## Brown School 201 Willow Ave. Somerville, MA 02144

AHERA Three-Year Reinspection

2023



# HUB TESTING LABORATORY, INC.

Environmental Testing and Consulting Service

Certified Woman-owned Business Enterprise (WBE)

95 Beaver Street Waltham, MA 02453

(781) 893-8330 FAX (781) 893-4414 www.hubtesting.net

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## A. AHERA Three Year Re-Inspection Report with Chart & Drawings



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REPORT FOR: City of Somerville

Dept. of Public Works

1 Franey Road

Somerville, MA 02143

ATTENTION: Matthew Bennett

Superintendent of Buildings

PROJECT: AHERA Three-Year Reinspection

SUBJECT: Brown School

201 Willow Ave.

Somerville, MA 02144

PREPARD BY: Hub Testing Laboratory, Inc.

Lynne Brimhall Projects Manager Management Planner

MA License No.: AP900405

DATE: September 2023



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DATE: September 2023

As required by the US Environmental Protection Agency's AHERA regulations, Hub Testing Laboratory has completed a survey and reassessment of asbestos containing materials in the Brown School of the Somerville Public School District. This report should be used in conjunction with the new chart format required by the Department of Labor Standards and elaborates on the condition of damaged materials as well as reviews the ongoing responsibilities of the Local Education Agency (LEA). Susan Boyle (AI 060146) completed the inspection on September 29, 2023.

When sampling of suspect asbestos-containing materials was required, samples representative of the material were collected. If samples of thermal systems insulation and miscellaneous materials were necessary, they were collected in unobtrusive locations. If samples of surfacing materials were necessary, they were collected using the guidance document method for random sampling.

This latest survey report should be incorporated into the files that the LEA maintains pertaining to response actions, operations & maintenance activities, six-month surveillances, training, air sampling and major asbestos activities, etc.

The re-inspection consisted of reviewing previous documentation available, interviewing building personnel, and performing a thorough survey of each functional space in the building.

The Brown School appears to have most of the original materials identified in the first few inspections. If new materials are installed, safety data sheets should be added to the AHERA files.

The floor plan found in Attachment B should be used to identify functional spaces identification.

The standardized form from the Department of Labor Standards has been completed and is found in Attachment A.

The management planner develops recommendations based on the hazard ranking and removal ranking. See below.

<b>Hazard Rank</b>	ACBM Condition	ACBM Disturbance Potential
7	Significantly Damaged	Any
6	Damaged	Potential for Significant Damage
5	Damaged	Potential for Damage
4	Damaged	Low
3	Good	Potential for Significant Damage
2	Good	Potential for Damage
1	Good	Low

Removal Rank	AHERA Category	Response Action Required By AHERA
1	Significantly Damaged	Evacuate or isolate the area if needed. Remove the ACBM or enclose/encapsulate if sufficient to contain fibers. Repair of thermal systems is allowed if feasible and safe. Continue O&M
2	Damaged & Potential for Significant Damage	Evacuate or isolate the area if needed. Remove, enclose or encapsulate or repair to correct damage. Take steps to reduce potential for disturbance. Continue O&M
3	Damaged & Potential for Damage	Evacuate or isolate the area if needed. Remove, enclose or encapsulate or repair to correct damage. Take steps to reduce potential for disturbance. Continue O&M
4	Damaged	Evacuate or isolate the area if needed. Remove, enclose or encapsulate or repair to correct damage. Take steps to reduce potential for disturbance. Continue O&M
5	Potential for Significant Damage	Evacuate or isolate the area if needed. Take steps to reduce potential for disturbance. Continue O&M Continue O&M
6	Potential for Damage	Continue O&M
7	All remaining ACBM	Continue O&M

The materials previously identified in the Brown School are in relatively good condition. However, there are some materials that will require attention. Based on the recent inspection, the following actions for ongoing asbestos management in the school are recommended. All work beyond the capabilities of a trained and licensed in house O&M maintenance person must be performed by a licensed and qualified asbestos removal contractor. A licensed Project Designer must design all abatement projects outside of O&M.

- 1. Perform a periodic surveillance of known and assumed asbestos-containing materials every six months until such time. The chart included in this report may be used for the documentation. Next survey should be performed in March of 2024 and has an estimated cost of \$1,000.
- 2. Provide training for new maintenance personnel within 60 days of hire and provide training annually to all maintenance personnel. Training should be conducted during the Christmas break and has an estimated cost \$2,250 which is for all maintenance personnel within the school district.
- 3. All friable asbestos-containing materials in routine maintenance areas must be maintained with identifying labels. Some labels are present, but further labeling will be necessary. Asbestos labels can be bought and the maintenance personnel can place them where appropriate. This should be completed by Christmas break of this year.
- 4. The school should continue with the use of commercial grade HEPA vacuums in lieu of dry sweeping. In classrooms where projectors have been installed, a thorough cleaning using HEPA vacuum and wet wipe techniques should be performed.
- 5. The pipe insulation in the storage room next to the handicapped ramp has a hazard ranking of 3 and should be removed during summer break. Estimated cost of design and monitoring is \$3,500. Funding should be appropriated using a cost of \$2,500 for removal.
- 6. The majority of 12" x 12" floor tiles throughout the school appears to have been installed sometime after 2012. Safety data sheets should be obtained to determine if the materials are non-asbestos. The 12" Tan floor tile with orange & brown and the golden/tan speckled linoleum are damaged and have a hazard rank of 3. These materials are assumed and should be sampled to determine if further action is necessary. An estimated cost of \$1,200 will be needed to conduct the sampling. Care should be taken to not cause further damage. Efforts, such as a thick coat of wax, should be taken to prevent the delamination of the floor tiles in the building. The condition of the floor tiles should be monitored during the six-month surveillances, which is performed as required by a knowledgeable person. This process will aid in documenting when tiles become broken and to determine when and where significantly damaged tiles need to be replaced
- 7. Assumed asbestos containing materials such as the various ceiling tiles, textured application on sheetrock, various generations of sheetrock, joint compounds, CMU and associated mortar, and smooth plaster have a hazard ranking of 4 or 6. Sampling, in accordance with AHERA, is required to determine if further action is necessary. An estimated cost of \$3,000 will be needed to conduct the sampling. If funding is available, sampling could be conducted over the Summer break. Care should be taken to not cause further damage.
- 8. Keep an updated copy of the Management Plan in the school as well as a master copy with the Mr. Bennett. The plan must be available, without restriction, to the public, school personnel and their representatives, parents and representatives of EPA and the state, for inspection during normal business hours.

9. Perform a three-year reinspection in September of 2026 which should cost around \$3200.



School: Benjamin G Brown School

Address: 201 Willow Ave., Somerville, MA

Date of Reinspection: 9/29/2023

Inspector Name: Susan Boyle

Inspector Signature:\_

License #: AI 060146

Material	Location (Homogeneous Area)	QTY	Friable	Phys Assess Category	Assumed ACM	Sample Date ACM Y or N	Recommendation	Amount/Location of Damage; Type of Damage	Schedule Begin/Complete	Special Cleaning
TSI Pipe insulation	Storage room next to handicapped ramp	14 LF	F	1	Y		Remove, only remaining TSI in building	<10%, storage rm beside handicap ramp, access- low, vibration -low, air erosion -low		N
TSI pipe insulation (no access)	Assumed in pipe chase in boy's and girl's bath	< 50 LF	F	N/A	Y		Not visible			N
Fiberglass pipe insulation	Throughout the school, except for above	N/A	F	N/A	N – under regs	N/A	N/A	N/A	N/A	N/A
Boiler insulation	2 smaller package style boilers located on 3 <sup>rd</sup> floor in closet and Principal's office (Weil McLain). 2 new large package style high efficiency boilers in boiler room (HB Smith 28 High Efficiency)	4 boilers	F	5	Y					N

Туре	Amount	Friability
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S-Surfacing	LF-Linear feet	NF-Non-friable
M - Miscellane	ous	

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  - \*Potential for future disturbance for categories 5, 6, & 7
    Access, Vibration, Air Erosion: L-low M-medium H-high

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2 x 4 Ceiling tile, mostly large thick fissures with a few random styles mixed in	1 <sup>st</sup> floor girl's bath, 2 <sup>nd</sup> floor nurse's office, handicap bath and ramp in basement	1,000 SF	F	4	Υ		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
2 x 4 Ceiling tile, mostly small fissures with dots and with a few random styles patched in	Basement boy's bath	300 SF	F	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
2 x 2 Rough fissure ceiling tile with dots	3 <sup>rd</sup> floor bathrooms	100 SF	F	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
2 x 2 Small rough fissures ceiling tile with dots	Library, computer room, room 11, stairs and landing to 3 <sup>rd</sup> floor C side	2,500 SF	F	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N

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Old horsehair plaster	Walls throughout, except where drywall noted (in 2015 was identified as brown on 1st fl. and light blue on 2nd fl.)	≈50,000 SF	F	4	N	N-25060- march 11, 2015 (NVLAP 101147) N-27680- January 18, 2018	N/A	≈25% damage in HVAC rooms, no damage in classrooms	N/A	N/A
Smooth plaster	Ceiling - Basement cooking area	550 SF	F	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Textured application (sand texture on sheetrock)	Throughout 1st and 2nd floors, 3rd floor where no CT's, basement hall between kindergartens, HVAC behind kindergarten Side B, custodial, teachers' room and basement art classroom	≈13,000 SF	F	7	Υ		Sample to prove negative until such time as it is proven negative include in O&M Plan			N

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Associated sheetrock	Throughout 1st and 2nd, 3rd where no CT's basement hall between kindergartens,. HVAC behind kindergarten Side B, custodial, teachers room and basement (art) classroom	≈13,000 SF	F	7	Υ		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Sheetrock (2)	Wall between nurse's room	160 SF	F	5	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Associated joint compound			F	5	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N

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Sheetrock (3)	3 <sup>rd</sup> floor walls	1500 SF	F	4	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan	<10% damaged 3 <sup>rd</sup> floor bath nearer to the A side, landing on 2 <sup>nd</sup> to 3 <sup>rd</sup> floor A side		N
Associated joint compound			F	4	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Old sheetrock	Ceiling of boiler room, wall at teacher's room, walls at handicap ramp and bath.	1400 SF	F	4	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan	Boiler room, <10%		N
Associated joint compound	Painted, and exposed in some areas.		F	4	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan	Boiler room, <10%		N

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Brick	In Basement: chimney stack, walls in boys bathroom, boiler	3500 SF	NF	4	N	01-26-2024 N 33851-1 & 33851-2	<2.5% HVAC room behind side B kindergarten			N
Associated mortar	room, teachers room, cooking area, storage, hallway, custodial rm, HVAC rooms behind B side Kindergarten, storage rooms behind D side kindergarten, vent room and exterior access room off basement classroom (art), exposed on 3 <sup>rd</sup> floor,		NF	4	N	01-26-2024 N 33851-3 & 33851-4	<2.5% HVAC room behind side B kindergarten			N

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CMU	Handicapped ramp, lower section of dividing wall in basement	350 SF	NF	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Associated mortar	hallway		NF	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Wood paneling	Nurse's room	640 SF	NF	N/A	N/A	N – under regs	N/A	N/A	N/A	N/A
Adhesive associated			NF	7	Y		Sample to prove negative until such time as it is proven negative include in O&M Plan			N
Paneling	Basement - access rooms to	400 SF	NF	N/A	N/A	N – under regs	N/A	N/A	N/A	N/A
Adhesive associated (nailed in place, assumed behind)	exterior; D side.		NF	7	Υ		Sample to prove negative until such time as it is proven negative include in O&M Plan			N

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Gray vinyl cove base	Nurse's room, separating wall	20 LF	NF	N/A	N/A	N – under regs	N/A	N/A	N/A	N/A
Associated mastic			N	7	Υ		O&M, Installed sometime after 2012			N
Golden/tan speckled linoleum (backing)	Stairs both staircases	600 SF	F	4	Y		O&M, caulk any cracks, maintain in good condition until removal	Minor cracks <1%, risers		
9 x 9 Tan floor tile	Corner classroom A/D side below at least 2 layers of carpet	780 SF	N	5	N	9/10/12 Tile: 22869-12 3% Chrysotile	O&M  Approximately 65 SF removed near bath due to water leak (>2015)			N
Associated mastic			N	5	N	9/10/12 Mastic: 22869-13 5% Chrysotile	O&M			N

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12 x 12 Gray mottled floor tile (thickly mottled, darker gray)	Teacher's room	336 SF	NF	5	Y		O&M			N
Associated mastic			NF	5	Υ		O&M			N
12 x 12 Blue floor tile w/white & dark blue splotches	Room 2	896 SF	NF	5	Υ		O&M			N
Associated mastic			NF	5	Υ		O&M			N
12 x 12 Gray floor tile w/dark gray	Room between room 11 and computer room, room 8, room 9,	500 SF	NF	5	Y		O&M			
Associated mastic	office off library, storage top of side C stairs, stairs to 3 <sup>rd</sup> floor and C side landing		NF	5	Y		O&M			N

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12 x 12 Tan floor tile with orange & brown	Nurse's office, Halls of 1 <sup>st</sup> & 2 <sup>nd</sup> floors, stair landings, new principal's office	3850 SF	NF	4	Y		Sample, O&M	hallways sooner if	cupping causes	N
Associated mastic	(small end office A side), hall/coatroom behind nurse, main office, and resource room		NF	4	Y					
12 x 12 Off white floor tile with black	Room 6	336 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic			NF	7	Υ		O&M, Installed sometime after 2012			N
12 x 12 Off white floor tile with brown	Room 1	140 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic			NF	7	Υ		O&M, Installed sometime after 2012			N

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12 x 12 Mottled tan floor tile (new)	Room 1	200 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic			NF	7	Υ		O&M, Installed sometime after 2012			N
12 x 12 Gray floor tile with beige and white splotches	Room 6	560 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic			NF	7	Υ		O&M, Installed sometime after 2012			N
12 x 12 Tan floor tile with small brown splotches	Room 7 & room 5	900 SF per	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic			NF	7	Υ		O&M, Installed sometime after 2012			N
12 x 12 Light blue (large mottles) floor tile	Room 11 (800SF), 3 <sup>rd</sup> floor landing C side (138SF), & computer room	1738 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic	(800 SF)		NF	7	Υ		O&M, Installed sometime after 2012			N

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- 3: Significantly damaged (SD) surfacing
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- 5: Suspect or proven ABCM with the potential for D (\*one moderate)
- 6: Suspect or proven ABCM with the potential for SD (\*one high)
- 7. Any remaining suspect or proven ACBM (\*all low)
  - \*Potential for future disturbance for categories 5, 6, & 7
    Access, Vibration, Air Erosion: L-low M-medium H-high

School: Benjamin G Brown School

Address: 201 Willow Ave., Somerville, MA

Date of Reinspection: 9/29/2023

Inspector Name: Susan Boyle

Inspector Signature:\_

License #: AI 060146

Material	Location (Homogeneous Area)	QTY	Friable	Phys Assess Category	Assumed ACM	Sample Date ACM Y or N	Recommendation	Amount/Location of Damage; Type of Damage	Schedule Begin/Complete	Special Cleaning
12 x 12 Dark blue gray (large mottles) floor tile	Contrasting with light blue (Ig mottle) in room 11	38 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Associated mastic			NF	7	Y		O&M, Installed sometime after 2012			N
Carpet Adhesive on wood	3rd floor A side landing, 3rd floor principal's office and storage rms off principal's office, library	1700 SF	NF	7	Y		O&M, Installed sometime after 2012			N
Mosaic ceramic floor tile grout	At front entry	100 SF	NF	5	Y		O&M			N
Mosaic ceramic floor tile thin set/adhesive			NF	5	Y		O&M			N

Туре	Amount	Friability
T-TSI	SF-Square feet	F-Friable
S-Surfacing	LF-Linear feet	NF-Non-friable
M - Miscellane	ous	

- 1. Damaged or significantly damaged TSI
- 2. Damaged (D) surfacing
- 3: Significantly damaged (SD) surfacing
- 4: Damaged or significantly damaged misc.
- 5: Suspect or proven ABCM with the potential for D (\*one moderate)
- 6: Suspect or proven ABCM with the potential for SD (\*one high)
- 7. Any remaining suspect or proven ACBM (\*all low)
  - \*Potential for future disturbance for categories 5, 6, & 7
    Access, Vibration, Air Erosion: L-low M-medium H-high

School: Benjamin G Brown School

Address: 201 Willow Ave., Somerville, MA

Date of Reinspection: 9/29/2023

Inspector Name: Susan Boyle

Inspector Signature:

License #: AI 060146

Material	Location (Homogeneous Area)	QTY	Friable	Phys Assess Category	Assumed ACM	Sample Date ACM Y or N	Recommendation	Amount/Location of Damage; Type of Damage	Schedule Begin/Complete	Special Cleaning
1 x 1 Granite floor tile & 3x3 Granite floor tile thin set	3 <sup>rd</sup> floor Men's & women's baths	150 SF	NF	5	Υ		O&M			N
4x4 off white with tiny dots and contrasting 4x4 beige ceramic wall tile grout	3 <sup>rd</sup> floor Men's and women's baths	340 SF	NF	5	Y		O&M			N
4x4 off white with tiny dots and contrasting 4x4 beige ceramic wall tile thin- set/adhesive			NF	5	Y		O&M			N

Туре	Amount	Friability
T-TSI	SF-Square feet	F-Friable
S-Surfacing	LF-Linear feet	NF-Non-friable
M - Miscellaneo	uc	

M - Miscellaneous

### **Assessment Categories for Friable Materials**

- 1. Damaged or significantly damaged TSI
- le 2. Damaged (D) surfacing
  - 3: Significantly damaged (SD) surfacing
  - 4: Damaged or significantly damaged misc.
- 5: Suspect or proven ABCM with the potential for D (\*one moderate)
- 6: Suspect or proven ABCM with the potential for SD (\*one high)
- 7. Any remaining suspect or proven ACBM (\*all low)
  - \*Potential for future disturbance for categories 5, 6, & 7

Access, Vibration, Air Erosion: L-low M-medium H-high

School: Benjamin G Brown School

Address: 201 Willow Ave., Somerville, MA

Date of Reinspection: 9/29/2023

Inspector Name: Susan Boyle

Inspector Signature:\_

License #: AI 060146

Material	Location (Homogeneous Area)	QTY	Friable	Phys Assess Category	Assumed ACM	Sample Date ACM Y or N	Recommendation	Amount/Location of Damage; Type of Damage	Schedule Begin/Complete	Special Cleaning
6 x 6 Red ceramic floor tile grout	Girl's bath	750 SF	NF	5	Y		O&M			N
6 x 6 Red ceramic floor tile thin set/adhesive			NF	5	Y		O&M			N
Ceramic tile cove base grout	Girl's bath	60 LF	NF	5	Υ		O&M			N
Ceramic tile cove base thin set/adhesive			NF	5	Y		O&M			N

Туре	Amount	Friability
T-TSI	SF-Square feet	F-Friable
S-Surfacing	LF-Linear feet	NF-Non-friable
M - Miscellane	ous	

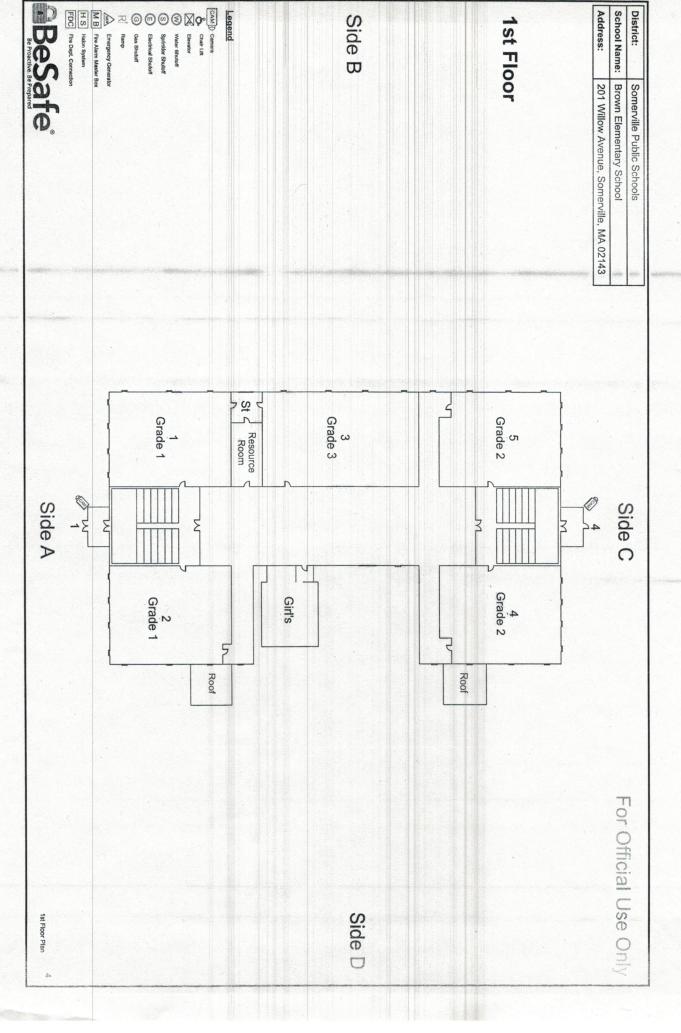
### **Assessment Categories for Friable Materials**

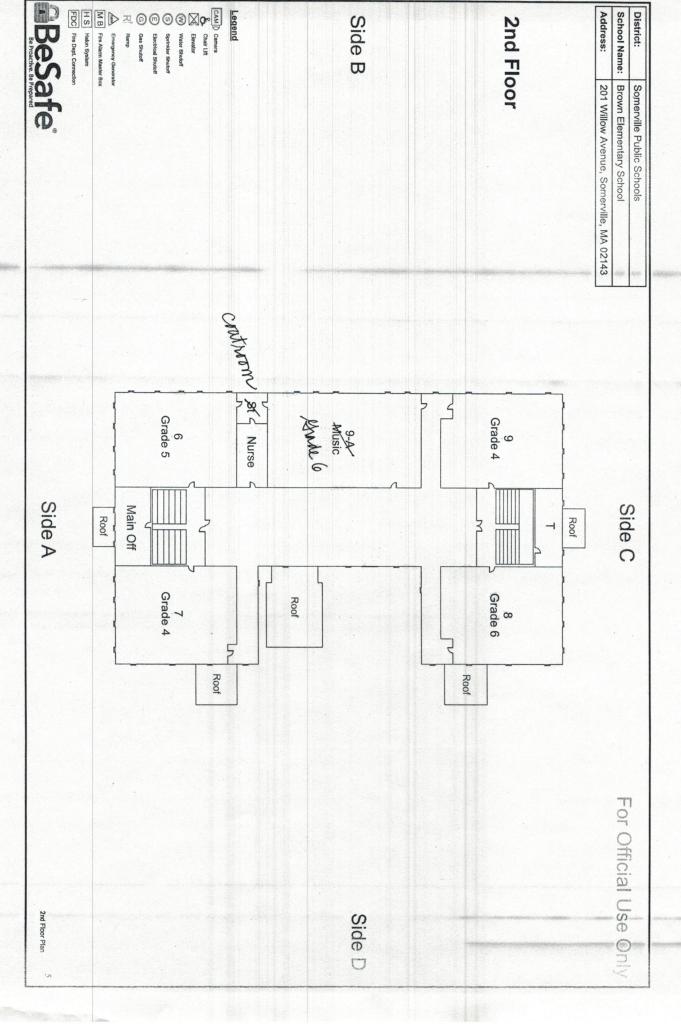
- 1. Damaged or significantly damaged TSI
- 2. Damaged (D) surfacing
- 3: Significantly damaged (SD) surfacing
- 4: Damaged or significantly damaged misc.
- 5: Suspect or proven ABCM with the potential for D (\*one moderate)
- 6: Suspect or proven ABCM with the potential for SD (\*one high)
- 7. Any remaining suspect or proven ACBM (\*all low)

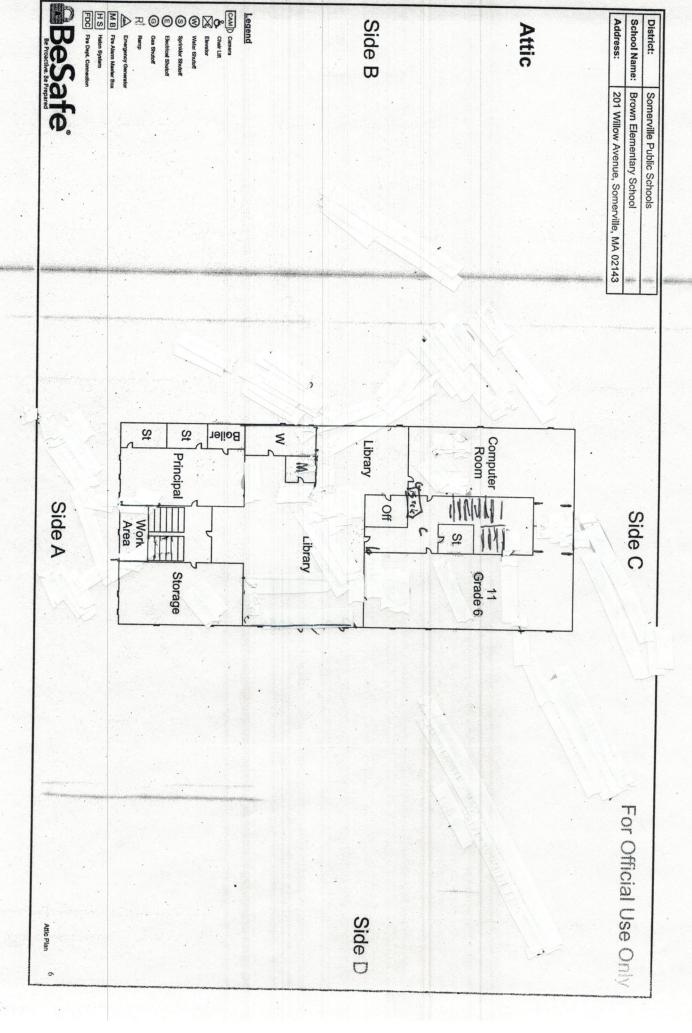
\*Potential for future disturbance for categories 5, 6, & 7

Access, Vibration, Air Erosion: L-low M-medium H-high

## Attachment B







Classroom ©	(8)	Legend  CAMID Camera  Chair Lift  Elevator  W water Stuteff  S Sprinkler Stuteff  S Sprinkler Stuteff  C G Gas Stuteff  E Electrical Stuteff  C G Gas Stuteff  E Emergency Cenerator  Ramp  AM Energency Cenerator  H S Haton System
Classroom	FROOM	Legend  AMI) Camera  Chair Lift  Elevator  Water Stution  Sprinder Stution  Sprinder Stution  Suprinder Stut
T < St	Room	Egend  AMI Camera  AMI Camer
	om I	_egend  AM∏ Camera
T 1	I	
	I	
Boy's	St 4	
Side D	24 Handicapped A	Side B
	St T	
> Vent Room		
) 5		
Kindergarten	3 Kindergarten K	Basement
	IA 02143	Address: 201 Willow Avenue, Somerville, MA 02143
C For Official Use Only	Side C	Vame:
2	9	District: Somerville Public Schools

## B. Management Plan Documentation (AHERA Policies)

- Abatement Policy
- Training Policy
- Notification Policy
- Short Term Worker Policy
- Record Keeping Policy
- Designated Person Statement
- Assurance of Accreditation

## **Abatement Policy**

It is the policy of the Somerville Public School District that asbestos removal, repair and/or O&M activities will be conducted by contract personnel. All contracted personnel will be licensed under the Commonwealth of Massachusetts and will be accredited thought the Environmental Protection Agency Model Accreditation Program.

## ORGANIZATIONAL CHART

The following is an administrative/organizational chart identifying personnel involved with the asbestos operations and maintenance program (O&M) at this facility:

Name	Title	Phone Number
Matthew Bennet	Designated Person	857-300-3414
Hub Testing Laboratory	Contracted Inspector Management Planner Project Designer Project Monitor	781-893-8330

- 1. Although these individuals will be responsible for the execution of the Operations and Maintenance Program for this facility, they will not perform any of the O&M functions themselves.
- 2. An outside contractor(s) under the direction of the Designated Person and the certified Asbestos Abatement Project Designer will conduct the necessary abatement activity.
- 3. If unable to contact the above parties, coordination should be conducted through the Superintendent's Office.

## **DESIGNATED PERSON'S RESPONSIBILITIES**

The Designated Person's responsibilities include the following:

- a. Become knowledgeable of the results of the asbestos inspection.
- b. Have a working knowledge and understanding of the Management Plan.

- c. Ensure that all asbestos related activities are performed by appropriately trained individuals.
- d. Employ the services of outside consulting and contract personnel to assist in the implementation of the Management Plan.
- e. Comply with all federal, state and local regulations.

## **CUSTODIAL AND MAINTENANCE STAFF RESPONSIBILITIES**

The custodial and maintenance staff responsibilities include:

- a. Know and understand where ACBM is located in the building.
- b. Be able to recognize material, which has become damaged and requires a response.
- c. Know who the Designated Person is.
- d. Help to verify that the outside contractors do not damage an in-place ACBM.
- e. Notify the Designated Person of any observed changes to an existing ACBM.

## PROHIBITED WORK/MAINTENANCE ACTIVITIES

## All employees are prohibited from the following activities

- a. Holes must not be drilled into asbestos-containing materials except where previously described using proper procedures.
- b. Plants or pictures must not be hung on structures covered with asbestos-containing materials
- c. Do not saw, sand or drill asbestos-containing floor tile except where previously described using proper procedures.
- d. Do not damage asbestos-containing materials while moving furniture or other objects.
- e. Do not install curtains, drapes, or dividers in such a way that they damage asbestos containing materials.
- f. Do not dust floors, ceilings, molding, or other surfaces in asbestos-contaminated environments with a dry brush or sweep with dry broom.
- g. Do not use an ordinary vacuum to clean up asbestos-containing debris.
- h. Do not remove asbestos-containing ceiling tiles.
- i. Do not remove ventilation system filters while dry.
- j. Do not shake ventilation system filters.

When non-friable ACBM is likely to become friable as a result of activities performed in the building, the material must be treated as if it were friable.

## RESPONSE PROCEDURES IN DISASTROUS SITUATIONS

In disastrous situations such as tornadoes, fires, floods and earthquakes; asbestos containing materials may suffer significant damage and therefore release asbestos fibers and pose immediate hazards to human health and environment. The following procedures should be followed in these situations:

- a. Protect yourself from immediate danger before following any asbestos response procedures.
- b. Remove unauthorized personnel and restrict access.
- c. As soon as the immediate emergency has passed, vacate the area.
- d. Contact the Designated Person or his/her assistant and follow their instructions.
- e. The Designated Person will be responsible for contacting the Response Team or an asbestos abatement contractor and must issue a work permit order before the start of any asbestos abatement procedures.
- f. The Designated Person shall notify state and local authorities when required.
- g. The contractor must immediately take all measures to vacate the area of unauthorized personnel, put up warning and danger signs, and rope-off or close off the area.
- h. The Designated Person and his/her agent (Project Monitor) shall oversee a post-work inspection to assure that all asbestos-containing materials have been properly removed or repaired and cleaned-up prior to re-occupancy.

## **Training Policy**

## A. TRAINING PROGRAM

The key element in initiating and carrying out this Asbestos Operations and Maintenance Plan is the building custodial and maintenance staff. This group is responsible for daily awareness of ACM as they perform their tasks. The custodial and maintenance staff will report any indication of potential problems resulting from changes of ACM condition, area use, or in maintenance practices. The custodial and maintenance staff will receive the 2-Hour Awareness Training. The following elements should be presented in the training programs:

## **Custodial and Maintenance Personnel (required)**

- a. Introduction General background on asbestos, common uses of asbestos in building materials, explanation of the Asbestos Operations and Maintenance Plan, abatement efforts to date, etc.
- b. Medical/Mechanisms for Exposure Condensed version of medical review from the 16 hour "Operations and Maintenance" training, along with similar mechanisms for exposure, with emphasis on fiber entrainment mechanisms.
- c. Location of ACBM and Presumed ACBM
- d. Recognition of damage, deterioration and delamination of ACBM.
- e. Name and telephone number of the Designated Person.

## Capital Projects & Planning

Same as above however special attention will be made to the responsibility of inspection and sampling prior to any renovation or demolition.

## **School Administration (recommended)**

Same as above however special attention will be made to the Administrations responsibility of over sight of potential asbestos concerns in their schools.

## **In-house IT and contracted IT Personnel (recommended)**

Same as above however special attention will be made to the potential asbestos concerns regarding running wires, drilling through walls,

disturbing ceiling tiles and other building materials they may come in contact with in their daily operations.

## Any other people or Departments suggested by DPW or LEA.

## B. TRAINING UPDATE

Training update sessions should be provided annually. The updating sessions should include all items listed in paragraph A – Training Program, plus any new issues or concerns, which may have arisen between sessions.

All custodial and maintenance staff and the Custodial and Maintenance Supervisors as well as IT Personnel shall attend the update in-service training <u>annually</u>.

School Administration shall attend the update in-service training as necessary.

All training records should be kept with the Asbestos O&M Plan.

### C. NEW EMPLOYEE TRAINING

Each new employee will be trained in asbestos 2-Hour Awareness Training within 30 days of hire.

Each new employee will be given a tour of the areas ACM is located.

All training records should be kept with the Asbestos O & M Plan.

## D. SUGGESTED TRAINING COURSES FOR EMPLOYEES INVOLVED IN THE O&M PLAN

Custodial & Maintenance Personnel 2-Hour Awareness Training

IT Professionals 2- Hour Awareness

School Administration 2-Hour Awareness

Custodial & Maintenance Personnel

who will impact know and suspect ACBM

16-Hour Associated Worker Training

Designated Person LEA Designated Person/Asbestos

**Coordinator Training** 

## E. APPROVED ASBESTOS TRAINING SOURCES

Providers Name	City/State	Phone Number
(Awareness Training) Hub Testing Laboratory	Waltham MA	781-893-8330
(Associated Worker Training) Institute for Environmental Education	Wilmington MA	978/658-5272
(Designated Person Training) Institute for Environmental Education	Wilmington MA	978/658-5272

### **Notification Policy**

Notification of asbestos containing materials and associated activates will take place in three forms; a notification to occupants as to the availability of the AHERA Inspections and Management Plan, an update on asbestos related activities within the schools and a notification as to the potential for asbestos containing materials to be present in routine mechanical spaces.

A. Availability of the AHERA Inspection and Management Plan.

Annually the parents, guardians, employees and occupants will be notified as to the availability of the Asbestos Hazard Emergency Response Act Asbestos Inspections and Management Plan.

This notification will be conducted through:

A notice will be placed in the "Parent/Guardian Guide" as well as the "Colleague Guide" provided at the beginning of each school year.

B. Update of asbestos related activities.

Annually at the beginning of the school year the parents, guardians, employees and occupants will be notified as to the current status of asbestos related activities in the schools. This will cover items such as periodic surveillances, inspections, and abetment activities.

This notification will be conducted through:

A posting will be placed on the bulletin boards in each school and Central office as well as on the school department website.

C. Location of asbestos containing materials in routine maintenance areas.

The presence of asbestos containing materials will be posted in routine maintenance areas.

This notification will be conducted through:

The placement of yellow warning stickers immediately inside routine maintenance areas where asbestos containing materials are located. These will be areas such as crawlspaces, boiler rooms and electrical equipment spaces. The stickers will be standard manufactured in a bright yellow color. The wording shall be "Caution. Asbestos. Hazardous. Do Not Disturb Without Proper Training and Equipment."

### **Short Term Workers Policy**

All short-term workers who may come in contact with known or suspect asbestos containing materials should be made aware of the presence of asbestos in the Somerville Public School District and adjust their work accordingly. If they feel their work may impact upon asbestos in the school buildings they should be in direct contact with the Designated Person (Matthew Bennett) to verify the possibility. If this is the situation, the asbestos consultant should be called to confer or redirect activity so as not to disturb ACBM. The Somerville Public School District, at a minimum, will have this form in each individual school's office. Additionally, any contracted companies will be notified with a copy of the AHERA chart for verification purposes.

### SHORT TERM WORKER

(Tel. repair personnel, plumbers, heating contractors etc.)

Name	Company	Date	Reason For Work	Have You Reviewed The Location Of ACBM Or Suspect ACBM	Will Your Work Impact ACBM Or Suspect ACBM

<sup>\*</sup>If your work in the building has the potential of impacting asbestos containing materials, please contact Matthew Bennet at 857-300-3414 prior to impacting the materials.

### **Record Keeping Policy**

All records associated with asbestos related activities in the Somerville Public School District will be maintained by the Designated Person. Currently the main file is located with the Superintendent of Buildings at 1 Franey Road, Somerville, MA 02145. All records associated with asbestos related activities as they pertain to individual schools will also be maintained in each school's office in a central location.

The following records are required to be maintained for each type of activity:

Preventative Measure and Response Action for Friable and Non-Friable

- A. A detailed written description of measures or action taken. Including:
- B. Method used
- C. Reason for choosing method
- D. Start and completion dates
- E. Name and addresses of all contractors involved
- F. State accreditation and accreditation numbers
- G. Name and location of disposal facility

For Any Air Samples That Are Collected For Completion Purposes

- A. Name and signature of any person collecting completion air samples
- B. Location where samples were collected
- C. Date of collection
- D. Name and address of laboratory analyzing samples
- E. Date of analysis
- F. Results of analysis
- G. Method of analysis
- H. Name and signature of person performing analysis
- I. Laboratory compliance with accreditation requirements

For Each Persons Required To Be Trained Under Section 763.92 (A) (1) (2) (Awareness and Associated Worker Training)

- A. Person's name
- B. Job title
- C. Date training was conducted
- D. Location of the training
- E. Number of hours of training completed

### For Each Time That Periodic Surveillance Is Conducted

- A. Name of person performing surveillance
- B. Date of surveillance
- C. Any changes in the condition of the known or assumed asbestos containing materials

### For Each Time Cleaning Is Performed Under 763.91 c

- A. Person performing cleaning,
- B. Date of cleaning
- C. Location cleaned
- D. Method used to clean

### For each O&M activity is conducted

- A. Name of each person involved in activity
- B. Start and completion date of activity
- C. Location where activity occurred
- D. Description of activity
  - i. including
- F. Preventative measures used
- G. If ACBM is removed name and location of disposal facility

### For Each Major Abatement Activity

- H. Name and signature of each person performing activity
- I. State and number of accreditation of each person performing activity
- J. Start and completion date
- K. Location where activity occurred
- L. Description of activity including preventative measures
- M. Name and location of disposal facility

### For Each Fiber Release Episode

- Date of episode A.
- В. Location of episode
- Method of repair C.
- Preventative measures or response action taken Name of each person performing work D.
- E.
- Name and location of disposal facility F.

Mr. Matthew Bennett
Designated Person
Superintendent of Buildings
City of Somerville - DPW
1 Franey Road
Somerville, MA 02145

As Designated Person for the Somerville Public Schools, I will hereby:

- Ensure that activities of any persons that perform inspections, re-inspection, and periodic surveillance, develop and up date Management Plans, and implement response actions, including operations and maintenance activities, are carried out in accordance with 40 CFR Part 763 Subpart E.
- Ensure that all custodial and maintenance employees are properly trained as required by 40 CRF Part 763 Subpart E and other applicable federal and/or state regulations (e.g., the OSHA standards for construction, EPA worker Protection Rule, and/or applicable state regulations).
- Ensure that workers and building occupants or their legal guardians are informed at least once each year about inspections, response actions, and post response action activities including periodic re-inspection and surveillance activities that are planned or in progress.
- Ensure that short term workers (e.g., telephone repair workers, utility workers, computer wiring technicians, exterminators, etc.) who may come into contact with asbestos in a school are provided information regarding the location of ACBM and suspect ACBM assumed to be ACM.
- Ensure that warning labels are posted in accordance with 40 CFR Part 763.95.
- Ensure that Management Plans are available for inspection and notification of their availability has been provided as specified in the Management Plan and under 40 CFR Part 763.93 (g).
- Furthermore, I hereby state that I am/will be trained with a basic knowledge of:
  - Health effects of asbestos
  - · Detection, identification and assessment of ACM
  - Options for controlling ACBM
  - Asbestos management programs
  - Relevant federal and state regulations concerning asbestos, including those in 40 CFR Part 763 Subpart E and those of the Occupational Safety and Health Administration, US Department of Labor, the US Department of Transportation and the US Environmental Protection Agency.

Mr. Matthew Bennett Designated Person

Superintendent of Buildings

City of Somerville

Mr. Matthew Bennett
Designated Person
Superintendent of Buildings
City of Somerville - DPW
1 Franey Road
Somerville, MA 02145

As Designated Person of the Somerville Public Schools, I hereby assure that all persons who have or will:

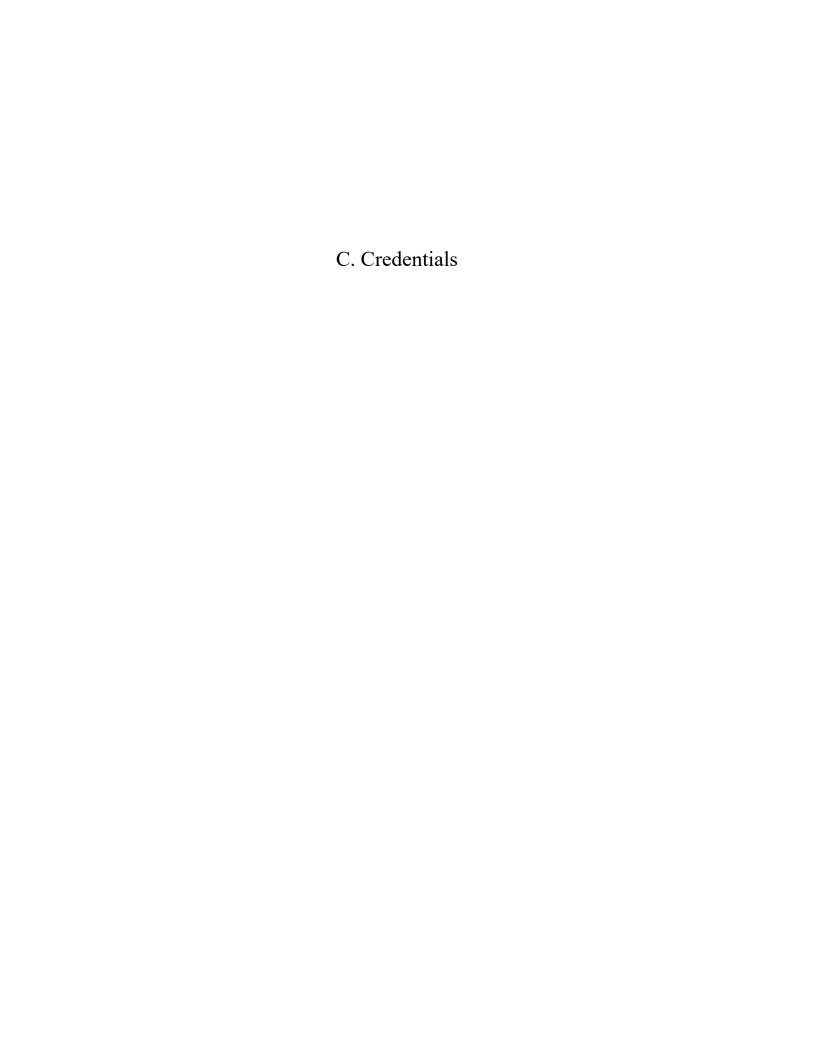
- Inspect for ACBM in school buildings,
- Prepare Management Plans for such buildings,
- Design response actions and/or abatement activities and/or
- Conduct response actions with respect to friable and non friable ACBM in such schools

shall be accredited as required by federal and state regulations.

Mr. Matthew Benner Designated Person

Superintendent of Buildings

City of Somerville







### Lynne G. Brimhall

147 Franklin Ave, Apt 2, Chelsea, MA 02150 MA DLS Asbestos Inspector License# AI061691



has completed requisite training by Video Conference, and has passed an examination for reaccreditation as:

### Asbestos Inspector Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

### **Course Location**

Zoom Video Conference
Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

**November 15, 2022** 

**Course Dates** 

22-4312-106-231902

Certificate Number

November 15, 2022

**Examination Date** 

November 15, 2023

**Expiration Date** 

Training Director

16 Upton Drive, Wilmington, MA 01887

Telephone 978.658.5272





### Lynne G. Brimhall

147 Franklin Ave, Apt 2, Chelsea, MA 02150 MA DLS Asbestos Inspector License# AI061691



has completed requisite training by Video Conference, and has passed an examination for reaccreditation as:

### Asbestos Inspector Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

### **Course Location**

Zoom Video Conference
Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

November 15, 2023

**Course Dates** 

23-4818-106-231902

Certificate Number

November 15, 2023

**Examination Date** 

November 15, 2024

**Expiration Date** 

Alon Elle

**Training Director** 

16 Upton Drive, Wilmington, MA 01887

Telephone 978.658.5272





### Lynne G. Brimhall

147 Franklin Ave, Apt 2, Chelsea, MA 02150
MA DLS Asbestos Management Planner License# AP900405



has completed the requisite training by Video Conference, and has passed an examination for reaccreditation

Asbestos Management Planner Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

### **Course Location**

Zoom Video Conference
Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

**November 15, 2022** 

**Course Dates** 

22-4509-136-231902

Certificate Number

November 15, 2022

**Examination Date** 

November 15, 2023

**Expiration Date** 

Training Director

16 Upton Drive, Wilmington, MA 01887

Telephone 978.658.5272





### Lynne G. Brimhall

147 Franklin Ave, Apt 2, Chelsea, MA 02150
MA DLS Asbestos Management Planner License# AP900405



has completed the requisite training by Video Conference, and has passed an examination for reaccreditation

Asbestos Management Planner Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

### **Course Location**

Zoom Video Conference
Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

**November 15, 2023** 

**Course Dates** 

23-4937-136-231902

Certificate Number

November 15, 2023

**Examination Date** 

November 15, 2024

**Expiration Date** 

Alon Elle

**Training Director** 

16 Upton Drive, Wilmington, MA 01887

Telephone 978.658.5272







# CERTIFICATE OF ACHIEVEMENT

This certifies that

### Susan Boyle

4 Hour Asbestos Site Inspector Refresher Training Asbestos Accreditation Under TSCA Title II has successfully completed the 40 CFR Part 763

Training held via a Live Webinar

Score: 96%

conducted by:

ATC Group Services LLC dba ATLAS Technical West Springfield, MA 01089 (413) 781-0070 73 William Franks Drive

Gregory J. moral

Regional Training Director: Gregory Morsch

SIAR - 7495 Certificate Number

July 13, 2023

Examination Date

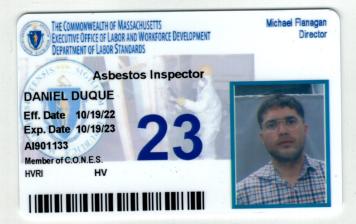
Gregory J. moral

Principal Instructor: Gregory Morsch

July 13, 2023 Date of Course

July 13, 2024

Expiration Date





### Daniel I. Duque

192 Kelton Street, Allston, MA 02134



has completed the requisite training, and has passed an examination for accreditation as:

## Asbestos Inspector

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

Course Location

16 Upton Drive Wilmington, MA 01887 Institute for Environmental Education

August 10, 2022

August 10, 2023 **Examination Date** 

22-4269-102-276300

Certificate Number

August 8-10, 2022

Course Dates

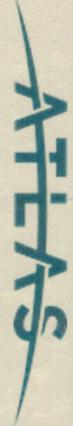
**Expiration Date** 

Training Director

16 Upton Drive, Wilmington, MA 01887

Telephone 978.658.5272





# CERTIFICATE OF ACHIEVEMENT

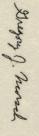
This certifies that

### Daniel Duque

has successfully completed the

4 Hour Asbestos Site Inspector Refresher Training Asbestos Accreditation Under TSCA Title II 40 CFR Part 763

conducted by:
ATC Group Services LLC dba ATLAS Technical West Springfield, MA 01089 73 William Franks Drive (413) 781-0070



Dreson J. neved

Principal Instructor: Gregory Morsch

August 10, 2023

August 10, 2024
Expiration Date

Regional Training Director: Gregory Morsch

SIAR - 7501 Certificate Number

August 10, 2023





Erin E. Maguire

80 Willet Street, Quincy, MA 02170



has completed requisite training by Video Conference, and has passed an examination for reaccreditation as:

Asbestos Inspector Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

**Course Location** 

Zoom Video Conference
Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

**November 3, 2023** 

**Course Dates** 

23-4817-106-275489

Certificate Number

November 03, 2023

**Examination Date** 

November 03, 2024

**Expiration Date** 

Alon Ell

**Training Director** 

16 Upton Drive, Wilmington, MA 01887

Telephone 978.658.5272



## Erin E. Maguire

80 Willet Street, Quincy, MA 02170



has completed requisite training, and has passed an examination for reaccreditation as:

# Asbestos Inspector Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

Course Location

Zoom Video Conference

Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

November 03, 2022

November 3, 2022

Course Dates

22-4311-106-275489

Certificate Number

November 03, 2023 **Examination Date** 

**Expiration Date** 

www.ieetrains.com

raining Director

Telephone 978.658.5272 16 Upton Drive, Wilmington, MA 01887

INSTITUTE FOR ENVIRONMENTAL EDUCATION