

Environmental Site Assessments
Asbestos & Hazardous Materials
Industrial Hygiene Consulting
Air Quality Testing & Analysis
Mold and Moisture Surveys
Infrared Thermal Imaging

ST. PAUL'S SCHOOL
2010 ASBESTOS 3 YEAR REINSPECTION
Faculty Residences

Prepared by:
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Introduction

RPF Associates, Inc. (RPF) conducted asbestos reinspection work for the St. Paul's School (SPS) located in Concord, New Hampshire during the period of March 11 and March 12, 2010. The Faculty residential buildings included in this phase of the reinspection work consisted of: Site 234, Site 330, Site 331, Site 329, Site 242, Site 255, Site 254, Site 289, Site 259, Site 261, Site 249, Site 229, Site 303, Site 304, Site 327, Old Miller house Sites 243-246 and Site 248.

The subsequent associated management planner review and assessment work was performed during this period as well. The reinspection work was completed in accordance with Part 763.85 (b) of 40 CFR Part 763, Subpart E - Asbestos Hazard Emergency Response Act (AHERA). As we reviewed, the scope-of-services for the reinspection included a visual inspection of the areas known to contain asbestos-containing building materials (ACBM) and assumed ACBM, which was documented, as of the time of this reinspection, in the above referenced buildings as stated in the AHERA inspection records provided to RPF for review.

Reinspection Methods

All accessible ACBM which were identified in the existing AHERA reports were visually reinspected in accordance with AHERA, to (a) observe whether the materials are friable, (b) observe the conditions of the ACBM and potential for disturbance, and (c) to assess the hazard potential of the ACBM. Documentation review consisted of only those specific documents which list ACBM and which were provided by the School to RPF for review. A full review or audit of the AHERA Plans for each building, including abatement records, other record keeping requirements, or AHERA implementation records was not completed as part of this service.

Please note that this reinspection report is intended to comply with the federal regulation and the report should not be considered or referenced as a detailed full, initial AHERA room-by-room inspection. Please also reference the initial 1988 AHERA Inspection Report prepared for the building by AOHS, subsequent update reinspection records prepared by RPF, and 6-month surveillance update reports prepared by the School's Program Manager. This reinspection does not meet the requirements for full inspections prior to renovation or demolition activity.

A full inspection (for confirmation of previous inspection results) was also not completed during this project. In the event that other readily accessible suspect materials were observed by the inspector during the course of the reinspections (materials that may have been missed during the initial inspection or may require confirmation testing), the inspector provide preliminary notation on the reinspection reports to make the School aware that additional inspection or review may be required; however, in accordance with the AHERA reinspection requirements, the inspector did not conduct full initial inspection during the course of the reinspection work.

Signatures

The reinspection work and management planning was completed by Kara Forsythe and Roger Francoeur of RPF Associates, Inc.

Accredited Inspectors


Kara L. Forsythe, NH AI000211 Exp. 10/24/10

Accredited Inspector/Management Planner


Roger Francoeur, NH AM00025, Exp. 08/31/10

Assessments and Recommendations

Attachment 1 includes general comments and preliminary recommendations for compliance with AHERA that need to be reviewed and considered by the School. Attachment 2 contains a listing of the ACBMs reinspected during this project and the AHERA assessment and minimum responses for each area of ACBM. For areas with damaged ACBM listed, care must be used to prevent further disturbance and to avoid the creation of dust. Areas with damaged material should also be prioritized for abatement work.

The report findings and recommendations should be reviewed by the School's designated asbestos coordinator and a plan for implementation should be prepared, as applicable. Any ACBM maintenance or repair activity must be conducted by accredited personnel using proper personal protective equipment. Properly accredited personnel and certified laboratories must conduct all ACBM testing. Response actions, as defined by AHERA, must be detailed in a specification (project design) prepared by a license asbestos abatement project designer in accordance with AHERA and NH Admn. Rule Env-A 1800. Finally, properly licensed personnel and contractors must carry out response actions and the work must be monitored/tested by a qualified environmental testing firm.

The School must continue with their ACBM surveillance activity every 6 months, training of maintenance and custodial staff, annual notifications, labeling and other Management Plan items. *A copy of this report must be filed in the School central office.* If you have any questions or comments, or if you would like assistance with the recommendations provided herein, please do not hesitate to contact our office.

Other General Recommendations and Comments

Below are other general comments and recommendations to be reviewed and considered by the School for compliance with current State and Federal regulations and industry standards. The comments and recommendations should be reviewed in conjunction with the findings and discussions contained in the text of the report, attachments, and the federal standard, 40 CFR Part 763 and other applicable State and federal standards.

- The 1988 initial AHERA reports should be reviewed for detailed initial inspection results, Management Plan and O&M Plan requirements, analytical data, and other related documentation. Except as otherwise noted the reinspection work only included ACBM identified in the inspection reports provided to RPF by the School. During the reinspection, initial inspections, abatement documentation and other record keeping items were not completely reviewed or audited for accuracy and completeness. This type of review was beyond the scope of services for the project. Based on the RPF preliminary review of the records provided to RPF, it is our opinion that the AHERA Plans may not address all of the possible ACBM present. For example, although not directly regulated by AHERA, various exterior suspect materials are present as well as hidden interior ACBM in some locations.
- This reinspection only included the school buildings designated in the RPF listing. It should be noted however, the majority of the faculty housing inspected are not required to be included in an AHERA reinspection by definition. SPS is being proactive including them and there are some housing units that are required to be included due to faculty advising roles where student may enter their housing for academic purposes. For any new buildings or renovated space, obtain architectural statements for new construction/renovation areas in accordance with AHERA certifying no asbestos was specified or used.
- All ACBMs must be included in the Management Plan and O&M Program until the materials are completely removed. The ACBM listings in the Reports should be reviewed and updated periodically to reflect all abatement work, any testing performed, and all O&M Program maintenance or repair activity completed. Examples of activity that must be documented include but are not limited to the following: covering area of ACBM tile with carpet or other newer flooring; installation of other new building materials - certification of asbestos-free material must be obtained and filed; any sampling and testing; any spot asbestos repairs or removal work; personnel training; annual notifications; and other activities.
- Materials listed as MNO (materials not observed) should be reviewed further by the Program Manager to determine if in fact such materials were abated, if abatement records are on file, and/or, if the areas were not accessible that such materials be inspected when the areas can be accessed. ACBM assumed to be enclosed should continue to be documented as such for future renovations/demolition issues. Please note that new enclosures are a form of abatement and are subject to the requirements of AHERA as a response action.
- Inaccessible ACBMs are or may be present in wall, floor, ceiling, and other spaces not accessible during the inspection. Care should be used during any renovation or demolition work. If suspect materials are encountered, the materials must be properly tested by a NH licensed inspector and, if in fact identified as ACBM, properly abated prior to disturbance. All contractors and other persons working in the building who may come into contact with the ACBM should be properly notified in accordance with current State and federal regulations.

- Certain types of floor maintenance activities can result in release of asbestos fibers. Proper cleaning, stripping, and finishing methods should be used as recommended by the State of NH and U.S.E.P.A. guidelines. Depending on the condition of various non-friable ACMs and the specific action/disturbance to the material (i.e., chipping of flooring during removal, cutting and abrasive activities, or sanding/scraping of adhesives), non-friable ACM can be rendered friable. This is particularly true with flooring materials that are aged, thin, brittle, or have prolonged water damage.
- Flooring mastic, along with any floor tile or linoleum that is ACM was or may have been assumed to be ACM, should continue to be classified as ACM and properly tested prior to any flooring removal work, as applicable. It should be noted that a recent EPA advisory statement recommends that flooring which was previously tested as asbestos free be confirmed using electron microscopy prior to any removal or other activities that may result in the disturbance of the flooring.
- All assumed ACM should be properly tested by a licensed inspection firm, prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. This type of testing *should not* be conducted by asbestos abatement contractors, but by a qualified licensed consulting/laboratory firm.
- In accordance with State and federal regulations, ACM must be abated prior to disturbance due to renovation or demolition activity, or maintenance activity that will result in disturbance to the materials. This work must be properly designed in advance of the planned work and it must be implemented by properly trained, accredited, and/or licensed individuals as applicable.
- Abatement of friable and non-friable ACM should be designed by, and monitored by, a qualified/certified consultant. Trained, licensed workers and firms should complete all abatement work. Please note that exterior building materials, such as roofing materials, were often not included in the initial inspection work and should be properly tested prior to any renovation or demolition. It is recommended that sufficient time be allowed prior to any renovation or construction work for accredited design, review, and impact study to determine abatement work that may be necessitated to facilitate renovation. It should also be determined that all suspect materials have been properly sampled in the existing reports prior to work.
- O&M level trained employees may be able to perform small scale, short duration maintenance work (<3 linear/square feet) involving asbestos if all applicable state and federal requirements are met and proper medical surveillance, safety equipment and other programs are in place. Any work in excess of 3 feet or work performed for the sole purpose of abating asbestos hazards must be designed and performed by licensed personnel and companies.
- All janitorial, custodial, and maintenance staff require a minimum of 2-hour asbestos awareness training and maintenance staff who perform O&M work must also have another 14 hours of training. Maintenance staff performing O&M work must also receive at least 4-hours refresher

training every two years for the State and annual refresher training is required for 2-Hour and 16-Hour personnel in accordance with 29 CFR Part 1926.1101.

- A general review of the AHERA Plans should be completed periodically to ensure compliance with record keeping, training, labeling of ACBM in maintenance areas and as required by OSHA, annual notifications, and other requirements. The school must also continue with their 6-month surveillance activities. Certain record keeping and notification requirements may still be required regardless of whether new construction has occurred or all ACBMs have been removed.

The following Attachment 1 includes an index sheet with a description of codes used in the Attachment 2 building listings of ACBM assessed during this reinspection.

ATTACHMENT 1

CODE DESCRIPTIONS

(Index sheet for use with individual building listings included with Attachment 2)

EPA Assessment Codes:

1. Damaged or significantly damaged thermal systems insulation asbestos containing material (ACM)
2. Damaged friable surfacing ACM
3. Significantly damaged friable surfacing ACM
4. Damaged or significantly damaged friable miscellaneous ACM
5. ACBM with the potential for damage
6. ACBM with the potential for significant damage
7. Any remaining ACBM or friable suspected ACBM
- NF. Material is nonfriable and assessments are not required.

Response Summary Codes: (Summary of minimum recommendations only, please reference text of report and Attachment 2 for additional recommendations.)

Code Description

1. **Continue to manage this ACBM under the buildings Management Plan, Operations and Maintenance (O&M) Program and AHERA.** Conduct spot maintenance repairs of any minor damage present (nonfriable ACBM) or that occurs in accordance with AHERA and the School O&M Program.
2. **Conduct repair, surface cleaning, encapsulation or enclosure response actions** for this ACBM in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage this ACBM under the buildings Management Plan, O&M Program and AHERA (See Summary Code 1). A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. Some small-scale maintenance work (<3 linear/square feet) can be completed by the School's maintenance staff if they qualify for the licensing exemption and they possess adequate training, current refresher training, and the necessary personal protective equipment and safety programs in place.
3. **Remove the ACBM and conduct surface decontamination** as recommended by accredited/licensed project designer in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage any remaining ACBM under the buildings Management Plan, O&M Program and AHERA (See Summary Code 1). All assumed ACBM should be properly tested by a licensed inspection prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. All abatement activities must be conducted by properly accredited and licensed personnel/companies.
4. **Complete verification of AHERA Inspection documentation.** Licensed inspector must assume materials are ACBM or properly test additional suspect ACBM. Exterior materials, except under certain circumstances, are not covered under AHERA but still must be inspected and handled as ACBM in accordance with other State, local, and federal regulations. Licensed inspector and management planner must update ACBM listings and Management Plans as needed. Obtain architectural statements for new construction/renovation areas in accordance with AHERA. Confirm that proper numbers of samples have been collected.
5. **Abated material may be removed from ACBM listing.** Materials have been removed and abatement records are on file. RPF did not audit records for completeness or accuracy.
6. **Material could not be located** and may have been abated, or it was not possible to confirm if the materials observed were in fact newer replacement materials. Verify abatement records and, if all records are obtained and complete, update the ACBM listings to reflect the abatement work. If an MNO listing is due to an inaccessible area or locked room, such areas should be inspected when feasible.

ATTACHMENT 2

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes	
St. Paul's School								
Site No. 330								
2nd Floor Bathroom	Floor Tile	Misc	No	Good	NF	1		
Basement Bathroom	Floor Tile	Misc	No	Good	NF	1		
Basement, N.W. Bedroom	Floor Tile	Misc	No	Good	NF	1		
Quirk Kitchen	Floor Tile	Misc	No	Good	NF	1		
S.W. Bedroom & Hall	Floor Tile	Misc	No	Good	NF	1		
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes. Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	No	Good	NF	1	Assessment	Response	Notes
St. Paul's School Site No. 331										
S.W. Bedroom & Hall Closet	Floor Tile	Misc	No	Good	NF		1			
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.									
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.										
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.										
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.										

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 329							
Kitchen	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
2nd Floor Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	
Basement, N. W. Bedroom	Floor Tile	Misc	No	Good	NF	1	
Basement, Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
S.E. Bedroom	Floor Tile	Misc	No	Good	NF	1	
S.W. Bedroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.					4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes. Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School Site No. 242							
1st Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	5	Materials were removed in 2009 by ABS.
1st Floor Closet	Pipe Fitting	TSI	MNO	MNO	MNO	5	Materials were removed in 2009 by ABS.
2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	5	Materials were removed in 2009 by ABS.
Washroom	Floor Tile	Misc	MNO	MNO	MNO	5	
Throughout	Other exterior suspect materials are present and further review is required. Prior to any renovation and/or demolition additional samples maybe required in addition to the 2009 NESHAP survey and removal records.						
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School Site No. 255							
Basement	Pipe Insulation	TSI	Yes	Damaged	1	3	Material was observed to have knicks, dents, and water damage throughout and should be removed as soon as feasible
	Pipe Fitting	TSI	Yes	Damaged	1	3	
Garage	Transite	Misc.	No	Damaged	1	3	Material was observed to be cracked, broken pieces with debris present along the floor, and rough edges and should be removed as soon as feasible.
Throughout	Other exterior suspect materials are present and further review is required. Prior to any renovation and/or demolition additional samples maybe required in addition to the 2009 NESHAP survey conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 254							
1st Floor, Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	
Throughout	Other exterior suspect materials are present and further review is required. Prior to any renovation and/or demolition additional samples maybe required in addition to the 2010 NESHAP survey conducted in accordance with various state and federal regulations.					4	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes	
St. Paul's School								
Site No. 289								
Kitchen		Misc	MNO	MNO	MNO	5	Materials were removed and can be removed from the list.	
2nd Floor Bathroom		Misc	MNO	MNO	MNO	5		
2nd Floor Closet		Misc	MNO	MNO	MNO	5		
Throughout		Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.					4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes. Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and further review is required. See further discussion and requirements in report.								

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site 259							
1st Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	5	Materials were removed in 2003 and can be removed from the list.
2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	5	
	Linoleum	Misc	MNO	MNO	MNO	5	
3rd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	5	
Kitchen	Floor Tile	Misc	MNO	MNO	MNO	5	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.					4	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site 261							
1st Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Materials were not observed and may have been covered or removed. Records were not available at the time of the survey.
3rd Floor Bathroom Throughout	Linoleum	Misc	MNO	MNO	MNO	1	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site 249							
Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.					4	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School Site No. 229							
2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	5	Materials were removed in 2009 by ABS.
1st Floor Kitchen	Floor Tile	Misc	MNO	MNO	MNO	5	Materials were removed in 2009 by ABS.
Throughout	Other exterior suspect materials are present and further review is required. Prior to any renovation and/or demolition additional samples maybe required in addition to the 2009 NESHAP survey and removal records.					4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes. Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Yes	MNO	MNO	Assessment	Response	Notes
St. Paul's School									
Site No. 304									
Basement	Pipe Insulation	TSI					MNO		1 Material has been enclosed and was inaccessible at the time of the survey. The material continues into the steam tunnel to Gordon Rink.
Throughout									Please note a full NESHAP survey was conducted in 2006. It is important to note that care should be used during demolition and renovation activities for hidden inaccessible materials.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>									

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School Site No. 303							
Kitchen and Hall Throughout	Linoleum Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.	Misc. No	No	MNO MNO	MNO MNO	5 4	Materials were previously removed and can be removed from the list. Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 245, 246 Old Miller House							
Chen Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Chen Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	
Greenleaf Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	
Greenleaf 2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	
2nd Floor Apartment Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	
Top Floor Apartment Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	
2nd Floor Apartment Washroom	Linoleum	Misc	MNO	MNO	MNO	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.					4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes. Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 248							
Kitchen & Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring.
Throughout						4	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2010

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School Site No. 234							
Den	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring. Possible inaccessible ACBM also.
Throughout						4	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							