

March 15, 2016

Mr. Bob Adams
S.A.U. 64, Milton & Wakefield School Districts
Maintenance Director
22 Elm Street
Milton, NH 03851

Re: 3-Year AHERA Reinspection
Nute High School and Milton Elementary School
RPF Project No. 167149

Dear Mr. Adams:

RPF Environmental, Inc. (RPF) conducted an asbestos reinspection for the Nute High School and the Milton Elementary School on March 8, 2016. Following the site work, RPF completed the associated reporting, management planner review and material assessments. The reinspection was completed in accordance with Part 763.85 (b) of 40 CFR Part 763, Subpart E - Asbestos Hazard Emergency Response Act (AHERA). The scope of services for the reinspection included a visual inspection of the areas known to contain asbestos-containing building materials (ACBM) and assumed ACBM as stated in the AHERA inspection records provided to RPF for review.

Buildings included in this reinspection included the Nute High School and the Milton Elementary School in Milton NH.

Records used to conduct the reinspection included the initial AHERA survey listings provided in the 1988 initial inspection report prepared by Balsam Environmental and the RPF 2012 three year reinspection.

This reinspection report should be filed with the AHERA Plans for each of the school buildings as well as the central office. Appendix A contains a listing of the ACBM reinspected during this project and the AHERA assessment and minimum recommended actions for each area of ACBM in the School. Appendix B includes other general comments and recommendations for compliance with the current State and federal regulations and industry. Methodology and limitations for this reinspection are provided in Appendix C. The Asbestos Program Manager (AHERA-designated person) for the School is required, pursuant to the AHERA Rule, to review this report and the appendices and develop a written plan to implement recommendations for management, abatement or additional testing work, as applicable.

Assessments and Recommendations

Appendix A contains the room by room listings for each school building. The first page in Appendix A is an index sheet containing a description of codes referenced on the room by room listings.

In general the ACBM inspected by RPF during this reinspection was observed to be in good to fair condition and the School should continue to manage the materials in accordance with the AHERA Management Plan.

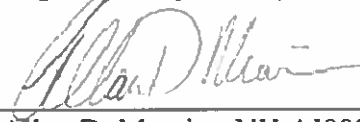
ACBM maintenance or repair activity must be conducted by properly trained personnel using proper personal protective equipment. (**Important note:** Prior to renovation or demolition activity, additional inspection and testing by a licensed inspector is required to satisfy current state, EPA and OSHA requirements.). Asbestos response actions, as defined by AHERA, must be detailed in a specification (project design) prepared by a licensed asbestos abatement project designer in accordance with AHERA and State regulations, and licensed personnel/contractors must carry out response actions.

In accordance with AHERA, the School needs to continue with their ACBM surveillance activity every 6 months, training of maintenance and janitorial staff, annual notifications, labeling and other Management Plan items.

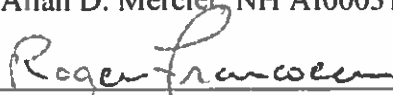
Signatures

The reinspection work and management planning was completed by Allan D. Mercier and Roger Francoeur of RPF Environmental, Inc.

Accredited Inspector


Allan D. Mercier, NH AI000316, Exp. 4/12/16

Accredited Management Planner


Roger Francoeur, NH AM00025, Exp. 8/13/16

If you have any questions or comments, or if you would like assistance with the recommendations provided herein, please do not hesitate to call me.

Sincerely,
RPF ENVIRONMENTAL, INC.


Allan D. Mercier
EH&S Consultant, Inspector

- Enclosures:
- Appendix A: ACBM Assessments and Recommendations
 - Appendix B: Other General Comments and Recommendations
 - Appendix C: Methodology and Limitations

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APPENDIX A

CODE DESCRIPTIONS (Index sheet for use with room by room listings in this appendix)

EPA Assessment Codes:

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

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

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

School : 3-Year AHERA Reinspection 2016

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Nute High School								
1st Floor								
Corridor	Floor tile and mastic	1,200 sq. ft.	Misc	No	Fair	NF	1	
Stage Landings	Floor tile and mastic	32 sq. ft.	Misc	No	Fair	NF	1	
Room 16 & Storage Room	Floor tile and mastic	1249 sq. ft	Misc	No	Fair	NF	1	Floor tiles were observed to have normal wear throughout.
Room 16	Transite Window Panels	88 sq. ft	Misc	No	Good	NF	1, 6	One window panel removed and replaced with plywood. No abatement records available for review at the time of the re-inspection
Room 18	Floor tile and mastic	180 sq. ft	Misc	No	Good	NF	1	
	Transite Window Panels	88 sq. ft	Misc	No	Good	NF	1	
Room 20	Floor tile and mastic	875 sq. ft	Misc	MNO	MNO	MNO	1	Material have been covered over with carpet.
Main Office	Transite Window Panels	40 sq. ft	Misc	No	Good	NF	1	
	Floor tile and mastic	95 sq. ft	Misc	MNO	MNO	MNO	1	Materials have been covered over with carpet.
Room 28	Transite Window Panels	24 sq. ft	Misc	No	Good	NF	1	
	Floor tile and mastic	180 sq. ft	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring.
Room 29 (corner office in Main Office)	Floor tile and mastic	180 sq. ft	Misc	No	Good	NF	1	
	Transite Window Panels	40 sq. ft	Misc	No	Good	NF	1	
Room 7	Sheet Flooring	700 sq. ft	Misc	No	Good	NF	1	6 sq.ft. patch near back windows done by facility O&M trained staff. Noted on 6-month surveillance
Room 8	Sheet Flooring	700 sq. ft	Misc	No	Good	NF	1	
Hallway near Room 6	Sheet Flooring	200 sq. ft	Misc	No	Good	NF	1	
Room 6 (former Library)	Floor Tile	750 sq. ft	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring.
See notes on last page								

School : 3-Year AHERA Reinspection 2016

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Nute High School								
2nd Floor								
Room 10	Sheet Flooring	385 sq. ft	Misc	No	Good	NF	1	
Room 11	Sheet Flooring	385 sq. ft	Misc	No	Good	NF	1	
Sp.Ed. Office at top of stairs	Sheet Flooring	50 sq.ft.	Misc	No	Good	NF	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.							
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACBM with potential for damage; 6. ACBM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

School : 3-Year AHERA Reinspection 2016

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Milton Elementary School								
Basement								
Hallway in front of storage rooms	9" Floor tile	40 sq.ft.	Misc	MNO	MNO	MNO	1	
Storage Room (formerly Guidance Office)	Sheet Flooring	48 sq.ft.	Misc	No	Good	NF	1	
Storage Room (formerly Music/PE)	9" Floor tile	50 sq.ft.	Misc	No	Good	NF	1	
Oil Tank Room (formerly Speech Room)	9" Floor tile	80 sq.ft.	Misc	No	Good	NF	1	
First Floor								
Hallway	Floor Tile	1,100 sq.ft.	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.
Nurse's Bathroom	Floor Tile	16 sq.ft.	MNO	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.
Nurse's Office	Floor Tile	95 sq.ft.	MNO	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.
Multi-Purpose Room	Floor Tile	1,100 sq.ft.	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.
Library/Media Center	Floor Tile	900 sq.ft.	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.
Kitchen	Floor Tile	375 sq.ft.	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.
Second Floor								
Hallway	Floor tile	500 sq.ft.	Misc	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the site representative.

School : 3-Year AHERA Reinspection 2016

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

APPENDIX B

AHERA REINSPECTION REPORT
OTHER GENERAL COMMENTS AND PRELIMINARY RECOMMENDATIONS
(Page 1 of 2)

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

- The initial AHERA report should be reviewed for detailed initial inspection results, Management Plan and O&M Plan requirements, analytical data, and other related documentation. Except as otherwise noted, the reinspection work only included ACBMs identified inspection report provided to RPF by the School. During the reinspection, initial inspections, abatement documentation and other record keeping items were not completely reviewed or audited for accuracy and completeness. This type of review was beyond the scope of services for the project. Based on the RPF preliminary review of the records provided to RPF, it is RPF's opinion that the AHERA Plans may not address all of the possible ACBM present. For example, although not directly regulated by AHERA, various exterior suspect materials are present as well as possible interior hidden ACBM.
- This reinspection only included the school buildings designated in the RPF listing. If other buildings are used as school buildings in accordance with 40 CFR Part 763 and need to be reinspected, please notify our office to make necessary arrangements. This reinspection and report does not meet the requirements set forth by US EPA, OSHA, and State agencies for conducting full asbestos inspections prior to renovation or demolition.
- For any new buildings or renovated space, obtain architectural/engineering (A/E) statements for new construction/renovation areas in accordance with AHERA certifying no asbestos was specified or used. In lieu of A/E statements, newly installed buildings materials must be tested pursuant to the AHERA inspection requirements.
- All ACBMs must be included in the Management Plan and O&M Program until the materials are completely removed. The ACBM listings in the Reports should be reviewed and updated periodically to reflect all abatement work, any testing performed, and all O&M Program maintenance or repair activity completed. Examples of activity that must be documented include but are not limited to the following: covering area of ACBM tile with carpet or other newer flooring; installation of other new building materials - certification of asbestos-free material must be obtained and filed; any sampling and testing; any spot asbestos repairs or removal work; personnel training; annual notifications; and other activities.
- Materials listed as MNO (materials not observed) should be reviewed further by the Program Manager to determine if in fact such materials were abated, if abatement records are on file, and/or, if the areas were not accessible that such materials be inspected when the areas can be accessed. ACBM assumed to be enclosed should continue to be documented as such for future renovations/demolition issues. Please note that new enclosures are a form of abatement and are subject to the requirements of AHERA as a response action.
- Inaccessible ACBMs are or may be present in wall, floor, ceiling, and other spaces not accessible during the inspection. Care should be used during any renovation or demolition work. If suspect materials are encountered, the materials must be properly tested by a State licensed inspector and, if in fact identified as ACBM, properly abated prior to disturbance. All contractors and other persons working in the building who may come into contact with the ACBM should be properly notified in accordance with current State and federal regulations.

OTHER GENERAL COMMENTS AND PRELIMINARY RECOMMENDATIONS

(Page 2 of 2)

- Certain types of floor maintenance activities can result in release of asbestos fibers. Proper cleaning, stripping, and finishing methods should be used as recommended by the State and U.S.E.P.A. guidelines. Depending on the condition of various non-friable ACBMs and the specific action/disturbance to the material (i.e., chipping of flooring during removal, cutting and abrasive activities, or sanding/scraping of adhesives), non-friable ACBM can be rendered friable. This is particularly true with flooring materials that are aged, thin, brittle, or have prolonged water damage.
- Flooring mastic, along with any floor tile or linoleum that is ACBM was or may have been assumed to be ACBM, should continue to be classified as ACBM and properly tested prior to any flooring removal work, as applicable. It should be noted that a recent EPA advisory statement recommends that flooring which was previously tested as asbestos free be confirmed using electron microscopy prior to any removal or other activities that may result in the disturbance of the flooring.
- All assumed ACBM should be properly tested by a licensed inspection firm, prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. This type of testing *should not* be conducted by asbestos abatement contractors, but by a qualified licensed consulting/laboratory firm.
- In accordance with State and federal regulations, ACBM must be abated prior to disturbance due to renovation or demolition activity, or maintenance activity that will result in disturbance to the materials. This work must be properly designed in advance of the planned work and it must be implemented by properly trained, accredited, and/or licensed individuals as applicable.
- Abatement of friable and non-friable ACBM should be designed by, and monitored by, a qualified/certified consultant. Trained, licensed workers and firms should complete all abatement work. Please note that exterior building materials, such as roofing materials, were often not included in the initial inspection work and should be properly tested prior to any renovation or demolition. It is recommended that sufficient time be allowed prior to any renovation or construction work for accredited design, review, and impact study to determine abatement work that may be necessitated to facilitate renovation. It should also be determined that all suspect materials have been properly sampled in the existing reports prior to work.
- O&M level trained employees may be able to perform small scale, short duration maintenance work (<3 linear/square feet) involving asbestos if all applicable state and federal requirements are met and proper medical surveillance, safety equipment and other programs are in place. Any work in excess of 3 feet or work performed for the sole purpose of abating asbestos hazards must be design and performed by licensed personnel and companies.
- All janitorial, custodial, and maintenance staff require a minimum of 2-hour asbestos awareness training and maintenance staff who perform O&M work must also have another 14 hours of training. Annual refresher training is also required in accordance with 29 CFR Part 1926.1101 and the EPA Worker Protection Rule.

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

APPENDIX C

Reinspection Methods

Accessible ACBMs which were identified in the existing AHERA reports were visually reinspected in accordance with AHERA, to (a) observe whether the materials are friable, (b) observe the conditions of the ACBM and potential for disturbance, and (c) to assess the hazard potential of the ACBM. Documentation review consisted of only those specific documents which list ACBM and which were provided by the School to RPF for review. A full review or audit of the AHERA Plans for the building, including abatement records, other record keeping requirements, or AHERA implementation records was not completed as part of this service. Please note that this reinspection report is intended to comply with the federal regulation and the report should not be considered or referenced as a detailed full, initial AHERA room-by-room inspection. Please also reference the initial AHERA Inspection Report prepared for the building by RPF and subsequent update records. This reinspection does not meet the requirements for full inspections prior to renovation or demolition activity.

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

Limitations

- This reinspection only included the school buildings designated in the RPF listing. If other buildings are used as school buildings in accordance with 40 CFR Part 763 and need to be reinspected, please notify our office to make necessary arrangements. This reinspection and report does not meet the requirements set forth by US EPA, OSHA, and State agencies for conducting full asbestos inspections prior to renovation or demolition.
- The observations and conclusions presented in the Report were based solely upon the services described herein, and not on scientific tasks or procedures beyond the scope of services as discussed in the proposal and text of the report. The conclusions and recommendations are based on visual observations and testing, limited as indicated in the Report, and were arrived at in accordance with generally accepted standards of industrial hygiene practice and asbestos professionals. In addition and as applicable, where sample analyses were conducted by an outside laboratory, RPF has relied upon the data provided, and has not conducted an independent evaluation of the reliability of this data.
- Observations were made of the designated accessible areas of the site as indicated in the Report. While it was the intent of RPF to conduct a survey to the degree indicated, it is important to note that not all suspect ACBM material at the site(s) were specifically assessed and visibility was limited, as indicated, due to the presence of furnishings, equipment, solid walls and solid or suspended ceilings throughout the facility. Suspect material may have been used and may be present in areas where detection and assessment is difficult until renovation and/or demolition proceeds.
- Although some assumptions may have been stated regarding the potential presence of inaccessible or hidden ACBM, a full inspection for all ACBM or a destructive inspection for possible inaccessible suspect ACBM was not conducted. This inspection did not include a hazard assessment survey or testing to determine current dust concentrations of asbestos in and around the building. The survey was limited to ACBM as indicated herein and a site assessment for other possible environmental health and safety hazards or subsurface pollution was not performed as part of the scope of this initial site inspection.

- Where access to portions of the surveyed area was unavailable or limited, RPF renders no opinion of the condition and assessment of these areas. The survey results only apply to areas specifically accessed by RPF during the site inspection.
- Interiors of mechanical equipment and other building or process equipment may also have ACBM gaskets or insulation present and were not included in this inspection. Further inspections would likely be required prior to renovation or demolition activity.
- Existing reports, drawings, and analytical results provided by the Client to RPF, as applicable, were not verified and, as such, RPF has relied upon the data provided as indicated, and has not conducted an independent evaluation of the reliability of these data.
- All hazard communication and notification requirements, as required by 40 CFR Part 763, U.S. OSHA regulation 29 CFR Part 1926, 29 CFR Part 1910, and other applicable rules and regulations, by and between the Client, general contractors, subcontractors, building occupants, employees and other affected persons were the responsibility of the Client and Client's abatement contractor and are not part of the scope of services to be provided by RPF.
- Results presented in the report are limited to the materials and conditions present at the time that the site inspection was actually performed by RPF. The applicability of the observations and recommendations presented in this report to other portions of the site were not determined as part of this scope of work. Many accidents, injuries and exposures and environmental conditions are a result of individual employee/employer actions and behaviors, which will vary from day to day, and with operations being conducted. Changes to the site that occur subsequent to the RPF inspection may result in conditions which differ from those present during the survey and presented in the findings of the report. For example, during construction changes it is possible that previously inaccessible suspect material may be encountered. As such, the contractors, employers OSHA-competent persons, and other affected staff should be advised of the possible presence of inaccessible ACBM and suspect ACBM. In the event that newly identified suspect material is encountered, please contact RPF to arrange for proper inspection, assessment and testing as applicable.
- Typically, hazardous building materials such as asbestos, lead paint, PCBs, mercury, refrigerants, hydraulic fluids and other materials may be present in buildings. The survey performed by RPF only addresses the specific items as indicated in the report. In general, it is recommended that surveys for all accessible hazardous building material be performed. Notify RPF to arrange for additional survey work as needed.