

Office Locations: Newington, CT Fairfield, CT Boston, MA

August 31, 2005

Mr. John Calhoun Facilities Manager Environmental Services New Milford Public Schools 386 Danbury Road New Milford, CT 06776

RE: Three Year AHERA Asbestos Re-inspection and Management Plan Update Northville Elementary School New Milford, Connecticut EnviroScience Project No. 04-542.10

Dear Mr. Calhoun:

Enclosed is the report of the three-year AHERA asbestos re-inspection and management plan update conducted by EnviroScience Consultants, Inc. (EnviroScience) at the Northville Elementary School, New Milford, Connecticut. This report is an important document that must be kept on file at the school as well as at a central location where the Management Plans are preserved. Please review re-inspection form 2 in Appendix D and sign and date each form at the bottom.

If you have any questions regarding this report, please do not hesitate to contact me at (203) 333-8872 extension 3102. Thank you for this opportunity to have served your environmental needs.

Sincerely,

Matthew A. Myers

Manager, Hazardous Materials

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Enclosure

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Office Locations: Newington, CT Fairfield, CT Boston, MA

ASBESTOS HAZARD EMERGENCY RESPONSE ACT THREE-YEAR ASBESTOS REINSPECTION AND MANAGEMENT PLAN UPDATE FOR NORTHVILLE ELEMENTARY SCHOOL

PERFORMED BY

ENVIROSCIENCE CONSULTANTS, INC.
795 NORTH MOUNTAIN ROAD
NEWINGTON, CONNECTICUT 06111

For Compliance with
State of Connecticut, Department of Public Health
Regulation Regarding Asbestos-Containing Material in Schools
(19a - 333-1 through 19a - 333-13)

And EPA Asbestos Hazard Emergency Response Act (40 CFR Part 763)

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1.0 INTRODUCTION

This three-year asbestos re-inspection of the Northville Elementary School, New Milford, Connecticut was conducted in accordance with the requirements of the following regulations:

- (i) State of Connecticut Department of Public Health (CTDPH) Asbestos-Containing Materials in Schools regulation (19a-331-1 through 19a-333-13, Section 3 (b)).
- (ii) United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA) regulation (40 CFR Part 763, Section 763.85 (b)).

Mr. Dominick Fiore of EnviroScience Consultants, Inc. (EnviroScience) performed the reinspection on January 12, 2005. Mr. Fiore is an accredited Asbestos Inspector in the State of Connecticut (License No. 000299). During the re-inspection, the following required tasks were performed:

- 1. A visual re-inspection and reassessment of all friable known or assumed asbestos-containing building materials (ACBM).
- 2. A visual re-inspection of ACBM that was previously considered non-friable to determine if the present condition of the material has made it friable.
- 3. Identification and assessment of any homogeneous areas that contains newly friable ACBM.
- 4. A six-month periodic surveillance was also conducted to assess the condition of the assumed or verified asbestos containing materials.

2.0 BUILDING AND MECHANICAL SYSTEM DESCRIPTION

The Northville Elementary School is an education facility for grades K-6. The school was constructed in 1982. The building is constructed on a slab foundation with brick outer walls and a corrugated steel frame. The inner walls are constructed of cinderblock. Suspended ceilings exist in most areas of the building, resulting in a ceiling plenum space with water pipes and air ducts located near the ceiling deck areas.

Ventilation is provided by an air handling system, which draws air into return ducts and supplies air by means of air handling units located above the ceiling, forcing air into each room by means of supply ducts.

All areas of the school are serviced by a central boiler room. Heat is provided by one oil burning boiler, which conveys heat via hot water pipes that traverse the building through the ceiling plenum to radiators in the rooms.

3.0 RE-INSPECTION REPORT

3.1 Review of Records

An important part of this AHERA Re-inspection involved checking documentation that were required to be present at the school being inspected as well as at the central location where all management plans are preserved.

Please see Appendix A for details of our findings.

The Northville Elementary School was originally inspected for asbestos in August and September of 1986 by Jack S. Kozuchowski of Consulting Services. This inspection is known as the Asbestos Management Plan (AMP). During that survey the following four (4) materials were suspected of containing asbestos:

HOMOGENEOUS MATERIAL	LOCATION
Boiler stack insulation	Boiler room
Stage curtains	Cafeteria
Ceiling tiles (2 types)	Throughout the building
Floor tiles	Throughout the building

The boiler stack insulation and stage curtain were sampled, in triplicate, by Mr. Kozuchowski during the 1986 inspection. Asbestos was not detected during analyses.

The manufacturer of the ceiling tiles, The Armstrong Corp. (Armstrong) was contacted during the AMP inspection and was provided with lot numbers of the two types of ceiling tiles in the building. Both the "Cortega Minaboard" (lot #769A) and "Cortega Tegular Minatone (lot #704A) suspended ceiling tiles were verified by Armstrong as not containing asbestos.

The manufacturer of the floor tiles, The Armstrong-Marietta Corp. (Armstrong-Marietta) was also contacted regarding the asbestos content in each of the floor tiles used throughout the building*. Armstrong-Marietta's, Terry Hackman checked each lot number* and determined that none of these floor tiles contained asbestos:

*Tile Type and Lot Number

Excelon Tile #51855J8411 Pagoda Red #51842P769 Casa Orange #51843J8411 Imperial 22 #51855J841 White #5185J8311

As mentioned, this inspection was conducted in 1986 and will serve as the original AHERA inspection for the purpose of this 3-Year AHERA Asbestos Re-inspection. EnviroScience conducted the first 3-Year AHERA Asbestos Re-inspection in 1994.

Our 1994 re-inspection lists only thermal system insulation (TSI), in the boiler room, as suspect ACBM. The material was assessed as non-asbestos TSI and should be removed from the Operation & Maintenance (O&M) Plan.

An important part of this AHERA Re-inspection involved checking documentation that were required to be present at the school being inspected as well as at the central location where all management plans are preserved.

During the 1999 3-year AHERA inspection the following materials were assumed to contain asbestos and if in the future these materials might be impacted during renovation these materials would have to be sampled for asbestos content.

MATERIAL	LOCATION(S)
Transite panels	Interior below windows, especially at courtyards
Cove base and associated mastic	Throughout the school
Fire door insulation	Throughout the school, potentially in fire door cores
Gypsum wallboard and associated joint compound	Throughout the school
Glue daubs	Throughout the school, potentially behind blackboards, mirrors and ceiling tiles
Floor tile mastics	Throughout the school

3.2 <u>Re-inspection Summary</u>

The on-site portion of the re-inspection was documented on forms modeled after examples provided by USEPA and reviewed by the State of Connecticut Department of Public Health.

The first form, **Re-inspection Form 1A**, <u>abstracts inspection data gathered during the initial AHERA inspection</u> (see Appendix B). This form is useful to reference response actions (if any) which have been performed since the last inspection. It additionally provides the inspector a "quick glance" reference when performing the re-inspection.

The second EPA form, **Re-inspection Form 1B**, is used to list all known or assumed asbestoscontaining materials that were previously unidentified (see Appendix C). It also lists the ACBM in areas newly acquired by the school for student use, either permanently or temporarily.

The third EPA form, **Re-inspection Form 2**, was used to provide information and justification regarding <u>reassessment of the ACBM</u> (see Appendix D). This form also provides response action recommendation including a tentative schedule for completing response actions that recommended removal or repair.

The information obtained during this re-inspection was transmitted to Mr. Matthew Myers, an accredited Management Planner, so that response actions relative to the condition of the ACBM could be designed. Mr. Myers is a licensed Asbestos Management Planner in the State of Connecticut (License No. 000041).

3.3 Newly Identified or Re-sampled ACBM

The inspector revealed several items not mentioned on previous inspections, which may be ACBM. These items do not appear to have ever been sampled. Due to cost constraints and the destructive nature of some of the testing required, no samples of these materials were taken. These materials should be tested by a qualified individual on an 'as needed' basis before they are disturbed for renovation/demolition/modification. The following materials should be considered ACBM until analysis proves otherwise:

MATERIAL	LOCATION(S)
Sink undercoating	All classrooms
Vapor barrier and associated mastic	Under gymnasium floor

No bulk samples were taken. As previously mentioned, these materials should be tested before any maintenance/demolition occurs.

AHERA only covers interior ACBM. Therefore, exterior ACBM were not sampled. However, the following suspect ACBM were noted exterior to the building: caulking compounds and roofing materials.

Any suspect material encountered during renovation/demolition that is not specifically identified in this report as a non-ACM should be assumed to contain asbestos unless sample results prove otherwise.

3.4 Physical Assessment of ACBMs

During inspection, suspect ACBM were separated into three USEPA categories. These categories are thermal system insulation (TSI), surfacing ACBM, and miscellaneous ACBM. TSI includes all materials used to prevent heat loss or gain or water condensation on mechanical systems. Examples of TSI are pipe insulation, boiler insulation, duct insulation, and mudded insulation on pipe fittings. Surfacing ACBM is commonly used for fireproofing, decorative, and acoustical applications. Miscellaneous materials include all ACBM not listed in TSI or surfacing, such as linoleum, vinyl asbestos flooring, and ceiling tiles.

Finally, all ACBM is quantified in linear and/or square footage, depending on the nature of the material.

All ACBM identified during the inspection and still remaining in the school were reassessed using the State of Connecticut Department of Public Health and AHERA guidelines for assessment of ACBM. The assessment categories are listed as follows:

- 1 = Damaged or significantly damaged TSI ACBM
- 2 = Damaged friable surfacing ACBM
- 3 = Significantly damaged friable surfacing ACBM
- 4 = Damaged or significantly damaged friable miscellaneous ACBM

- 5 = ACBM with potential for damage
- 6 = ACBM with potential for significant damage
- 7 = Any remaining friable ACBM or friable suspected ACBM

Material locations, assessments, and recommended response actions are listed in the reinspection forms.

4.0 MANAGEMENT PLAN UPDATE

Based on the inspection report, physical walk-through inspection and existing condition of the ACBM, following response actions are recommended:

- 4.1 <u>Recommended Response Actions</u>
- 1. Removal

Not Applicable

2. Repair

Not Applicable

3. Enclosure

Not applicable

4. Encapsulation

Not applicable

5. Operations and Maintenance (O & M)

It should be noted that only locations with assessments of 1 or 2 are recommended for removal or repair. All remaining ACBM in the school shall be placed in an Operations and Maintenance (O & M) Program. The condition of such materials will be monitored until all the ACBM have been removed from the building. A successful O & M Program include the following elements:

a) <u>Cleaning</u>: All areas of the school where friable ACBM or friable suspected ACBM assumed to be ACBM are present shall be cleaned at least once after the completion of the initial inspection. Additional cleaning may be necessary if the Management Planner make a written recommendation indicating methods and frequency of such cleaning.

- b) O & M Activities: The LEA shall ensure that the procedures described below are followed to protect building occupants for any O & M activities that may disturb known or assumed ACBM:
 - (1) Restrict entry into the area either by physically isolating or by scheduling.
 - (2) Post warning signs to prevent entry by unauthorized persons.
 - (3) Shut off or temporarily modify the air-handling system.
 - (4) Use proper work practices and engineering controls such as wet methods, protective clothing, HEPA-vacuums, mini enclosures/ glove bags etc. to inhibit spread of fibers.
 - (5) Place all asbestos debris and other contaminated materials in a sealed, leak-tight container for eventual disposal.
- c) <u>Minor Fiber Release Episodes</u>: The LEA shall ensure that the procedures described below are followed in the event of a minor fiber release episode (i.e., disturbance of 3 linear/square feet or less of friable ACBM):
 - (1) Saturate the debris using wet method.
 - (2) Place the debris in a sealed leak-tight container and clean the area.
 - (3) Repair the area of damaged ACBM with materials such as asbestos-free spackling, plaster or insulation or seal with an encapsulant.
- d) <u>Major Fiber Release Episode</u>: The LEA shall ensure that the procedures described below are followed in the event of a major fiber release episode (i.e., disturbance of more than 3 linear/square feet of friable ACBM):
 - (1) Restrict entry into the area and post warning signs.
 - (2) Shut off or temporarily modify the air handling system to prevent spread of fibers to other areas of the school.
 - (3) The response for any major fiber release episode must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions.
 - (4) The LEA shall notify the CTDPH of any major fiber release episode within twenty-four hours of its occurrence and, if necessary, provide written notification as required by applicable federal and/or state regulations.

4.2 Periodic Surveillance

At least once every six (6) months after a management plan is in place, the LEA shall conduct periodic surveillance in the school that contains ACBM or assumed to contain ACBM. The person conducting periodic surveillance shall visually inspect all areas in the school that have been identified in the management plan as having ACBM, record the date of surveillance, his/her name, and any changes in the condition of the materials and submit the record to the LEA Designated Person for inclusion in the management plan.

Please see Appendix E for Periodic Surveillance Form that may be used for conducting periodic surveillance.

4.3 <u>Preventive Measures</u>

The LEA shall institute appropriate preventive measures to eliminate the reasonable likelihood that the ACBM will become damaged, deteriorated or delaminated.

Please see Appendix F for preventive measures designed for various types of ACBM that may exist in the school.

5.0 EPA CERTIFICATION REQUIREMENTS

The certificates and the licenses for the individuals (Dominick Fiore and Matthew Myers) involved in performing the re-inspection and updating the management plan are provided in Appendix G.

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CHECKLIST FOR EXISTING RECORDS

Local	Education Agency (LEA): Administration Building New Milford, Connecticut		
Scho	ol Building: Northville Elementary School		
centr	following documentation is required to be present in both the LEA's Officalized location in the administrative office of the school. The information shall be verified to be present and complete as part of three year re-i	n include	d in this
	DOCUMENTATION	LOCA	TION
		School	LEA Office
1.	Original AHERA Inspection/Management Plan	Yes	Yes
2. 3.	Three year Re-inspection (First)	Yes	Yes
3.	Three year Re-inspection (Second)	Yes	Yes
4.	Notifications to Parents/Guardians and Teachers (yearly since last re-inspection)	No	No
5.	Designated Person Identified and Proper Training (person must be named and have appropriate training)	No	No
6.	Designated Person Periodic Surveillance (every six months since last re-inspection)	No	No
7.	Record of Awareness Training for Maintenance Staff	No	No
8.	Outside Vendor Awareness Notification	No	No
9.	Warning Signs and Labels (required posting in Boiler room and mechanical spaces only)	No	No
10.	Record of Response Actions (includes any abatement done since last re-inspection)	No	No
Com	ments:		
Inspe	ector: Dominick Fiore Date: 02	2/21/05	

Reinspection Form 1 (A) - List of ACM Asbestos-Containing Materials

School NUCTHVILLE ELEM Building

Date(s) of Original AHERA Inspection

1990

Response actions taken/	renovalions/other comments						
	recorded locations	Blog interior Letters Windows Coperating	Throughou t	The About	Throughant	Thoughout	Throughout
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Material	Category	TSI Surf. Misc.)	TSI Surf. Misc.			Surf. (Misc.)	Surf. Misc.
Homogeneous sampling areas	Material description	Transite Parkus	tove base(s) + Assoc mastic(s)	FICE Door	Sypsum wallocard Assoc. Joint compul	Black board / Taillings, MICTOR	Floor Fie MASTICS
Flomogen	Sample number	Acom					\rightarrow

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 friable surfacing ACBM, 4 = Dannaged or significantly dannaged friable miscellaneous ACBM, 5 = ACBM with potential
 for dannage, 6 = ACBM with potential for significant dannage, 7 = Any remaining friable ACBM or friable suspected

Date 01-12-65

Reinspection Form 1 (B) - New Suspect Asbestos-Containing materials previously unidentified

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		TSI Surf. Misc.		r R F			
		TSI Surf. Misc.		F AN			
		TSI Surf. Misc.		r Z			
Inspected by_	Inspected by Donning France				Date	1/2/05	

Friability: F = friable, NF = nonfriable

AHERA assessment category:

I = Damaged or significantly damaged TSI ACBM, 2 = Damaged friable surfacing ACBM, 3 = Significantly damaged friable surfacing ACBM, 4 = Damaged or significantly damaged friable miscellaneous ACBM, 5 = ACBM with potential for significant damage, 7 = Any remaining friable ACBM or friable suspected ACBM

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Building Northwile Eleun Date(s) of Reinspection 1D Number Reinspection Form 2. Reinspection of ACBM: Findings and Management Planner Recommendations Transite panels Homogeneous Sampling Area: Material Description School New Markors

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Were additional samples of this ACBM collected?	is ACBM co	llected? Yes	oN s		Date of Management Planner review:		128/05
Inspectors name	OMINICK (MICK	4	0,00		Management Planner name Mo. C. Mew Uses	(Chew	2
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I, the LEA's Designated Person, have read and understood the recommendations made above:	on, have reac	i and underst	ood the reconn	nendations made above:	Davie:		

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Inspector signature Down McK From	Management Planner signature
Accreditation #/State 000 297	Accreditation #/State 200041
Expiration date 04-30-05	Expiration date 04. 30.05
I, the LEA's Designated Person, have read and understood the recommendations made above:	Date:

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Complete MANAGEMENT PLANNER RECOMMENDATIONS Management Planner name MAECHOW MYERS Management Planner signature روير Accreditation #/State OOOO+/Begin Date of Management Planner review: Date(s) of Reinspection Dale: Preventive measures Z TO Expiration date 1D Number Reinspection Form 2. Reinspection of ACBM: Findings and Management Planner Recommendations School / Vew Miltors Building Northville Elem.
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Reinspection Form 2.	Reinspecti	on of ACBM	: Findings an	Reinspection Form 2. Reinspection of ACBM: Findings and Management Planner Recommendations			
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Inspector signature	2000	1, 2,	J. W.	9	Management Planner name / Proceedings		
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PERIODIC SURVEILLANCE FORM

Local Education Agency (LEA):	LEA): New Milford Public Schools, 386 Danbury Road, New Milford, CT	ols, 386 Dan	oury Road, l	New Milford	,CT	1
Facility Address: No	Northville Elementary School					
11: 03						
Date of Surveillance:	ACBM DA	ACRM DAMAGE REPORT	TaOd		1	
Asbestos Containing Material	Location	Previous Condition	Present Condition	Change in Condition (Yes/No)	Quantity Damaged	Comments
Transite panels	Interior below windows, especially at courtyards					
Wall/cove base and associated mastic	Throughout the school					
Insulation in Fire Doors	Potentially in doors throughout the school					
Gypsum wallboard and associated joint compound	Throughout the school					
Glue daubs	Potentially behind blackboards, tackboards, and mirrors throughout the school					
Floor tile mastics	Throughout the school					
Vapor barrier and mastic	Under gymnasium wood floor		•			
Sink undercoating	All classrooms					
Conditions: G = Good			-			
D = Damaged SD = Significar	D = DamagedSD = Significant damage					
Surveillance conducted by:	y:					
	2	(Signature)				

PREVENTIVE MEASURES FOR VARIOUS ASBESTOS-CONTAINING MATERIALS

A. SURFACING MATERIALS

"Surfacing Materials" means materials in a school building that are sprayed-on, troweled-on, or otherwise applied to surfaces. These include sprayed-on fireproofing materials on structural members, ceiling and wall plasters, or other materials applied to surfaces for acoustical, fireproofing, or other purposes.

Surfacing Materials are generally considered friable and can release asbestos fibers if damaged by impact, air erosion, vibration, and/or water intrusion. The following procedures, when properly implemented, will reduce the potential for fiber release:

1. Sprayed-on fire-proofing

- a) Identify the materials and post warning signs on the laid-in or glued-in ceiling tile. If the decking is not covered, place the sign on the wall.
- b) Maintain the materials in intact state and undamaged condition. During winter, pigeons, squirrels and other rodents tend to roost in boiler/machine rooms and dislodge sprayed-on fireproofing on the decking. Prevent such possibilities.
- c) Prevent water leakage. If the material is significantly damaged, removal is the best option. For minor damage, enclosure is a temporary solution. Encapsulation of damaged sprayed-on fireproofing material is not recommended.
- d) Train the custodial people who are responsible for care and maintenance of surfacing materials. Please note that the repair/removal can only be performed by a licensed abatement contractor.

2. <u>Ceiling and wall plaster</u>

- a) Identify the materials and post warning signs.
- b) Maintain the materials in intact state and undamaged condition. Avoid storing/stacking on/near the materials to reduce contact damage.
- c) Prevent water leakage. If the material is significantly damaged, removal is the best option. For minor damage, repair or enclosure is a temporary solution.
- d) Train the custodial people who are responsible for care and maintenance of surfacing materials.

B. THERMAL SYSTEM INSULATION (TSI)

"Thermal System Insulation (TSI)" means insulating materials applied to pipes, pipe fittings, boilers, breechings, tanks, ducts, or other components to prevent process heat loss or gain, water condensation, or for other purposes (e.g., fire door insulation core).

TSI are generally considered friable asbestos-containing materials. This means they can be easily damaged, increasing the potential for fiber release. The following procedures, when properly implemented, will reduce the potential for fiber release:

1. Boiler and breeching insulation

- a) Identify the locations and label the boiler. Warning signs should be posted outside the boiler room.
- b) Reduce the likelihood of fiber release by ensuring that the insulation is not damaged. Avoid storing/stacking on/near the boiler to reduce contact damage.
- c) Maintain the insulation in intact state and undamaged condition. Repair damaged areas as soon as possible to prevent further deterioration. If repair is not feasible due to extensive damage/deterioration, remove the material.
- d) Train the custodial people who are responsible for care and maintenance of TSI.

 Please note that the repair/removal can only be performed by a licensed abatement contractor.

2. Pipe, pipe-fittings, tank and duct insulation

- a) Identify the locations and label the materials. Warning signs should be posted outside of rooms that have TSI materials.
- b) Reduce the likelihood of fiber release by ensuring that the materials are not damaged. Avoid storing/stacking near the materials to reduce contact damage.
- c) Maintain all TSI materials in intact state and undamaged condition. Inspect the protective jackets for damage. Repair damaged areas as soon as possible to prevent further deterioration. If repair is not feasible due to extensive damage/deterioration, remove the material.
- d) Train the custodial people who are responsible for care and maintenance of TSI.

 Please note that the repair/removal can only be performed by a licensed abatement contractor.

3. Fire door

- a) Identify the locations and label the materials.
- b) Since there may be a number of different types of fire doors throughout a building, fire door cores must be considered to have asbestos-containing interior insulation unless sample result prove otherwise. Prior to performing any maintenance on any door (lock change, drilling, etc.), the door should be surveyed by qualified personnel to rule out the existence of an asbestos core.
- c) Train the custodial people who are responsible for care and maintenance of TSI.

 Please note that the repair/removal can only be performed by a licensed abatement contractor.

C. MISCELLANEOUS MATERIALS

"Miscellaneous Materials" are all other asbestos-containing materials in a school building that do not fall under the categories of Surfacing Materials or TSI. These include floor tiles, floor tile and carpet mastic, gypsum wallboard and joint compound, ceiling tiles, glue daubs, transite panels, laboratory counter tops, wallbase and associated glue, window caulking and glazing compounds etc. The following maintenance procedures are recommended for these materials:

1. Vinyl Asbestos Floor Tiles (VAT)

Vinyl Asbestos Floor Tiles (VAT) are considered non-friable, however routine maintenance procedures such as spray-buffing, burnishing, wet scrubbing, and stripping can generate asbestos fibers. Following procedures, when properly implemented, will reduce the potential of fiber release:

- a) Do not sand, grind or abrade the tiles. Stripping of VAT should be done as infrequently as possible. When stripping becomes necessary, follow the appropriate work practices. Never perform dry stripping.
- b) During spray-buffing or burnishing the floor, operate the machine at the lowest workable speed and use the least abrasive pad. Use a wet mop for routine cleaning whenever possible.
- c) Routinely check whether chair and desk glides are in good condition and replace when necessary. Worn glides can gouge the floor and cause fiber release.
- d) Place carpets/floor mats in all entrances to reduce abrasion of floor tiles by sand and pebbles. During winter, have parking lots and walkways swept to the extent possible to avoid the tracking of salt and ice-melting compounds into the school by the students.
- e) Train the custodial people who are responsible for care and maintenance of VAT.

 Please note that the repair/removal can only be performed by a licensed abatement contractor.

2. Gypsum wallboard and joint compound assembly

- a) Since there may exist a number of different homogeneous assemblies in a building, all sheetrock/joint compound must be assumed to be ACBM unless sample result prove otherwise. If any specific areas are going to be disturbed, the material in that area should be sampled.
- b) Reduce the likelihood of fiber release by avoiding cutting or drilling holes through the sheetrock panels.

3. <u>Ceiling Tile and Glue Daubs</u>

- a) Reduce the likelihood of fiber release by limiting access to the area above the ceiling tiles. Maintain the ceiling tiles in undamaged condition. Replace any damaged or water-stained tile.
- b) If the ceiling tiles are negative for asbestos, sample and analyze the glue daubs to ascertain whether these are asbestos-containing before the tiles are replaced.

4. <u>Transite Panels, Laboratory Counter Tops, Window Caulking and Glazing Compounds</u>

- a) Reduce the likelihood of fiber release.
- b) Maintain transite panels, lab tabletops and window caulking and glazing compounds in undamaged condition.

5. <u>Carpet Glue, Blackboard/ Tack Board Glue, Sink Undercoating, Floor Tile Mastic,</u> Baseboard and <u>Mastic</u>

- a) Reduce the likelihood of fiber release by leaving base cove and carpets in place.
- b) Maintain carpets and base cove in good condition. Sample and analyze the glue and the mastic to ascertain whether these are asbestos-containing if the renovation activities are going to impact the carpet and the baseboard.

There are general work practices which apply to all schools in the school system.

- 1. Vinyl Asbestos Floor Tile (VAT). In many cases, the surface of the tile may appear abraded. Often, custodial employees will use abrasives to clean floor surfaces prior to the application of floor wax. This practice should be strongly discouraged, as it wears away the top surface, exposing the underlying matrix which may contain asbestos. Where a dull white finish is observed through the top surface of the tile, it indicates that damage to the tile has occurred.
- 2. Hammering or drilling through floor tile to fasten carpeting or other materials should be prohibited.
- 3. Chairs and desks should be equipped with rubber feet or gliders to reduce damage to the floor tile surfaces.
- 4. Efforts should be made to minimize storage of maintenance supplies in the portions of the boiler rooms nearby boilers, breeching, headers, or other areas which might be damaged. This applies specifically to items such as ladders, chairs, desks, and other large items which might damage the surface.
- 5. The storage of desks, chairs, and other school supplies in pipe tunnels or chases where there is ACM should be discouraged. In addition to limiting access, movement of these items may cause damage to the surface.

6. Where ladders are required in areas where thermal system ACBM has been documented, hinge-type ladders should be used if possible. Custodial employees are discouraged from leaning extension ladders against boilers, breeching, or headers.

Boiler Rooms often have asbestos containing materials such as pipe insulation, pipe fitting insulation, tank insulation, boiler insulation, firebrick, gaskets, spray applied fireproofing and wall and ceiling plaster. Damage to these materials can be caused by contact forces (ladders and equipment hitting the materials), water (leaks in boilers, pipes and tanks) and vibration forces. All personnel (custodians, maintenance, and outside contractors) entering boiler rooms must be made aware of the asbestos containing materials and exercise caution as to not damage or disturb these materials. The boilers are typically serviced by an outside boiler contractor. The routine maintenance activities must not disturb the asbestos containing materials. The designated person should be notified if planned work or routine maintenance may disturb the asbestos containing materials. The appropriate response action (removal, etc.) will be selected by a licensed management planner and project designer and performed by properly trained personnel prior to routine non-asbestos maintenance work beginning.

Tunnels and crawl spaces often have asbestos containing pipe and/or pipe fitting insulation throughout. Sometimes asbestos containing tank insulation, duct insulation and transite are also found in these areas. The area should be restricted to persons with sixteen-hour training and respiratory protection at a minimum if the insulation is in damaged condition. All damaged areas should be repaired and a clearance air test passed prior to occupancy by custodial staff or outside Contractors. Persons entering a tunnel and/or crawl space must be made aware of the types of asbestos containing materials in these areas and exercise extreme caution as to not damage these materials.

Asbestos containing spray applied fireproofing can often be found on metal I-beams above ceilings and behind walls in many schools. This material is a very friable and usually is also found on adjacent ceiling decks, piping and mechanical systems, etc. (over-spray) because of the method of original installation. The fireproofing is often not hidden behind walls or ceilings in mechanical and boiler rooms. Sometimes this material becomes dislodged (age, delamination, air plenum wind forces and gravity) and lands on drop, sheetrock or plaster ceilings. Caution should be exercised if someone has to do work above the ceilings or when replacing a specific section of a ceiling. Schools with common return air plenums have additional concerns of delaminating fireproofing and subsequent asbestos fiber release into the return air. The designated person and a licensed asbestos management planner and project designer should be notified if work involves disturbance of the ceiling or areas above the ceiling. The project designer should develop standard operating procedures and a project design is its found that exposure is possible through activities such as popping ceiling tiles, routine repair or maintenance activities above the lower ceilings or work involving the disturbance of the material directly (example - installing ducts, pipes, ceilings, computer lines, etc - scraping areas to hang product).

Asbestos containing ceiling tiles can be found in school buildings. These tiles are often covering older ceiling materials such as plaster or sheetrock and are typically 2x4', 2x2' and 1x1' in size. They are either supported by a metal grid system (drop ceiling), concealed spline, or glued in place. Special considerations must be given for glue adhered ceilings. The ceiling tile, glue daub and ceiling above (plaster, etc.) must all be considered as asbestos containing even if one is found not to contain asbestos. The ceiling tile is adhered to the glue daub that is adhered to the ceiling above and they usually can not be separated. A licensed asbestos abatement contractor should remove ceiling tiles that are within reach of building occupants and have a history of damage. Ceiling tiles that are "popped" on occasion to access areas above (for routine maintenance activities and due to small amounts of water damage) should be replaced with nonasbestos tiles or the potential for exposure should be examined through air testing in conjunction with a test containment. A licensed project designer should design a method for routine activities (portable pop-up containment, water, hepa-vac, respiratory protection, sixteen hour training, etc.). Asbestos containing ceiling tiles should be removed if work activity involves "popping" more than a few tiles. Running new computer lines, telecommunication systems, security systems, piping for sprinklers, large roof leaks, etc. all typically required moving many ceiling tiles throughout the school, therefore a licensed abatement contractor should remove the tiles prior to work by other contractors. Custodians, maintenance staff and outside contractors should be made aware of the locations of the asbestos containing ceiling tiles and in house work practices pertaining to them.

Asbestos containing pipe and/or pipe fitting insulation, duct insulation (commonly within reach in incinerator rooms, mechanical and air handling rooms and above ceilings in kitchens) roof drain insulation and vibration isolation cloth (on sections of metal ducts) are often located in chases, behind walls and above ceilings. Sometimes these materials are within reach of all building occupants (located below the ceilings in classrooms, corridors, stages, stairwells, etc.). Custodians, maintenance staff and contractors should be made aware of the presence of these materials. Persons working in these areas must exercise caution and not damage these materials. These asbestos containing materials should be removed or enclosed if they are within reach of most building occupants and damage has occurred in the past.

Asbestos containing hard and soft acoustical wall and ceiling plaster can exist throughout a building (corridors, classrooms, etc.) or only in limited areas such as a boiler room, auditorium, pool, etc. Asbestos containing hard plaster typically does not pose a threat to human health and safety unless deliberately disturbed. Activities such as drilling holes to run or hang wires and pipes, demolition of interior walls during renovation, removing glue daubs from plaster and water leaks can damage the material and result in a release of airborne asbestos fibers. Asbestos containing soft plaster can be damaged from the activities described above as well as contact damage from simply toughing the material. Asbestos containing fibers from soft plaster are dislodged from the light contact forces such as poking the materials with ones hand, pencils, pens, etc. Soft plaster should be removed immediately if it's located within reach of students (low ceiling in an auditorium, etc.). Outside contractors, custodial and maintenance staff must be made aware of the location of asbestos containing plaster and informed to avoid work practices that may disturb this material. The designed person and a licensed management planner and

project designer should select the response action required if planner work activities anticipate disturbance of the asbestos containing plaster.

Asbestos containing 9x9" and 12x12" floor tiles and underlying mastic are common throughout school buildings. It shall be assumed that all areas with carpeting have floor tile and mastic located below carpet unless the floor tiles and mastic were abated prior to the installation of the carpet. Custodians, maintenance staff and contractors other than licensed asbestos abatement contractors shall not be permitted to remove carpeting unless the floor tiles are not disturbed in the process (stay intact adhered to the sub-flooring). Areas with "newer" nonasbestos containing floor tiles shall be assumed to have a lower layer of asbestos containing floor tile and/or flooring mastic adhered to the underneath unless both the older tile and underlying mastic were abated prior to the installation of the newer tile and mastic. The "newer" tile must be considered an asbestos containing material if asbestos containing floor tile and/or mastic is adhered to the bottom of it. Floor tiles are typically not damaged unless they are losing adhesion to the substrate due to adhesion failure, age and water damage or through improper maintenance or work activities. The designated person shall be contacted if adhesion failure, are and/or water damage has occurred or if renovation work will disturb the material (drilling for pipe insulation, etc.). A licensed management planner will select the proper response action and a project designer will create a design if abatement is required. Maintenance activities should be standardized and training required in order to minimize possible fiber release during routine floor maintenance. OSHA requires the following:

- a) Sanding of floors is prohibited
- ii) Stripping of finishes shall be conducted using low abrasion pads at speed lower than 300 rpm and wet methods.
- Burnishing or dry buffing may be performed only on flooring which had sufficient finish so that the pad cannot contact the flooring material.

Some additional work practices are listed below:

- i) Stripping of floor coverings should be done as infrequently as possible (ex-annually)
- ii) Follow manufactures instructions and never perform dry stripping. Always use the least abrasive pad when stripping.
- iii) Sealing floors should be done through applying sever thin coats of high percentage solids finish.
- iv) Use the lowest rates of speed and least abrasive pads when spray-buffing or dry-burnishing floors
- v) Install floor matting at entrances (16-24 feet).

Asbestos containing materials in fire doors is typically inaccessible. These materials are often found in boiler and mechanical room doors as well as auditorium, library, café, kitchen and exterior doors. Sometimes these materials are also located in common doors used for classrooms, corridors, etc. Samples taken from any one door may not be representative of other doors in the facility. Prior to performing any maintenance or replacement of any door (lock

changes, planning, sanding, drilling, removal, etc.) the designated person should be notified and the specific door should be sampled by a licensed asbestos inspector. A licensed project designer will design the work procedures to be used for a specific work activity if the door materials are found to contain asbestos.

Asbestos containing electrical insulation is common in auditorium/stage light trays and as "pigtails" on spotlights. This material is often white and contains a high percentage of asbestos. Many schools also have these light trays and pigtails in storage or lying around the stage area. This material should be removed if no longer in use. The lighting insulation still in use should be removed and replaced if contact damage is likely. Black insulated wire and gray or black electrical box lining (paper like) sometimes contain asbestos. Custodians, maintenance staff, outside contractors, and parties (students, etc.) responsible for operating lighting with this insulation should be made aware of this material and practice work procedures that will not disturb it.

Many different mastics, glues and adhesives can contain asbestos. Common forms of these materials are carpet glue, flooring mastics (under tile, sheet flooring, linoleum and wood floors (gym)), ceramic tile adhesive, baseboard adhesive, ceiling and wall tile glue, daubs, chalkboard and bulletin board adhesives, etc. These materials are sometimes adhered to non-asbestos containing materials. These non-asbestos containing materials must be considered as asbestos containing because the mastic, glue or adhesive usually can not be separated from them. The custodians, maintenance staff and outside contractors must be made aware of any asbestos containing mastics, glues and adhesives prior to conducting activities that may disturb them. A licensed asbestos inspector must sample materials previously not analyzed for asbestos content prior to work activities that will disturb them. Only a licensed asbestos abatement contractor can remove asbestos containing materials (greater than 3 feet) and asbestos or non-asbestos containing materials bonded to them.

Sheetrock, taping/joint compound, wallboard, vinyl or sheet flooring and countertops, laboratory countertops and laboratory hoods can contain asbestos. Transite board is another common building product that contains asbestos. This material is typically found behind radiators, on exterior soffits, in laboratory products (tables, piping, hoods and exhaust ductwork) and on walls or ceilings. These materials are typically not a threat to human health and safety unless deliberately disturbed. Puncturing walls and ceilings, sawing countertops and laboratory hoods, etc. can release asbestos fibers into the air. Custodians, maintenance staff, and outside contractors must be made aware of these possible asbestos containing products and avoid work that will disturb them.

Exterior materials may also contain asbestos. Roofing and flashing materials, door and window caulking and glazing, soffits, entrance eves and overhangs, covered walkways, etc. may have asbestos containing materials. These materials must be sampled prior to their disturbance in order to determine the appropriate removal techniques and disposal requirements. Covered walkways and overhangs must be assumed to contain asbestos unless bulk sample results prove otherwise.

Some building materials may be found to contain less than one percent asbestos and therefore are not regulated by the federal or state asbestos regulations. However, demolition or renovation activities that disturb these materials can create possible OSHA violations if the PEL (permissible exposure limit) or (exposure limit) is exceeded. Plaster and ceiling tiles (containing less than one percent asbestos) undergoing demolition can exceed OSHA's standards as well as the State of Connecticut Re-occupancy Criteria. These building materials should be removed either as an asbestos containing material or under a semi-controlled environment (ex. — use a significant amount of water during demolition of the ceiling or wall in conjunction with air testing) to control possible airborne exposures to asbestos.

Newer building materials may also contain greater than one percent asbestos. Building additions, portable classrooms and building products installed during renovations after 1980 have occasionally been found to contain asbestos. Floor tiles and mastics, adhesives and glues, wall and ceiling materials, roofing materials, etc. should be samples prior to performing activities that will disturb them. Sampling can be avoided if the building architect signs a statement that the building materials do not contain asbestos or MSD sheets prove the corresponding materials are not asbestos containing.

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STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH

PURSUANT TO THE PROVISIONS OF THE GENERAL STATUTES OF CONNECTICUT
THE INDIVIDUAL NAMED BELOW IS LICENSED
BY THIS DEPARTMENT AS A

ASBESTOS CONSULTANT-INSPECTOR

DOMINICK FIORE

LICENSE NO. 000299 CURRENT THROUGH 04/30/06 VALIDATION NO. 03-144247

DOMINICK FIONE A Robert Alvin M.D., M.E.R. COMMISSIONER

EnviroScience Consultants, Inc.

795 North Mountain Road, Newington, CT 06111 - (860) 953-2700

This is to certify that

Dominick Fiore

3 Ivy Lane, Shelton, CT 06484 SS# 042-74-1243 has successfully completed the
4 Hr. Asbestos Inspector Refresher
Asbestos Accreditation under TSCA Title II
40 CFR Part 763

Frank Mills Alfull M

Principal Instructor

September 21, 2004

Date of Course

September 21, 2004: A-

Examination Date & Grade

Training Managey

AI-R-9/04-9

Certificate Number

September 21, 2005

Expiration Date

Certificate of Training

Awarded to

Dominick Fiore

042-74-1243 (DOB 4/27/67)

For successful completion of a 24 Hour, 3 Day

Asbestos Building Inspector Initial Training Course October 20 - 22, 1997

Required by OSHA and the EPA Revised MAP for accreditation under the TSCA Title 11 as self-certified by Trainer 4/4/94

Presented by

Mystic Air Quality Consultants, Inc. 1204 North Road, Groton, Connecticut

Certificate Number: 353 AIC

Exam Grade: 97%

Exam Date: 10/22/97

George Williamson, Training Director

Expiration Date: 10/22/98

erinicate Number: 333 AAC

Christopher J. Eident, CIH, CSP, RS



Concentra Medical Centers (CT) 32 Strawberry Hill Ct STAMFORD, CT 06902 Phone: (203) 325-7889 Fax: (203) 325-7977

PLHCP1 WRITTEN STATEMENT for RESPIRATORS (EMPLOYEE)

Service Date: 03/22/2005	Employee CSM:	042.74.4242
Employee Name:	Employee SSN:	042-74-1243
Fiore, Dominick		
Address:		
3 ivy Lane		
SHELTON CT 06484		
Employer: Enviro science		
You were evaluated in this office of your medical s	status related to your phy	sical capability
to wear a respirator. (Check $$ one that applies)		
There were no abnormal findings that would hamp	or your ability to perform vo	our job duties while wearing a respirator.
☐ The abnormal findings listed below were not relate	el your ability to portettir your ability to wearing a respirator bi	ut should be reported to your
personal physician for further evaluation.	to would a respect	,
personal physician for farther overestion.		_
	coninion that you: (Chec	– k√ ALL that apply)
Based upon the results of this evaluation it is my	Opinion that you. (Ones	7.00
ARE qualified to wear a respirator.		
Have the following restrictions concerning respiration	for usage:	
ARE NOT qualified to wear a respirator.		opert of his/her findings to
☐ Require further testing by your private physician v	on that a final decision	on your ability to wear a respirator can be made
Concentra Medical Centers (CT)	so that a linar decision to accommodate respirator	on your domy to store the t
Must wear Special prescription eye-wear needed	to accommodate respirator	
☐ Must use an Eye glass conversion kit. ☐ May need to shave Facial hair to assure tight sea	I on certain face masks.	
May need to shave Facial field to assure light see	TOTAL CONTRACTOR	
☐ Need to stop smoking.		
(Check V ALL that apply)		
The above individual HAS been examined for respirator fitness in accurate to the state of the st	ordance with 29 CFR 1910.134. This lin	nited evaluation is specific to respirator
use only. Employees should be instructed to report any difficulties in the	sing respirators of origings of any	
This evaluation included the Respiratory Questionnaire outlined in 29 The above individual HAS NOT been examined by me for respirator to the state of the state	itness. The employee's medical evalua	tion consisted of a review of OSHA's Medical Evaluation
The above individual <u>HAS NOT</u> been examined by me for respirator of Questionnaire in Appendix C Part A Section 2. In accordance with 29 to report any difficulties in using respirators or change of any physical	CFR 1910.134, this limited evaluation i	s specific to respirator use only. Employees should be included the Respiratory Questionnaire
to report any difficulties in using respirators or change of any physical	Status to tricit supervisor or projection	to a serviced conditions requiting from
outlined in 29 CFR 1910.134. In accordance with specific OSHA requirements, I have informed the	above named individual of the results o	of this evaluation and of any medical conditions resulting from
In accordance with specific OSHA requirements, I have informed the exposures that may require further explanation or treatment. Where a attributable to the combined effect of smoking and asbestos, lead and	pplicable, the above trained members	100 0000, 1110
		be exposed. Failure to follow the use and fitting instruction
Respirators must be properly selected based on the containment and con and warnings for proper use contained on the respirator packaging and or	r failure to wear the respirator during all t	imes of exposure can reduce the respirator's effectiveness up and packaging for specific information regarding fit,
and result in sickness or death. Wearer must be trained in the proper cont	or any respirator. Keler to product its or	
use and/or limitations.		0000
Sw M		Employee's Signature
PLHCP Signature		Employee's Signature
\mathcal{L}		3-22-06
PLHCP Name (printed)		Expiration Date
1 Physician or other Licensed Healthcare Professional		
To be maintained i	າ the employee's file with a cop	y to the employee

Page 1 of 1

r_plhcp_stmt_resp_employee

03/22/2005

04/06/2000

Print Date:

Revision Date:

Please live 60 Mike Guerra

EnviroScience Consultants, Inc. 795 North Mountain Road Newington, CT 06111

Phone: (860) 953-2700 Fax: (860) 953-3203

QUALITATIVE FIT TEST RECORD

EMPLOYEE INFORMATION
Name: Dominick Flore Date of Birth: 04-27-67
Date of Last Pulmonary Function Test: 03-29-04 Passed Failed
RESPIRATOR(S) FIT TESTED
Manufacturer: Noveh Wilson
Manufacturer: Novich Wilson Type: 1/2 Face 1/2 Face
Model: 7700-80L 6000Series
Model: 7700-80L 6000Series Size: Large Mobium
Approval Number: 46 > 367)
TEST AGENT AND RESULTS OF TEST Irritant Smoke
Name: PAT SHARLANY Date: 10-12-04 Signature: Next Test Due Date: 10-12-05
qualfic.doc 3/31/97



Health Care or Environmental Health Professional's License Status

This site is part of CT-clic.com, the Connecticut Licensing Info Center, that links to all YOUR State licensing and registration needs.

Note: Requests for copies of documents related to past disciplinary action must be submitted in writing. Such documents are currently not available in an electronic format. Therefore, include your name, mailing address and telephone number on any request.

License Type:

Asbestos Consultant - Insp/Mgmt Planner

License Number: 000041

Name:

MYERS, MATTHEW A

Expiration Date: 4/30/2006

Granted Date:

12/23/1994

License Name:

MATTHEW A. MYERS

License Status:

Current

Disciplinary

None

Action:

Questions

E-mail webmaster.dph@po.state.ct.us or call (860) 509-7603 Return to DPH Licensure/Renewal Page

For Business Registry Questions? Contact Smart or call 1-800-392-2122.

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EnviroScience Consultants, Inc

795 North Mountain Road, Newington, CT 06111 - (860) 953-2700

This is to certify that

Matthew Myers

10 Lewis Street, Milford, CT 06460 SS# 371-80-3305

8 Hr. Asbestos Inspector/Management Planner Refresher Asbestos Accreditation under TSCA Title II has successfully completed the 40 CFR Part 763

Frank Mills, Principal Instructor

September 21 & 22, 2004

Date of Course

September 22, 2004: A Examination Date & Grade

AMP-R-9/04-2

Neal Freuden, Training Manager

Certificate Number

September 22, 2005

Expiration Date

Certificate of Training

Awarded to

Dominick Fiore

042-74-1243 (DOB 4/27/67)

For successful completion of a 24 Hour, 3 Day

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Exam Date: 10/22/97

George Williamson, Training Director





Stamford Corporate Health Services
Tully Health Center
32 Strawberry Hill Court
Stamford, CT 06902
(203) 325-7389

MEDICAL LETTER OF PROOF

In accordance with the requirements of section (m) (4) (1) of the OSHA Standard, CFR 1910.120;
This is to certify that on this date <u>04 09 04</u> and in accordance with the OSHA Standard 29 CFR 1910.120, bases on physical examination and spirometry testing:
NAME: Mathews Myss social security NUMBER 371-80-3305 And based upon the findings I have determined that this individual:
() MAY use a respiratory device while performing his/her required employment functions and the results of this examination have not detected any medical condition which would place the named individual at an increased risk of material health impairment from exposure to Hazardous Materials or from use of a respirator.
() MAY NOT use a respiratory device while performing his/her required employment functions and the results of this examination have detected a medical condition which would place the named individual at an increased risk of material health impairment from exposure to Hazardous Materials or of any condition which may be affected by the use of a respirator.
In accordance with OSHA requirements, I have informed the named individual of the results of his/her medical examination and of any condition, which may be affected by the use of a respirator.
ADDITIONAL COMMENTS:
Check as applicable:
The above –named individual has been counseled about the increased health risks of cigarette smoking combined with Hazardous Materials exposure and has been advised to discontinue smoking and to avoid cigarette smoking in the future.
Signed: Nww. Ma. (Physician) Date: 04 59 54
(Physician) らんしたかしたべ

EnviroScience Consultants, Inc. 795 North Mountain Road Newington, CT 06111

Phone: (860) 953-2700 Fax: (860) 953-3203

QUALITATIVE FIT TEST RECORD

EMPLOYEE INFORMATION	
Name: MYERS, MATT Date of Birth: 4/7/1970	
Date of Last Pulmonary Function Test: 4/64 Passed Failed	Ŀ
RESPIRATOR(S) FIT TESTED	
Manufacturer: Willson	
Type: 1/2 FACE	
Model: 6505	
Size: <u>LARGE</u>	
Approval Number:	-
TEST AGENT AND RESULTS OF TEST	
☐ Irritant Smoke ☐ Isoamyl Acetate ☐ Saccharin Aerosol	
Passed	_
TEST ADMINISTRATOR	
Name:	Ø4
Signature: Next Test Due Date: 11/17/2005	<u>></u>

	-			•		278		10	79		
1308F	14-Loorman	Excel	15-Sophia			G ym CE					
6	13-17-				<u>,</u>	<u> </u>			<u></u> _	γ	
15+	1.2-G00drow		17-Storage		19-Tchr Room			23	21-Lang 3 cd	23-Winter	26 25 3rd Activity 24 24 18
	I I-Keading		16-Book Room 17-Storage		18-Art		Library	3rd	20-Yanik 3 rd	22-Brandorff	Actiut R
42 6	I O-Annese		ပ						ard		Hoy
184	9-Salatto		B-Speech		ard	ESL	Staff Rm		Courtyard		850 850 850 850
	9-Colli		A-Speech		Courtyard	Nurse	Staff Rm	200	35-Maronza スパダ	33-Strever	100/20 Och
St	sinuide-/							2nd	34Clarke 2 n 4	32Williams	2nd 2nd 2nd 3/6
70	o-neidi		K4-Guastello		K2-Sprindis		Office Area		eouez		
	o-Loornian		K3-Weber	451	1-Helbig			m Ju	UTER ROOM	QIIDO RI OITA	
						Cafeteria		>	Stage	Music	
						Kitchen	7		2	ย	