Three-Year Reinspection Report

Site:
Illiana Christian High School
2261 Indiana Avenue
Lansing, IL 60438

Local Education Agency:
Illiana Christian High School
2261 Indiana Avenue
Lansing, IL 60438

Date:
5/15/2013

Ideal Number:
15198

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ENGINEERING INC

ASBESTOS THREE-YEAR REINSPECTION
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Reinspection Introduction

According to the federal Environmental Protection Agency's (EPA's) Asbestos Hazard Emergency Response Act (AHERA), at least once every three years from the implementation of a school's initial asbestos inspection and management plan, a reinspection must occur. The reinspection must be completed according to AHERA rules and regulations.

In Illinois, the reinspection must be completed by an EPA/AHERA-accredited, Illinois Department of Public Health (IDPH)-licensed asbestos inspector and performed according to the most recent IDPH reinspection protocol. At the time of this reinspection, the most recent reinspection protocol is published in IDPH's "Asbestos Abatement for Public and Private Schools and Commercial and Public Buildings" dated March 12, 1999.

During a reinspection, an inspector walks through the building to visually reinspect and reassess the condition of all known and assumed friable and non-friable asbestos containing materials. The inspector touches the materials to determine friability and notes any changes in the friability of the materials since the last inspection/reinspection. During a building's first reinspection, the initial inspection report is reviewed and referred to in order to identify known and assumed asbestos containing materials. During subsequent reinspections, the inspector refers to the most recent three-year reinspection report, any intermittent sampling events, and the initial inspection report if needed.

Also during a reinspection, inspectors will note the discovery of any suspect asbestos containing materials which have not been accounted for previously. For example, prior inspections may have omitted some suspect asbestos containing materials, or suspect asbestos containing materials may have become exposed during general renovation projects. The inspector may collect samples of the material(s) to determine asbestos content or document the material(s) as assumed to contain asbestos. In addition, at the school's direction, the inspector may collect samples of previously assumed asbestos materials to determine asbestos content. Supporting documentation typically includes a detailed inspection report for the material, a diagram which indicates the location of the material, and photos of the material.

If an inspector identifies newly installed suspect asbestos containing materials, recommendations are provided on how to treat these materials within the context of the asbestos management plan program. Please refer to the General Definitions page in this report for the definition of newly installed materials.

The inspector's assessments during the reinspection are reviewed by an EPA/AHERA-accredited, IDPH-licensed asbestos management planner. The assessments include any changing factors for each material, such as friability, vibration, deterioration, damage, use of room, etc. If the changing factors warrant revisions to previous response actions, then revised response actions are provided. Revised response action schedules are completed by the management planner.

Reinspection Report Description

Reinspection Information

This section contains a general information page followed by an Asbestos Program Overview page. The Asbestos Program Overview page provides a general overview of activities that have occurred since the onset of the asbestos program. After the overview page are attestments by the inspector and management planner. They certify by signature that they have performed the reinspection according to reinspection rules and regulations.

Following the attestments is an inventory of known and assumed asbestos containing materials. This information is a very important part of the report. This inventory describes whether or not changes have occurred to these materials within the last three years and provides the inspector's assessment of these materials. It indicates the current physical condition and friability of each material. In addition, it summarizes the current response action for each friable material.

Directly following this data is an inventory of any materials which were assumed to contain asbestos or which were sampled during the reinspection as well as any suspect asbestos containing materials that may have been newly installed in the building. Recommendations on how to treat the newly installed building materials are provided.

The Reinspection General Overview provides general comments about the asbestos program at the building.

The Asbestos Program Policy Statement provides an overview of the procedures that have been/will be/will continue to be taken by the LEA to protect the health of building occupants in relation to asbestos issues. Upon reviewing the results of the reinspection and concurring with any revised response actions, the LEA completes and signs the policy statement. If the LEA does not agree with the response actions, justifications for any disagreement are to be provided to the management planner so that the concerns can be resolved. [AHERA regulations require that a policy statement is adopted by each LEA. Please note that the LEA signed a policy statement during the adoption of the initial asbestos management plan, and this is an updated policy statement.]

Materials Sampled/Assumed During Reinspection

If sampling or assuming of suspect asbestos containing materials was done during the reinspection, this section will contain a narrative which summarizes the materials addressed and the purpose for addressing them. Inspection report pages, diagrams and photos are typical documentation for each sampled or assumed material. If sampling was performed during the reinspection, this section will also contain the laboratory analysis results, sample chain of custody, and a summary of sampling protocol as applicable to school buildings.

Response Actions & Amendments

All friable known or assumed asbestos containing materials require a response action. Response actions are prepared by management planners and provide the LEA with appropriate actions to take with their asbestos materials (i.e. repair or removal). If a material is determined to be in need of a response action or a revised response action during the reinspection, detailed documentation for each material will found be found in this section. The management planner will typically use a schematic guideline called a decision tree to assist in determining response actions. A decision tree is also found in this section.

Each material that receives a response action also receives a time line for the completion of the response action. The time lines are prepared by a management planner. If a time line has not been met for a material (i.e. repair the material within one year), then the response action has expired, and a new time line is necessary. Once evaluated and established, new time lines are typically implemented by an amendment to the original response action time line schedule. If amendments to the response action time line schedule are completed, the information can be found in this section. If no amendment was completed for an expired time line, explanation for the reason an amendment was not done is found in this section.

Reinspection Report Description (continued)

School Information Form
The school information form is required to be filled out and sent to IDPH. This section may also contain a fax cover sheet and fax transmittal report indicating that the completed sheet was faxed to IDPH on the LEA's behalf.

Appendix
This section contains copies of the current license and accreditation certificates for the inspector and management planner who completed the reinspection. If sampling was done during the reinspection, a copy of the current laboratory accreditation certificate will also be found in this section.

An informational sheet regarding asbestos regulations pertaining to renovation projects in school buildings can be found in this section.

This section contains General Definitions and General Comments pages to help explain some of the terminology of an asbestos program. A helpful checklist describing the record-keeping requirements of an asbestos program is also provided.

This section also contains several sample asbestos program forms that can be used as reference tools or examples. Some are suited to be copied and used as part of your asbestos program.

If you have any questions about the elements of the three-year reinspection report, please do not hesitate to contact IDEAL at (800)535-0964.

REINSPECTION INFORMATION

General Information Page

The information provided below applies to the school building listed at the time of the reinspection.

School Building:	Illiana Christian High School 2261 Indiana Avenue Lansing, IL 60438 Cook County
Phone:	708-474-0515
School ID#:	44-016-1580-039X
Total Square Feet:	123,962
Approx. Bldg Construction Dates:	1947, 1957, 1967, 1975
Associated Outbuildings:	Shed, Old Three Car Garage/Storage Building

Three-Year Reinspection Date:	5/15/2013
IDEAL Number:	15198

Inspector:	Jack Shelton
Inspector ID#:	100-01479
State of Accreditation:	IL

Management Planner:	Jerry L. Wilson
Management Planner ID#:	100-01338
State of Accreditation:	IL

Local Education Agency:	Illiana Christian High School 2261 Indiana Avenue Lansing, IL 60438 Cook County
Contact:	Mr. A.J. Turkstra, Vice-Principal
Phone:	708-474-0515

Asbestos Designated Person:	Mr. A.J. Turkstra 2261 Indiana Avenue Lansing, IL 60438
Phone:	708-474-0515

Asbestos Program Overview

The following is a general overview of activities that have occurred in the building since the onset of the asbestos program. This information has been determined by IDEAL and is based on available asbestos management plan information and available general building information. This information is provided for general informational purposes only and may not be an all-inclusive history.

Additional Asbestos Sampling	Some additional sampling has taken place. Prior to any further sampling, school should review previous documentation to determine if materials have already been sampled.
Asbestos Abatement Design Projects	In 1990, boiler #2 was abated. In summer 2003, the boiler room was abated.
Non-Friable Floor Tile Removal Projects	None apparent
Major Renovation	New ceilings were added in the 1947 original building and 1957 addition. Various renovation projects have taken place throughout the school.
Building Additions	None apparent
Demolition Activities	None apparent
Tunnel/Crawlspace Information	A tunnel/crawlspace system is found in this school.
Outbuilding Comments	The shed and old three car garage/storage building were inspected during this reinspection. No suspect asbestos containing materials were identified in these buildings.
Additional Notes	None

Inspector/Management Planner Attestments

INSPECTOR REINSPECTION ATTESTMENT

I conducted the Three-Year Reinspection. I followed the reinspection requirements as noted in the Reinspection Introduction. I am an EPA/AHERA-accredited, IDPH-licensed asbestos inspector. My inspector certification is current.

During the reinspection, I visually reinspected and reassessed under AHERA Section 763.88 the condition of all accessible friable and non-friable asbestos containing materials, known or assumed, and touched the materials to determine friability. Reassessment of the areas included reviewing the following factors for each material:

- Vibration
- Deterioration
- Physical damage
- Accessibility
- Proximity of the material to areas requiring maintenance
- Barriers
- Ventilation
- Air movement
- Use of room
- Rooms used above and adjacent to the ACBM areas

☐ Not applicable, as no accessible friable or non-friable asbestos containing materials are in the building. However, it is important to note that known or assumed asbestos containing materials exist or are believed to exist in the building in inaccessible areas such as behind walls and above ceilings.

Jack S Shelton — Inspector Signature

100-01479 — IDPH License #

5/15/13 — Date

MANAGEMENT PLANNER REINSPECTION ATTESTMENT

I reviewed the results of the inspector's reassessment and determined if any response action revisions were necessary due to the reassessment. I followed the management planner review requirements as noted in the Reinspection Introduction. I am an EPA/AHERA-accredited, IDPH-licensed asbestos inspector and management planner. My inspector and management planner re-certification is current.

Management Planner Signature

100-01338 — IDPH License #

4/25/2013 — Date

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Illiana Christian High School
School ID#: 44-016-1580-039X
Reinspection Date: 5/15/2013

		Management Planner's Comments			
		Prior Assessment		Current Assessment	
Area ID	Area Description	Area Loca ment Planner mendations	Response Action #	Management Planner Recommendations	Response Action #
2	Thermal Pipe Insulation	1947 Original Building ake preventative Addition Throughout (se potential for room) . Continue O&M.	2	Repair damage. Take preventative measures to reduce potential for significant damage. Ensure O&M is being completed	2
2 (inaccessible)	Thermal Pipe Insulation	1947 Original Building n if accessing areas Addition Throughout likely to be found, such Areas and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4
No#	Heat Exchanger Cover	1947 Original Building Art Storage Room	5	Monitor any damage. Take preventative measures to reduce potential for significant damage. Ensure O&M is being completed	5
3 (tunnel)	Thermal Pipe Insulation	1947 Original Building ge. Continue O&M.	7	Monitor any damage. Ensure O&M is being completed.	7
23	2x4 Pinhole Ceiling Panels	1967 Addition Through ake preventative e likelihood further Continue O&M.	3	Take preventative measures to reduce likelihood further damage will occur. Complete the response action.	3
2010-MCB	2x4 Pinhole Replacement Ceiling Panel (cut to fit required ceiling openings)	1957 Addition Room 2	N/A	Monitor any damage. Take preventative measures to reduce potential for significant damage. Ensure O&M is being completed.	5
12	Fire Doors	1947 Addition Boiler Rge. Continue O&M until olition requires removal, t factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
18	Floor Tile	1947 Original Building ge. Continue O&M until Addition Throughout (solition requires removal, over) t factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
22	Linoleum	1947 Original Building ge. Continue O&M until Stage Floor (carpet ovolition requires removal, t factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
MMA	All Mastics (such as floor tile, ceiling tile, carpet, and linoleum)	1947 Original Building, ge. Continue O&M until 1967 Addition & 1975 olition requires removal, Various Areas Throughnt factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Ceramic Tile Grout	Boys' Shower Room, G Room, First Level Boys Second Level Girls' Re Second Level Custodia	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A

Information listed above reflects current information on file for the apection and management plan report information and subsequent asbestos documentation prior to the date of this reinspection. Areas which wnidden suspect asbestos areas must be done, and this report is not a substitute for such an inspection.

ACM = Asbestos Containing Material Non-ACM = Non-Asbestos

Material Type: Damage Conons & maintenance program

M=Miscellaneous S=Surfacing T=Thermal ND=Not Dam

Response Actions and Priority for Removal:

1: For thermal system insulation materials: Immediately isolate theve the damaged materials.
For surfacing and miscellaneous materials: Immediately isolate sufficient to contain fibers.
For all ACM not removed: Maintain ACM in good condition unde
2: Take preventative measures to reduce potential for significant dge. Maintain ACM in good condition under O&M program.
3: Take preventative measures to reduce likelihood further damag
4: Remove, enclose, encapsulate or repair to correct damage. Ma
5: Take preventative measures to reduce potential for significant dndition under O&M program.
6: Take preventative measures to reduce likelihood that damage w
7: Maintain ACM in good condition under O&M program.

Management Planner's Comments

Area ID	Area Description	Area Loca	Prior Assessment ment Planner mendations	Response Action #	Current Assessment Management Planner Recommendations	Response Action #
No#	Lab Table Tops w/Sinks	Room 101 & 215		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Materials Under Wood Flooring	1957 Addition Gym & ' Gym		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Terrazzo Flooring	Girls' Locker Room & I Corridor		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Terrazzo Sink	Shop Areas		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Vinyl Stair Tread	Various Areas Through		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Vinyl Stair Tread Mastic	Various Areas Through		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Wall Board Mastic (chalkboard, bulletin board and dry erase board)	Various Areas Through		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A

Information listed above reflects current information on file for the a pection and management plan report information and subsequent asbestos documentation prior to the date of this reinspection. Areas which w hidden suspect asbestos areas must be done, and this report is not a substitute for such an inspection.

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IDEAL ENVIRONMENTAL ENGINEERING, INC.

Illiana Christian High School
School ID#: 44-016-1580-039X
Reinspection Date: 5/15/2013

Newly Identified or Sampled Suspect Asbestos Materials

Inventory of any newly identified or sampled suspect asbestos materials — Page 1 of 2

Area ID	Area Description	Area Location	Asbestos Containing	Sampled & Type of Analysis or Assumed	Material Type	Damage Condition	Friable	Response Action #	Comments
No#	Glass Block Mortar	Various Areas	Yes	Assumed	M	ND	No	N/A	Assumed to contain asbestos 5/15/2013. Material must be sampled prior to any disturbance.
	Newly Installed 2x2 & 2x4 Ceiling Panels (replacement)	1947 Original Building & 1957 Addition Various Areas Throughout							Some ceiling panels sampled 6/24/10 in 1957 addition rm 211 as 2010-MCA: non-ACM & 2010-MCB: ACM, & in rms 211 & 213 as 2010-MCC: non-ACM. Refer to 2010-MCB. Sample other ceiling panels to determine asbestos content.
	Newly Installed Building Materials (such as 12x12 floor tile/mastic, 2x2 ceiling panels)	Computer Room & Shop Area							Current NESHAP asbestos regulations require sampling prior to any disturbance, as the materials are suspected to contain asbestos regardless of installation date. Sample 2x2 ceiling panels to determine asbestos content.
	Newly Installed Building Materials (such as floor tile/mastic, ceiling tile/mastic)	Kitchen							Current NESHAP asbestos regulations require sampling prior to any disturbance, as the materials are suspected to contain asbestos regardless of installation date. Sample ceiling tile and mastic to determine asbestos content.
	Newly Installed Carpet Mastics	1947 Original Building & 1957 Addition Various Areas Throughout							Current NESHAP asbestos regulations require sampling prior to any disturbance, as the material is suspected to contain asbestos regardless of installation date.
	Newly Installed Ceramic Tile Materials (such as grout, mastic)	Teachers' Lounge & Lower Level Girls' Restroom by Cafeteria							Current NESHAP asbestos regulations require sampling prior to any disturbance, as the materials are suspected to contain asbestos regardless of installation date.
	Newly Installed Dry Erase Board Mastic	Various Areas							Current NESHAP asbestos regulations require sampling prior to any disturbance, as the material is suspected to contain asbestos regardless of installation date.

Material Type: M=Miscellaneous; S=Surfacing; T=Thermal Damage Condition: ND=Not Damaged; D=Damaged; SD=Significantly Damaged N/A = Not Applicable
ACM = Asbestos Containing Material Non-ACM = Non-Asbestos Containing Material PLM = Polarized Light Microscopy TEM = Transmission Electron Microscopy

Response Actions and Priority for Removal:

1: For thermal system insulation materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials. For surfacing and miscellaneous materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access. Remove all damaged materials in the functional space(s), unless enclosure or encapsulation is sufficient to contain fibers. For all ACM not removed: Maintain ACM in good condition under O&M program.
2: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.
3: Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
4: Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
5: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, response actions other than O&M, including area isolation, may be required. Maintain ACM in good condition under O&M program.
6: Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M Program.
7: Maintain ACM in good condition under O&M program.

IDEAL ENVIRONMENTAL ENGINEERING, INC.

Illiana Christian High School
School ID#: 44-016-1580-039X
Reinspection Date: 5/15/2013

Newly Identified or Sampled Suspect Asbestos Materials

Inventory of any newly identified or sampled suspect asbestos materials — Page 2 of 2

Area ID	Area Description	Area Location	Asbestos Containing	Sampled & Type of Analysis or Assumed	Material Type	Damage Condition	Friable	Response Action #	Comments
	Newly Installed Flooring Materials (such as rubber flooring mastic, base cove/mastic, floor tile/mastic)	1947 Original Building Weight Room							Current NESHAP asbestos regulations require sampling prior to any disturbance, as the materials are suspected to contain asbestos regardless of installation date.

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ACM = Asbestos Containing Material Non-ACM = Non-Asbestos Containing Material PLM = Polarized Light Microscopy TEM = Transmission Electron Microscopy

Response Actions and Priority for Removal:

1: For thermal system insulation materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials. For surfacing and miscellaneous materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access. Remove all damaged materials in the functional space(s), unless enclosure or encapsulation is sufficient to contain fibers. For all ACM not removed: Maintain ACM in good condition under O&M program.
2: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.
3: Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
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6: Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M Program.
7: Maintain ACM in good condition under O&M program.

Reinspection General Overview

A general overview of the asbestos management plan, comments and recommendations for this building — Page 1 of 4

TUNNEL/CRAWLSPACE SYSTEM ADVISORY:
This building has a tunnel/crawlspace system with asbestos containing thermal system insulation material which is reported to be in a not damaged condition. Restricting access to the space is recommended. The minimum training for anyone entering the space is two-hour asbestos awareness training due to the presence of friable asbestos containing materials. In addition, for OSHA compliance, confined space training is necessary. Anyone entering it must proceed with caution, as the condition of the thermal system insulation may have changed to damaged or significantly damaged. If the tunnel/crawlspace system is entered and damage or significant damage is observed, the person should immediately exit the tunnel/crawlspace system. The observation must be immediately reported to the LEA's asbestos designated person for appropriate action.

CEILING PANEL ADVISORY
Asbestos containing 2x4 ceiling panels are present throughout the 1967 addition and in the 1957 addition room 211. The panels pose a hazard to the health and safety of building occupants when they are disturbed. Due to the size of the panels, if one panel falls, it is considered a major asbestos fiber release, which is defined as the disturbance of any asbestos containing material greater than 3 square feet or 3 lineal feet.

Unless the material is significantly damaged, removal of the material is generally not necessary unless the LEA cannot effectively implement or has not implemented measures to prevent disturbance and potential significant damage to the material. The use of preventative measures is a very important part of the response action. When preventative measures are not effectively implemented, a response action for ceiling panels further calls for isolation, removal, enclosure or encapsulation.

It is especially difficult to effectively implement preventative measures to reduce the potential for disturbance (and fiber release) to the ceiling panels when they exist in hallways, gymnasiums and other very public (non-controlled) areas. Part of the difficulty is controlling student behavior. Examples of circumstances requiring measures to prevent disturbance are noted below:
-- Measures must be in place to prevent kids from poking at the panels (as is evident), jumping to try to touch the panels or bouncing balls up to the panels.
-- Measures must be in place to prevent teachers from hanging items from the panels.
-- Measures must be in place to prevent roof leaks and pipe leaks. Water damage to the panels will disturb the binding matrix of the panels.
-- Measures must be in place to prevent sports activities from disturbing the panels. For instance, a volleyball hit high to the ceiling will cause disturbance.

All of these types of activities will cause disturbance to the friable ceiling panels and possibly significant damage, including a major asbestos fiber release. Your asbestos management plan may outline other circumstances requiring preventative measures. Vibration and air erosion are also factors which require preventative measures. For instance:
-- Ceiling fans must be prohibited in rooms/areas with asbestos containing ceiling panels. Continual air movement and vibration caused by the fans create the strong potential for asbestos fiber release, especially as ceiling panels age.
-- Band practice/performances must be prohibited in and above rooms/areas with asbestos containing ceiling panels. Continual vibration to the panels as a result of the band instruments creates a strong potential for asbestos fiber release.

Without measures to help prevent disturbance to the ceiling panels, the potential for asbestos fiber release is high. Major asbestos fiber releases pose a health and safety factor for building occupants and are very disruptive to school operations. A major asbestos fiber release can shut down a school until it is cleaned up. Continual asbestos fiber release is a concern where ceiling panels may be disturbed due to high air erosion and vibration factors.

Reinspection General Overview

A general overview of the asbestos management plan, comments and recommendations for this building — Page 2 of 4

In summary, it is very difficult to prevent ceiling panel disturbances. Strong evidence of past disturbance would be replacement panels or damaged ceiling panels, including water stains. Without effective measures in place by the LEA to prevent disturbance, the response action needs to be completed. Removal of ceiling panels is typically more feasible and economical than enclosure or encapsulation, therefore, removal is recommended. When asbestos containing ceiling panels are present throughout various areas of the building, it is recommended that the LEA considers the feasibility of removing the ceiling panels over time, with priority on high potential disturbance areas. It is also recommended that the LEA budget for ceiling panel removal as part of its life/safety building needs.

Management Planner _____ Date 6/25/2013

SAMPLING ADVISORY
Assumed asbestos containing heat exchanger cover and ceiling tile mastic are present. Newly installed 2x2 ceiling panels and 2x4 ceiling panels are present. Sample the materials to determine asbestos content due to the potential for disturbance and friability factors.

Due to the size of the ceiling panels, the disturbance of even just one panel is considered a major fiber release, which is a costly expense to clean up. Therefore, these panels must not be displaced for any reason without following appropriate asbestos procedures.

REGARDLESS of installation date, all suspect asbestos containing materials must be sampled to determine asbestos content prior to any disturbance, including removal or renovation.

FIRE BRICK ADVISORY
Ensure fire bricks are not used for welding purposes or any other purposes. They may contain asbestos. Sample them to determine asbestos content. If found to contain asbestos, recommend removing them in accordance with all asbestos rules.

TERRAZZO FLOORING
Do not sand, grind or remove terrazzo flooring unless it has been proven to be a non-asbestos containing material by transmission electron microscopy (TEM) analysis method. Sample the terrazzo for analysis by TEM.

CARPET ADVISORY
If carpet is planned to be disturbed in any way, be sure to check the asbestos management plan to see if it can be determined if asbestos containing flooring material exists below the carpet. If it does exist underneath the carpet, proceed with caution when disturbing the carpet, as the asbestos containing floor tile, etc., may be loose and/or damaged and may dislodge easily. Stop the project if the floor tile becomes dislodged, and contact asbestos professionals for guidance. If carpet mastic exists, ensure it is sampled prior to disturbance.

MANAGEMENT PLAN REVIEW & ORGANIZATION ADVISORY
The asbestos program documentation needs to be thoroughly reviewed. The AHERA rule has been in place since 1988. That was over 20 years ago. The LEA has received much asbestos program documentation to file since 1988. The AHERA rule requires that all asbestos documentation be retained in the administration office. In addition, each building is to also have a set of the asbestos program documentation specific to that building. The documentation at each school office must be identical to that which is at the

Reinspection General Overview

administration office. The task of keeping identical plans at each location can be overwhelming, regardless of the size of the LEA. However, the task is critical and is often overlooked, or its importance is understated. Review and organize the entire asbestos program documentation to help make it more manageable and to help ensure duplicate information is present in the administration office records and in the individual building records.

OTHER ADVISORIES

Asbestos containing thermal system insulation material is assumed to be present in inaccessible areas. Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.

Non-friable asbestos containing materials exist in this building. These materials can become friable due to unintentional damage and disturbances. Ensure preventative measures are taken to reduce the possibility of disturbances, which may cause damage to non-friable materials.

Review and follow the asbestos program requirements summarized in the policy statement. In particular:
-Ensure a designated person is assigned, trained and documented in the asbestos management plan.
-Ensure annual asbestos awareness training for custodial/maintenance staff is done and documented in the management plan.
-Ensure annual parent/teacher notifications are issued and that copies of the dated notifications are filed in the asbestos management plan.
-Ensure a work permit program is in place and that copies of work permits are filed in the asbestos management plan.
-Ensure six-month surveillances are being completed and that copies of the surveillances are filed in the asbestos management plan.
-Ensure you obtain reports for all sampling events, abatement events and operations and maintenance events. Ensure all reports are filed in the asbestos management plan.

Document the location of newly installed building materials as well as the date of installation.

Ensure you are repairing any damaged thermal system insulation materials (TSI) on an annual basis under your operations and maintenance O&M program. All TSI is to be maintained in good condition and be not damaged.

Refer to the following page which describes suspect asbestos containing materials which are not covered under the AHERA rule but for which other asbestos regulations apply. If disturbance to these materials becomes necessary, ensure the applicable rules are followed.

COMPLIANCE VISITS & FINES/PENALTIES ADVISORY

Please know that as recently as summer 2012, an Illinois school has received substantial fines/penalties for non-compliance matters within their asbestos program. Some of the alleged violations included: failure to maintain asbestos records, failure to ensure a new building was inspected for asbestos or to have the required architect/engineer exclusionary statement for the building, failure to keep the management plan in the office, failure to update the management plan, failure to provide notifications regarding the presence of the management plan, failure to record six-month surveillances in the management plan, failure to properly document asbestos removal projects, failure to sample or assume suspect asbestos containing materials in their buildings, and failure to notify IDPH of floor tile removal projects. The allegations stemmed from an IDPH compliance audit.

This information is brought to your attention as the fine was nearly $20,000, and costs to dispute allegations and fines can be just as substantial. During this three-year reinspection, we have provided to you critical information and advisories that warrant the attention of the LEA. It is our sincere hope that, when acted upon, the information

Reinspection General Overview

and advisories we provide to you will help your LEA achieve the necessary compliance with asbestos regulations in the AHERA Rule.

It is very important that you understand that documentation is critical and that the LEA is responsible to ensure that all documentation is filed into each set of the school's management plan.

NON-AHERA SUSPECT ASBESTOS CONTAINING MATERIALS

SCHOOL NAME: **Illiana Christian High School - Lansing**
ID NUMBER: **44-016-1580-039X**

DATE OF REINSPECTION: 5/15/2013

The following suspect asbestos containing materials were noted in the building, however, they are not technically covered under the AHERA rule. This list is provided for informational purposes only and is not meant to incorporate the materials into the AHERA asbestos management plan for this building. Please note that applicable asbestos regulations must be followed prior to any disturbance of these materials.

Material Description	Location
Chalkboards	1947 Original Building, 1957 Addition, 1967 Addition & 1975 Addition Various Areas
Fire Bricks	Welding Tables
Kiln(s)	1967 Addition Shop Area
Lab Table Tops (no utilities)	Various Areas
Stage Curtains	Stage(s)
Stage Light Wire Insulation (not hard-wired)	Stage(s)

INSPECTOR: **Jack Shelton**

IDPH LICENSE#: **100-01479**

ASBESTOS PROGRAM POLICY STATEMENT

[This policy statement supersedes any previously adopted policy statements.]

The asbestos policy of the school [Local Education Agency (LEA)] is as follows:

We will continue to comply with the AHERA rules and regulations as set forth in 40 CFR part 763 of Federal Register on October 30, 1987, and in IDPH Section 855. The Asbestos Management Plan was put into effect approximately June 9, 1989 or within one year of the date of the initial inspection. A complete set of Asbestos Management Plan books for each building will be kept at the main administration office, and each school office will have a copy of its respective Asbestos Management Plan.

We understand that the Asbestos Management Plan is followed to help preserve the health and safety of building occupants.

Any asbestos containing material that is damaged or may become damaged will be repaired by an EPA/AHERA-accredited, IDPH-licensed asbestos worker.

All accessible asbestos containing areas and repaired materials will be maintained in good condition.

All the tunnel/crawlspace areas containing damaged asbestos materials will be repaired within one year and maintained, or the spaces will be locked and/or restricted, with entry permitted only by EPA/AHERA-accredited, IDPH-licensed asbestos workers wearing respirators and disposable suits. Tunnels requiring abatement will be sealed with access remaining restricted until material is abated.

Warning labels will be posted on all known or assumed ACBM in all maintenance areas to indicate the presence of asbestos.

Prior to any remodeling or renovation projects, an inspection will be completed to determine what asbestos containing materials might be affected, and proper procedures will be carried out to ensure AHERA compliance. Any suspect asbestos containing building material (ACBM) not previously addressed will be assumed to contain asbestos until inspected, sampled and analyzed to determine asbestos content.

Building occupants will be notified annually about the availability of the Asbestos Management Plan and about asbestos-related activities. The dated notification will be filed in the Asbestos Management Plan. Even if all asbestos materials are removed or if all building materials are determined not to contain asbestos, the building occupants will be notified each year of the availability of the Asbestos Management Plan.

Any buildings leased, acquired, or put into use on or after October 12, 1988 as a school building (as defined by AHERA) will be inspected for asbestos and have an Asbestos Management Plan developed prior to school use.

Outside contractors will be required to obtain a work permit before undertaking maintenance or remodeling work. The contractor will be notified of the Asbestos Management Plan and the location of any asbestos materials that must not be disturbed. The signed work permits will be filed in the Asbestos Management Plan.

Custodial/maintenance personnel, including summer employees, will receive the required two (2) hours of asbestos awareness training, and any newly hired custodial/maintenance personnel will receive this required training within 60 days of employment. The training documentation will be filed in the Asbestos Management Plan. The training will be renewed on an annual basis to meet OSHA requirements.

We will provide an in-house asbestos coordinator for our school's asbestos program. Our in-house asbestos coordinator is:

Name_____ Phone_____

The Asbestos Designated Person will oversee any minor operations and maintenance removal of less than three square feet or three linear feet of asbestos containing material, or the cleanup of any minor fiber release, and will ensure that six-month surveillances are completed.

If we need to remove any asbestos containing building materials, such as prior to any repair, remodeling, renovation or demolition work, we will follow applicable asbestos rules, such as the use of an EPA/AHERA-accredited IDPH-licensed designer to design the project and project managers/air sampling professionals during the removal process.

If we have a new building or addition lacking an architect statement (stating that no asbestos containing materials were specified for use in the project), an original asbestos inspection of that building or addition will be completed, and subsequent six-month surveillances and three-year reinspections will be completed as applicable.

We will only employ an IDPH-licensed asbestos abatement contractor to complete response actions. We will complete the response actions in accordance with the response action timelines provided in the management plan documentation. If we disagree with a response action or its timelines, we will consult with a licensed asbestos management planner to discuss the situation and amend the plan accordingly.

This policy statement may be revised at any time, and the Asbestos Management Plan may be updated as needed.

_____ _____ _____

LEA ADMINISTRATOR LEA DATE

[If you have questions about or need assistance with any of the above statements, please do not hesitate to call IDEAL at (800)535-0964.]

MATERIALS SAMPLED/ ASSUMED DURING REINSPECTION

ASBESTOS CONTAINING AREAS

LISTED ASSUMED AREAS

SCHOOL NAME: **Illiana Christian High School**
ID NUMBER: **44-016-1580-039X**

DATE OF REINSPECTION: 5/15/2013

According to the March 1999 Illinois Department of Public Health (IDPH) regulations [(Section 855.310(m)(2)]:

> "Any additional suspect ACBM found during the reinspection, that was not included in the original management plan or previous reinspection report, shall be sampled according to procedures in Section 855.310(d) or listed as assumed ACBM and added to the management plan."

The following suspect asbestos containing materials were found in the building and were not sampled as part of the reinspection. Therefore, they are listed as assumed to contain asbestos.

Material Description	Location
Glass Block Mortar	Various Areas

For additional documentation on each listed assumed area, we recommend having a licensed inspector complete an Inspection Report form for each material, along with diagrams showing the location of each material and photos. This additional service is not part of the scope of service for a reinspection.

INSPECTOR: **Jack Shelton**

IDPH LICENSE#: **100-01479**

NON-ASBESTOS CONTAINING AREAS

RESPONSE ACTIONS & AMENDMENTS

HAZARD ASSESSMENT & RESPONSE ACTION DETERMINATION
Thermal System Insulation & Friable Surfacing & Miscellaneous Materials

SCHOOL NAME: **Illiana Christian High School**
ID NUMBER: **44-016-1580-039X**
BUILDING: **1957 Addition**

SAMPLE AREA ID: **2010-MCB**
SAMPLE AREA DESCRIPTION: **2x4 Pinhole Replacement Ceiling Panel**

HAZARD ASSESSMENT:
This area **contains** asbestos. Per the inspector's assessment, this material is **not damaged.**

Per typical building layouts and previous experience, I, the management planner, have deemed the disturbance factor to be **high.** A disturbance factor is based on the accessibility of the material, activity levels, vibration, and air erosion in the area where the material is located.

It is anticipated that there is air flow in the building.

POTENTIAL DAMAGE CLASS:

-Not Applicable
[Material is already damaged or significantly damaged.]

X -Potential Significant Damage
[Material is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. There are indications that there is a reasonable likelihood that the material or its covering will become *significantly damaged*, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. The material is subject to major or continuing disturbance, due to factors including but not limited to accessibility or, under certain circumstances, vibration or air erosion.]

-Potential Damage
[Material is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. There are indications that there is a reasonable likelihood that the material or its covering will become *damaged*, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.]

-Low Potential Damage
[Material has a reduced likelihood for damage based on the current condition of the material and the school's O&M practices and preventative measures that have been taken to reduce the potential for damage or the material is in an area not readily accessible by building occupants such as behind walls and above ceilings.]

RESPONSE ACTION NUMBER: 5

1. FOR THERMAL SYSTEM INSULATION MATERIALS: Immediately isolate the functional space(s) which is significantly damaged and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials.
   FOR SURFACING AND MISCELLANEOUS MATERIALS: Immediately isolate the functional space(s) which is significantly damaged and restrict access. Remove all damaged materials in the functional space, unless enclosure or encapsulation is sufficient to contain fibers.
   FOR ALL ACM NOT REMOVED: Maintain ACM in good condition under O&M program.
2. Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.
3. Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
4. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
5. Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, response actions other than O&M, including area isolation, may be required. Maintain ACM in good condition under O&M program.
6. Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M program.
7. Maintain ACM in good condition under O&M program.

Note: An O&M program may include enclosure and encapsulation where appropriate to increase the effectiveness of O&M.

Response actions (1-7) above indicates **priority** for removal.

The Management Planner inference for damage (or potential damage) may be different from Inspector's responses.

HAZARD ASSESSMENT & RESPONSE ACTION DETERMINATION
Thermal System Insulation & Friable Surfacing & Miscellaneous Materials

SCHOOL NAME: **Illiana Christian High School**
ID NUMBER: **44-016-1580-039X**

SAMPLE AREA ID: **2010-MCB**

HEALTH AND SAFETY MEASURES:
Ceiling tile should not be subjected to thumb tacks or ANY attachment device, nor should it be replaced or disturbed without following the outline in the O & M Plan. Any damage should be repaired within six months.

RECOMMENDATIONS & COST ESTIMATES FOR AREA:
If the LEA would like to remove this material, a cost estimate can be determined at that time.

Operations & Maintenance program per year: $ <2,000.00

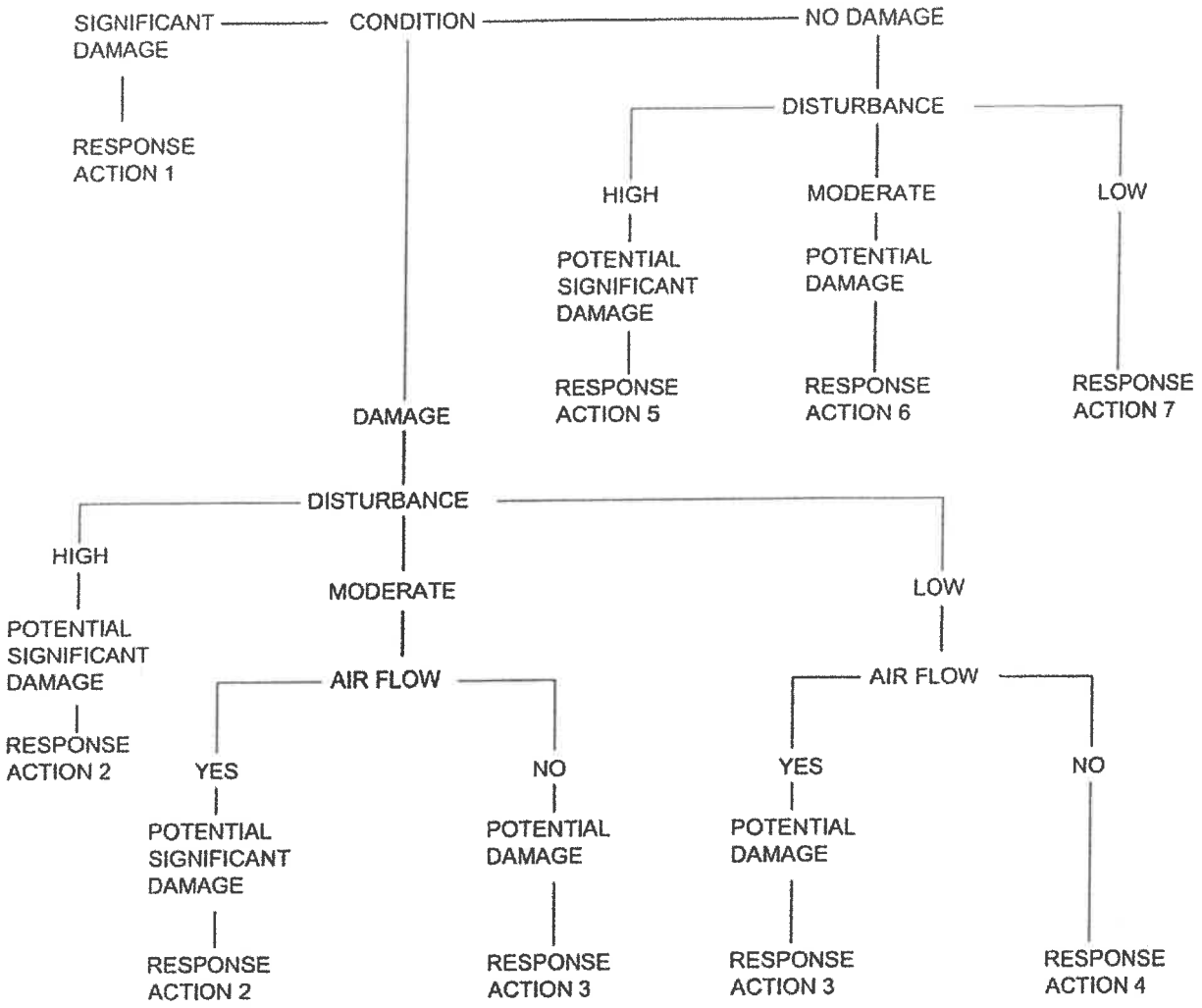
Note: The estimate does not include replacement of materials in affected areas. Also, price is based on local contractor's prices and does not reflect actual price. Actual price is determined after bidding process is complete.

Removal is always an option under AHERA regulations.

Enclosure and Encapsulation are initially less costly, but **total removal** is most cost effective over time.

INSPECTOR:	**Jack Shelton**
IDPH LICENSE#:	**100-01479**
INSPECTION DATE:	**5/15/2013**
MANAGEMENT PLANNER:	**Jerry L. Wilson**
IDPH LICENSE#:	**100-01338**
REVIEW DATE:	**6/25/2013**

DECISION TREE - Thermal System Isulation & Friable Surfacing and Miscellaneous Materials



Response Actions and Priority for Removal:

1. FOR THERMAL SYSTEM INSULATION MATERIALS: Immediately isolate the functional space(s) which is significantly damaged and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials.
   FOR SURFACING AND MISCELLANEOUS MATERIALS: Immediately isolate the functional space(s) which is significantly damaged and restrict access. Remove all damaged materials in the functional space, unless enclosure or encapsulation is sufficient to contain fibers.
   FOR ALL ACM NOT REMOVED: Maintain ACM in good condition under O&M program.
2. Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.
3. Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
4. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.
5. Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, response actions other than O&M, including area isolation, may be required. Maintain ACM in good condition under O&M program.
6. Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M program.
7. Maintain ACM in good condition under O&M program.

SCHOOL INFORMATION FORM

IDEAL
ENVIRONMENTAL
ENGINEERING, INC.

FAX COVER SHEET

DATE: May 21, 2013

TO FAX NUMBER: 217-785-5897
TO CONTACT PERSON: Mr. John Riley, Chief
COMPANY: IDPH

FROM: Jessica Stearns
PAGES (INCLUDING COVER): 2
SUBJECT: Asbestos Program – School Information Forms

The following AHERA Three-Year Reinspection School Information Form(s) are respectfully submitted:

Public School District Name:
School Name:

Private School Name: Illiana Christian High School - Lansing

If this document is improperly transmitted, please call **(800) 535-0964** or **(309) 828-4259**.

2904 Tractor Lane, Bloomington, IL 61704-9163 • Phone: (800)535-0964 or (309)828-4259 • Fax: (309)828-5735
www.idealenvironmental.com • Email: info@idealenvironmental.com

ILLINOIS DEPARTMENT OF PUBLIC HEALTH
AHERA THREE YEAR REINSPECTION
ASBESTOS PROGAM
SCHOOL INFORMATION FORM

SECTION I

SCHOOL_NAME: ILLIANA CHRISTIAN HIGH SCHOOL
SCHOOL ID NUMBER: 14-016-1580-039Y
ADDRESS: 2261 INDIANA AVENUE
CITY: LANSING IL 60438

LAST REINSPECTION DATE: 5/18/2010

SECTION II *(Please type or print)*

PLEASE COMPLETE THE FOLLOWING FOR YOUR CURRENT THREE YEAR REINSPECTION:

DATE REINSPECTION COMPLETED: 5/15/13 ENROLLMENT 540
IDPH LICENSED INSPECTOR NAME: JACK SHELTON
IDPH LICENSE #: 100-01479
IDPH LICENSED MANAGEMENT PLANNER NAME: Jeny L. Wilson
IDPH LICENSE #: 100-01338

DESIGNATED PERSON: [signature] PHONE: 708 474-0515

Signature of Designated Person AS TURKSTRA *Date* 5-15-2013

SECTION III

PLEASE COMPLETE THE FOLLOWING INFORMATION FOR ANY CHANGES WITHIN THE SCHOOL DISTRICT.

School building has been sold. ~~Date of Sale:~~
School has been closed. ~~Date closed:~~
School building has been demolished. ~~Date:~~
School building is asbestos free since last reinspection:

Please explain in writing why the school building is now asbestos free and include the supporting documentation.

If a new school building has been added to the district, submit either and exclusionary statement or a management plan and inspection report. Include the complete name, address and city of school building.

Other (explain):

IL 482-1026
Revised 09/05

HP 3180 Fax

Fax Log for
IDEAL Environmentaj
3 3285735
M_ 21 2013 8:17a

Last Transaction

Date	Time	Type	Station ID	Duration	Pages	Result
May 21	08:16a	Fax Sent	12177855897	1:07	2	OK

APPENDIX

Illinois Department of
PUBLIC HEALTH

ASBESTOS PROFESSIONAL LICENSE

ID NUMBER	ISSUED	EXPIRES
100 - 01479	3/14/2012	05/15/2013

JACK SHELTON
1440 E COLLEGE APT 6
NORMAL, IL 61761

Environmental Health

ENDORSEMENTS	TC EXPIRES
INSPECTOR	8/12/2012
PROJECT MANAGER AIR SAMPLING PROFESSIONAL	3/18/2012

Alteration of this license shall result in legal action
This license issued under authority of the State of Illinois Department of Public Health
This license is valid only when accompanied by a valid training course certificate.

SAFETY TRAINING CENTER

6520 Manchester Avenue, St. Louis, MO 63139 * Phone: 314-652-4STC

Environmental and Occupational Safety & Health Training

Does hereby certify

Jack Shelton

2904 Tractor Lane, Bloomington, IL 61704

Has successfully completed and passed the course examination with at least 70% for re-accreditation under AHERA (Title II)

Asbestos Building Inspector Refresher

Class Date:	***August 10, 2012***
Examination Date:	***08/10/2012***
STC Certificate Number:	***STC-08102012-000310ABIR***
Certification Expiration:	***08/10/2013***

David M. Mendoza – President/Training Director
Certified Environmental Specialist
OSHA Authorized Instructor

This training course is accredited by the Illinois Department of Public Health and the Missouri Department of Natural Resources

Illinois Department of
PUBLIC HEALTH

Pat Quinn, Governor
LaMar Hasbrouck, MD, MPH, Director

525-535 West Jefferson Street • Springfield, Illinois 62761-0001 • www.idph.state.il.us

2/14/2013

JERRY L WILSON
407 NORTH CENTER STREET
COLFAX, IL 61728

ASBESTOS PROFESSIONAL LICENSE ID NUMBER: 01338

Enclosed is your Asbestos Professional License that expires 05/15/2014

	CERTIFICATE EXPIRATION DATE
INSPECTOR	8/10/2013
PROJECT DESIGNER	8/3/2013
MANAGEMENT PLANNER	8/10/2013
PROJECT MANAGER	8/9/2013
AIR SAMPLING PROFESSIONAL	

If you have any questions or need further assistance, contact the Asbestos Program at (217)782-3517 or fax (217)785-5897.
Our WEB address is http://www.idph.state.il.us/envhealth/ehhome.htm

Illinois Department of
PUBLIC HEALTH

ASBESTOS PROFESSIONAL LICENSE

ID NUMBER	ISSUED	EXPIRES
100 - 01338	2/25/2013	05/15/2014

JERRY L WILSON
407 NORTH CENTER STREET
COLFAX, IL 61728

Environmental Health

ENDORSEMENTS	TC EXPIRES
INSPECTOR	8/10/2013
PROJECT DESIGNER	8/3/2013
MANAGEMENT PLANNER	8/10/2013
PROJECT MANAGER	8/9/2013
AIR SAMPLING PROFESSIONAL	

Alteration of this license shall result in legal action
This license issued under authority of the State of Illinois Department of Public Health
This license is valid only when accompanied by a valid training course certificate.

SAFETY TRAINING CENTER

6520 Manchester Avenue, St. Louis, MO 63139 * Phone: 314-652-4STC

Environmental and Occupational Safety & Health Training

Does hereby certify

Jerry L. Wilson

2904 Tractor Lane, Bloomington, IL 61704

Has successfully completed and passed the course examination with at least 70% for re-accreditation under AHERA (Title II)

Asbestos Building Inspector Refresher

Class Date:	***August 10, 2012***
Examination Date:	***08/10/2012***
STC Certificate Number:	***STC-08102012-000303ABIR***
Certification Expiration:	***08/10/2013***

David M. Mendoza – President/Training Director
Certified Environmental Specialist
OSHA Authorized Instructor

This training course is accredited by the Illinois Department of Public Health and the Missouri Department of Natural Resources

STC SAFETY TRAINING CENTER

6520 Manchester Avenue, St. Louis, MO 63139 * Phone: 314-652-4STC

Environmental and Occupational Safety & Health Training

Does hereby certify

Jerry L. Wilson

2904 Tractor Lane, Bloomington, IL 61704

Has successfully completed and passed the course examination with at least 70% for re-accreditation under AHERA (Title II)

Asbestos Management Planner Refresher

Class Date:	***August 10, 2012***
Examination Date:	***08/10/2012***
STC Certificate Number:	***STC-08102012-000056AMPR***
Certification Expiration:	***08/10/2013***

David M. Mendoza – President/Training Director
Certified Environmental Specialist
OSHA Authorized Instructor

This training course is accredited by the Illinois Department of Public Health and the Missouri Department of Natural Resources

Building Renovation Information

When renovating or demolishing buildings that are used for K-12 school purposes, two separate sets of asbestos regulations apply to the projects. These regulations are AHERA (Asbestos Hazard Emergency Response Act) and NESHAP (National Emission Standards for Hazardous Air Pollutants). [Other asbestos regulations may also apply to your project or in your locality, however, this information is limited to AHERA and NESHAP regulations only.]

AHERA regulations:

- Require an ongoing asbestos management plan program (including six-month surveillances, three-year reinspections, etc.) in school buildings only
- Implemented in the late 1980's
- Require only school interiors to be inspected for asbestos but also include entry porticos, covered walkways and areas used to condition the air in the building, all of which may be exterior to the building
- Allow schools to assume materials to contain asbestos

NESHAP regulations:

- Require commercial and public buildings, including schools, to be inspected for asbestos prior to renovations and building demolitions
- Implemented in late 1990
- Require the interior and exterior of buildings to be inspected for asbestos prior to disturbance
- Do not allow suspect asbestos containing materials to be assumed to contain asbestos and require sample analysis to determine asbestos content
- Require any friable or category II non-friable materials that may have been previously analyzed and found to contain trace amounts of asbestos by Polarized Light Microscopy (PLM) to be analyzed by Point Count Method or Transmission Electron Microscopy (TEM) to verify asbestos content

NESHAP rules are not often talked about in school settings, as many people only think about school AHERA rules. Although an LEA can use AHERA sampling results for NESHAP purposes prior to renovation and demolition, a school's AHERA asbestos program does not satisfy the NESHAP requirements prior to disturbing materials.

For interior renovation projects, NESHAP and AHERA regulations apply. Additional sampling may be necessary prior to any disturbance.

For exterior renovation projects, in most cases, only NESHAP regulations apply. It is extremely likely that additional sampling will be necessary prior to any disturbance.

Prior to the start of any renovation or demolition project, contact an asbestos consultant to ensure all required regulations for your project are followed before any materials are disturbed.

<u>This general information is based upon complex environmental rules and regulations and is not meant to be a substitute for the written regulations.</u>

General Definitions

Asbestos Containing Material (ACM) - Material containing greater than 1% asbestos as determined by Polarized Light Microscopy (PLM).

Homogeneous Area – An area of material that is uniform in texture, size and color. The number of required samples for a material must be collected per homogeneous area.

Friable – Describes a material that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. See the General Comments section for more information on friability.

Material Type – The category in which the material is placed per AHERA definitions. The material type helps to determine the number of samples required to be collected for a material.

> **Surfacing Material** – Material that is sprayed-on, troweled-on or otherwise applied to surfaces, such as: acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing and other purposes.
> **Thermal System Insulation (TSI) Material** – Insulation applied to pipes, fittings, boilers, breeching, tanks, ducts and other structural components to prevent heat loss or gain.
> **Miscellaneous Material** – Any material which is not categorized as surfacing or thermal.

Damage Condition – The condition of the material in regards to damage. The damage condition is classified into three categories.

> **Not Damaged** – Material that has <1% localized or distributed damage as determined by an asbestos inspector.
> **Damaged** – Material that has 1-25% localized damage or 1-10% distributed damage as determined by an asbestos inspector.
> **Significantly Damaged** – Material that has >25% localized damage or >10% distributed damage as determined by an asbestos inspector.

Response Action – Identifies the appropriate action that the LEA should take regarding a material. A response action is assigned by an asbestos management planner and is required for all thermal system insulation materials and for all friable surfacing and miscellaneous materials.

O&M – Operations and maintenance

Accessible – For the purposes of this report, "accessible" materials, spaces or areas mean those materials, spaces or areas for which nothing is required to be removed in order to access the material, space or area (i.e. no walls, ceilings, floors, outlet covers, etc. are required to be removed).

Inaccessible – For the purposes of this report, "inaccessible" materials, spaces or areas mean those materials, spaces or areas for which something is required to be removed in order to access the material, space or area (i.e. a wall, ceiling, floor, outlet cover, etc. is required to be removed).

Area Estimate – The quantity of accessible material.

Newly Installed Material – For the purpose of this reinspection, IDEAL defines a newly installed material as one installed since the date of a school's initial inspection report. [Most initial inspection reports are dated 1988-1989.] When known, dates of installation are provided. Since asbestos is not currently banned in the United States, materials are considered suspect asbestos containing regardless of when they were installed. If any newly installed materials are planned to be disturbed — whether they are recorded as assumed to contain asbestos, simply documented as newly installed materials, or not documented at all in the asbestos management plan — then asbestos sampling protocol that is current at the time of disturbance will need to be reviewed.

Signed Exclusionary Statement / Architect Non-ACM Letter – Building materials installed during new building or building addition projects involving an architect can be excluded from periodic surveillance and reinspection for the ongoing asbestos management plan program if there is a statement on file (signed by the architect of record) which declares that the use of non-asbestos containing materials was specified for the project. If no architect statement is present, the buildings cannot be excluded from periodic surveillance or reinspection. Also, regardless of the status of an architect statement, if any of these new materials will be disturbed during any planned renovation work, asbestos sampling protocol current at the time of disturbance will need to be reviewed.

General Comments

The friability listed for each material in this report was based on the inspector's opinion of the condition of the material at the time of the reinspection and may differ from that of another inspector. Some materials which may be currently listed as non-friable in their current condition must be treated as friable during disturbance (i.e. nailing holes, renovation work, demolition, etc.), as they are likely to become friable during disturbance. These materials include but are not limited to transite, plaster, drywall, drywall joint compound and non-damaged thermal system insulation materials.

Accessible building areas were visually inspected for known and suspect asbestos containing materials. The inspection was non-destructive in nature, and no demolition of building components was performed in order to identify inaccessible materials. IDEAL does not guarantee that all suspect asbestos containing materials have been identified in the building. Suspect asbestos containing materials behind walls, under floors, or other similar inaccessible areas are often hidden from visual observation. IDEAL will not be held responsible for any misidentification of materials which are covered, such as by paint, wallpaper, carpet, etc. Any suspect asbestos containing materials not yet sampled must be assumed to contain asbestos until sampled.

Any buildings or building sections which were locked or otherwise inaccessible at the time of the reinspection were not reinspected. Any suspect asbestos containing materials found within these buildings or building sections which have not been previously identified in the asbestos management plan must be assumed to contain asbestos until sampled.

We recommend ensuring that your custodial/maintenance staff and outside contractors such as plumbers are fully aware of all known or assumed asbestos containing materials in the building. Disturbance of these materials, even done without knowledge, can cause costly major or minor fiber releases and could potentially result in fines and penalties.

Please note that a three-year reinspection does not address materials in the building which have been previously sampled and found to be non-asbestos containing. Therefore, it is important to look at all asbestos management plan documentation (original inspection report and all subsequent sampling reports) for information on previously identified non-asbestos containing materials.

Any samples collected during this reinspection were analyzed by a National Voluntary Laboratory Accreditation Program (NVLAP)-approved or American Industrial Hygiene Association (AIHA)-accredited laboratory. IDEAL does not provide warranty for the services of the laboratory.

If provided, cost projections and quantity estimates of material are based solely on accessible areas (as defined in the General Definitions) and may not include materials under carpet, behind walls, above ceilings, inside boilers, under floors, etc. Quantity estimates are provided as a general indication of the amount of material present. Quantity estimates are not guaranteed. All quantities and conditions that affect costs for asbestos removal and disposal should be verified prior to asbestos removal.

Please note that additional inspection and sampling may be required prior to renovation or demolition work. For example, AHERA regulations address the interior of K-12 school buildings but not the exterior of the buildings. Exterior materials are regulated by National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. It is likely that additional inspection and sampling will be required to comply with all applicable regulations.

If suspect asbestos containing materials not previously identified are found during demolition or renovation work, the work must stop, and the materials must be sampled and removed (if applicable) prior to proceeding with demolition or renovation work.

Information in this report is based on asbestos management plan documentation made available to the inspector at the time of this reinspection.

This report and the general comments herein are our interpretations of the regulations affecting K-12 school buildings. No warranty or guarantee, expressed or implied, is made as to the conclusions and/or professional advice and recommendations included in this report.

General Recommendations

Record-keeping is a very important part of AHERA compliance. Your records must be continually updated. The following are items that the LEA needs to ensure are kept up-to-date.

- ☐ The main LEA office must have a set of Management Plan Books for each building, and each building must have a copy of their respective plan. Books should be kept in an easy-to-find location, and school personnel should be aware of their location. A copy of any supplement book, including three-year reinspection reports, must also be kept at the main LEA office and each respective school building.

- ☐ The LEA must name a designated person. The designated person must be trained and must complete a designated person Assurances page. Copies of the Assurances page and training must go in each plan book.

- ☐ A parent/teacher notification letter must be sent out annually. Copies of the letter must go in each plan book. The letters must be dated. If a school uses their handbook or a newsletter to distribute the notification, a copy of the relevant dated page must be placed in each management plan book.

- ☐ All custodial and maintenance personnel, including summer employees, must receive two hours of asbestos awareness training. Documentation of this training for each person must be kept in each of the plan books. Any new custodial or maintenance personnel must be trained within 60 days of employment. (An annual refresher course is necessary to meet OSHA rules.)

- ☐ All short-term workers (phone workers, utility workers, exterminators, plumbers, electricians, etc.) must sign a work permit verifying that they were provided information regarding locations of known or assumed asbestos containing materials.

- ☐ Warning labels must be posted in routine maintenance areas such as mechanical rooms, boiler rooms, etc. on or adjacent to any known or assumed asbestos containing materials.

- ☐ Buildings leased, acquired, or put into use on or after October 12, 1988, as a school building (as defined by AHERA) must be inspected for asbestos and have a management plan developed prior to school use.

- ☐ Management plan updates such as six-month surveillance forms, notification letters, O&M activities, response action activities, reinspections, etc. must be in or with every plan book. If the plan book cannot be added to, or if it is full, a new three-ring binder should be started for this type of record-keeping.

- ☐ Some schools have made it a practice to document newly installed building materials in their management plan by obtaining Material Safety Data Sheets (MSDS's) and product labels declaring the materials to contain no asbestos, and by noting the installation and location of the materials with diagrams, photos and/or detailed descriptions. Currently, even with this information, the only acceptable way to prove that a material is non-asbestos containing is through sampling. However, if your LEA does make it a practice to obtain and file MSDS's and other verification of non-asbestos content, you may want to continue to do so in case the materials are ever accepted by IDPH and EPA as asbestos-free based on this type of documentation.

- ☐ Prior to doing any small or large renovation projects, including floor tile removal projects, the renovation area must be inspected to determine if all suspect asbestos containing materials that will be disturbed by the renovation work have been adequately sampled to determine asbestos content. If the materials have not been adequately sampled, they must be sampled prior to disturbance.

- ☐ If you are planning new building construction, please advise with your asbestos consultant and architect to help ensure that your new building can be excluded from your asbestos program.

The above recommendations are a general list and are not intended to cover all regulations. For additional assistance, please contact IDEAL at (800)535-0964, or contact IDPH, IEPA, or USEPA Region V.

SAMPLE LETTER TO MAINTENANCE PERSONNEL

Date: _____
From: Administrator
To: Maintenance Personnel
Re: Asbestos Program

Our required Asbestos Three-Year Reinspection was recently completed by Ideal Environmental Engineering, Inc. Please follow the attached policy statement. Also attached are other pages from the report I thought you might be interested in.

Asbestos rules and regulations affect our buildings and our building occupants. In addition to our concern for the health and safety of our students, employees, and visitors, there are substantial penalties for violating asbestos regulations.

If you have any questions or concerns about asbestos, please make them known to me through your supervisor.

Thanks.

SAMPLE PARENT/TEACHER NOTIFICATION LETTER

DATE: *(XXXX)*
TO: PARENTS AND STAFF
RE: ANNUAL ASBESTOS MANAGEMENT PLAN NOTICE
FROM: ***(NAME AND TITLE)***

This is to inform you of the status of ***(Name of School or District)*** asbestos management plan(s). It has been determined by the Illinois Department of Public Health and the Federal Environmental Protection Agency that asbestos is a potential health hazard, and precautions should be taken to avoid disturbing any asbestos containing materials.

As required, our building(s) was/were initially inspected for asbestos. Our inspection was conducted on ***(Date of Original inspection).*** The AHERA law requires that a visual surveillance of asbestos containing areas be completed every six months, and a reinspection conducted every three years. Any evidence of disturbance or change in condition will be documented in the Management Plan as required.

The Inspection/Management Plan is available for public review in the ***(Location of Management Plan)*** office. Should you wish to review the plans, please call to make an appointment between ***(business hours).***

Any concerns relative to asbestos containing materials should be directed to ***(contact/asbestos coordinator)*** at ***(address & phone #)***.

Sincerely,

(Name)
(Title)

SAMPLE PARENT/TEACHER NOTIFICATION LETTER STATING HOW YOU NOTIFIED

I, ***(name)***, ***(title)***, do hereby attest that the attached notification has been distributed by ***(mail, newsletter, handbook, etc.)*** to ***(parents, teachers, etc.)*** on ***(date notification was sent out)***.

_____

Signature

_____

Date

EMPLOYEE MEMORANDUM:

All outside contractors must report to the main office and sign a worker permit before starting a work project.

We are requesting your assistance with this matter.

If you see anyone in the building starting to conduct work without a signed permit, please direct the individual to the main office.

Sincerely,

_____ _____

Signature Date

_____

Title

REQUEST FOR MAINTENANCE WORK

CONTRACTOR NAME: _____

DATE: _____

TELEPHONE NUMBER: _____

1. JOB LOCATION: _____

2. REQUESTED STARTING DATE: _____ ANTICIPATED FINISH DATE: _____

3. DESCRIPTION OF WORK: _____

_____

4. DESCRIPTION OF ANY ASBESTOS CONTAINING MATERIAL/PRESUMED ASBESTOS CONTAINING MATERIAL THAT MIGHT BE AFFECTED: _____

_____

_____

5. NAME AND TELEPHONE # OF REQUESTER: _____

6. NAME AND TELEPHONE # OF SUPERVISOR: _____

NOTE: An application must be submitted for all maintenance work whether or not asbestos containing material might be affected. An authorization must be received before any work can proceed.

GRANTED-MAINTENANCE WORK APPROVAL PERMIT NUMBER: _____

DENIED: _____

BY: _____ TITLE: _____

NOTIFICATION AND TRAINING OF SHORT TERM WORKERS

I, _____, with the firm of _____, have been informed of the presence and the hazard of friable and non-friable asbestos containing material in this building this _____ day of _____ in the year _____. I will not disturb any asbestos areas in this building. I understand that I and/or my employer may incur substantial clean up costs and fines if I do disturb any asbestos areas in this building. I certify that if I am working near damaged or friable asbestos containing material or presumed asbestos containing material that I have received two hours of asbestos awareness training.

SIGNED BY and DATED: _____

MAINTENANCE WORK APPROVAL PERMIT NO. _____

1. AUTHORIZATION

   Authorization is given to_____
   to proceed with the following maintenance work:_____
   _____
   _____
   _____

2. PRESENCE OF ASBESTOS CONTAINING MATERIALS/PRESUMED ASBESTOS CONTAINING MATERIALS

   Asbestos containing materials/presumed asbestos containing materials are/are not present in the vicinity of the maintenance work.

3. WORK PRACTICES WHEN ASBESTOS CONTAINING MATERIALS/PRESUMED ASBESTOS CONTAINING MATERIALS ARE PRESENT

   The following work practices shall be employed to avoid disturbing asbestos:____
   _____
   _____

4. PERSONNEL PROTECTION IF ASBESTOS CONTAINING MATERIALS/PRESUMED ASBESTOS CONTAINING MATERIALS ARE PRESENT

   The following equipment/clothing shall be used/worn during the work to protect workers:_____
   _____
   _____

5. PROOF OF TWO HOURS OF ASBESTOS AWARENESS TRAINING IS ATTACHED FOR EACH CONTRACTOR EMPLOYEE WORKING NEAR DAMAGED OR FRIABLE ASBESTOS CONTAINING MATERIALS OR PRESUMED ASBESTOS CONTAINING MATERIALS.

SIGNED:_____ DATE:_____

ASBESTOS EMERGENCY REPAIR PHONE NUMBERS

If you need help in an emergency asbestos situation or just need repair work to meet the AHERA law, call:

8:00 AM - 4:30 PM
Monday - Friday
Office: (309)828-4259 or (800)535-0964

After 4:30 PM Weekdays or Holidays and Weekends call Ron Curry
Cell Phone: 309-261-1058

Our EPA/AHERA-accredited, IDPH-licensed professionals will respond quickly to all of your emergency situations, 24 hours a day, 7 days a week.

IDEAL
ENVIRONMENTAL
ENGINEERING, INC.

2904 Tractor Lane, Bloomington, IL 61704-9163

NOTICE!!

OUTSIDE CONTRACTORS
PLEASE REPORT TO MAIN OFFICE

OUTSIDE CONTRACTORS CANNOT WORK IN THIS BUILDING WITHOUT FIRST GETTING A PERMIT FROM ONE OF THE ASBESTOS COORDINATORS.

Short–term workers (e.g. telephone repair workers, contractors, etc.) who may come in contact with asbestos in a school must be provided with information about the location of Asbestos Containing Building Materials and suspect ACBM assumed to be ACM.

All employees shall be notified that no work of any kind may be performed without the notification and prior authorization.

NOTE: ONLY STATE OF ILLINOIS LICENSED ASBESTOS WORKERS CAN DISTURB OR REMOVE ASBESTOS. ALL ILLINOIS AND FEDERAL AHERA LAWS MUST BE FOLLOWED.

THE ASBESTOS DESIGNATED PERSON FOR THIS SCHOOL IS:

_____

_____

_____