Asbestos-Containing Materials in Schools; Final Rule and Notice.

RESUME

**CHARLES ARTHUR SPEAR
REGISTERED ENVIRONMENTAL ASSESSOR
REA - 01241**

AHERA INSPECTOR (EPA CERTIFICATION NO. IRO-21-2439A)

**CERTIFIED ENVIRONMENTAL INSPECTOR
CEI - 10364**

Professional Background

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

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

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

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

Professional experience includes the following:

Professional Experience

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

Professional Employment/Consultation

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

Professional Education

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

Additional Education

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

Special Skills

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

Certification

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

REGULATIONS

Asbestos - Background

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

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

Regulatory Background

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

AHERA requires the following:

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

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

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

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

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

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

ACTIVITY

Background

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

The Banks elementary school classrooms, administrative areas, common areas, cafeteria, library, gymnasium, and hallways were examined for suspect ACM during the AHERA reinspection. Data forms were completed. The completed forms were edited for completeness and potential problem areas or areas requiring abatement or extensive repair were noted. Copies of the forms are attached for review and reference and generally represent a condition evaluation and summary of the potential homogeneous sampling areas and functional space areas. No concerns were noted regarding all examined ACM.

REINSPECTION

Charles A. Spear conducted a triennial asbestos reinspection of the Banks elementary school areas on Monday, January 31, 2022. Actual field activities included blueprint and/or facility floor plan review; an interview with the maintenance supervisor; and a physical reinspection examination of all suspect and confirmed friable and non-friable asbestos-containing building materials at the subject Banks administrative areas. The Banks classrooms, gymnasium, library, hallways, common rooms, and offices are well maintained.

The accredited EIS inspector performed a preliminary examination of the subject structure. The AHERA inspector confirmed the existence of suspect asbestos-containing building materials (ACBM) such as vinyl floor tiles; moulding mastic adhesives; skim coat plaster applications on sheet rock; office wall and ceiling surfaces, and acoustic ceiling tiles ceiling tile adhesives, and miscellaneous and cementitious materials.

All accessible areas to include The Banks elementary boiler room, hallways, common rooms, classroom areas, restrooms, and storage rooms and stairwells were examined for suspect ACBM during the AHERA reinspection. All the aforementioned functional areas were visibly inspected during this AHERA reinspection. No significantly damaged ACBM was observed during there inspections.

The Banks elementary Building walkover revealed all asbestos-containing materials to be candidate building materials for Operations and Maintenance. The original AHERA Management Plan confirmed asbestos in several forms. Operations and Maintenance is recommended for all confirmed and suspected asbestos-containing materials to include vinyl tiles ; ceiling tiles; and miscellaneous materials. No ACBM concerns were noted for the aforementioned materials. Asbestos abatement is not recommended for the subject facility ACBM at this time. Minor repair of damaged areas is adequate and protective.

All the aforementioned materials are in good condition and candidate materials for Operations and Maintenance. No noteworthy damages or disturbances of ACBM were observed. These materials have low potential for damage with no influence of vibration or potential for air erosion.

SUMMARY OF FRIABLE / NONFRIABLE ACBM

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

1.0 Vinyl Asbestos Tile (VAT) Non-Friable

Varieties of suspect resilient floor coverings to include the classrooms, entry rooms, hallways, common rooms, were noted in the school. (Refer to sheet No. 4 for details).

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

AHERA Classification-Miscellaneous

COVE-BASE ADHESIVE

Cove-base mastic adhesive was observed on floor moulding within various functional spaces of the admin areas. The moulding is otherwise intact and in good condition. No samples were collected in moulding mastics. No samples were collected in moulding mastics. (Refer to data sheets No.3 for details).

TAPE JOINT COMPOUND

Tape joint compound was noted throughout the admin area wall surfaces in areas of sheet rock joints. This compound is typically applied to taped joints applied between sheet rock wall surfaces. Tape joint compound exists on sheet rock panels throughout the subject building. The compound usage was extensive and is likely throughout the entire structure original pre-1980 wall panel tape joints. The compound is in good condition, sealed and or encapsulated, and a candidate building material for operations and maintenance.

Products not utilized as TSI or surfacing materials are classified as miscellaneous materials. Materials such as transite pipe, ceiling tiles, fire doors, gaskets, vinyl floor coverings, duct work flexible connections, roofing felt, roofing flashing, and fume hood ducting and paneling are miscellaneous materials. These miscellaneous materials were not observed in various areas of the subject building as noted in data sheets. Samples were not collected from suspect ACM.

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

2.0 Thermal System Insulation (TSI)

AHERA Classification - TSI

No Thermal system insulation (TSI) was observed on-site.

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

3.0 Acoustic ceiling Tiles, Suspect - Non Friable Miscellaneous

one foot square ceiling tiles were observed as the ceiling covering in the offices, converted classrooms, main areas, storage rooms and conference room. No samples were collected from ceiling tiles or mastics. No specific ceiling tile quality concerns were noted. No problematic ceiling tiles were observed on ceiling surfaces throughout the building. No problematic ceiling tiles were observed on ceiling surfaces throughout the building. (Refer to datasheet No. 5 for details).

Fibrous acoustical ceiling tiles, varying in size from one foot square to two by four foot lengths. Fibrous material integrated with cellulose binder and directly adhered to ceiling surfaces. The material in most classrooms is in good condition. Ceiling tiles are easily damaged and may create a dust hazard if the material is broken, abraded, cut, or drilled. Acoustical ceiling tiles were observed on ceiling surfaces in the admin office areas. The adhesive tabs to the tiles are suspect ACBM and are candidate building materials for in-place operations and maintenance. No ceiling tile or mastic concerns were noted.

4.0 Adhesive mastic

Cove-base mastic adhesive was observed on floor moulding within various functional spaces throughout the subject admin building. Edge wear was noted in other minor areas in the building. The moulding is otherwise intact and in good condition. No samples were collected in moulding mastics. (Refer to data sheet No.3).

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

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

(5.0) - Sprayed-on acoustic popcorn ceiling materials

No suspect popcorn ceiling materials were observed within the subject building. Popcorn ceiling materials are an acoustic sprayed-on application spray applied to ceiling sheet rock surfaces as an acoustic material.

RECOMMENDATIONS AND CONCLUSIONS

All observe flooring, wall and ceiling materials were observed to be in good condition.

All materials are candidate building materials for Operations and Maintenance. Asbestos abatement of confirmed asbestos-containing building materials is not recommended at this time. EIS noted no concerns.

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

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

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

LIMITATIONS

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

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

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

APPENDIX 1.0

SITE PLAN

APPENDIX 2.0

RECORDING FORMS FOR ASSESSMENT DATA

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING Banks Elementary FLOOR MAIN
FUNCTIONAL AREA throughout HOMOGENEOUS MATERIAL tape joint cpd
TYPE OF SUSPECT MATERIAL SURFACING X TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL _____

APPROXIMATE AMOUNT OF MATERIAL (SF) 710K (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING _____ TSI _____ MISC X FLOOR _____ CEILING _____

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 710K (LF) _____

FRIABLE: _____ (YES) _____ (NO) _____

NON-FRIABLE _____ (YES) X (NO) _____

WARNING LABELS _____ (YES) _____ (NO) X

CHANGE FROM INITIAL AHERA REPORT _____ (YES) _____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION _____ PHYSICAL X WATER _____ FIRE _____

EXTENT OF DAMAGE: LOCALIZED _____ DISTRIBUTED X

PERCENT OF DAMAGE: 0% _____ 1-10% X 10-25% _____ 25-100% _____

OVERALL RATING: GOOD X FAIR _____ POOR _____

DESCRIPTION: intact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____

POTENTIAL FOR CONTACT: _____ HIGH _____ MODERATE _____ LOW X

INFLUENCE OF VIBRATION: _____ HIGH _____ MODERATE _____ LOW X

POTENTIAL FOR AIR EROSION: _____ HIGH _____ MODERATE _____ LOW X

OVERALL RATING: _____ HIGH _____ MODERATE _____ LOW X

DESCRIPTION: Candidate for in-place operations and maintenance

LOCATION IN AIR PLENUM: YES X NO _____

Operations and Maintenance OPM

INSPECTOR: Charles Spear ACCREDITATION NO. IAA-21-2439A

SIGNATURE: Charles Spear DATE: 11/3/22

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING BANKS Elementary FLOOR MAIN
FUNCTIONAL AREA throughout HOMOGENEOUS MATERIAL textured plaster

TYPE OF SUSPECT MATERIAL SURFACING X TSI _____
FLOORING _____ CEILING _____ WALLS X OTHER _____
DESCRIPTION OF MATERIAL textured plaster

APPROXIMATE AMOUNT OF MATERIAL (SF) 71012 (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING _____ TSI _____ MISC X FLOOR _____ CEILING _____

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 71012 (LF) _____

FRIABLE: _____ (YES) _____ (NO) _____
NON-FRIABLE _____ (YES) X (NO) _____
WARNING LABELS (YES) _____ (NO) X
CHANGE FROM INITIAL AHERA REPORT (YES) _____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION _____ PHYSICAL X WATER _____ FIRE _____
EXTENT OF DAMAGE: LOCALIZED _____ DISTRIBUTED X
PERCENT OF DAMAGE: 0% _____ 1-10% X 10-25% _____ 25-100% _____
OVERALL RATING: GOOD X FAIR _____ POOR _____
DESCRIPTION: interact

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: _____ HIGH _____ MODERATE _____ LOW X
INFLUENCE OF VIBRATION: _____ HIGH _____ MODERATE _____ LOW X
POTENTIAL FOR AIR EROSION: _____ HIGH _____ MODERATE _____ LOW X
OVERALL RATING: _____ HIGH _____ MODERATE _____ LOW X

DESCRIPTION: Candidate for in-place operations and maintenance
LOCATION IN AIR PLENUM: YES X NO _____
Operations and Maintenance OP&M

INSPECTOR: Charles Spear ACCREDITATION NO. IMO-21-2439A
SIGNATURE: Charles Spear DATE: _____

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING BANKS Elementary FLOOR MAIN
FUNCTIONAL AREA Throughout HOMOGENEOUS MATERIAL MOULDING mastics

TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING _____ WALLS _____ OTHER x
DESCRIPTION OF MATERIAL _____

APPROXIMATE AMOUNT OF MATERIAL (SF) _____ (LF) > 10K

REINSPECTION DATA :

ACBM TYPE: SURFACING _____ TSI _____ MISC x FLOOR _____ CEILING _____

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) _____ (LF) > 10K

FRIABLE: _____ (YES) _____ (NO) _____
NON-FRIABLE _____ (YES) _____ (NO) x
WARNING LABELS _____ (YES) _____ (NO) x
CHANGE FROM INITIAL AHERA REPORT _____ (YES) _____ (NO) x

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION _____ PHYSICAL x WATER _____ FIRE _____
EXTENT OF DAMAGE: LOCALIZED _____ DISTRIBUTED x
PERCENT OF DAMAGE: 0% _____ 1-10% x 10-25% _____ 25-100% _____
OVERALL RATING: GOOD x FAIR _____ POOR _____
DESCRIPTION: OFM

POTENTIAL FOR DISTURBANCE: ACCESSIBLE x INACCESSIBLE _____
POTENTIAL FOR CONTACT: _____ HIGH _____ MODERATE _____ LOW x
INFLUENCE OF VIBRATION: _____ HIGH _____ MODERATE _____ LOW x
POTENTIAL FOR AIR EROSION: _____ HIGH _____ MODERATE _____ LOW x
OVERALL RATING: _____ HIGH _____ MODERATE _____ LOW x

DESCRIPTION: Candidate for in-place operations and maintenance
LOCATION IN AIR PLENUM: YES x NO _____
Operations and Maintenance OFM

INSPECTOR: Charles Spear ACCREDITATION NO. IAO-21-2439A
SIGNATURE: Charles Spear DATE: 1/31/22

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING BANKS elementary FLOOR MAN
 FUNCTIONAL AREA throughout HOMOGENEOUS MATERIAL vinyl tile
 TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
 FLOORING x CEILING _____ WALLS _____ OTHER _____
 DESCRIPTION OF MATERIAL 1' vinyl tile
 APPROXIMATE AMOUNT OF MATERIAL (SF) 7100 (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING _____ TSI _____ MISC _____ FLOOR x CEILING _____

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 7100 (LF) _____
 FRIABLE: _____ (YES) _____ (NO) _____
 NON-FRIABLE _____ (YES) x (NO) _____
 WARNING LABELS _____ (YES) _____ (NO) x
 CHANGE FROM INITIAL AHERA REPORT _____ (YES) _____ (NO) x

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION _____ PHYSICAL x WATER _____ FIRE _____
 EXTENT OF DAMAGE: LOCALIZED _____ DISTRIBUTED x
 PERCENT OF DAMAGE: 0% _____ 1-10% x 10-25% _____ 25-100% _____
 OVERALL RATING: GOOD x FAIR _____ POOR _____
 DESCRIPTION: in bot

POTENTIAL FOR DISTURBANCE: ACCESSIBLE x INACCESSIBLE _____
 POTENTIAL FOR CONTACT: _____ HIGH _____ MODERATE _____ LOW x
 INFLUENCE OF VIBRATION: _____ HIGH _____ MODERATE _____ LOW x
 POTENTIAL FOR AIR EROSION: _____ HIGH _____ MODERATE _____ LOW x
 OVERALL RATING: _____ HIGH _____ MODERATE _____ LOW x
 DESCRIPTION: Candidate for in-place operations and maintenance
 LOCATION IN AIR PLENUM: YES x NO _____
 Operations and Maintenance 084

INSPECTOR: Charles Spear ACCREDITATION NO. FD-21-24394
 SIGNATURE: Charles Spear DATE: 11/31/2

RECORDING FORM FOR ASBESTOS ASSESSMENT DATA

BUILDING BANKS Elementary FLOOR 1st
FUNCTIONAL AREA Throughout HOMOGENEOUS MATERIAL ceiling tiles 11x11"

TYPE OF SUSPECT MATERIAL SURFACING _____ TSI _____
FLOORING _____ CEILING X WALLS _____ OTHER _____
DESCRIPTION OF MATERIAL 9" ceiling tiles

APPROXIMATE AMOUNT OF MATERIAL (SF) 7100 (LF) _____

REINSPECTION DATA :

ACBM TYPE: SURFACING _____ TSI _____ MISC _____ FLOOR _____ CEILING X

DESCRIPTION

APPROXIMATE AMOUNT OF MATERIAL _____ (SF) 7100 (LF) _____
FRIABLE: _____ (YES) _____ (NO) _____
NON-FRIABLE _____ (YES) X (NO) _____
WARNING LABELS _____ (YES) _____ (NO) X
CHANGE FROM INITIAL AHERA REPORT _____ (YES) _____ (NO) X

PHYSICAL CONDITION:

TYPE OF DAMAGE: DETERIORATION _____ PHYSICAL X WATER _____ FIRE _____
EXTENT OF DAMAGE: LOCALIZED _____ DISTRIBUTED X
PERCENT OF DAMAGE: 0% _____ 1-10% _____ 10-25% X 25-100% _____
OVERALL RATING: GOOD X FAIR _____ POOR _____
DESCRIPTION: _____

POTENTIAL FOR DISTURBANCE: ACCESSIBLE X INACCESSIBLE _____
POTENTIAL FOR CONTACT: _____ HIGH _____ MODERATE _____ LOW X
INFLUENCE OF VIBRATION: _____ HIGH _____ MODERATE _____ LOW X
POTENTIAL FOR AIR EROSION: _____ HIGH _____ MODERATE _____ LOW X
OVERALL RATING: _____ HIGH _____ MODERATE _____ LOW X

DESCRIPTION: Candidate for in-place operations and maintenance
LOCATION IN AIR PLENUM: YES X NO _____
Operations and Maintenance _____

INSPECTOR: Charles Spear ACCREDITATION NO. F100-21-2439A
SIGNATURE: Charles Spear DATE: 1/31/22

APPENDIX 3.0
REGULATIONS

THIS IS TO CERTIFY THAT

CHARLES SPEAR

HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE

for

ONLINE AHERA ASBESTOS INSPECTOR REFRESHER

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 02/23/2021

Course Location: Portland, OR

Certificate: IRO-21-2439A



4-Hour Online AHERA Inspector Refresher Training; AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

Expiration Date: 02/23/2022

For verification of the authenticity of this certificate contact:

PBS Engineering and Environmental Inc

4412 S Corbett Avenue

Portland, Oregon 97239

503.248.1939

A handwritten signature in black ink that reads "Andy Fridley".

Andy Fridley, Instructor

Asbestos Survey Requirements

All commercial buildings regardless of construction date and residential buildings constructed before 2004 must have an asbestos survey conducted by an accredited inspector prior to any demolition or renovation activities.

A copy of the asbestos survey report must be on-site during all renovation or demolition activities, and must be provided to DEQ upon request.

Owner occupants of a single family home performing their own home renovation project are exempt from the asbestos survey rule. However, DEQ recommends owner occupants have an asbestos survey performed or take samples of suspect materials and send to a lab for analysis prior to renovation projects even though it's not required. Owner occupants are required to follow all asbestos packaging, labeling and disposal requirements, and lab analysis is the only way to identify if asbestos is present in materials.

Demolition and renovation

Demolition is defined as wrecking that involves the removal of any load-supporting component or intentional burning.

Renovation is defined as altering one or more building components that does not involve removing a load-supporting component. Renovation includes the replacement, stripping, or repair of building components, such as mechanical ventilation systems, pipes, ceilings, walls, flooring, and insulating materials.

Who can perform the survey and produce the asbestos survey report?

Only an accredited AHERA inspector may perform the asbestos survey and produce an asbestos survey report.

For training courses, contact PBS Environmental Building Consultants at 503-248-1939 or Asbestos Training Project at 503-233-7707.

What does the survey involve?

DEQ generally requires a sample of each type of material suspected to contain asbestos to be collected and analyzed at a laboratory before any demolition or renovation activity.

When complete demolition or extensive renovation is planned, an asbestos survey of the entire facility is required. When partial

renovation is planned, such as a kitchen remodel, a survey is required for that area of the structure only. If a single material, such as sheet vinyl flooring is to be removed, then an accredited inspector must take a sample of each layer of flooring and have it analyzed. Alternatively, the material can be presumed to contain asbestos, in which case it must be treated, removed, handled, managed, transported and disposed of as asbestos-containing material.

An asbestos survey report includes all of the following:

- Dates the asbestos survey was performed
- A copy of the accredited inspectors certificate and their phone numbers
- The project site address and location where the survey was performed
- The facility owner or operator's name and phone
- Description of the facility and area surveyed, including past and current use, area square footage, approximate construction date and number of floors
- The purpose of the asbestos survey
- Description of any limitation of the asbestos survey
- A table listing all of the materials sampled and identified as asbestos-containing or presumed asbestos-containing including the percent asbestos and type of asbestos, description of the material color, texture and pattern, the location of the material, description of the material condition as in good condition or in poor condition, identification of the material as friable or nonfriable and the approximate quantity of the material;
- A recommended response action
- A complete copy of the laboratory report including the laboratory name, address and phone number, unique sample analysis identification number, bulk sample analysis results, name of the analyst and the completed chain of custody for the samples.

Additional information

Visit www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Asbestos-Information.aspx

Find all DEQ's asbestos requirements in [Oregon Administrative Rules 340, Division 248](#).

An asbestos survey may not be required if the project meets certain conditions. If you have



State of Oregon
Department of
Environmental
Quality

Asbestos Program

Contact Information:

Clackamas, Clatsop, Columbia, Multnomah, Tillamook and Washington Counties, call the **Northwest Region – Portland Office** at 503-229-5982, 503-229-5364 or 800-452-4011.

Benton, Lincoln, Linn, Marion, Polk and Yamhill Counties, call the **Western Region – Salem Office** at 503-378-5086 or 800-349-7677.

Jackson, Josephine and Eastern Douglas Counties, call the **Western Region – Medford Office** at 541-776-6107 or 877-823-3216.

Coos, Curry and Western Douglas Counties, call the **Western Region – Coos Bay Office** at 541-269-2721, ext. 222.

Crook, Deschutes, Harney, Hood River, Jefferson, Klamath, Lake, Sherman and Wasco Counties, call the **Eastern Region – Bend Office** at 541-633-2019 or 866-863-6668.

Baker, Gilliam, Grant, Malheur, Morrow, Umatilla, Union, Wallowa and Wheeler Counties, call the **Eastern Region – Pendleton Office** at 541-278-4626 or 800-304-3513.

Lane County, call the **Lane Regional Air Protection Agency** at 541-736-1056.

questions or need technical assistance, contact asbestos program staff.

Contact a professional asbestos abatement contractor with any concerns about proper asbestos removal.

If asbestos-containing materials are disturbed or mishandled, the public and the environment may be exposed to asbestos fibers. Violations of asbestos rules and statutes may subject the property owner or operator or the contractor to civil penalties.

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.

An official website of the United States government.

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

Close



Asbestos and School Buildings

Public and non-profit private schools have distinct regulatory requirements to protect school children and school employees from asbestos exposure. This page provides information on these requirements as well as resource materials for schools and parents.

- [Learn Federal Requirements](#)
 - [How Schools Comply with the Asbestos Hazard Emergency Response Act \(AHERA\)](#)
 - [School Asbestos Management Plans](#)
- [Find Resources for Schools and Parents](#)
- [En Español, Información para padres, maestros y otros empleados escolares](#)

Learn Federal Requirements

The [Asbestos Hazard Emergency Response Act \(AHERA\)](#) and its regulations require public school districts and non-profit schools including charter schools and schools affiliated with religious institutions to:

- Inspect their schools for asbestos-containing building material
- Prepare management plans and to take action to prevent or reduce asbestos hazards

These legal requirements are founded on the principle of "in-place" management of asbestos-containing material. Removal of these materials is not usually necessary unless the material is severely damaged or will be disturbed by a building demolition or renovation project.

Personnel working on asbestos activities in schools must be trained and accredited in accordance with [The Asbestos Model Accreditation Plan](#).

In addition, if removal of asbestos during renovation is warranted, or school buildings will be demolished, public school districts and non-profit schools must comply with the [Asbestos National Emissions Standards for Hazardous Air Pollutants \(NESHAP\)](#).

[Read more about NESHAP regulations for renovation and demolition of buildings.](#)

In addition, state and local agencies may have more stringent standards than those required by the Federal government.

How Schools Comply with the Asbestos Hazard Emergency Response Act (AHERA)

The AHERA regulations require public school districts and non-profit schools to:

- Perform an original inspection to determine whether asbestos-containing materials are present and then re-inspect asbestos-containing material in each school every three years
- Develop, maintain, and update an asbestos management plan and keep a copy at the school
- Provide yearly notification to parent, teacher, and employee organizations on the availability of the school's asbestos management plan and any asbestos-related actions taken or planned in the school
- Designate a contact person to ensure the responsibilities of the public school district or the non-profit school are properly implemented
- Perform periodic surveillance of known or suspected asbestos-containing building material
- Ensure that trained and licensed professionals perform inspections and take response actions
- Provide custodial staff with asbestos-awareness training

School Asbestos Management Plans

Public school districts and non-profit schools are required to develop, maintain and update asbestos management plans and to keep a copy at each individual schools. These plans are required to document the recommended asbestos response actions, the location of the asbestos within the school, and any action taken to repair and remove the material.

The school authority must maintain records to be included in the Asbestos Management Plan. These records, among other things, include:

- Name and address of each school building and whether the building has asbestos-containing building material, and the type of asbestos-containing material
- Date of the original school inspection
- Plan for re-inspections
- Blueprint that clearly identifies the location of asbestos-containing building materials that remains in the school
- Description of any response action or preventive measures taken to reduce asbestos exposure
- Copy of the analysis of any building, and the name and address of any laboratory that sampled the material
- Name, address, and telephone number of the "designated person" or contact to ensure the duties of the school district or non-profit private school are carried out
- Description of steps taken to inform workers, teachers, and students or their legal guardians about inspections, re-inspections, response actions, and periodic surveillance

Parents, teachers, and school employees, or their representatives, have the right to inspect the school's asbestos management plan. Schools are required to notify parent-teacher organizations (such as PTAs) once a year about the availability of the school's asbestos management plan and asbestos-related activity taking place within the school. The school must make the plan available for inspection within five working days of it being requested.

For a complete list of School Asbestos Management Plan Requirements, see the [Asbestos-Containing Materials in Schools Rule](#).

Find Resources for Schools and Parents

[How to Manage Asbestos in School Buildings: The AHERA Designated Person's Self Study Guide](#) (January 1996)

[AHERA Asbestos Management Plan Self-Audit Checklist for Designated Persons](#) (February 2009)

[Model AHERA Asbestos Management Plan for Local Education Agencies](#) (February 2009)

[The ABC's of Asbestos in Schools](#) (August 2003)

[Asbestos in Schools Fact Sheet](#) (August 2003)

[EPA's Creating Healthy Indoor Environments in Schools Website](#)

[What Local Education Agencies \(LEAs\) Should Know About the National Emission Standard for Hazardous Air Pollutants \(NESHAP\)](#) (March 2005)

[Find Labs for Testing Asbestos](#)

[Find frequent questions on schools](#)

En Español, Información para parientes, maestros y otros empleados escolares

[El ABC del Asbesto en las Escuelas](#)

[Plan de manejo de asbesto de AHERA. Lista de comprobación de auditoría interna para Personas designadas](#)

[Modelo AHERA para el Plan de manejo de asbesto para las Agencias locales de educación](#)

LAST UPDATED ON JUNE 14, 2018