AHERA Asbestos Re-Inspection Report
Lake County School District

of the building located at:

Westpark Elementary School
130 W 12th St
Leadville, CO 80461

Weecycle Job No.: 18-16016

Performed On: 10/22/18

Prepared For:

Lake County School District R-1
328 W 5th St
Leadville, CO 80461

Weecycle Environmental Consulting, Inc.

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November 10, 2018

Todd Coffin
Lake County School District
328 W 5th St
Leadville, CO 80461

RE: AHERA 3 Year Re-Inspection
Westpark Elementary School
130 W 12th St
Leadville, CO 80461 (the Property)

Dear Mr. Coffin,

Weecycle Environmental Consulting, Inc. is pleased to submit the attached AHERA Re-Inspection Report for the property. The report includes the scope of service, procedures and methodologies utilized, analytical results and summary of asbestos containing building materials identified by this survey.

The results of the AHERA Management Plan Re-inspection indicate that Asbestos Containing Building Materials **are** present in the buildings on campus.

Weecycle Environmental Consulting, Inc. appreciates the opportunity to perform environmental services for the Lake County School District and we look forward to working with you in the future. If you have questions or comments regarding the information in this report or need further assistance, please contact Weecycle.

Copies of the appropriate and certification are included in Section 11 of this report.

Sincerely,

Lauren York
Director of Operations
AHERA Building Inspector/
Management Planner
Cert #3748

Judith Sawitsky
President
AHERA Building Inspector/
Management Planner
Cert # 672

Table of Contents

1. REVIEW OF EXISTING PAPERWORK/RECORD KEEPING

Each Local Education Agency (LEA) must keep an updated copy of the management plan in its administrative office for each school under its administrative control or direction. The plan must be available without restriction to the school personnel and their representatives, parents, and representatives of United States Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment for inspection during normal business hours.

Section 763.94 (Record-keeping) of the AHERA Final Rule (40 CFR Part 763, Subpart E) requires that the following paperwork be obtained for each *response action* and *fiber release episode* (commonly referred to as asbestos abatement activities)

- copies of all personnel accreditation's and licenses (40 CFR 763.94(b)(1), 763.94(g) and 763.94(h))
- copy of the company's (Abatement Contractor) license, (40 CFR 763.94(b)(1) and 763.94(g))
- copies of any required notifications,
- copies of disposal receipts, (40 CFR 763.94(b)(1), 763.94(g) and 763.94(h)), and
- records of the of the job as to activity, location, and personnel used with their signatures, where applicable (40 CFR 763.94(b)(1), 763.94(g) and 763.94(h)).

Review of Response Action Records and Other AHERA Documentation:

Response Actions Completed by In-House Staff:

No information available for review.

Response Actions Completed by Independent Abatement Contractors:

Information was available for review

Six-Month Periodic Surveillance:

No information available for review.

Annual Notifications:

No information available for review; TBD with Administration.

2. 2018 RESPONSE ACTIONS PRIORITY LIST

There are no high priority response items based on the 2018 re-inspection.

All identified ACBM and suspect materials assumed to be ACBM should be maintained in accordance with the school's AHERA Management Plan.

3. AHERA INSPECTION REPORT

AHERA TERMS, ABBREVIATIONS, AND ACRONYMS

AHERA	Asbestos Hazard Emergency Response Act
Rule	40 CFR Part 763 Subpart E – Asbestos-Containing Materials in Schools Rule, including Appendices A, B, C, and D
Section	Sections 763.80 - 763.99 in the Rule
LEA	The Schools' Local Education Agency (as defined in the Rule)
Plan	The AHERA Management Plan for the School
Part	Subsections of the Plan
EPA	Environmental Protection Agency
OSHA	Occupational Safety and Health Administration
NESHAPS	National Emission Standards for Hazardous Air Pollutants
ACBM	Asbestos-containing Building Material (as defined in the Rule)
ACM	Asbestos-containing Material
Non-ACM	Non-Asbestos-containing Material
S No.	Bulk Sample Number
F	Friable
NF	Non-friable
HA	Homogeneous Area
FS	Functional Space
O&M	Operation and Maintenance Program
MIS	Miscellaneous Building Material (as defined in the Rule)
CT	Ceiling Tile
FT	Floor Tile
FBGL	Fiberglass
TSI	Thermal Systems Insulation (as defined in the Rule)
SURF	Surfacing Materials
HVAC	Heating, Ventilation, Air Conditioning System
N/A	Not Applicable
CDPHE	Colorado Department of Public Health and Environment Air Pollution Control Division

Other relevant terms, abbreviations, and acronyms may be found within regulations included in the Appendices.

STATEMENT OF COMPLIANCE

AHERA REINSPECTION REPORT FOR MANAGEMENT PLAN
Lake County School District
328 W 5th St
Leadville, CO 80461

This school was inspected in order to comply with the Asbestos Hazard Emergency Response Act (AHERA), signed into law by President Reagan in 1986. This AHERA Re-inspection Report is based on the re-inspection and condition assessment of previously identified asbestos-containing materials. The re-inspection conducted by the Judith Sawitsky accredited Asbestos Inspector/Management Planner and Chris Schiechl, accredited Asbestos Inspector from Weecycle Environmental Consulting, Inc.

Asbestos-containing materials were classified according to guidelines in the AHERA regulations. Based on a material's asbestos content, and the condition, location, and hazard potential of the material that was sampled, Weecycle's accredited Asbestos Management Planner recommended a response action if deemed necessary or the material should be maintained in good condition in accordance with the existing AHERA Management Plan.

Requirements of the Asbestos Hazard Emergency Response Act, Subpart E (Asbestos-containing Materials in Schools) were complied with for this Re-inspection Report.

The following Consultant Accreditation Page identifies the inspectors and management planners who contributed to the Plan. Also provided are the certificate numbers, signatures, and date of signature of each.

CONSULTANT ACCREDITATION

Weecycle Environmental Consulting, Inc.
Lafayette, CO 80026

1. ACCREDITED ASBESTOS INSPECTOR / MANAGEMENT PLANNER

Name: Judith Sawitsky

Colorado Accreditation Number: 672 (Exp. Date 10/10/19)

Date: November 12, 2018

Signature: Judith E. Sawitsky

2. ACCREDITED ASBESTOS INSPECTOR

Name: Chris Schiechl

Colorado Accreditation Number: 15586 (Exp. Date 2/22/19)

Date: November 12, 2018

Signature: Chris Schiechl

ASBESTOS RE-INSPECTION INFORMATION

1. GENERAL

"Asbestos" is the term used to describe certain fibrous silicate minerals that were formerly widely used for insulating, construction, and other purposes. Asbestos fibers were used throughout the construction industry due to their properties of non-flammability, high tensile strength, and low heat conductance. In the Colorado, the most commonly encountered types of asbestos are "chrysotile" and "amosite". Other types of asbestos are found in a wide variety of construction materials.

Asbestos poses a health hazard when very small asbestos fibers, approximately five micrometers in length, are released into the air and inhaled into the lungs. Once in the lungs these fibers can either be expelled or become trapped. If they become trapped the body cannot break the fibers down, and the lungs try to encase the foreign material with tissue. This process can cause scarring of the lung tissue that may ultimately result in impaired lung elasticity and subsequent chronic dysfunction. This disease is called asbestosis.

Asbestos diseases may manifest in other forms that are equally dangerous, such as mesothelioma, a form of cancer. The latency period of these diseases has been determined by medical professionals to be anywhere between ten- and thirty-years following exposure. For additional information regarding the health hazards of asbestos, consult Health Hazards of Asbestos, U.S. Department of Labor, Occupational Safety and Health Administration (OSHA 3040), and Guidance for Controlling Friable Asbestos-Containing Materials in Buildings, U.S. Environmental Protection Agency (EPA 560/5-83-002, March 1983). These documents are available from the regional office of the U.S. Environmental Protection Agency, Federal Office Building, 26 Federal Plaza, New York, New York 10007, 212-264-2525.

Asbestos-containing building materials (ACBM) can be categorized into two groups: (1) friable; and (2) non-friable. Friable asbestos-containing material is that which can be crumbled, pulverized, or reduced to dust or powder using hand pressure. The presence of friable ACBM creates the need for the most urgent attention, while the presence of non-friable ACBM should be documented and proper handling procedures established, in order to avoid allowing the material to deteriorate to a friable and hence potentially hazardous condition. Non-friable ACBM, as well as friable ACBM, must be assessed periodically to determine their potential for fiber release. An operation and maintenance program including preventive measures must be established to prevent disturbance of all asbestos-containing materials.

Note: The AHERA Rule differentiates between ACBM and ACM. In the remainder of this report, all asbestos-containing material, including ACBM, will be referred to by the acronym "ACM".

2. AHERA CLASSIFICATIONS

AHERA classifies asbestos-containing materials as thermal system insulation, miscellaneous materials, or surfacing materials.

a. Thermal System Insulation (TSI)

The most common asbestos-containing thermal system insulation (TSI) are the following: (1) air cell, which is an asbestos-containing paper; (2) calcite and magnesia, which are powdery fibrous silicas; and (3) preformed asbestos lagging or blocks. These types of TSI were used for many years as the insulation wrapped around pipes, boilers, ducts, and hot water tanks in order to reduce thermal heat loss and prevent condensation.

When asbestos-containing insulation and its outer wrapping are in good condition, there is minimal chance that asbestos fibers will become airborne, provided the insulation is not disturbed. Insulation that is intact may remain in place as long as its location and condition are documented, and proper education is provided to individuals who may potentially disturb the insulation and may thereby cause a fiber release episode.

If TSI is intact and in good condition, it must be maintained according to an Operations and Maintenance Program in order to monitor its condition, since the physical condition of the insulation may change, thereby increasing the potential for fiber release. If asbestos insulation is frayed, punctured, ripped, water damaged, or vandalized, a fiber release episode may occur. Whenever a fiber release occurs, the insulation should be repaired, encapsulated, enclosed, or removed in order to decrease the potential hazard to both human health and the environment.

b. Miscellaneous Materials

Floor and ceiling tiles are categorized as miscellaneous interior building materials. Of the two, ceiling tiles are the most common friable materials. Ceiling tiles may release asbestos fibers upon the slightest disturbance. Air currents from HVAC systems may also cause erosion of ceiling tiles and subsequent asbestos fiber release. Routine maintenance of pipes located above asbestos-containing ceiling tiles can possibly cause some quantity of fibers to be released due to disturbance of the tiles. Under normal conditions, non-friable miscellaneous ACM has virtually no potential for fiber release. However, if these materials are sanded drilled, broken, or otherwise structurally disturbed, they can release fibers to the air and the environment.

c. Surfacing Materials

Acoustical troweled-on-plaster and sprayed-on fireproofing are categorized as surfacing ACM. Fireproofing insulation was applied as a fluffy coating in order to provide two to four-hour fire protection, so that structural beams would not warp and collapse during a fire. Insulation of this type has a high potential to release fibers into the air upon any physical contact or by the action of air currents. Asbestos-containing plaster was also used for fireproofing and for acoustical purposes. Non-friable surfacing ACM that has a low potential for disturbance also presents a low potential for fiber release.

3. RE-INSPECTION METHODOLOGY

This school was re-inspected for ACM by a trained and licensed Weecycle Environmental Consulting, Inc. Asbestos Inspector/Management Planner. The re-inspection was conducted in general accordance with 40 CFR Part 763.86 (b)(3) and included the following:

a. Visually re-inspect and reassess the condition of all friable known or assumed ACM.
b. Visually inspect the material that was previously considered non-friable ACM and touch material to determine whether it has become friable since the last inspection or re-inspection.
c. Identify any homogeneous areas with material that has become friable since the last inspection or re-inspection.
d. For each homogeneous area of newly friable material that is already assumed to be ACM, bulk samples may be collected and submitted for analysis.
e. Assess the condition of the newly friable material in areas where the samples are collected and in areas that are assumed to be ACM.
f. Re-assess the condition of friable known or assumed ACM previously identified.
g. Record the following information and submit to the LEA within 30 days of the re-inspection:
    1. The date of the re-inspection, the name and signature of the person making the re-inspection, Colorado license number, and any changes in the condition of known or assumed ACBM.
    2. The exact locations where samples are collected during the re-inspection, a description of the manner use to determine the sample locations, the name and signature of the person who collected the samples, and Colorado license number.
    3. An assessment or re-assessments made of friable material, the name and signature of the person who made the assessments, and Colorado license number.

The ACM and locations that were included in the re-inspection were based upon the information presented in the AHERA Re-inspection and Updated Management Plan, Lake County School District, 328 W 5th St, Leadville, CO 80461, prepared by Weecycle Environmental Consulting, Inc. and dated October 2018. The previous Management Plan and abatement records were used as reference for the current 2018 re-inspection report. Please refer to Section 6.0 of this report for re- inspection results and current material condition assessment of the identified ACBM.

BULK SAMPLE ANALYSIS

Bulk sampling of suspect asbestos-containing materials was conducted as part of this re-inspection.

4. LOCAL EDUCATION AGENCY (LEA)

LEA RESPONSIBILITIES

The following list summarizes the LEA's responsibilities as denoted in the Rule. The complete text may be found at Section 763.84 of the Rule.

1. All aspects of the inspection and management plan are carried out in accordance with the Rule.

2. Custodial and maintenance staff receives proper training as required by all federal and state regulations.

3. Workers and building occupants or their legal guardians are informed at least once each school year about all asbestos-related activities that are planned or are in progress.

4. Short-term workers who may come in contact with asbestos are informed about the locations of ACM and assumed ACM.

5. Required warning labels are posted in routine maintenance areas according to Section 763.95 of the Rule.

6. Parent, teacher, and employee organizations are notified yearly of the availability of the Plan. The School maintains a copy of the Plan at the School for inspection per Section 763.93(g) of the Rule.

7. Per Section 763.84(g)(1) of the Rule, the LEA shall "Designate a person to ensure that requirements under this section are properly implemented and ensure that the designated person receives adequate training as described in Section 763.84 (g)(2)."

8. "Consider whether any conflict of interest may arise from the interrelationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under this Subpart." (Section 763.84(h) of the Rule.)

Confirmation of Designated Person

LEA	Lake County School District R-1
School	Westpark Elementary School
Address	130 W 12th St, Leadville, CO 80461
Telephone	(719) 486-6890
Designated Person	Mr. Todd Coffin
Title	Director of Facilities
Address	328 W 5th St, Leadville, CO 80461
Telephone	(719) 486-0105
QUALIFICATIONS	
Training	2 Hour Awareness
Training Facility	Margret Pitts Elementary
Town, State	Leadville, CO 80461
Certificate Number	
Hours of Training	2 Hours
Date of Course	August 15, 2018

ASSURANCE OF RESPONSIBILITIES ASSUMED

As the AHERA Designated Person, I shall assume responsibility to ensure that the LEA's duties are carried out as described in 40 CFR 763, Subpart E.

Date **Signature of Designated Person**

RECOMMENDATION TO LEA

There is an increasing number of regulations regarding the handling, removal, transportation, and disposal of asbestos-containing materials. The LEA must be kept informed of and perform all response actions and other asbestos-related activities, in accordance with all federal, state, and local regulations regarding asbestos. In addition to AHERA 40 CFR Part 763 Subpart E, these regulations include, but are not limited to: Colorado Regulation 8; 29 CFR 1926.1101 and 29 CFR 1910.134 (OSHA); 40 CFR Part 763, Subpart G (EPA Worker Protection); 40 CFR Part 61, Subpart M (NESHAPS); Colorado Regulation 8, 49 CFR Part 100-177 (DOT); and all amendments and mandatory appendices and regulations cited within these regulations.

The regulations are meant to protect the health and safety of those working with and around asbestos, as well as building occupants. Given the LEA's responsibility to protect both human health and the environment of the school building's occupants, and the high potential liability associated with asbestos remediation projects, the LEA **MUST ENSURE** that the interests of the building's occupants are protected.

All response actions other than small-scale, short duration activities must be designed and conducted by persons accredited and licensed to conduct such activities. Design specifications should be sufficiently explicit to avoid conflicts or confusion that may arise concerning the scope of work and required procedures. It is recommended that the LEA contract a Colorado certified and licensed Asbestos Abatement Project Monitor to help ensure that projects are carried out safely, thoroughly, and in compliance with all applicable laws and regulations. Areas adjacent to the project should be sufficiently monitored throughout the project to provide clear documentation of project integrity. Final inspection and air clearance must be achieved as required in Section 763.90(i) of the Rule before any response action may be considered successfully completed.

The LEA must consider any conflict of interest that may potentially arise when retaining accredited designers and contractors to perform asbestos-related activities. Generally, it is recommended that the LEA choose separate accredited entities: one for project design (including project oversight, clearance visual inspection, and air monitoring); and another to conduct the asbestos project according to the design. Appendix A of the Rule states that ". . . air sampling operations must be performed by qualified individuals completely independent of the abatement contractor".

5. PUBLIC NOTIFICATION

OCCUPANT NOTIFICATION

In accordance with Section 763.84(c) of the Rule, the LEA will notify in writing, at least once yearly, all relevant occupants of the school of all asbestos-related activities that take place at the school. Relevant occupants include but are not limited to: building occupants or their legal guardians; staff, including teaching, administrative, custodial, maintenance, and all other personnel; all parent, teacher, employee, and administrative organizations; and/or any similar organizations at the school which serve similar functions.

Asbestos activities include but are not limited to: inspections; response actions, including removal, encapsulation, enclosure, repair, and operation and maintenance; and post-response action activities, including periodic surveillance and reinspection. In addition, Section 763.93(g)(4) of the Rule requires the LEA to inform occupants at least once per year that the AHERA Management Plan exists and is available for review in the school's Administration Office.

In accordance with the Section 763.93(b) of the Rule, the LEA must maintain a dated copy of all such notifications. The list of relevant groups to be notified will be added to and updated as necessary and should also be kept on file.

PLAN FOR NOTIFICATION

In accordance with Sections 763.84(c) and Sections 763.93(e)(10) and (g)(4) of the Rule, all school building occupants will be informed by written notification about all asbestos-related activities at least once every school year.

Building occupants to be notified include, but are not limited to, all students or their legal guardians, and all staff members and their committees, representatives, and organizations.

Building occupants at the school include the following:

- Students
- Legal guardians of students
- Staff (including teaching, custodian, maintenance,
- Administrative, and all other personnel)

The LEA may choose various methods of notification to building occupants. The method of notification, such as written notification via posted notices at the school, through publications such as a legal notice in the local newspaper, or by posting the information to the LEA website, must be documented and details of the new notification methods used must be included in the Management Plan. Copies of the annual public notice must be included in the Management Plan.

ACBM LOCATIONS

According to Section 763.84(d) of the Rule, the LEA must ensure that all short-term workers who may come in contact with asbestos in the school (e.g., telephone, plumbing, HVAC, electrical workers, etc.) are provided information regarding the locations of identified or

assumed ACM. In addition, as required by Section 763.92(a)(i)(iii), members of the school's maintenance and custodial staff must be informed of the locations of ACM identified throughout each school building in which they work.

Please refer to Section 6.0 of this report for the locations of the previously identified ACBM and their current material condition assessment.

ASBESTOS ACTIVITIES

Prior to the start of asbestos abatement and/or associated or remediation projects, proper notifications must be made by the appropriate entities to all applicable federal, state, and local agencies and authorities. The local Health and Fire Departments are often good places to begin researching local regulations and notification requirements. Notifications may include but are not limited to the following.

1. NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)

NESHAPS notifications are submitted to the EPA Region I Office per 40 CFR Part 61, Subpart M. NESHAPS requires notification whenever asbestos is being removed according to the quantities involved, as follows:

a. Demolition

10 days notice for any asbestos abatement project. Notification must include friable and potentially friable ACBM

b. Renovation

10 days notice for any asbestos abatement project. Notification must include friable and potentially friable ACBM

2. Colorado Department of Public Health and Environment (CDPHE)

CDPHE, Air Pollution Control Division must be given proper notice when any asbestos abatement project or asbestos associated project involving more than three linear or three square feet is planned. The Division must be notified at least ten days prior to the project start date (postmark or hand delivery), or in the case of an emergency, within one working day after the project start date. (Section III.E.1.d of Colorado Regulation 8).

3. Colorado Department of Public Health & Environment (CDPHE)

The CDPHE requires proper notification and ten days prior notice (one day prior notice in the event of emergency) before the start date of **any and all** asbestos removal projects (Regulation 8 paragraph III.G.1).

*Contact the agencies denoted above or refer to the appropriate regulations for further information requiring proper notification procedures and guidelines.

6. ASBESTOS-CONTAINING MATERIALS RESPONSE ACTIONS

RESPONSE ACTION DETERMINATION SUMMARY

Response Action Determinations were made by using the EPA recommended method to determine the risk to human health associated with exposure to asbestos within a given ACM category. Appropriate response actions that are consistent with applicable regulations and protect human health and the environment are then recommended in order to best respond to and/or control ACM.

RESPONSE ACTION DESCRIPTIONS

Future building uses and planned renovations all should be taken into consideration when the LEA must choose among the alternative response actions recommended, or otherwise available, for reducing the hazard to human life and the environment posed by the presence of ACM. Conditions that must be taken into consideration when determining the appropriate method of treatment for ACM are location, quantity, physical condition, future uses, renovation or demolition plans, and any social, political, or economic constraints that may apply.

The following is a brief and general description of the Response Actions recommended in the Plan. The following response actions may only be undertaken in accordance with all applicable federal, state, and local regulations governing the handling and disposal of asbestos. Procedural requirements and work practices regarding small-scale, short-duration asbestos activities may be found in the O&M Section of this Plan. Refer to the Table at the end of Part 5 for a complete list of ACM and recommended response actions.

1. Removal

Although initially the most expensive option, removal is a permanent solution and often the most cost-effective. Removal means the complete removal and disposal of designated asbestos-containing material of any kind. If ACM debris is present, the area must be isolated and the debris cleaned up immediately. Not only are future potential hazards associated with asbestos-containing materials eliminated, operation and maintenance, repair, and periodic surveillance and inspection (as required with the options described above) become unnecessary. Future problems or costs for asbestos control are thus completely eliminated.

2. Repair

Repair is generally one of the least expensive forms of treatment. Repair means to restore a damaged area to its original intact condition. This includes making the damaged area airtight to prevent the release of fibers into the air. If ACM debris is present, the area must be isolated, and the debris cleaned up immediately. All repaired ACM is incorporated into the O&M Program and repair activities must be documented in the O&M program to monitor the future condition of the material and its potential for damage. This method also leaves the leaves the ACM in the building where it will continue to age and deteriorate.

3. Encapsulation

Encapsulation is the other least expensive form of treatment. Encapsulation means the

application of a material with a bonding or sealing property to prevent the release of airborne fibers. If ACM debris is present, the area must be isolated, and the debris cleaned up immediately. Encapsulated ACM is incorporated into the O&M Program and the encapsulation activities must be documented in the O&M program to monitor the future condition of the material and its potential for damage. This method also leaves the leaves the ACM in the building where it will continue to age and deteriorate.

4. Enclosure

Enclosure offers a more expensive but more secure solution for some ACM. Enclosure means creating an airtight structure around an affected area to prevent the release of airborne fibers and significantly reduce the possibility of future physical disturbance or damage to the ACM. Any damaged ACM must be repaired prior to enclosure. If ACM debris is present the area must be isolated and the debris cleaned up immediately. The enclosed area is incorporated into the O&M Program. In addition, the NESHAPS legislation requires that if future plans include activities that would disturb the ACM, the ACM must first be removed.

5. Operation & Maintenance (O&M) Program

An O&M program describes a structured plan of action to maintain ACM in a condition that protects the health and safety of the occupants in a building and provides for remedial action in the event that ACM is disturbed.

RESPONSE ACTION RECOMMENDATION / IMPLEMENTATION

Regardless of the abatement method chosen, it is important to bear in mind that any disturbance of friable asbestos-containing material can cause fibers to be released, if proper procedures and precautions are not observed.

Asbestos abatement workers licensed in Colorado must be employed to perform any large-scale operation (one involving greater than three square or three linear feet of asbestos). It is recommended that a Colorado certified Asbestos Project Monitor be employed to ensure the safety of employees and building occupants and to ensure that proper work practices and procedures are followed during all phases of an abatement project. Collection of samples to determine ambient air fiber levels upon completion of a project is also required. Final inspection and air clearance must be achieved as required in Section 763.90(i) of the Rule before any response action may be considered successfully completed.

It is also recommended that ambient air fiber levels be measured before and during a project. These added precautionary measures greatly increase a school's ability to document and record pertinent data and thereby reduce its own potential liability.

RISK ASSESSMENT AND ASBESTOS CONTROL

Actual risk due to asbestos exposure cannot be quantitatively defined, nor can the relationship between an exposure and its consequential effect be estimated. The only precise quantitative statement that can be made concerning asbestos is that zero exposure will give zero risk. It is generally agreed, however, that the greater the exposure, the greater the risk.

The above consideration, combined with the fact that over time, any building material will decay and eventually most systems will be replaced by newer, more advanced and efficient systems, is the basis for the recommendation that, whenever possible, exposed friable asbestos be removed and that any remaining asbestos-containing materials be controlled with an asbestos O&M Program. Recommended control methods are outlined in the Operation and Maintenance Program in Part VII. Appendix B of the Rule should be consulted regularly as a guide for specific work practices to use for jobs that require contact with asbestos in a School. Again, bear in mind that NESHAPS regulations currently in force require the proper removal of ACM before any major renovation, repair, or demolition occurs.

SUMMARY TABLE OF ACBM
Lake County School District
Westpark Elementary School
130 W 12th St
Leadville, CO 80461
Reinspection October 2018

Material	Location/ Functional Space/Homogenous Area ID	Quantity Observed in 1988 Initial AHERA Inspection	Quantity Observed in 2018 AHERA Re-Inspection	Friable / Non-Friable	Material/ Condition Assessment Code	Asbestos Content %	Comments	Response Action Recommendation
Drywall Texture DT-3	South Wing, Janitor closet ceiling	-	150	Friable	7	2% Chrysotile	The drywall appears in fair condition.	Maintain the material in good condition in accordance with the O&M Plan.
Drywall Texture DT-4	Boiler and Janitor work room ceiling, Bathroom/Locker room, Gym Bathrooms	-	3300	Friable	7	2% Chrysotile	The drywall appears in fair condition.	Maintain the material in good condition in accordance with the O&M Plan.

Cinderblock Coating CMU-1	Admin 100, Round room closets & rooms, Office for Admin walls (South wing) 110, 109, 101, 108, 107, 106, 105, 104, 103, 102, 101, Mechanical room, Janitorial work room, 120 W/E/S walls. 118, 111, 117, 112, 116, 113, 115, 114, Gym top half of walls, Gym office walls	-	25,000	Friable	6	2% Chrysotile	The cinderblock coating appears in good condition.	Maintain the material in good condition in accordance with the O&M Plan.
Floor Tile FT-2	Under carpet throughout Round room	2200	2200	Non-Friable	6	3% Chrysotile	The floor tile appears in fair condition. Although the floor tile is ACM, the underlying mastic is also asbestos-containing.	Maintain the material in good condition in accordance with the O&M Plan.
Mastic						Mastic 5% Chrysotile		

AHERA MATERIAL/CONDITION ASSESSMENT KEY FOR FUNCTIONAL SPACES (AS FOUND IN 40 CFR 763.88(B))

1. Damaged or significantly damaged TSI.
2. Damaged friable surfacing material.
3. Significantly damaged friable surfacing material.
4. Damaged or significantly damaged friable miscellaneous material.
5. ACM with potential for damage.
6. ACM with potential for significant damage.
7. Any remaining friable known or suspect ACM.
8. Damaged or significantly damaged non-friable ACMB. Note that this category is not listed in the AHERA regulations but is provided for reference in this report.

METHOD OF RESPONSE ACTION DETERMINATION FOR SURFACING AND MISCELLANEOUS ACM

1. Friable Surfacing or Miscellaneous ACM with Significant Damage

Response Action 1: Remove – Isolate the area and clean up debris immediately. Remove ACM as soon as possible.

2. Friable Surfacing or Miscellaneous ACM with Damage and High Potential for Disturbance

Response Action 1: Remove – Isolate area and clean up immediately. Remove ACM as soon as possible.

3. Friable Surfacing or Miscellaneous ACM with Damage and Moderate Potential for Disturbance

Response Action 4: Enclose – Institute preventive measures. Repair ACM to return to airtight, intact condition, and enclose with an impermeable encasement to prevent physical disturbance. Continue with O&M.

4. Friable Surfacing or Miscellaneous ACM with Damage and Low Potential for Disturbance

Response Action 3: Encapsulate – Institute preventive measures. Repair damaged

material to return to intact condition and encapsulate to reduce the possibility of fiber release. Continue with O&M.

5. Friable Surfacing or Miscellaneous ACM with No Damage and High Potential for Damage

Response Action 4: Enclose – Institute preventive measures. Enclose material to reduce effects of future disturbance. Continue with O&M.

6. Friable Surfacing or Miscellaneous ACM with No Damage and Moderate Potential for Damage

Response Action 3: Encapsulate – Institute preventive measures. Encapsulate material to reduce the possibility of fiber release. Continue with O&M.

7. Friable Surfacing or Miscellaneous ACM with No Damage and Low or no Potential for Damage

Response Action 5: O&M Program – Continue with O&M until condition factors change, requiring additional response.

8. Non-Friable Surfacing or Miscellaneous ACM

Response Action 5: O&M Program – Continue with O&M until condition factors change, requiring additional response.

AHERA MATERIAL/CONDITION ASSESSMENT KEY FOR FUNCTIONAL SPACES (AS FOUND IN 40 CFR 763.88(B))

1. Damaged or significantly damaged TSI.
2. Damaged friable surfacing material.
3. Significantly damaged friable surfacing material.
4. Damaged or significantly damaged friable miscellaneous material.
5. ACM with potential for damage.
6. ACM with potential for significant damage.
7. Any remaining friable known or suspect ACM.
8. Damaged or significantly damaged non-friable ACMB. Note that this category is not listed in the AHERA regulations but is provided for reference in this report.

METHOD OF RESPONSE ACTION DETERMINATION FOR SURFACING AND MISCELLANEOUS ACM

1. Friable Surfacing or Miscellaneous ACM with Significant Damage

Response Action 1: Remove – Isolate the area and clean up debris immediately. Remove ACM as soon as possible.

2. Friable Surfacing or Miscellaneous ACM with Damage and High Potential for Disturbance

Response Action 1: Remove – Isolate area and clean up immediately. Remove ACM as soon as possible.

3. Friable Surfacing or Miscellaneous ACM with Damage and Moderate Potential for Disturbance

Response Action 4: Enclose – Institute preventive measures. Repair ACM to return to airtight, intact condition, and enclose with an impermeable encasement to prevent physical disturbance. Continue with O&M.

4. Friable Surfacing or Miscellaneous ACM with Damage and Low Potential for Disturbance

Response Action 3: Encapsulate – Institute preventive measures. Repair damaged material to return to intact condition and encapsulate to reduce the possibility of fiber release. Continue with O&M.

METHOD OF RESPONSE ACTION DETERMINATION FOR SURFACING AND MISCELLANEOUS ACM

5. Friable Surfacing or Miscellaneous ACM with Significant Damage

Response Action 1: Remove – Isolate the area and clean up debris immediately. Remove ACM as soon as possible.

6. Friable Surfacing or Miscellaneous ACM with Damage and High Potential for Disturbance

Response Action 1: Remove – Isolate area and clean up immediately. Remove ACM as soon as possible.

7. Friable Surfacing or Miscellaneous ACM with Damage and Moderate Potential for Disturbance

Response Action 4: Enclose – Institute preventive measures. Repair ACM to return to airtight, intact condition, and enclose with an impermeable encasement to prevent physical disturbance. Continue with O&M.

8. Friable Surfacing or Miscellaneous ACM with Damage and Low Potential for Disturbance

Response Action 3: Encapsulate – Institute preventive measures. Repair damaged material to return to intact condition and encapsulate to reduce the possibility of fiber release. Continue with O&M.

9. Friable Surfacing or Miscellaneous ACM with No Damage and High Potential for Damage

Response Action 4: Enclose – Institute preventive measures. Enclose material to reduce effects of future disturbance. Continue with O&M.

10. Friable Surfacing or Miscellaneous ACM with No Damage and Moderate Potential for Damage

Response Action 3: Encapsulate – Institute preventive measures. Encapsulate material to reduce the possibility of fiber release. Continue with O&M.

11. Friable Surfacing or Miscellaneous ACM with No Damage and Low or no Potential for Damage

Response Action 5: O&M Program – Continue with O&M until condition factors change, requiring additional response.

12. Non-Friable Surfacing or Miscellaneous ACM

Response Action 5: O&M Program – Continue with O&M until condition factors change, requiring additional response.

METHOD OF RESPONSE ACTION DETERMINATION FOR THERMAL SYSTEM INSULATION (TSI) ACM

1. Significantly Damaged Thermal System Insulation (TSI)

Response Action 1: Remove the damaged material - Isolate the area and restrict access. ACM debris should be removed, and the area cleaned up immediately.

2. Damaged Thermal System Insulation with High Potential for Disturbance

Response Action 1: Remove - Institute preventive measures and remove material as soon as possible.

3. Damaged Thermal System Insulation with Moderate Potential for Disturbance

Response Action 4: Enclosure - Institute preventive measures. Repair insulation to airtight condition and enclose with an impermeable encasement to protect against further physical damage. Continue with O&M.

4. Damaged Thermal System Insulation with Low Potential for Disturbance

Response Action 2: Repair - Repair to airtight condition and take preventive measures necessary to eliminate any potential disturbance. Continue with O&M.

5. Undamaged Thermal System Insulation with High Potential for Disturbance

Response Action 1: Remove - Institute preventive measures. Remove to prevent the high possibility of disturbance to the ACM.

6. Undamaged Thermal System Insulation with Moderate Potential for Disturbance

Response Action 4: Enclose - Institute preventive measures. Enclose the ACM within an airtight barrier to prevent potential disturbance of ACM. Continue with O&M.

7. Undamaged Thermal System Insulation with Low or No Potential for Disturbance

Response Action 5: O&M - Continue with O&M.

7. RESPONSE ACTION DETERMINATION SUMMARY

INTRODUCTION

In compliance with the AHERA Rule, the LEA must establish and implement an Operation, Maintenance, and Repair (O&M) Program for each school that contains ACM. The purpose of an O&M program and its required periodic surveillance and re-inspection is to monitor and control the condition and location of any remaining ACM in the school and to reassess the potential for hazard to human health and the environment that the ACM poses. The following summary of Section 763.91 of the Rule highlights the LEA's responsibilities with respect to O & M for all ACM that remains in the school.

LEA RESPONSIBILITIES

1. Establish and implement an Operation, Maintenance, and Repair (O&M) Program for all material identified or assumed to be ACM, including both friable ACM and non-friable ACM with the potential to become friable due to activities performed.

2. Implement the initial cleaning of any areas containing friable ACM or assumed friable ACM that is present after the inspection has been completed and before response actions other than O & M takes place.

3. Cleaning techniques [taken directly from Section 763.91(c)(1) of the Rule] include but are not limited to:

    a. HEPA-vacuum or steam-clean all carpets.

    b. HEPA-vacuum or wet-clean all other floors and all other horizontal surfaces.

    c. Dispose of all debris, filters, mop heads, and cloths in sealed, leak-tight containers.

4. Initiate any additional cleaning recommended in the Plan.

5. Implement the following procedural techniques (taken directly from Section 763.91(d) of the Rule) for all O & M activities that involve the disturbance of friable ACM:

    a. Restrict entry into the area by persons other than those necessary to perform the maintenance project, either by physically isolating the area or by scheduling.

    b. Post signs to prevent entry by unauthorized persons.

    c. Shut off or temporarily modify the air handling system and restrict other sources of air movement.

    d. Use work practices or other controls, such as wet methods, protective clothing, HEPA vacuums, mini-enclosures, and glovebags, as necessary to inhibit the dispersal of released fibers.

e. Clean all fixtures or other components in the immediate work area.

f. Place asbestos debris and contaminated cleaning materials in a sealed, leak-tight container.

6. Make certain that all response actions involving more than three linear or square feet of friable ACM will be designed by a Colorado Accredited Project Designer and performed Colorado Accredited Contractors and Consultants. The State of Colorado requires that proper notifications be made as necessary to the Colorado Department of Public Health and Environment (CDPHE), per NESHAPS

7. Ensure that the following procedures (from Section 763.91(f)(1) of the Rule) are adhered to in the event of a minor fiber release episode or the falling or dislodging of three linear or square feet or less of friable ACM:

   a. Thoroughly saturate the debris using wet methods.

   b. Clean the area as described in Section 763.91(c) of the Rule.

   c. Place the asbestos debris in a sealed, leak-tight container.

   d. Repair the area of damaged ACM with materials such as asbestos-free spackling, plaster, cement, or insulation, or seal with latex paint or other encapsulant, or immediately have the appropriate response action implemented as required by Section 763.90 of the Rule.

8. Make certain that the following procedures (taken directly from Section 763.91(f)(2) of the Rule) are adhered to in the event of a major fiber release episode or the falling or dislodging of more than three linear or square feet of friable ACM:

   a. Restrict entry into the area and post signs to prevent entry by persons other than those necessary to perform the response action.

   b. Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas in the building.

   c. The response action for any major fiber release episode must be designed by persons accredited to conduct response actions.

9. Post warning labels immediately adjacent to all ACM or assumed ACM located in routine maintenance areas as described in Section 763.95 of the Rule.

10. Make certain the designated person and custodial and maintenance staff are properly trained in accordance with the Rule and all other applicable federal, state, and local regulations. **Staff members who may disturb ACM must receive sixteen hours of training.** Members of the building's maintenance or engineering staff or outside contractors (plumbers, electricians, installers, etc.) who may be required to handle or disturb ACM are required by the Colorado Regulation 8 to be trained by a state-certified training provider regarding proper handling procedures for asbestos.

11. Once the Plan is in effect, the LEA must implement periodic surveillance of all remaining ACM in the facility for changing condition and hazard assessment every six months after the Plan is in effect. **Staff members who have completed the aforementioned sixteen-hour training can perform this.**

12. Make certain that re-inspection of all remaining ACM is conducted by an accredited asbestos inspector every three years while ACM remains in the school in accordance with Section 763.85(b) of the Rule.

13. Make certain that all short-term workers (generally outside contractors) are provided with information regarding the locations of ACM and assumed ACM, per Section 763.84(d) of the Rule.

TRAINING REQUIREMENTS AND WORKER PROTECTION

In compliance with Section 763.92(a) of the Rule, all maintenance and custodial staff must receive at least two hours of asbestos awareness training prior to the implementation of the O & M Program described in this Plan. Lake County School District R-1 school maintenance personnel training certificates should be attached in Section 10.0.

New staff personnel must similarly be trained within sixty days of commencement of employment. In addition, **personnel who will conduct activities that may result in the disturbance of ACM must receive an additional fourteen hours of training, as required by the Rule.**

As described in Section 763.92(a) of the Rule, awareness training must include information regarding: the forms and uses of asbestos; the health effects associated with asbestos exposure; the locations of ACM identified throughout the school; how to recognize damage, deterioration, and delamination of ACM; the name and telephone number of the person designated by the LEA; and the availability and location of the Plan.

As described in Section 763.91(b) of the Rule, all LEA employees who perform O & M and repair activities involving ACM and who are not covered by OSHA 29 CFR 1926.1101, or are approved by Section 19 of the Occupational Safety and Health Act, are extended worker protection provided by the EPA at 40 CFR 763.121. According to the EPA's "AHERA Fact Sheet", the LEA may choose to institute the provisions of Appendix B of the Rule in the case of small-scale, short-duration projects rather than comply with the full EPA Worker Protection Rule.

PERIODIC SURVEILLANCE & RE- INSPECTION

The LEA must conduct a periodic surveillance in each building every six months after the Plan is in effect. An assigned person trained in accordance with Section 763.92(a) of the Rule shall visually inspect all areas that are identified in the Plan as ACM or assumed ACM, record the date of the surveillance, his or her name, any changes in the condition of the materials, and submit to the Designated Person a copy of such record to be included in the Plan, in accordance with Section 763.92(b) of the Rule.

At least once every three years after the plan is in effect, the school must conduct a re-inspection of all friable and non-friable, assumed and identified ACM. The re-inspection must

be conducted by a Colorado accredited inspector and performed in accordance with Section 763.85(b) of the Rule.

Once the Plan has been approved by the Governor's Designee, the Plan is considered to be "in effect", so that the first periodic surveillance will have to occur before the expiration of six months from the "effective date." Likewise, the first re-inspection will have to take place within three years of the effective date.

It is recommended that the effective date and appropriate periodic surveillance and re-inspection dates be entered into the Plan in tabular form and also be posted to serve as a frequent schedule reminder.

WARNING SIGNS

In accordance with Section 763.95 of the Rule, the LEA is responsible to prominently place warning signs immediately adjacent to all identified or assumed, friable and non-friable ACM that is located in all routine maintenance areas in the School.

The warning signs must be readily visible and easy to read, with large print and bright color (normally black print on bright yellow background), and read as follows:

CAUTION:
ASBESTOS. HAZARDOUS.
DO NOT DISTURB WITHOUT PROPER
TRAINING AND EQUIPMENT.

The routine maintenance areas for the building covered by this Plan presently include, but are not limited to:

- Any rooms that contain assumed materials such as fire doors, fire filed and safes, art kilns, acid resistant countertops and sinks, and chalkboards.

PREVENTIVE MEASURES

Preventive measures include any action or actions taken in order to eliminate or reduce the possibility of disturbing ACM. All preventive measures taken must be properly recorded according to Section 763.94(b) of the Rule. Examples of precautions to take include the following:

1. Do not cut, sand, drill, break, nail into, or otherwise disturb ACM or create dust.

2. Avoid contact damage to any ACM. Remove any adjacent items that may contact ACM.

3. Keep suspended ceiling tiles in place wherever any ACM exists above them. Do not remove or displace ceiling tiles without taking the proper precautionary measures outlined in 'ACM Above Ceilings', in Part VII below.

4. Do not hang fixtures, wires, etc. from ACM.

5. Prevent water damage to ACM.

6. Do not disturb asbestos-containing materials when replacing lights, etc

7. Do not allow doors or dividers to rub against ACM.

8. Isolate, redirect, or eliminate direct airflow onto any friable or damaged ACM.

Note: Always take proper precautions when working around ACM. Report any damaged ACM to the Designated Person **IMMEDIATELY**.

CLEANING

1. INITIAL CLEANING

Areas of the school where identified and assumed friable ACM and damaged or significantly damaged Thermal System Insulation ACM are present are required according to Section 763.91(c)(1) of the Rule to be cleaned at least once after the completion of the inspection and before the initiation of any response actions other than O & M.

2. ADDITIONAL CLEANING

In addition to initial cleaning and that which is required after any fiber release episode, the LEA is required to perform additional cleaning according to Section 763.91(c)(2) of the Rule. According to Section 763.91(c)(1) of the Rule, additional cleaning recommendations include, but are not limited to, cleaning all proximate surfaces of the areas previously identified:

a. Areas containing ACM where a suspect film or dust occurs.

b. Anytime any friable or non-friable ACM becomes damaged or significantly damaged.

c. Anytime the LEA's Designated Person determines cleaning is necessary to protect the health and environment of the building occupants.

It is important that all cleaning be completed prior to the initiation of other response actions that may be necessary. The initial cleaning will prevent or greatly reduce the possibility of further contamination within an affected area as well as surrounding areas and reduce the possibility of exposure to school workers and all other building occupants.

CUSTODIAL AND MAINTENANCE PROCEDURES:

Personnel conducting custodial or maintenance work shall take extreme care not to disturb or damage ACM. If damage occurs or is discovered the Report of Damaged Asbestos Containing Material (Appendix D) should be completed and sent to the Asbestos Program Manager.

ACM WASTE

Waste generated from asbestos projects must be properly stored and disposed. A minimum of a half-face negative pressure respirator and disposable clothing, with a hood and booties, are required when handling asbestos-containing materials. The following procedures must be implemented when handling asbestos-containing waste:

1. All waste must be placed in either sealed barrels or two six-mil polyethylene disposal bags. All waste containers must have two labels as required by both OSHA and the U.S. Department of Transportation (DOT). The labels are worded as follows:

   OSHA Label:

   DANGER
   CONTAINS ASBESTOS FIBERS
   AVOID CREATING DUST
   CANCER AND LUNG DISEASE HAZARD

   DOT Label:

   RQ ASBESTOS, SOLID,
   Class 9
   NA 2212, III

2. Waste must be adequately wet. Once the debris is in the barrel or disposal bag, sufficient water must be added so that there is a noticeable amount.

3. Disposal bags must be sealed to reduce airspace and make them leak-tight. Twisting and sealing with duct tape is one method to prevent leaks at the opening of the bag. All waste must be double-bagged and sealed. In the case of a glovebag, the use of one labeled bag around the glovebag is considered double-bagging. If the second bag is used to dispose of other contaminated waste and water, a third labeled bag must then be properly sealed around both.

4. Place the bags into a drum or other rigid container equipped with secure or locking ring lids and label with the same information described above.

5. The drums or container must be secured in a temporary storage area previously identified at your facility. This should be an area with limited access and preferably with a locked entry door.

6. Record the date and amount of waste placed in the temporary storage area. A log sheet should be established for this purpose.

7. Keep the temporary storage area clean by using good work practices. If any bags of waste break, clean the area using the 'Asbestos Debris Cleanup Procedures' in Part VII, and in compliance with all applicable regulations.

8. Before the temporary storage area is full or the expiration of the maximum allowable storage date, make arrangements to have the asbestos waste picked up and delivered to an approved asbestos waste disposal site.

9. Make advance arrangements with the waste disposal facility to ensure that your waste will be accepted.

10. Arrange to have the asbestos waste delivered safely to the previously identified disposal facility.

11. Receipts from both the transporter and landfill for each shipment of waste must be kept on file. Record all dates, destinations, and responsible persons involved in transporting the waste from the temporary storage area to the disposal facility previously identified in the Plan. For further information concerning storage, transportation, and disposal of asbestos-containing waste, contact the CDPHE Hazardous Waste Division.

8. SAFE WORK PRACTICES & PROCEDURES FOR ASBESTOS-CONTAINING MATERIALS

INTRODUCTION

The following safe work practices and procedures are minimum requirements and/or recommended guidelines for working with or around asbestos-containing materials. School personnel may perform Work involving three linear or square feet or less of ACM and small-scale or short-duration projects provided that they have received the required sixteen-hour asbestos O&M training.

All school employees who perform small-scale or short-duration projects must be provided with appropriate personal protective equipment. This equipment includes, at a minimum, half-face negative-pressure respirators equipped with High Efficiency Particulate Air (HEPA) filters and full-body Tyvek disposable coveralls or their equivalent. The following procedures are to be performed only after first donning this minimum personal protective equipment.

Activities which will disturb greater than three linear or three square feet of ACM must be designed and performed by persons or companies certified in Colorado to perform such activities. All asbestos activities must be performed in compliance with all applicable federal, state, and local regulations. Notifications to appropriate agencies are necessary. Isolation of the affected area is usually required. All asbestos work must also be performed in such a manner as to minimize the release of asbestos fibers and protect the health and environment of all building occupants.

EQUIPMENT

In addition to protective equipment such as disposable clothing and respirators, the following equipment may be necessary to perform work involving asbestos.

1. DUCT TAPE

Heavy-gauge tape used to seal glove-bags and secure adjacent sheets of polyethylene.

2. POLYETHYLENE OR PLASTIC SHEETING

Plastic sheeting (6 - mil thick) used to seal off an area in which an asbestos project is taking place in order to prevent contamination of other areas. Also used to seal waste.

3. SURFACTANT

A chemical wetting agent added to water that improves the ability of water to penetrate asbestos-containing material.

4. DISPOSAL BAGS

Six-mil-thick bags used to dispose of asbestos-containing materials. All bags must be properly labeled according to OSHA and DOT regulations.

5. RETRACTABLE UTILITY KNIFE

Used to cut asbestos-containing materials or equipment during removal. Always use **retractable** utility knives so as not to risk puncturing glove-bags.

6. GLOVE-BAG

A pre-manufactured polyethylene bag generally used as a containment around asbestos-containing insulation on pipes or valves so that the insulation may be removed without releasing asbestos fibers into the ambient air. The glove-bag consists of a 6- to 12-mil-thick polyethylene bag fitted with long-sleeve gloves, a tool pouch and an opening for a HEPA vacuum hose and garden sprayer wand. The size, quality, style, and cost vary depending on the manufacturer.

7. WARNING SIGNS

Warning signs are posted at the entrance to the work area and at a sufficient distance so as to allow all building occupants adequate forewarning of the occurrence of an asbestos associated project. The purpose of warning signs is to keep unauthorized personnel away from the work area. The OSHA warning sign is worded as follows:

DANGER
ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY
RESPIRATORS AND PROTECTIVE
CLOTHING ARE REQUIRED IN THIS AREA

8. HEPA VACUUM CLEANER

A High Efficiency Particulate Air (HEPA) filtered vacuum cleaner capable of trapping and retaining 99.97% of all particles larger than 0.3 microns. The HEPA vacuum cleaner is equipped with an extensive filtering system consisting of primary, secondary, and HEPA filters which trap fine particles.

9. RE-WETTABLE FIBERGLASS CLOTH

A canvas-like material impregnated with glue. The cloth is saturated with water and molded over asbestos-containing pipe and boiler insulation and hardens as it dries. When completely dry, it is sealed with latex paint. Because the cloth contains fiberglass, it is best to wear gloves when handling this material.

10. GARDEN SPRAYER

A garden sprayer is filled with amended water and is used to wet asbestos-containing material

or to lock down fibers remaining on substrate from which asbestos-containing material has been removed. When performing the glove-bag technique, a garden sprayer with a 2-3-gallon capacity is sufficient. It is best to have a hose at least six feet long. If the hose is not sufficiently long, it can be replaced or extended with flexible tubing.

11. ENCAPSULANT

A substance applied to asbestos-containing materials that controls the release of asbestos fibers. Encapsulant is applied over re-wettable fiberglass cloth, after the cloth has dried. Latex paint is suitable for this purpose. Be sure the encapsulant chosen has a fire rating appropriate to the area where it is used.

12. SPRAY BOTTLE

A spray bottle filled with water is used to wet any suspect debris.

13. SMOKE TUBES AND ASPIRATOR BULB

Used to test glove-bags for leaks and for respirator fit-testing.

14. RE-SEALABLE STORAGE BAGS

If repairs to pipe insulation are completed using the glove-bag technique, the patching material (i.e., re-wettable fiberglass cloth) must remain free of asbestos contamination. Placing the material inside a storage bag will prevent contamination.

15. RAGS, NYLON BRISTLE SCRUB BRUSHES (OR SCRUB PADS)

These items are used to clean the surface of a pipe or valve once asbestos-containing insulation has been removed. The scrub brush or pad are particularly useful when removing debris from threading. These items cannot be decontaminated and must be discarded as asbestos waste.

16. PATCHING COMPOUND (OR CEMENT)

Used to fill in cracks or holes in pipe or boiler insulation.

17. STAPLE GUN AND STAPLES

Used to temporarily secure polyethylene sheeting and glove-bags.

18. BUCKET

Preferably plastic and washable. Do not use wooden buckets. Used to catch asbestos debris and to wash equipment following use.

NON-FRIABLE ACM

Asbestos-containing or assumed asbestos-containing materials such as transite board and transite pipe are non-friable in their undamaged state. However, routine maintenance and renovation activities can disturb non-friable ACM and cause it to become friable. When non-friable material is removed, friable asbestos-containing dust and fibers may be released. For this reason, any activities that may possibly break these non-friable materials must be undertaken with care, including the application of control methods and preventive measures.

Control methods to minimize the possibility of creating asbestos dust include using water mist to significantly reduce the release of dust and fibers, together with isolation of the area when disturbing non-friable ACM. Precautions must be taken so as not to allow non-friable materials to become broken and damaged, thereby causing fibers to be released. Cutting, sanding, abrading or drilling will also promote fiber release from non-friable ACM. As a further safety measure, personal protective clothing should be worn when disturbing these materials.

Asbestos-containing or assumed asbestos-containing floor tiles are also non-friable in their undamaged state. Small-scale (less than three square feet) repair of these floor tiles may be performed, but the control methods for transite board described above must be applied. At no time should any amount of floor tiles be sanded, drilled, broken, or otherwise damaged. Large-scale repair and/or removal of floor tiles will require plans to be designed by a Colorado Certified Project Designer. In this event, a simplified containment system may be constructed for the ACM locations.

Note: Refer to 'Preventive Measures, in Part VII above, and Appendix B of the Rule for additional information regarding appropriate work practices.

MINI-ENCLOSURE OPERATIONS

Any work that would require the use of a mini-enclosure operation must be performed by a Colorado Certified Asbestos Abatement Contractor and these general procedures are provided for informational purposes as part of this updated management plan for Lake County School District R-1

1. Persons not immediately involved in asbestos-related activities are to be excluded from the work area. Use physical barriers where necessary to limit access to the work area for the duration of the work.

2. Construct airtight barriers to prevent the release of asbestos fibers. Where feasible, glove-bags are permitted in place of barriers to remove insulation on pipes and ducts.

3. Adequately wet the asbestos before disturbing it. Removed asbestos and asbestos-contaminated items are to be containerized in two six-mil polyethylene bags, or double-wrapped in six-mil polyethylene sheeting. If the material has sharp edges, double-wrap or bag it and then place the material in metal, fiber, or plastic drums that can be sealed.

4. Properly repair, enclose, or encapsulate friable asbestos that has been exposed during asbestos work.

5. HEPA-vacuum and wet-wipe until there is no visible debris or dust.

6. Asbestos-containing waste must be containerized, transported, and disposed of at an approved asbestos landfill in accordance with all applicable regulations.

ASBESTOS-DEBRIS CLEAN UP PROCEDURES

Any debris suspected of containing asbestos found on the floor, on top of ceiling tiles, or other

building structures should be cleaned up immediately. Asbestos debris is extremely friable. Any suspected debris that is equal to or greater than three linear or square feet must be cleaned up by a Colorado Certified Asbestos Abatement Contractor according to a plan designed by a Certified Asbestos Project Designer.

1. WHEN ASBESTOS-CONTAINING DEBRIS IS DRY OR DAMP AND SMALL IN SIZE

a. Asbestos-debris clean up shall be performed after occupied school hours and must be performed by workers with asbestos training. Workers shall wear protective clothing and respiratory protection.

b. Isolate and seal the work area and post warning signs, as required by Colorado Regulation 8

c. Thoroughly wet-mop, using a bucket of water, rags and/or mops, all of the structures and items on which the debris has fallen. Be sure all visible debris is removed.

d. Vacuum the floor using a HEPA vacuum. Again, be sure all visible debris is removed.

e. When the area is dry, inspect for any visible asbestos debris. Sometimes wet asbestos debris becomes hidden during the clean-up. If any visible asbestos material is found, repeat the wet-mop or HEPA-vacuuming procedure until no visible asbestos debris is observed.

f. Dispose of the protective clothing, mop heads, and rags into a six-mil polyethylene disposable bag. Pour the water from the bucket into the disposal bag also. Twist the top of the polyethylene bag and seal it with duct tape. Double-bag the waste material with another six-mil polyethylene bag. Dispose of the bagged asbestos waste according to all applicable regulations.

g. Remove respirator, clean, and place in re-sealable storage bag.

h. Clean the bucket in a sink, if available, and thoroughly rinse the sink used.

i. Remove barriers and posted warning signs.

2. WHEN ASBESTOS DEBRIS IS TOO WET OR TOO LARGE TO BE VACUUMED

a. This type of work shall be performed after occupied school hours and must be performed by workers with asbestos training. Workers shall wear protective clothing and respiratory protection.

b. Isolate and seal the work area and post warning signs as required by Colorado Regulation 8

c. Thoroughly wet the asbestos material and the surrounding area to a distance of six inches with the garden sprayer. Use a light mist of water when wetting the area and the material, as a heavy stream of water could dislodge and

disperse asbestos fibers.

d. If the material is intact and too large to be easily handled with a shovel, pick up the wet material and place it in a six-mil polyethylene disposable bag.

e. Use a HEPA vacuum to pick up smaller debris. Use a washable item, such as a garden trowel or scraper, to push the material into a pile if necessary. **DO NOT USE A BROOM OR BRUSH!** A broom or brush cannot be decontaminated and also will increase the possibility of dispersing asbestos fibers into the air.

f. Wet-mop the entire area and items that the asbestos material contacted, using a bucket of water, rags, and mops. If the floor is carpeted, vacuum the carpet with a HEPA-filtered vacuum cleaner. If the carpet is wet, or the debris is wet, the carpet must be steam-cleaned. A HEPA-filtered vacuum cleaner cannot be used to pick up water or wet material unless the vacuum is designed to do so.

g. Wash the items used in the cleanup, including hands, shovel, ice scraper, etc., by holding items over the six-mil disposal bag and washing them thoroughly with the garden sprayer. Pour the bucket of contaminated water into the disposal bag.

h. Place the protective clothing, mop heads, and rags in a six-mil polyethylene disposable bag and dispose of as contaminated waste. Twist the top of the polyethylene bag and seal it with duct tape. Double-bag the waste material with another six-mil polyethylene bag.

i. Place the respirator in a re-sealable storage bag and take it to a sink to clean.

j. Clean the respirator, re-clean the bucket, and thoroughly rinse the sink. Store the respirator after cleaning in a respirator bag.

k. Remove the barriers and posted warning signs.

ASBESTOS EMERGENCY PROCEDURES

An asbestos emergency is one in which there is an unexpected change in the condition of asbestos-containing material that results in the release of asbestos fibers. This is called an asbestos fiber release episode. Fiber release episodes have the potential to contaminate the area and expose the building occupants to asbestos fibers.

The following procedures should be followed in the event of an emergency:

1. Remove occupants from the immediate area and contact the appropriate building supervisor and the School's Designated Person.

2. Isolate the area as described in Colorado Regulation 8.

3. Trained personnel who will perform the work should wear the appropriate disposable

clothing and respiratory protection.

4. Vents and ducts leading into or out of the emergency area should be shut down and sealed with six-mil polyethylene sheeting and duct tape according to Regulation 8

5. If the asbestos debris or material is less than three linear or square feet, continue by following the "Asbestos Debris Clean-up Procedures" described above. If the asbestos material is greater than or equal to three square or linear feet, **DO NOT TOUCH OR REMOVE THE ASBESTOS**. Contact a Colorado certified asbestos abatement contractor and a Colorado certified project designer.

HEPA VACUUM

The HEPA vacuum cleaner is the **ONLY** vacuum cleaner designed to clean asbestos debris. Using a household or shop vacuum will not only contaminate the vacuum cleaner itself but will expose the user and the area to high levels of airborne asbestos dust.

It is important that personnel read and follow manufacturer's directions for proper use and maintenance of the HEPA vacuum. Some HEPA vacuum cleaners cannot pick up wet materials. Consult the manufacturer's directions.

CLEANING AND MAINTENANCE

When the inside of the vacuum cleaner needs to be accessed, whether to change a filter, a bag, or a part, the following procedures must be followed.

1. Gather the necessary equipment required by this section, including:

    a. Half-face negative pressure respirator
    b. Re-sealable storage bag or similar substitute
    c. Disposable clothing
    d. Bucket of water
    e. Sponges or rags
    f. Disposal bags
    g. Duct tape

2. Take the HEPA vacuum cleaner to a location away from non-authorized personnel.

3. Put on the half-face negative pressure respirator and disposable clothing.

4. Perform the necessary maintenance or repair according to the manufacturer's instruction. Place any of the contaminated, used, or worn parts, bags, and filters in the six-mil polyethylene disposal bag.

5. With a damp rag or sponge, clean visible debris from the interior and exterior of the vacuum cleaner.

6. Pour the bucket of water into the disposal bag. Thoroughly rinse the bucket and pour the rinse water into disposal bag.

7. Place the sponge or rag in the six-mil polyethylene disposal bag, along with the disposable clothing and any other contaminated items.

8. Seal the six-mil bag securely with duct tape, making sure there are no leaks in the bag. Place the used and sealed disposal bag into a second labeled six-mil polyethylene disposal bag. Twist the top of the bag and seal with duct tape.

9. Remove, clean, and store respirator.

10. Store and dispose of the asbestos waste properly.

9. ASBESTOS REPORT

AHERA Asbestos Survey Report

of the building located at:

Westpark Elementary School
130 W 12th St
Leadville, CO 80461

Weecycle Job No.: 18-16016

Performed On: 10/22/18

Prepared For:

Lake County School District
328 W 5th St
Leadville, CO 80461

Weecycle Environmental Consulting, Inc.

1208 Commerce Court Suite 5B
Lafayette, Colorado 80026

Tel: (303) 413-0452 Fax: (303) 413-0710
E-mail: weecycle@weecycle-env.com
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WEECYCLE ENVIRONMENTAL CONSULTING, INC.
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(303) 413-0452 Fax (303) 413-0710

280 W Kagy Blvd., #D-259
Bozeman, Montana 59715
(406) 548-5450

November 10, 2018

Todd Coffin
Lake County School District
328 W 5th St
Leadville, CO 80461

RE: Asbestos Containing Building Materials Survey
Westpark Elementary School
130 W 12th St
Leadville, CO 80461 (the Property)

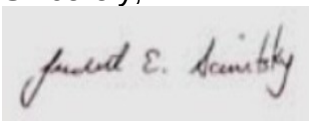
Dear Mr. Coffin,

Weecycle Environmental Consulting, Inc. is pleased to submit the attached Asbestos Containing Building Materials Survey report at the property. The report includes the scope of service, procedures and methodologies utilized, analytical results and summary of asbestos containing building materials identified by this survey.

The results of this Asbestos Containing Building Materials Survey determined that Asbestos Containing Building Materials **are** present in the building.

Weecycle Environmental Consulting, Inc. appreciates the opportunity to perform environmental services for the Lake County School District, and we look forward to working with you in the future. If you have questions or comments regarding the information in this report or need further assistance please contact Weecycle.

Sincerely,



Judy Sawitsky
President
AHERA Building Inspector
Management Planner

Chris Schiechl
AHERA Building Inspector

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Appendix

1.0 SCOPE OF SERVICES

Weecycle Environmental Consulting was retained by the Lake County School District, Leadville, CO 80461 to perform an AHERA building inspection for Asbestos Containing Building Materials (ACBM) at Westpark Elementary School, 130 W 12th St, Leadville, CO 80461. The inspection, conducted on October 22, 2018, consisted of a building walk-through, delineation and quantification of homogenous areas, collection of representative bulk samples, and delivery of bulk samples of suspect ACBM to an independent analytical laboratory.

2.0 SITE DESCRIPTION

The description of the structures is based on site information, Lake County Property Report and observations made in the field during the site assessment.

The building was reportedly constructed in 1963, with an addition in 2000. The site is an elementary school located in Steamboat Springs, CO. Exterior finishes include brick and concrete. The interior is primarily composed of drywall and plaster walls and ceilings.The floors are carpeted, or have floor tile and sheet flooring. The approximate square footage is 60,000 sq. ft.

3.0 AHERA COMPLIANCE & REGUALTORY STANDARDS

This survey was performed in accordance with Federal, State and local regulations for conducting asbestos building surveys to meet Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), and National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements.

COLORADO AIR QUALITY CONTROL COMMISION (CAQCC)
Colorado Regulation 8 definitions and requirements include**:**

I.B. Definitions:

> *"'Renovation' means altering in any way one or more facility components. Operations in which load-supporting structural members are wrecked or taken out are excluded. Examples or renovation work include replacement or repair or mechanical ventilation systems, pipes, ceilings, walls, flooring (including floor tiles) and insulating materials..."*
>
> *"'Demolition' means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility..."*

III.C.5. Asbestos Spill Response:

"In the event of an asbestos spill involving less than 50 linear feet on pipes, 32 square feet on other surfaces, or the volume equivalent of one 55-gallon drum, the building owner ***should****..."* (Refer to pages 8.114 and 8.115 for exact recommendations).

"In the event of an asbestos spill involving greater than 50 linear feet on pipes, 32 square feet on other surfaces, or the volume equivalent of one 55-gallon drum, the owner ***shall****..."* (Refer to page 8.115 for exact requirements).

III.C.6. Renovation and Demolition Projects:

"Prior to any renovation or demolition in any single family housing which may disturb 50 linear feet of material on pipes, 32 square feet of material on other surfaces, or the volume equivalent of one 55-gallon drum of material identified by the EPA as a suspect asbestos-containing material, the facility components(s) to be affected by the renovation or demolition shall have an inspection performed by a building inspector certified under these regulations. The inspection must be performed to the AHERA standards as given in 40 CFR Part 763 (1992)."

Note: Effective March 30, 2003, State Legislature, House Bill 1016 enacts a quantity change, as well as other regulatory requirements that will alter all of the following minimum level requirements. This format of quantities will remain the same with this notation, until CAQCC Regulation 8 is revised.

"Prior to any renovation or demolition in any public or commercial building which may disturb 260 linear feet of material on pipes, 160 square feet of material on other surfaces, or the volume equivalent of one 55-gallon drum of material identified by the EPA as a suspect asbestos-containing material, the facility component(s) to be affected by the renovation or demolition shall have an inspection performed by a building inspector certified under these regulations. The inspection must be performed to the AHERA standards as given in 40 CFR Part 763 (1992)."

NATIONAL EMISSION STANDARDS for HAZARDOUS AIR POLLUANTS (NESHAPS)

NESHAPS definitions and requirements include:

Section 61.141 Definitions:

"Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions."

"Demolition means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility."

Section 61.145 Standard of demolition and renovation:

"Prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II no friable ACM..."

"If a facility is being demolished...if the combined amount of RACM is at least 260 linear feet on pipes or at least 160 square feet on other facility components, or at least 35 cubic feet off facility components where the length or area could not be measured previously..."

"In a facility being renovated, including any individual nonscheduled renovation operation, if the combined amount of RACM to be stripped, removed, dislodged, cut, drilled, or similarly disturbed... is at least 260 linear feet on pipes or at least 160 square feet on other facility components, or at least 35 cubic feet off facility components where the length or area could not be measured previously..."

Asbestos Hazard Emergency Response Act (AHERA)

AHERA definitions and requirements include:

As referenced in 40 C.F.R. Part 763 (1992), "…requires a minimum number of samples for surfacing materials, thermal system insulating materials, and requires samples in a manner sufficient to determine whether the material is ACM or not ACM for miscellaneous materials.

Occupational Safety and Health Administration (OSHA)

OSHA definitions and requirements include: Any material that contains over one-percent (1%) of any type of Asbestos is considered Asbestos containing material (ACM) and must be handled according to OSHA and EPA regulations if disturbed.

Compliance and Implementation of OSHA 1926.1101 (replaces OSHA 1926.58) is required, as published, no later than October 01, 1995 which requires the Building Owner Methods of Compliance, Respiratory Protection, Hygiene Facilities and Practices for Employees. Communication of Hazards, Housekeeping, Medical Surveillance and the Designation and Training of Competent Persons, including: The Building/Facility Owner (including a lessee) must identify the presence, location and quantity of ACM and/or PACM (presumed asbestos-containing material) at the work site before beginning work.

The Building/Facility Owner must notify, (in writing or in person), the presence, location and quantity of ACM or PACM at the work sites to prospective employers whose employees will work in or next to areas with ACM or PACM. Owner's employees who will work in or next to such areas, all employers on multi-employer worksites whose employees will work in or next to such areas, tenants who will occupy such areas, etc.

> *"An employer or owner may demonstrate that PACM (Presumed Asbestos Containing Material) does not contain asbestos by the following: (A) Having an complete inspection conducted pursuant to the requirements of AHERA (40 CFR Part 763, Subpart E) which demonstrates that the material is not ACM; (B) Performing tests of the material containing PACM which demonstrates that no asbestos is present in the material...the tests, evaluation and sample collection shall be conducted by an accredited inspector."*

Note: The aforementioned regulatory phrases are not the regulations in their entirety. Consult the regulatory agency, which may apply.

3.1 STATEMENT OF COMPLIANCE

Weecycle recommends the owner use consultants and contractors accredited under Section 206 (b) of the AHERA act and by the Colorado Department of Public Health and Environment Regulation No. 8 to perform the renovations in this facility. It is the responsibility of the owner to meet the requirements as stated in Federal Regulations 40 C.F.R. 763.84 and Colorado Regulation No. 8.

4.0 ACM SURVEY

Previously existing ACBM surveys were made available to Weecycle.

4.1 REVIOUSLY ABATED MATERIAL

Findings indicated that asbestos abatement was conducted in various building sections:

- Floor tile with the exception of the mastic - August 2011

4.2 PREVIOUS SUSPECT ASBESTOS MATERIAL PROVEN NON -DETECT

None

4.3 PREVIOUS CONFIRMED ASBESTOS CONTAINING MATERIAL-REMAINING

- *Floor Tile Mastic*

4.4 ASSUMED ASBESTOS CONTAINING MATERIAL

If any of these items are found in school assume positive for asbestos:

- Floor Tile & Mastic under majority of School
- Roof Drain Gaskets
- Art Kilns
- Sink undercoating
- Acid Resistant Sinks and Countertops
- Chalkboards
- Fire doors, fire files, and safes

During the current assessment, Weecycle Asbestos Building Inspectors Judith Sawitsky and Christine Schiechl conducted the Asbestos Containing Building Materials (ACBM) survey on October 22, 2018. The entire building was available for inspection.

The scope of the asbestos containing building materials survey included all accessible suspect building material and interior and exterior building finishes, excluding building roofs.

Weecycle performed a visual inspection of all areas within the structure to determine the presence of suspected asbestos containing building materials. In accordance with AHERA sampling protocols and general industrial hygiene practices, Weecycle confirmed the square footage, determined the homogeneous areas and collected bulk samples of ACBM throughout the building to determine Bulk material samples were submitted to CEI Labs (AIHA Lab ID 103025) for analysis by Polarized Light Microscopy (PLM).

Prior to collecting any samples, homogenous materials were identified and listed to develop a sampling plan. Homogenous areas are defined by AHERA protocol as an area, which appears similar throughout in terms of color, texture, and date of application. The number of samples collected from each homogenous area was based upon criteria detailed in the following sections. Per Title 40 Code of Federal Regulations Part 63.

Weecycle identified twelve (12) Homogenous Areas at the property and collected thirty-six (36) representative bulk samples of suspect asbestos-containing materials (ACM) were collected.

All homogeneous areas were in an intact condition.

Complete information on homogenous areas, material categories, friability, number of samples, results and square footage is included in Table 1, below. Laboratory Results are included in Appendix D

TABLE 1: Homogeneous Areas and Analytical Results

Homogeneous Areas			Material Category	Friable (Y or N)	Samples		Location of Sampled Material	Asbestos Content	Total Square Feet
Area	Material	Location of Material			#	ID			
DT1	Drywall Texture	Admin Hall walls both sides	S	Y	3	DT1-1 DT1-2 DT1-3	Administration W wall Administration W wall Administration W wall	ND	2700
DT2	Drywall Texture	South wing, Boys & Girls Bathroom, All pipe case	S	Y	5	DT2-4 DT2-5 DT2-6 DT2-7 DT2-8	S wing, Boys Bath, Pipe case W S wing, Girls Bath, Pipe case W S wing, Girls Bath, Pipe case W S wing, Boys Bath, Pipe case W S wing, Boys Bath, Pipe case S	ND	2500
DT3	**Drywall Texture**	**South wing, Janitor closet ceiling**	**S**	**Y**	**3**	**DT3-9 DT3-10 DT3-11**	**S wing, Janitor's closet ceiling S wing, Janitor's closet ceiling S wing, Janitor's closet ceiling**	**2% Chrysotile**	**150**
P1	Plaster Texture	Round room, Janitor closet, Bathroom ceiling, Hall ceiling in Round room	S	Y	3	P1-12 P1-13 P1-14	Round room, Janitor's closet ceiling Bathroom Hall ceiling Girl's Bathroom ceiling	ND	980
DT4	**Drywall Texture**	**Boiler and Janitor work room ceiling, Bathroom/Locker room, Gym Bathrooms**	**S**	**Y**	**3**	**DT4-15 DT4-16 DT4-17**	**Mechanical room ceiling Ladies Bathroom ceiling Janitor's work room**	**2% Chrysotile**	**3300**
CMU1	**Cinderblock**	**Admin 100, Round room closets & rooms, Office for Admin walls (South wing) 110, 109, 101, 108, 107, 106, 105, 104, 103, 102, 101, Mechanical room, Janitorial work room, 120 W/E/S walls. 118, 111, 117, 112, 116, 113, 115, 114, Gym top half of walls, Gym office walls**	**S**	**Y**	**6**	**CMU1-18 CMU1-19 CMU1-20 CMU1-21 CMU1-22 CMU1-23 CMU1-24**	**W wing, Round room, Rm 1 closet W wing, Round room, Rm 1 closet W wing, Round room, Rm 1 closet 114 SW corner 119 NW corner 117 SW corner Mechanical W wall**	**2% Chrysotile**	**25,000**

Homogeneous Areas			Material Category	Friable (Y or N)	Samples		Location of Sampled Material	Asbestos Content	Total Square Feet
Area	**Material**	**Location of Material**			#	**ID**			
FT1	Floor Tile with Mastic	Main Entry, Cafeteria, all Halls	M	N	2	FT1-25 FT1-26	Cafeteria NE corner Cafeteria SW corner	ND	5,000
FT2	**Floor Tile with Mastic**	**Under carpet throughout Round room**	**M**	**N**	**2**	**FT2-27** **FT2-28**	**Round room #2 closet** **Round room #2 closet**	**3% Chrysotile** ***Mastic: 5% Chrysotile***	**2200**
FT3	Floor Tile with Mastic	Laundry room, Health room	M	N	2	FT3-29 FT3-30	Health room Laundry room	ND	150
CB1	Cove Base	Main Entry, Cafeteria, all Halls, all Round room, North wing	M	N	2	CB1-31 CB1-32	Cafeteria Cafeteria	ND	165
GD1	Glue Dot	Hall going to Round room ceiling	M	N	2	GD1-33 GD1-34	Hall going to round room ceiling Hall going to round room ceiling	ND	25
GD2	Glue Dot	Throughout building	M	N	2	GD2-35 GD2-36	Round room #2 ceiling Round room #2 ceiling	ND	25

Roofing Material was deemed to be non friable and in an intact condtion

4.1 HAZARD ASSESSMENT FACTORS

Weecycle conducted a physical assessment of each identified homogeneous material. The assessment included determining the condition, potential for disturbance, and the friability of the material. By definition, friable materials are those which can be crumbled or reduced to powder by hand pressure when dry. Following the evaluation, each material was further classified into one of three categories, which have specific sampling protocol.

Surfacing Materials:	Refers to spray or trowel applied materials such as plaster, drywall texture, fireproofing, and spray applied acoustical textures.
Thermal System Insulation:	Refers to insulation used to inhibit thermal gain or loss on pipes, boilers, ducts and other building components.
Miscellaneous Materials:	Refers to friable and non-friable products and materials that do not fit into the above categories such as sheet flooring, floor tile, adhesives, and mastics, roofing material, window glazing or acoustical ceiling tile.

The condition of all confirmed ACBMs were evaluated as:

- good (no visible damage or showing only very limited damage),
- damaged (less than 25% localized damage or 10% distributed damage),
- significantly damaged (25% or greater localized damage or 10% or greater distributed damaged)

4.2 SAMPLING STRATGEY

In accordance with AHERA requirements and in compliance with 29 CFR 1926.1101 the asbestos inspection was conducted using a specified number of samples collected for each homogenous material

Analytical results which indicated that all the samples collected from a homogenous material were not contain asbestos, the material was considered non-ACM for all areas defined as part of that homogenous area. Samples from a homogenous area determined to contain asbestos in quantities of one percent (1%) or greater, were treated as ACM, regardless of any negative results for other samples collected from that homogenous area.

Miscellaneous materials require adequately representative sampling, which typically involves collecting one to three samples per material. Inspectors relied on observations of the quantity, condition and friability of the material to determine the sufficient number of samples needed to accurately evaluate the

presence or absence of asbestos in the material. Sample locations were selected randomly within each homogeneous area.

Random Sampling Method by Grid Defination

- The exact number of samples will be specified.
- Every location on the map has an equal probability of being selected.
- **Sample** Areas that are in close proximity to each other will be gridded together as a group.
- The group of **sample** areas will be covered with equally-sized square **grids**.

All samples collected in this survey were sealed in an air-tight container at the time of sampling, and then assigned a unique identification number which was recorded on a field notation sheet, the sample container and a chain of custody and then submitted to an accredited laboratory.

4.3 LABORATORY ANALYTICAL RESULTS

Thirty-six (36) bulk samples of ACBM were collected from the building and analyzed by CEI Labs Cary, North Carolina using Polarized Light Microscopy (PLM) according to EPA method 600/R-93/116. CEI Labs participates in the National Voluntary Laboratory Accreditation Program (NVLAP), a quality assurance program for PLM analysis.

Any materials that contains greater than one percent (1%) asbestos by PLM analysis is consider an ACM and must be handled in accordance with OSHA, EPA and applicable state and local regulations. In addition, OSHA defines ACM as building materials containing between one tenth percent and one percent (0.1-1.0%).

Materials which are determined to be “Non-Detect” by PLM analysis for asbestos content need no further verification by Point Counting Methodology. If the amount of asbestos is reported as “Trace”, or less than ten percent (10%) by PLM analysis, the client may either assume the amount to be greater than one percent (1%) and treat the material as ACM or conduct further analysis via Point Count Mythology. If the results of the Point Count differ from the initial PLM result, the Point Count results shall be used.

Appendix A of this report contains the Inspector Certifications. Inspector Field Notes are located in Appendix B and Photographic Documentation in Appendix C. And the laboratory analytical report and chain of custody are included in Appendix E. Appendix F contains drawings of the building with sample locations and depictions of areas determined to contain ACBM

5.0 CONCLUSIONS

The results of this asbestos building survey conducted at the Property, indicate the following:

Four (4) of the suspect building materials sampled were found to contain more than one percent (1%) asbestos. Laboratory results are included in Appendix D of this report.

Table 2: Asbestos Containing Material

HOMO #	Homogeneous Material	Location of Material	Percentage of Asbestos	Total Square Feet
DT3	Drywall Texture	South wing, Janitor closet ceiling	2% Chrysotile	150
DT4	Drywall Texture	Boiler and Janitor work room ceiling, Bathroom/Locker room, Gym Bathrooms	2% Chrysotile	3300
CMU1	Cinderblock Coating	Admin 100, Round room closets & rooms, Office for Admin walls (South wing) 110, 109, 101, 108, 107, 106, 105, 104, 103, 102, 101, Mechanical room, Janitorial work room, 120 W/E/S walls. 118, 111, 117, 112, 116, 113, 115, 114, Gym top half of walls, Gym office walls	2% Chrysotile	25,000
FT2	Floor Tile with Mastic	Under carpet throughout Round room	3-5% Chrysotile	2200

Assumed Materials
If any of these items are found in school assume positive for asbestos:

- Art Kilns
- Acid Resistant Sinks and Countertops
- Chalkboards
- Fire doors, fire files, and safes
- Roofing Material was deemed to be non friable and in an intact condtion

Any additional materials, not identified in this report, discovered during renovation or demolition must be sampled by a Colorado State Certified Asbestos Inspector prior to proceeding with work.

Contractors and employees working in this building should be made aware of the possibility that concealed ACBM may be found during renovation or demolition. Any discovered material must not be disturbed without consulting the owner or manager of the building to determine if those materials were previously identified and sampled to determine if it was ACBM.

Suspect material discovered during renovation or demolition and not identified in this report must be sampled for ACBM by a Certified Asbestos Inspector prior to proceeding with work.
At the time of this report, the EPA has not prohibited the manufacture and import of miscellaneous materials, such as vinyl floorings, mastics, roofing materials, etc., which may be asbestos containing. As a result, Weecycle recommends testing of future replacement materials for the presence of asbestos prior to installation.

6.0 LIMITATIONS AND ASSUMPTIONS

Weecycle Environmental Consulting, Inc. and the findings presented in this Asbestos Survey Report make no representations or assumption as to past and/or future conditions/occurrences of the specific areas surveyed and are based solely on the conditions that were noted in this report.

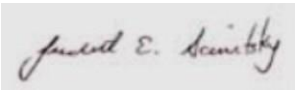
The selection of sample locations and frequency of sampling was based on Weecycle's observations and the assumption that like materials in the same area are homogenous in content (as per AHERA definitions).

The inspection **did not** incorporate destructive sampling techniques. It is possible that asbestos-containing materials may be concealed within structures and not identified in this report.

Weecycle is not responsible or liable for any opinions, conclusions or recommendations provided by others regarding the data presented in this Asbestos Survey Report.

7.0 INSPECTOR STATEMENT OF COMPLIANCE

As the certified Inspector responsible for the development of this Inspection Report, I certify that it has been written and reviewed in a manner of full compliance with applicable rules and regulations as required by Federal regulations and State of Colorado Regulation No. 8 USEPA/CDPHE Inspector



Signature: Judith Sawitsky Date: 11/12/2018
CDPHE Certification No. 672 Exp. Date: 9/18/2019

Signature: Date: 11/12/2018
CDPHE Certification No. 15586 Exp. Date: 2/22/2019

All certifications can be found in Appendix A.

Appendix A:
Inspector Certifications

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Judith E. Sawitsky

Certification No.: 672

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Inspector/Management Planner*

Issued: **October 10, 2018**

Expires: **October 10, 2019**

**** This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.***

Authorized APCD Representative

SEAL

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Chris Schiechl

Certification No.: 15586

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Building Inspector*

Issued: **February 22, 2018**

Expires: **February 22, 2019**

**** This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.***

Authorized APCD Representative

SEAL

Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

Weecycle Environmental Consulting, Inc.

Registration No.: ACF - 15049

has met the registration requirements of 25-7-507, C.R.S. and the Air Quality Control Commission Regulation No. 8, Part B, and is hereby authorized to perform asbestos consulting activities as required under Regulation No 8, Part B, in the state of Colorado.

Issued: January 30, 2018
Expires: January 30, 2019

Authorized APCD Representative

SEAL

Appendix B:
Inspector Field Notes

Project Address: West Park Elementary Date: 10/22/18
Project Number: 18-16016
Inspector: Judith Sawitsky

WALLS & CEILING

ID (i.e. "A")	Material Description	Room Location
ACT1	Acoustical Ceiling Tile 12x12	Holes throughout school
ACT2	Acoustical Ceiling Tile Smooth	Kitchen
DT1	Drywall Texture Adobe	Admin Hall Walls - both sides West
DT2	Drywall Texture Smooth	South wing, Boys & Girls Bathroom, All Pipe Case
DT3	Drywall Texture Roller Texture	South Wing, Janitor Closet, Ceiling
P1	Plaster	Round Rm, Janitor Closet Ceiling, Bathroom Ceiling, Hall Ceiling in Round Rm
DT4	Drywall Texture Smooth	Boiler and Janitor Work Rm Ceiling, Bathroom/Locker, Gym bathrooms
CMU1	Cinderblock Walls	Admin.100, Round Rm Closets & rooms, Office for Admin. walls (South Wing) 110, 109,
		101,108,107,106,105,104,103,102,101, Mechanical Rm, Janitorial Work Rm, 120 West/East/South Walls
		118,111,117,112,116,113,115,114,Gym top half of walls, Gym office walls

Inspector Signature: Judith E. Sawitsky Date: 10/22/18

WALLS & CEILINGS CONTINUED

ID (i.e. "A")	Material Description	Room Location
GB	Glaze Block (No sample taken)	Janitorial bathroom, South wall, 120, all bathrooms, all room counter sections

TSI

Elbows	Mudded Fittings in Walls Approx 50	Throughout School

FLOORS

ID (i.e. "1")	Material Description	Room Location
FT-1	Floor tile 12x12 White/Beige	Main entry, Cafeteria, All halls
FT-2	Floor Tile 9x9 Brown/ White	Under Carpet throughout Round Rm
FT-3	Floor Tile 12x12 Blue	Laundry Rm, Health Rm

MISCELLANEOUS

ID (i.e. "A1")	Material Description	Room Location
GD1	Glue Dots Dark Brown	Hall going to Round Rm Ceiling
GD2	Glue Dots Light Drown	Throughout Building
CB	Cove Base Maroon (No Sample taken)	Principal Office, Health Office, Work Rm, Gym hall, all rooms
	Bottom Metal Window Panels (No Sample taken)	Under all windows
CB1	Cove Base Brown 3" (No sample taken)	Main entry, Cafeteria, All halls, All Round Room, North Wing
CB2	Cove Base White 2"	Window on hall to Round Rm
CB3	Cove Base Black	South wing Storage ramp in North Wing, NW Exit,
CB4	Cove Base Blue (No sample taken)	Laundry

Asbestos Sample Sheet - Weecycle Environmental Consulting, INC. **Date** 10/22/18

Project Address: West Park Elementary

Project Number: 18-16016 **Inspector:** Judith Sawitsky

Weecycle Sample Identification	Sample Description	Sample Location	Sq. Footage
DT1-1	Drywall Texture Adobe	Administration West Wall	2700
DT1-2	"	"	
DT1-3	"	Administration Hall East Wall	
DT2-4	Drywall Texture Smooth	South Wing, Boys Bath, Pipe Case West	2500
DT2-5	"	South Wing, Girls Bath,Pipe Case West	
DT2-6	"	"	
DT2-7	"	South Wing, Boys Bath, Pipe Case West	
DT2-8	"	South Wing, Boys Bath, Pipe Case South	
DT3-9	Drywall Roller Texture	South Wing janitor's Closet Ceiling	150
DT3-10	"	"	
DT3-11	"	"	
P1-12	Plaster	Round Rm, Janitors Closet Ceiling	980
P1-13	"	Bath Hall Ceiling	
P1-14	"	Girls Bath Ceiling	
DT4-15	Drywall Smooth Texture	Mechanical Rm Ceiling	3300

Inspector Signature: _____ **Date:** 10/22/18

Asbestos Sample Sheet - Weecycle Environmental Consulting, INC. **Date** 10/22/18

Project Address: West Park Elementary

Project Number: 18-16016 **Inspector:** Judith Sawitsky

Weecycle Sample Identification	Sample Description	Sample Location	Sq. Footage
DT4-16	Drywall Smooth Texture	Ladies Bath Ceiling	
DT4-17	"	Janitor's Work Rm	
CMU1-18	Cinder Block	West Wing Round Rm, Rm 1 Closet	
CMU1-19	"	"	25,000
CMU1-20	"	"	
CMU1-21	"	114 SE Corner	
CMU1-22	"	119 NW Corner	
CMU1-23	"	117 SW Corner	
CMU1-24	"	Mechanical West Wall	
FT1-25	Floor Tile White/Beige 12x12	Cafeteria NE Corner	5000
FT1-26	"	Cafeteria SW Corner	
FT2-27	Floor Tile Brown/White 9x9	Round Rm #2 Closet	2200
FT2-28	"	"	
FT3-29	Floor Tile Blue 12x12	Health room	150
FT3-30	"	Laundry Rm	
CB1-31	Cove Base Brown 3"	Cafeteria	165
CB1-32	"	"	

Asbestos Sample Sheet - Weecycle Environmental Consulting, INC. **Date** 10/22/18

Project Address: West Park Elementary

Project Number: 18-16016 **Inspector:** Judith Sawitsky

Weecycle Sample Identification	Sample Description	Sample Location	Sq. Footage
GD1-33	Glue Dots Dark Brown	Hall going to Round Rm Ceiling	25
GD1-34	"	"	
GD2-35	Glue Dots Light Brown	Round Rm #2 Ceiling	25
GD2-36	"	"	

Appendix C:

Photographic Documentation
(Photos Not Available)

Appendix D:
Laboratory Results

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October 31, 2018

Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

CLIENT PROJECT: West Park; 18-16016
CEI LAB CODE: A1813652

Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on October 26, 2018. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% asbestos by weight as determined by visual estimation.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,

Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP® TESTING
NVLAP LAB CODE 101768-0

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ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

Weecycle Environmental Consulting, Inc

CLIENT PROJECT: West Park; 18-16016

LAB CODE: A1813652

TEST METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORT DATE: 10/31/18

TOTAL SAMPLES ANALYZED: 36

SAMPLES >1% ASBESTOS: 17

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Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: West Park; 18-16016 **LAB CODE:** A1813652

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
16016 WPDT 1-1	Layer 1	A157632	White	Drywall	None Detected
	Layer 2	A157632	White	Texture	None Detected
16016 WPDT 1-2	Layer 1	A157633	White	Drywall	None Detected
	Layer 2	A157633	White	Texture	None Detected
16016 WPDT 1-3	Layer 1	A157634	White	Drywall	None Detected
	Layer 2	A157634	White	Texture	None Detected
16016 WPDT 2-4		A157635	White	Texture	None Detected
16016 WPDT 2-5	Layer 1	A157636	White	Drywall	None Detected
	Layer 2	A157636	White	Texture	None Detected
16016 WPDT 2-6	Layer 1	A157637	White	Drywall	None Detected
	Layer 2	A157637	White	Texture	None Detected
16016 WPDT 2-7		A157638	White	Drywall	None Detected
16016 WPDT 2-8	Layer 1	A157639	White	Drywall	None Detected
	Layer 2	A157639	White	Texture	None Detected
16016 WPDT 3-9	Layer 1	A157640	White	Drywall	None Detected
	Layer 2	A157640	White	Texture	Chrysotile 2%
16016 WPDT 3-10	Layer 1	A157641	White	Drywall	None Detected
	Layer 2	A157641	White	Texture	Chrysotile 2%
16016 WPDT 3-11	Layer 1	A157642	White	Drywall	None Detected
	Layer 2	A157642	White	Texture	Chrysotile 2%
16016 WPPL 1-12	Layer 1	A157643	White	Plaster Skim Coat	None Detected
	Layer 2	A157643	Beige	Plaster Base Coat	None Detected
16016 WPPL 1-13	Layer 1	A157644	White	Plaster Skim Coat	None Detected
	Layer 2	A157644	Beige	Plaster Base Coat	None Detected
16016 WPPL 1-14	Layer 1	A157645	White	Plaster Skim Coat	None Detected
	Layer 2	A157645	Beige	Plaster Base Coat	None Detected
16016 WPDT 4-15	Layer 1	A157646	White	Drywall	None Detected
	Layer 2	A157646	White	Texture	Chrysotile 2%
16016 WPDT 4-16	Layer 1	A157647	White	Drywall	None Detected
	Layer 2	A157647	White	Texture	Chrysotile 2%
16016 WPDT 4-17	Layer 1	A157648	White	Drywall	None Detected

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Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: West Park; 18-16016 **LAB CODE:** A1813652

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
	Layer 2	A157648	White	Texture	Chrysotile 2%
16016 WPCMU 1-18		A157649	White/Green	Cmu - Coating	Chrysotile 2%
16016 WPCMU 1-19		A157650	White/Cream	Cmu - Coating	Chrysotile 2%
16016 WPCMU 1-20		A157651	White/Cream	Cmu - Coating	Chrysotile 2%
16016 WPCMU 1-21		A157652	White/Green	Cmu - Coating	Chrysotile 2%
16016 WPCMU 1-22		A157653	White/Cream	Cmu - Coating	Chrysotile 2%
16016 WPCMU 1-23		A157654	White/Cream	Cmu - Coating	Chrysotile 2%
16016 WPCMU 1-24		A157655	White/Green	Cmu - Coating	Chrysotile 2%
16016 WPFT 1-25		A157656A	Off-white	Floor Tile	None Detected
		A157656B	Tan	Mastic	None Detected
16016 WPFT 1-26		A157657A	Off-white	Floor Tile	None Detected
		A157657B	Tan	Mastic	None Detected
16016 WPFT 2-27		A157658A	White	Floor Tile	Chrysotile 3%
		A157658B	Black	Mastic	Chrysotile 5%
16016 WPFT 2-28		A157659A	White	Floor Tile	Chrysotile 3%
		A157659B	Black	Mastic	Chrysotile 5%
16016 WPFT 3-29		A157660A	Off-white	Floor Tile	None Detected
		A157660B	Tan	Mastic	None Detected
16016 WPFT 3-30		A157661A	Off-white	Floor Tile	None Detected
		A157661B	Tan	Mastic	None Detected
16016 WPCBM 1-31		A157662	Brown	Cove Base Mastic	None Detected
16016 WPCBM 1-32		A157663	Brown	Cove Base Mastic	None Detected
16016 WPGD 1-33		A157664	Brown	Glue Dots	None Detected
16016 WPGD 1-34		A157665	Brown	Glue Dots	None Detected
16016 WPGD 2-35		A157666	Brown	Glue Dots	None Detected
16016 WPGD 2-36		A157667	Brown	Glue Dots	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPDT 1-1 Layer 1 A157632	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157632	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected
16016 WPDT 1-2 Layer 1 A157633	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157633	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected
16016 WPDT 1-3 Layer 1 A157634	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157634	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected
16016 WPDT 2-4 A157635	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected

Lab Notes: No Drywall present.

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPDT 2-5 Layer 1 A157636	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157636	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected
16016 WPDT 2-6 Layer 1 A157637	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157637	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected
16016 WPDT 2-7 A157638	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	5% 80%	Paint Gypsum	None Detected
Lab Notes: No Texture present.							
16016 WPDT 2-8 Layer 1 A157639	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157639	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Calc Carb	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPDT 3-9 Layer 1 A157640	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157640	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPDT 3-10 Layer 1 A157641	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157641	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPDT 3-11 Layer 1 A157642	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157642	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPPL 1-12 Layer 1 A157643	Plaster Skim Coat	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Binder	None Detected

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		 Non-Fibrous		ASBESTOS %
Layer 2 A157643	Plaster Base Coat	Homogeneous Beige Fibrous Bound	<1%	Cellulose	60% 35% 5%	Binder Silicates Vermiculite	None Detected
16016 WPPL 1-13 Layer 1 A157644	Plaster Skim Coat	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Binder	None Detected
Layer 2 A157644	Plaster Base Coat	Homogeneous Beige Fibrous Bound	<1%	Cellulose	60% 35% 5%	Binder Silicates Vermiculite	None Detected
16016 WPPL 1-14 Layer 1 A157645	Plaster Skim Coat	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 90%	Paint Binder	None Detected
Layer 2 A157645	Plaster Base Coat	Homogeneous Beige Fibrous Bound	<1%	Cellulose	60% 35% 5%	Binder Silicates Vermiculite	None Detected
16016 WPDT 4-15 Layer 1 A157646	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157646	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPDT 4-16 Layer 1 A157647	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157647	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPDT 4-17 Layer 1 A157648	Drywall	Heterogeneous White Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
Layer 2 A157648	Texture	Heterogeneous White Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPCMU 1-18 A157649	Cmu - Coating	Heterogeneous White/Green Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPCMU 1-19 A157650	Cmu - Coating	Heterogeneous White/Cream Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPCMU 1-20 A157651	Cmu - Coating	Heterogeneous White/Cream Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPCMU 1-21 A157652	Cmu - Coating	Heterogeneous White/Green Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPCMU 1-22 A157653	Cmu - Coating	Heterogeneous White/Cream Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPCMU 1-23 A157654	Cmu - Coating	Heterogeneous White/Cream Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPCMU 1-24 A157655	Cmu - Coating	Heterogeneous White/Green Fibrous Bound	2%	Cellulose	8% 88%	Paint Calc Carb	**2% Chrysotile**
16016 WPFT 1-25 A157656A	Floor Tile	Homogeneous Off-white Fibrous Bound	2%	Cellulose	60% 38%	Vinyl Calc Carb	None Detected
A157656B	Mastic	Homogeneous Tan Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
16016 WPFT 1-26 A157657A	Floor Tile	Homogeneous Off-white Fibrous Bound	2%	Cellulose	60% 38%	Vinyl Calc Carb	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
A157657B	Mastic	Homogeneous Tan Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
16016 WPFT 2-27 A157658A	Floor Tile	Homogeneous White Fibrous Bound	2%	Cellulose	60% 35%	Vinyl Calc Carb	**3% Chrysotile**
A157658B	Mastic	Homogeneous Black Fibrous Bound	2%	Cellulose	60% 33%	Mastic Calc Carb	**5% Chrysotile**
16016 WPFT 2-28 A157659A	Floor Tile	Homogeneous White Fibrous Bound	2%	Cellulose	60% 35%	Vinyl Calc Carb	**3% Chrysotile**
A157659B	Mastic	Homogeneous Black Fibrous Bound	2%	Cellulose	60% 33%	Mastic Calc Carb	**5% Chrysotile**
16016 WPFT 3-29 A157660A	Floor Tile	Homogeneous Off-white Fibrous Bound	2%	Cellulose	60% 38%	Vinyl Calc Carb	None Detected
A157660B	Mastic	Homogeneous Tan Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPFT 3-30 A157661A	Floor Tile	Homogeneous Off-white Fibrous Bound	2% 	Cellulose 	60% 38%	Vinyl Calc Carb	None Detected
A157661B	Mastic	Homogeneous Tan Fibrous Bound	2% 	Cellulose 	60% 38%	Mastic Calc Carb	None Detected
16016 WPCBM 1-31 A157662	Cove Base Mastic	Homogeneous Brown Fibrous Bound	2% 5%	Cellulose Talc	60% 33%	Mastic Calc Carb	None Detected
16016 WPCBM 1-32 A157663	Cove Base Mastic	Homogeneous Brown Fibrous Bound	2% 5%	Cellulose Talc	60% 33%	Mastic Calc Carb	None Detected
16016 WPGD 1-33 A157664	Glue Dots	Homogeneous Brown Fibrous Bound	2% 	Cellulose 	60% 38%	Mastic Calc Carb	None Detected
16016 WPGD 1-34 A157665	Glue Dots	Homogeneous Brown Fibrous Bound	2% 	Cellulose 	60% 38%	Mastic Calc Carb	None Detected
16016 WPGD 2-35 A157666	Glue Dots	Homogeneous Brown Fibrous Bound	2% 	Cellulose 	60% 38%	Mastic Calc Carb	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Weecycle Environmental Consulting, Inc
1208 Commerce Court, 5B
Lafayette, CO 80026

Lab Code: A1813652
Date Received: 10-26-18
Date Analyzed: 10-31-18
Date Reported: 10-31-18

Project: West Park; 18-16016

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
16016 WPGD 2-36 A157667	Glue Dots	Homogeneous Brown Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected

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LEGEND: Non-Anth = Non-Asbestiform Anthophyllite
Non-Trem = Non-Asbestiform Tremolite
Calc Carb = Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORTING LIMIT: <1% by visual estimation

REPORTING LIMIT FOR POINT COUNTS: 0.25% by 400 Points or 0.1% by 1,000 Points

REGULATORY LIMIT: >1% by weight

Due to the limitations of the EPA 600 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. *Estimated measurement of uncertainty is available on request.*

This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins CEI. Eurofins CEI makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. Samples were received in acceptable condition unless otherwise noted. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

Information provided by customer includes customer sample ID, location, volume and area as well as date and time of sampling.

ANALYST: Shilpa Ladekar

APPROVED BY: Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP TESTING
NVLAP LAB CODE 101768-0

ASBESTOS CHAIN OF CUSTODY

A101365216)
A157632 – A157667

CEI LABS
107 New Edition Court, Cary, NC 27511
Tel: 866-481-1412; Fax: 919-481-1442

LAB USE ONLY:
CEI Lab Code:
CEI Lab I.D. Range:

COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #:	Job Contact: J. Sawitsky
Company: Weecycle Env.	Email / Tel: labresults@weecycle-env.com
Address: 1208 Commerce Ct #5B Lafayette, CO. 80026	Project Name: West Park
	Project ID# 18-16016
Email: Weecycle@weecycle-ENV.com	PO #: 18-16016
Tel: 303-413-0452 Fax: 303-413-0710	STATE SAMPLES COLLECTED IN: CO

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME: 4 HR	8 HR	24 HR	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	☐	☐	☐	☐	☒	☐
PLM POINT COUNT (400)	EPA 600	☐	☐	☐	☐	☐	☐
PLM POINT COUNT (1000)	EPA 600	☐	☐	☐	☐	☐	☐
PLM GRAV w POINT COUNT	EPA 600		☐	☐	☐	☐	☐
PLM BULK	CARB 435		☐	☐	☐	☐	☐
PCM AIR	NIOSH 7400	☐	☐	☐	☐	☐	☐
TEM AIR	EPA AHERA	☐	☐	☐	☐	☐	☐
TEM AIR	NIOSH 7402	☐	☐	☐	☐	☐	☐
TEM AIR	ISO 10312	☐	☐	☐	☐	☐	☐
TEM AIR	ASTM 6281-09	☐	☐	☐	☐	☐	☐
TEM BULK	CHATFIELD		☐	☐	☐	☐	☐
TEM DUST WIPE	ASTM D6480-05	☐	☐	☐	☐	☐	☐
TEM DUST MICROVAC	ASTM D5755-09	☐	☐	☐	☐	☐	☐
TEM SOIL	ASTM D7521-13			☐	☐	☐	☐
TEM VERMICULITE	CINCINNATI METHOD			☐	☐	☐	☐
OTHER:		☐	☐	☐	☐	☐	☐

REMARKS / SPECIAL INSTRUCTIONS:	☒ Accept Samples ☐ Reject Samples

Relinquished By:	Date/Time:	Received By:	Date/Time:
J. Sawitsky	10-25-18	MSV	10/26 9:50

Samples will be disposed of 30 days after analysis

ASBESTOS SAMPLING FORM

A1613652

CEI LABS

COMPANY CONTACT INFORMATION	
Company: Weecycle Env.	Job Contact: J Sawitsky
Project Name: West Park	
Project ID #: 18-16016	Tel: 303 434-0774

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME / AREA	TEST	
16016WPDT 1-1	DW w/texture		PLM ☒	TEM ☐
WPDT 1-2			PLM ☐	TEM ☐
WPDT 1-3			PLM ☐	TEM ☐
WPDT 1-4			PLM ☐	TEM ☐
WPDT 2-5			PLM ☐	TEM ☐
WPDT 2-6			PLM ☐	TEM ☐
WPDT 2-7			PLM ☐	TEM ☐
WPDT 2-8			PLM ☐	TEM ☐
WPDT 3-9			PLM ☐	TEM ☐
WPDT 3-10			PLM ☐	TEM ☐
WPDT 3-11			PLM ☐	TEM ☐
WPP 1-12	plaster w/texture		PLM ☐	TEM ☐
WPP 1-13			PLM ☐	TEM ☐
WPP 1-14			PLM ☐	TEM ☐
WPDT 4-15	DW / texture		PLM ☐	TEM ☐
WPDT 4-16			PLM ☐	TEM ☐
WPDT 4-17			PLM ☐	TEM ☐
WPCMU 1-18	CMU - coating		PLM ☐	TEM ☐
WPCMU 1-19			PLM ☐	TEM ☐
WPCMU 1-20			PLM ☐	TEM ☐
WPCMU 1-21			PLM ☐	TEM ☐
WPCMU 1-22			PLM ☐	TEM ☐
WPCMU 1-23			PLM ☐	TEM ☐
WPCMU 1-24			PLM ☐	TEM ☐
WPFT 1-25	Floor t/a		PLM ☐	TEM ☐
WPFT 1-26			PLM ☐	TEM ☐
WPFT 2-27			PLM ☐	TEM ☐
WPFT 2-28			PLM ☐	TEM ☐

ASBESTOS SAMPLING FORM

A1813652

CEI LABS

COMPANY CONTACT INFORMATION

Company: Weecycle Env.	Job Contact: J Sawitsky
Project Name: West Park	
Project ID #: 18-16016	Tel: 303 434-0774

SAMPLE ID #	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
WPFT 3-29	Floor tile		PLM ☒	TEM ☐
WPFT 3-30	|		PLM ☒	TEM ☐
WPCBM1-31	Cove Base Mastic		PLM ☒	TEM ☐
WPCBM 1-32	|		PLM ☒	TEM ☐
WPGD 1-33	Glue Dots		PLM ☒	TEM ☐
WPGD 1-34	|		PLM ☒	TEM ☐
WPGD 2-35	|		PLM ☒	TEM ☐
WPGD 2-36	|		PLM ☒	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
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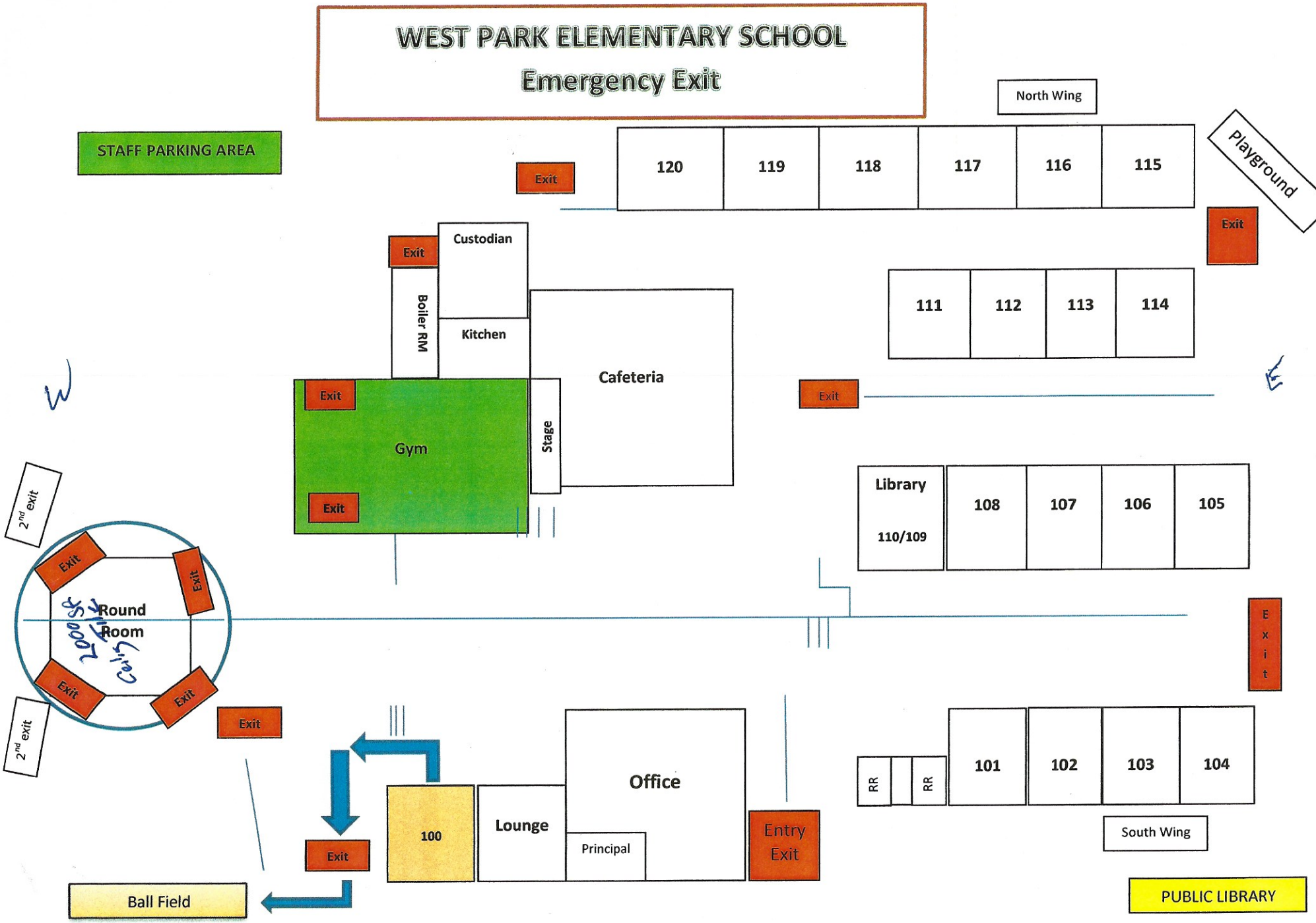
			PLM ☐	TEM ☐

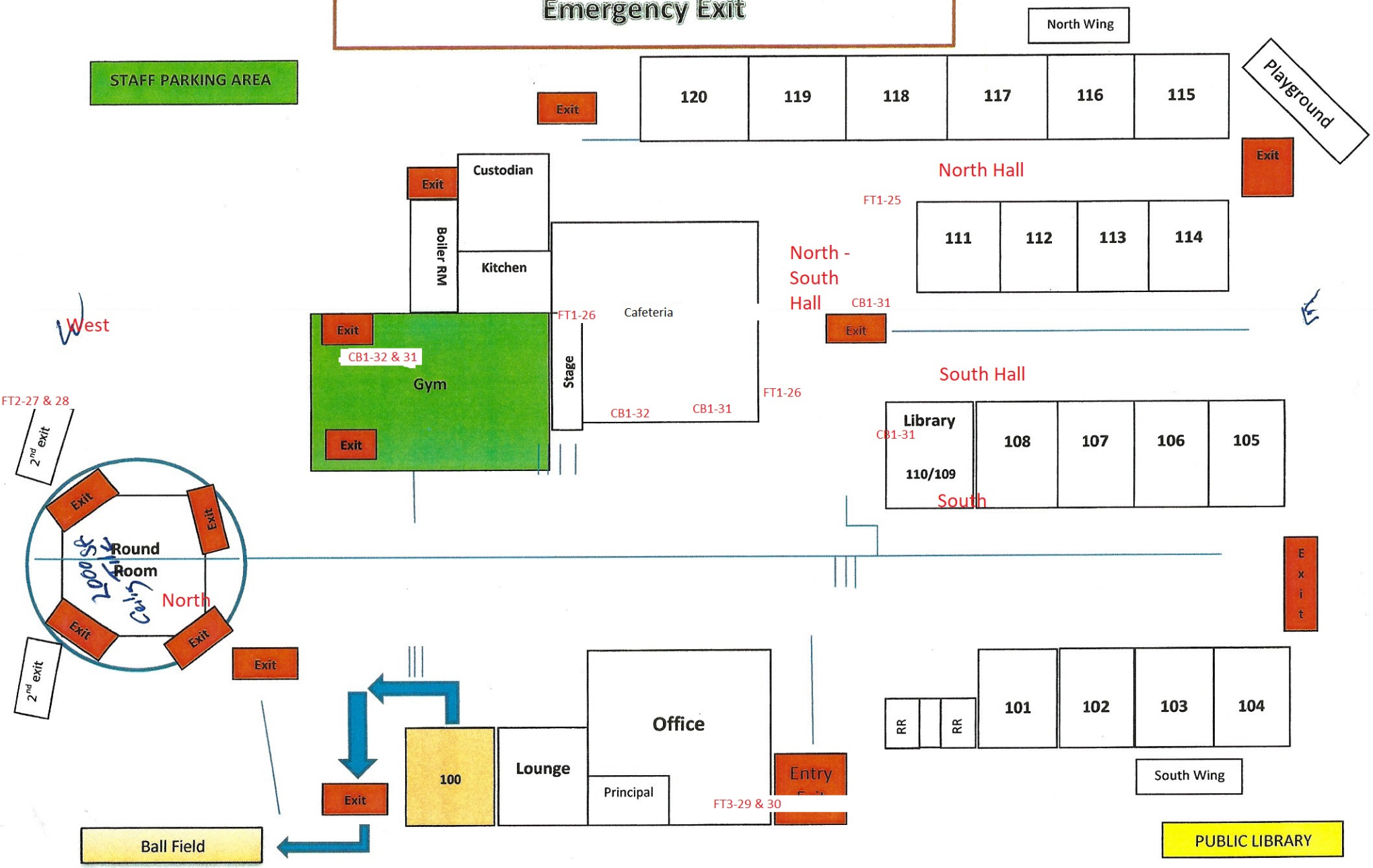
Appendix E:
Site Illustrations

WEST PARK ELEMENTARY SCHOOL
Emergency Exit



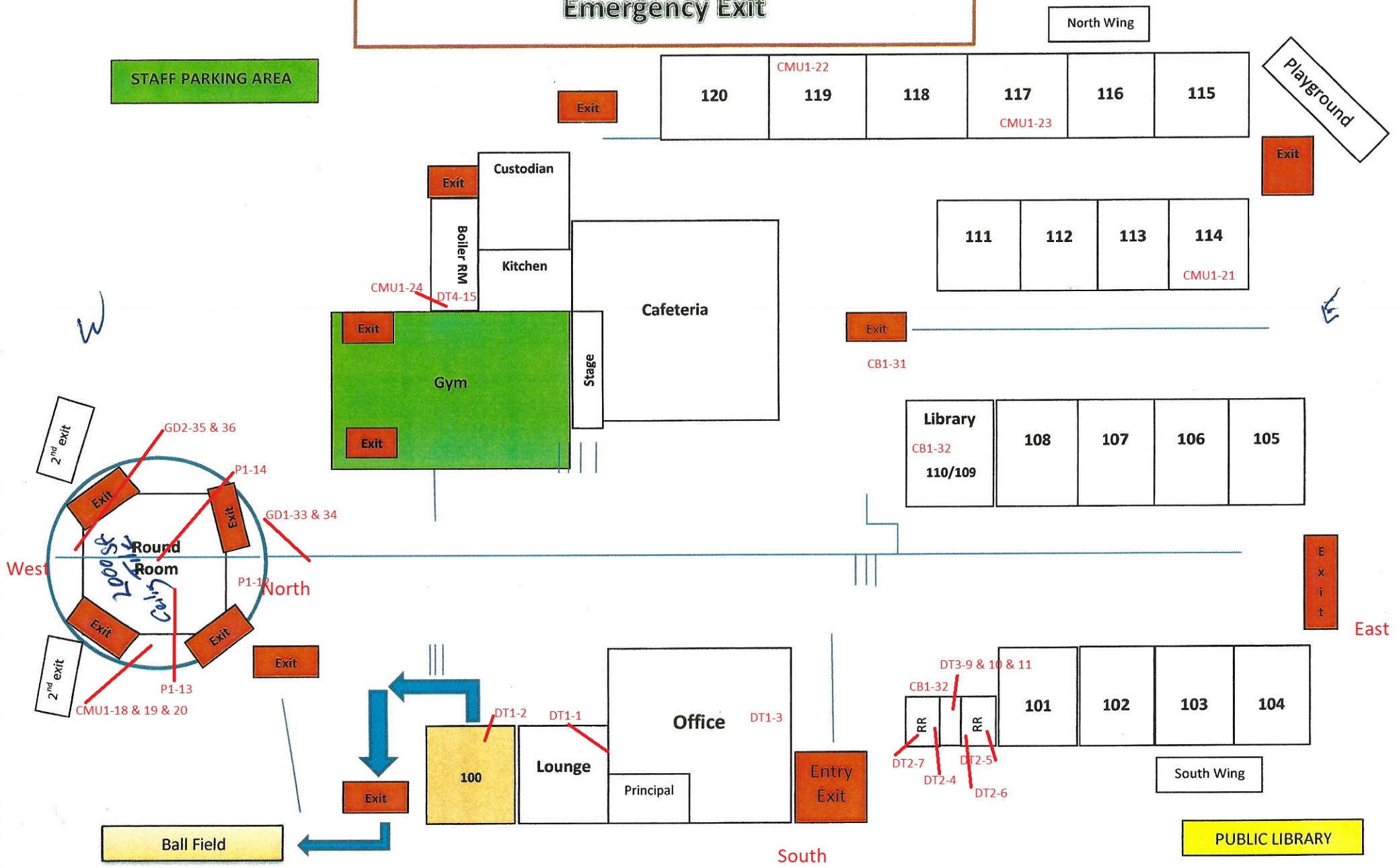
WEST PARK ELEMENTARY SCHOOL
Emergency Exit

Floors



WEST PARK ELEMENTARY SCHOOL
Emergency Exit

Walls and Ceilings



10. RECORDKEEPING

SUMMARY

Pursuant to requirements specified in the Rule, the LEA is responsible for maintaining adequate records for all the asbestos activities listed below in two locations: (1) the Local Education Agency office; and (2) the School Administration's offices. Refer to Section 763.94 of the Rule for the specific items required to be recorded for each activity.

It is recommended that the sample forms included in this section be used as a guide from which the LEA may develop its own forms. If the sample forms are chosen to be used, the LEA must ensure they provide a record of all of the information required by the Rule and all other applicable regulations. The guidance forms included within this section in no way supersede or replace records that may be necessary to comply with any applicable asbestos regulations. The LEA must take care to remain informed and ensure compliance with all new and existing regulations and update their methods of recording activity accordingly. This is especially important as long as any ACM remains in the School and building occupants may come in contact with or otherwise handle asbestos-containing materials. It is also recommended that the LEA maintain updated copies of the blank forms it chooses to use in this Record-keeping section.

The following asbestos activities, projects, and occurrences, and the entities involved in such projects, are to be recorded as required in Section 763.94 of the Rule. The activities to be recorded include, but are not limited to:

1. Preventive Measures
2. Response Actions
3. Contractors or Personnel Involved
4. Air Monitoring and Results
5. Personnel Training
6. Periodic Surveillance
7. Cleaning (per Section 763.91© of the Rule)
8. Operation and Maintenance (O&M) Activities
9. Major Asbestos Activities (per Section 763.91(e) of the Rule)
10. Fiber Release Episodes

Additional records required by OSHA (particularly if negative pressure respirators are used) include those required for, but are not limited to, medical surveillance and respiratory protection.

11. FORMS SAMPLE RECORD FORMS

In order to maintain all proper records required, it is essential to establish an organized format for record keeping. The following record forms and recommended formats are provided as guidance for creating and maintaining adequate records. The information requested in the forms should only be viewed as minimum requirements as stated in the Rule. It is important to be sure that additional records be kept as necessary to fully comply with all applicable regulations.

Additional record-keeping forms, such as medical surveillance or respiratory protection forms, may similarly be recorded and continued as necessary. Keep a blank copy of the record forms used in the Record-keeping section and revise as necessary. Copy several blank forms. Keep these blanks and completed forms in the Records section.

Project records may be compiled (copied as necessary in the case of repeat records, such as Worker Training) and grouped together, project by project, in order of occurrence.

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Lake County School District
Leadville, CO 80461

FORM A PERIODIC SURVEILLANCE & RE-INSPECTION SIGNOFF TABLE SIX-YEAR PLAN

LAKE COUNTY SCHOOL DISTRICT R-1

Form No. A-

	LATEST DATE	SURVEYOR OR INSPECTOR NAME	PROJECT DATE(S)	RECORD FORM NO(S).
SURVEILLANCE:	4/20/19	Judith Sawitsky	4/20/19	
SURVEILLANCE:				
SURVEILLANCE:				
SURVEILLANCE:				
SURVEILLANCE:				
RE-INSPECTION:				
SURVEILLANCE:				
SURVEILLANCE:				
SURVEILLANCE:				
SURVEILLANCE:				
SURVEILLANCE:				
RE-INSPECTION:				

(Periodic Surveillance every 6 months thereafter. Re-inspection every 3 years thereafter.)

Lake County School District
Leadville, CO 80461

PERIODIC SURVEILLANCE PLAN/REPORT

Periodic Surveillance Plan: At least once every six months after the AMP is in effect, periodic surveillance will be conducted in each building that the LEA leases, owns, or otherwise uses as a school building that containsACBM or is assumed to contain ACBM. At a minimum, surveillance is planned to be conducted during the fall and spring (insert alternate time frames and other details, as needed). Each person performing periodic surveillance must: visually inspect all areas that are identified in the AMP as ACBM or assumed ACBM, record the date of the surveillance, his or her name, and any changes in the condition of the materials, and submit a copy of the record to the DP for inclusion in the AMP.

			1st six months Date_____	2nd six months Date_____	
HA No.	**Description of ACBM**	**Area Inspected**	**ACBM Condition***	**ACBM Condition***	**Date ACBM Removed**

			1st six months Date_____	2nd six months Date_____	
HA No.	**Description of ACBM**	**Area Inspected**	**ACBM Condition***	**ACBM Condition***	**Date ACBM Removed**

*** If no change in condition, write N/C**

Surveillance Inspector's Name	**Surveillance Inspector's Signature**	**Date**

Lake County School District
Leadville, CO 80461

FORM B ACTIVITY / PROJECT RECORD
LAKE COUNTY SCHOOL DISTRICT R-1

Project No._____ Form No. B-_____

Measure or Action: _____

_____

If Periodic Surveillance or Re-inspection, Record Form No(s). _____

Start Date:_____ Completion Date: _____

ACM Type: Check Appropriate Material Type; see appropriate ACM Table or Summary)

F - Friable
NF - Nonfriable
S - Surfacing
T - Thermal
M - Miscellaneous
A - Other ACM

F/S	_____	F/M	_____
NF/S	_____	NF/M	_____
A/F/S	_____	A /F/M	_____
A/NF/S	_____	A/NF/M	_____
A/T	_____	NF/O	_____

ACM Description:_____ Homogeneous Area: _____

Specific Area Location(s): _____

ACM Location in Area(s): _____

HVAC Supply: Passive Direct Air Movement: High Moderate Low

Air System: Shut Down Isolated Not Present

Was Area Isolated? Yes No Proper Signs Posted? Yes No

Project Description and Methods: _____

_____

_____

_____

Why was action taken? _____

_____

_____

Was Project Resultant of a Major Fiber Release Episode (> 3 feet)? Yes No

Was Project Resultant of a Minor Fiber Release Episode (< 3 feet)? Yes No

Lake County School District
Leadville, CO 80461

FORM B ACTIVITY /PROJECT RECORD (CONTINUED)
LAKE COUNTY SCHOOL DISTRICT R-1

Was any ACM Removed? Yes No Total Amount _____

If YES: Storage Record Form No. _____

Disposal Record Form No. _____

If less than or equal to 3 linear or square feet then:

School Worker Record Form No. _____

Worker Training Record Form No(s). _____

Contractor Record Form No(s). _____

If greater than 3 linear or square feet then:

Design Consultant Record Form No(s). _____

Air Monitoring Consultant Record Form No(s). _____

Laboratory Consultant Record Form No(s). _____

Contractor Record Form No(s). _____

Does ACM remain in location? Yes No Amount _____

If YES: Describe additional Preventive Measures: _____

_____

_____

* Continue with Operations and Maintenance Program.

If NO: Be sure to update asbestos location blueprint, diagrams, and/or written description and adjust periodic surveillance forms.

Date of Notification to: DLS _____ DEP _____ EPA _____

Inspection Form No(s). _____

Name of Competent or Designated Person: _____

School Worker Record Form No. _____

Signature: _____ Date: _____
Competent or Designated Person

Lake County School District
Leadville, CO 80461

Form No. C-_____

FORM C SCHOOL WORKER RECORD

Project No._____ Project Form No._____ Project Date(s) _____
_____

Designated Person _____

Respiratory Workers' Protection Names	Date(s) of Activity	Worker Training Record Form No(s).	Medical Surveillance Record Form No(s).	Record Form No(s).

Lake County School District
Leadville, CO 80461

Form No. D-_____

FORM D DESIGN CONSULTANT RECORD

Project No:_____ Project Form No.: _____

Consultant Company Name: _____

Address: _____

_____

_____

Telephone: _____

Specification Location: _____

Project Designer Name: _____

State of Accreditation: _____

Accreditation Number: _____

Completion Date Project Designed: _____

Project Designer Signature: _____

Lake County School District
Leadville, CO 80461

Form No. E-____

FORM E ABATEMENT CONTRACTOR RECORD

Lake County School District R-1

Project No. _____ Project Form No. _____

Project Date(s): _____

Designated Person: _____

Contractor Name: _____

Address: _____

_____

Telephone: _____

Contractor's State of Accreditation: _____

Accreditation Number: _____

Worker Name	Date on Site	State of Accreditation	Accreditation Number	Day Supervisor/ Foreman

Lake County School District
Leadville, CO 80461

Form No. F-____

FORM F AIR MONITORING CONSULTANT RECORD

Lake County School District R-1

Project No._____ Project Form No. _____

Designated Person: _____

Consultant Company Name: _____

Address: _____

_____

Telephone: _____

Air Sample Collection Date: _____

Air Sample Collector's Name: _____

State of Accreditation: _____

Accreditation Number: _____

Collectors Signature: _____

Sample No.	Sample Location	Results

Lake County School District
Leadville, CO 80461

Form No. G-_____

FORM G LABORATORY RECORD

Project No._____ Project Record Form No. _____

Project Date(s): _____

Designated Person: _____

Consultant Company Name: _____

Address: _____

_____

Telephone: _____

State of Accreditation: _____

Accreditation Number: _____

Check if applicable:

_____ This laboratory is accredited by the National Institute for Standards and Technology to conduct air sample analysis using Transmission Electron Microscopy (TEM).

_____ This laboratory is enrolled in the EPA-sponsored Proficiency Analytical Testing Program for Phase Contrast Microscopy (PCM).

Sample Number	Result of Analysis	Method of Analysis	Date of Analysis	Name of Analyst	Signature Analyst

Lake County School District
Leadville, CO 80461

Form No. H- _____

FORM H DISPOSAL RECORD

Project No._____ Project Record Form No. _____

Project Date(s): _____

Designated Person: _____

Site Name: _____

Address: _____

_____

Telephone: _____

How Material is Containerized: _____

Material Quantity: _____

Date Material Transported
for Disposal: _____

Transporter Name: _____

Address: _____

_____

Telephone: _____

Lake County School District
Leadville, CO 80461

Form No. I-_____

FORM I STORAGE RECORD

Project No._____ Project Record Form No. _____

Project Date(s): _____

Designated Person: _____

Storage Site: _____

Address: _____

_____

Telephone: _____

Storage Area at Site: _____

Material Quantity: _____

Area Sealed? _____ How: _____

_____

Area Secured? _____ How: _____

_____

Date Material Transported
for Disposal _____

Lake County School District
Leadville, CO 80461

Form No. J-_____

FORM J WORKER TRAINING RECORD

_____ Check if Designated Person

Individual's Name	Individual's Identification No.
Permanent Street Address	Emergency Contact Person
Permanent City, State, Zip Code	Emergency Contact Phone No.
Home Phone No.	Attending Physician
Job Title	Attending Physician's Phone No.

ASBESTOS TRAINING HISTORY

Course Date	Course Location	Course Title	Training Center Name	Hours of Instruction	Certification Number

THIS INDIVIDUAL IS QUALIFIED TO PERFORM THE FOLLOWING TYPE(S) OF ASBESTOS-RELATED WORK

1) Restricted to maintenance work which does not involve the disturbance of asbestos-containing building materials.

Signature

Title Date

2) May perform "small-scale, short-duration" work as defined by the applicable rules and regulations, under proper supervision.

3) May perform "small-scale, short-duration" work as defined by the rules and regulations and is qualified to supervise other workers performing the same type of work.

4) May perform work in any type of asbestos removal project under proper supervision.

5) May perform work on any type of asbestos removal project and is qualified to supervise others performing the same type of work.

Lake County School District
Leadville, CO 80461

Form No. K-

FORM K GLOVE BAG RECORD

Date Performed: _____

Designated Person: _____

Performed by: _____

_____

_____

Contractor MA Certification No.: _____

CDPHE Notification No.: _____

Work Performed: _____

_____

_____

Worker Name: _____

Colorado Worker Certification No.: _____

Waste Landfill: _____

Waste Transporter: _____

12) COMPLETED FORMS

Lake County School District
Leadville, CO 80461

PERIODIC SURVEILLANCE PLAN/REPORT Form A

Periodic Surveillance Plan: At least once every six months after the AMP is in effect, periodic surv eillance will be conducted in each building that the LEA leases, owns, or otherwise uses as a school building that containsACBM or is assumed to contain ACBM. At a minimum, surveillance is planned to be conducted during the fall and spring (insert alternate time frames and other details, as needed). Each person performing periodic surveillance must: visually inspect all areas that are identified in the AMP as ACBM or assumed ACBM, record the date of the surveillance, his or her name, and any changes in the condition of the materials, and submit a copy of the record to the DP for inclusion in the AMP.

			1st six months Date 4/20/19	2nd six months Date_____	
HA No.	**Description of ACBM**	**Area Inspected**	**ACBM Condition***	**ACBM Condition***	**Date ACBM Removed**
DT-3	Drywall w/Texture	South wing, Janitor closet ceiling	N/C		
CMU-1	CMU Block Coating	Admin 100, Round room closets & rooms, Office for Admin walls (South wing) 110, 109, 101, 108, 107, 106, 105, 104, 103, 102, 101, Mechanical room, Janitorial work room, 120 W/E/S walls. 118, 111, 117, 112, 116, 113, 115, 114, Gym top half of walls, Gym office walls	N/C		
FT-2	Floor Tile w/ Mastic	Under carpet throughout Round room	N/C		

All Assumed Materials	• Art Kilns • Acid Resistant Sinks and Countertops • Chalkboards • Fire doors, fire files, and safes • Roofing Material was deemed to be non friable and in an intact condition	Throughout Building	N/C		

*** If no change in condition, write N/C**

Surveillance Inspector's Name	**Surveillance Inspector's Signature**	**Date**
Judith Sawitsky	Judith E. Sawitsky	**4/20/19**

13) MISCELLANEOUS DOCUMENTATION

(Bulk Sample Results, ACM Location Drawings, 6-Month Periodic Surveillance Records, Completed Response Action Records, Licenses, Employee Training Certificates, etc. Statement of No Asbestos Used in Administration Building, etc.)

CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Judith E. Sawitsky

Certification No.: 672

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Inspector/Management Planner*

Issued: **October 10, 2018**

Expires: **October 10, 2019**

**** This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.***

Authorized APCD Representative

SEAL

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Chris Schiechl

Certification No.: 15586

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Building Inspector*

Issued: **February 22, 2018**

Expires: **February 22, 2019**

**** This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.***

Authorized APCD Representative

SEAL

Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

Weecycle Environmental Consulting, Inc.

Registration No.: ACF - 15049

has met the registration requirements of 25-7-507, C.R.S. and the Air Quality Control Commission Regulation No. 8, Part B, and is hereby authorized to perform asbestos consulting activities as required under Regulation No 8, Part B, in the state of Colorado.

Issued: January 30, 2018
Expires: January 30, 2019

Authorized APCD Representative

SEAL

LEA NAME:_____ SCHOOL NAME:_____

(Number ___ of___, make copies as necessary)

AMP FORM 5 - TRAINING RECORD FOR MAINTENANCE AND CUSTODIAL STAFF

Every member of the maintenance and custodial staff who works in a building that contains ACBM must receive awareness training of at least 2 hours whether or not they are required to work with ACBM. Maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM must receive an additional 14 hours of training (total 16 hours of training). A record of the aforementioned training is required to be included in the AMP under 40 CFR §§ 763.93(h) and 763.94(c) of the EPA Asbestos-Containing Materials in Schools regulation, 40 CFR Part Subpart E.

Cert #	Employee Name (Please Print)	Job Title	Course Name	Training Agency	Date	Location of Training	Number of Hours Completed
1	Todd Coffin	Dir O/M	Two hour Awareness	Weeyule	8-15-18	Pitts	2
2	Eva Mascarenas	Custodial Manager			8-15-18		
3	Dennis Vigil	Custodian			8/15/18		
4	Tim Powell	Maintenance			8-15-18		
5	RAFAEL ROJO	CUSTODIAN			8-15-18		
6	Jorge Guerrero	custodial			8-15-18		
7	[illegible] Ordonez	Custodial			8-15-18		
8	Tim Mesko	Maintenance			8-15-18		

ATTACHMENT

- **Copies of training certificates suggested, but not required by EPA**

LEA NAME:_____ SCHOOL NAME:_____

(Number ___ of___, make copies as necessary)

AMP FORM 5 - TRAINING RECORD FOR MAINTENANCE AND CUSTODIAL STAFF

Every member of the maintenance and custodial staff who works in a building that contains ACBM must receive awareness training of at least 2 hours whether or not they are required to work with ACBM. Maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM must receive an additional 14 hours of training (total 16 hours of training). A record of the aforementioned training is required to be included in the AMP under 40 CFR §§ 763.93(h) and 763.94(c) of the EPA Asbestos-Containing Materials in Schools regulation, 40 CFR Part Subpart E.

Cert #

Employee Name (Please Print)	Job Title	Course Name	Training Agency	Date	Location of Training	Number of Hours Completed
9 R.M. Fresquez	Maintenance Tech.	Two hour Awareness	Weeruk	08/15/18	PITTS	2
10 Micki Pacheco	Custodian			8-15-18		
11 Patty Jaramillo	Custodian			8/15/18		
12 Guadalupe Carrasco	Custodian			8/15/18		
13. Josefa Escabar	Custodia			8/15/18		
14 Yolanda Gonzales	Custodian			8/15/18		
15 Elvin Leon	Custodian			8-15-18		
16 Brenda Caraveo	Family Engagement Specialist			8/15/18		

ATTACHMENT

- **Copies of training certificates suggested, but not required by EPA**

Name: Todd Coffin

Cert #1

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B,
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Eva Mascarenas

Cert # 2

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B ,
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Dennis Vigil

Cert #3

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Tim Powell

Cert #4

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: R.M. Fresquez

Cert #9

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Mickie Pacheco

Cert #10

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Patty Jaramillo

Cert #11

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Guadalupe Carrasco

Cert #12

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Josefa Escobaz

Cert #13

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B ,
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Yolanda Gonzales

Cert #14

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Elvira Leon

Cert #15

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

Name: Brenda Caraveo

Cert #16

Attended

ASBESTOS AWARENESS

Two Hour Training

Presented By:

Weecycle Environmental Consulting, Inc.

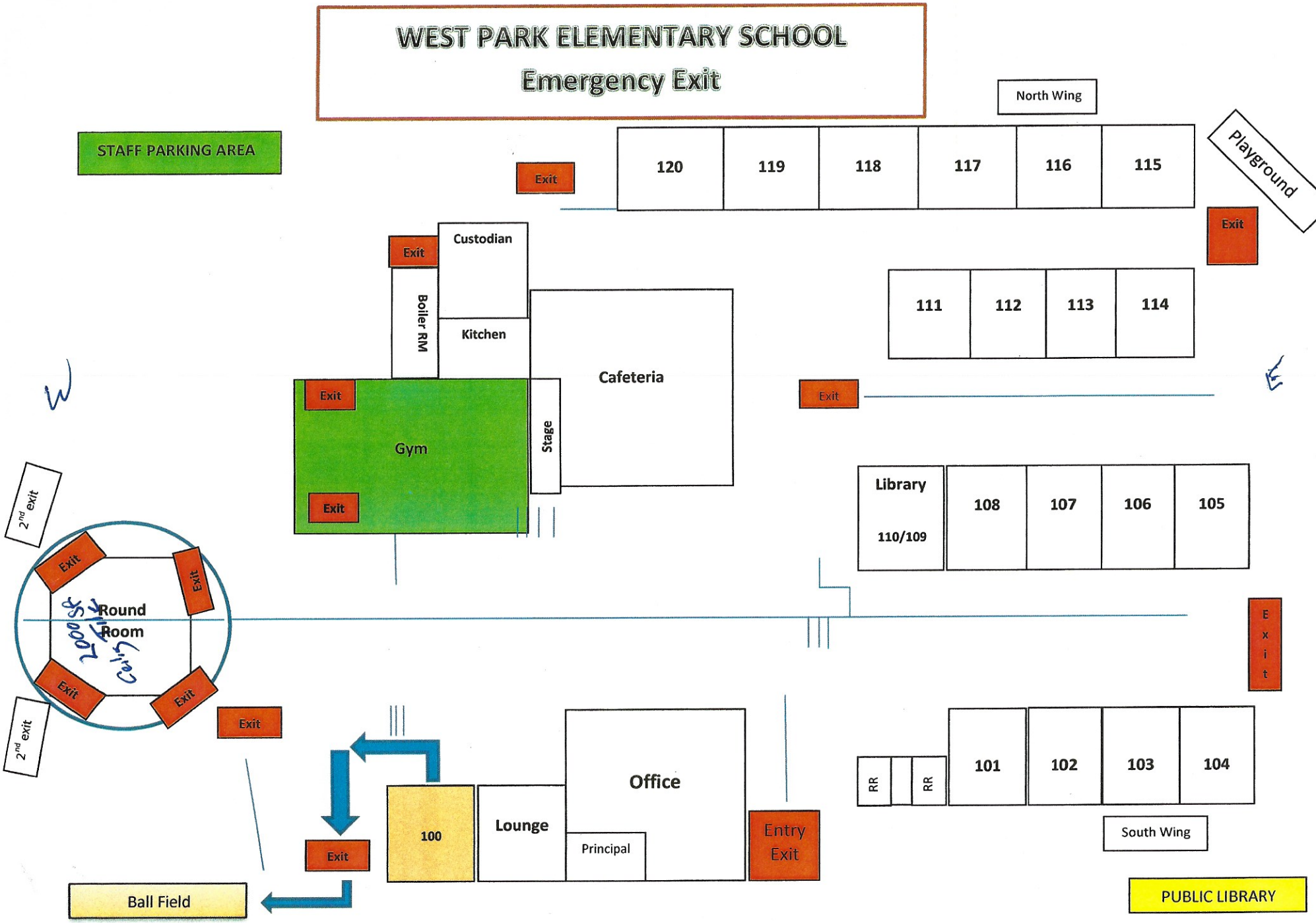
1208 Commerce Court, Ste 5B
Lafayette, CO 80026

Signed:

Date: 8/15/2018

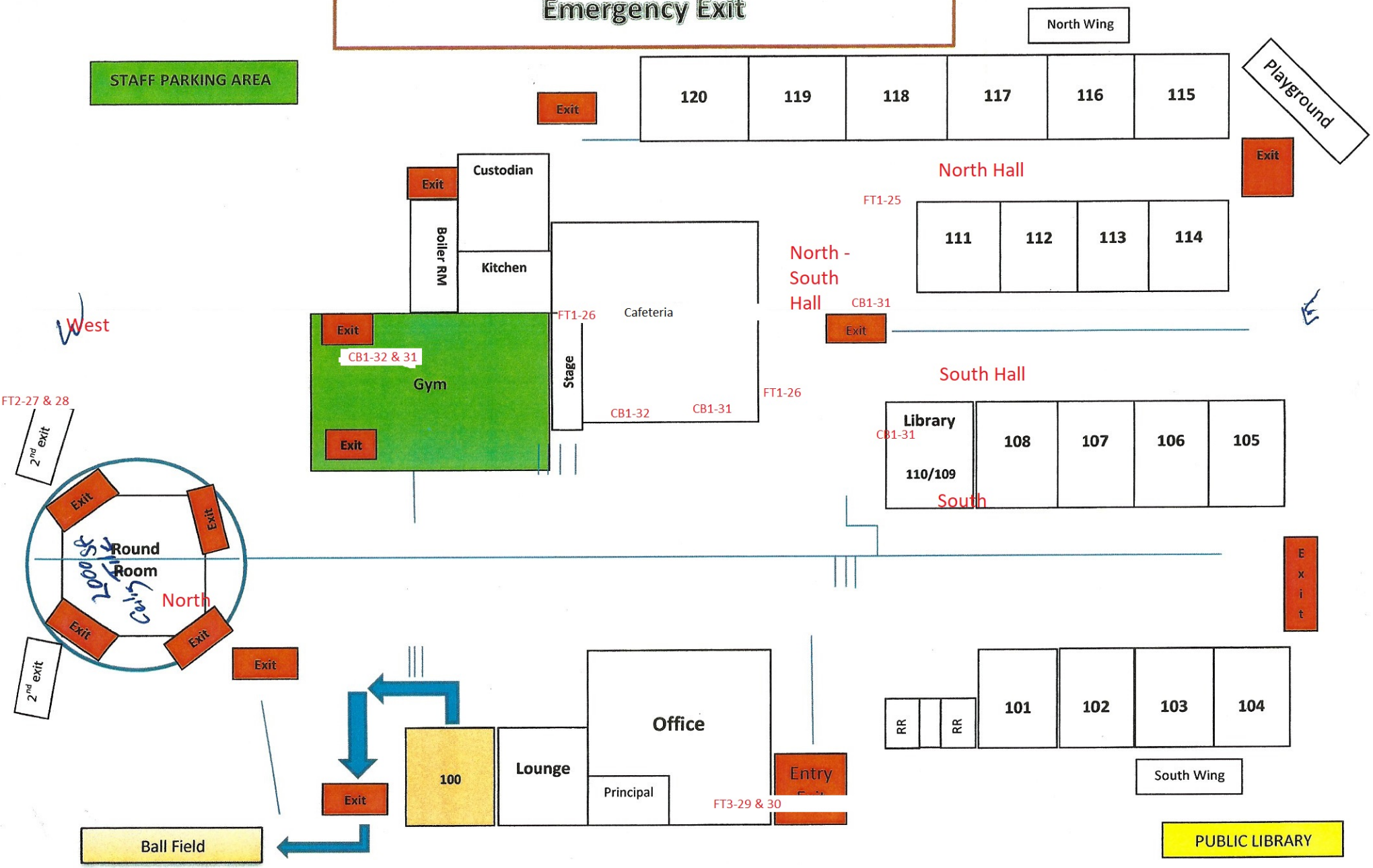
FLOOR PLANS

WEST PARK ELEMENTARY SCHOOL
Emergency Exit



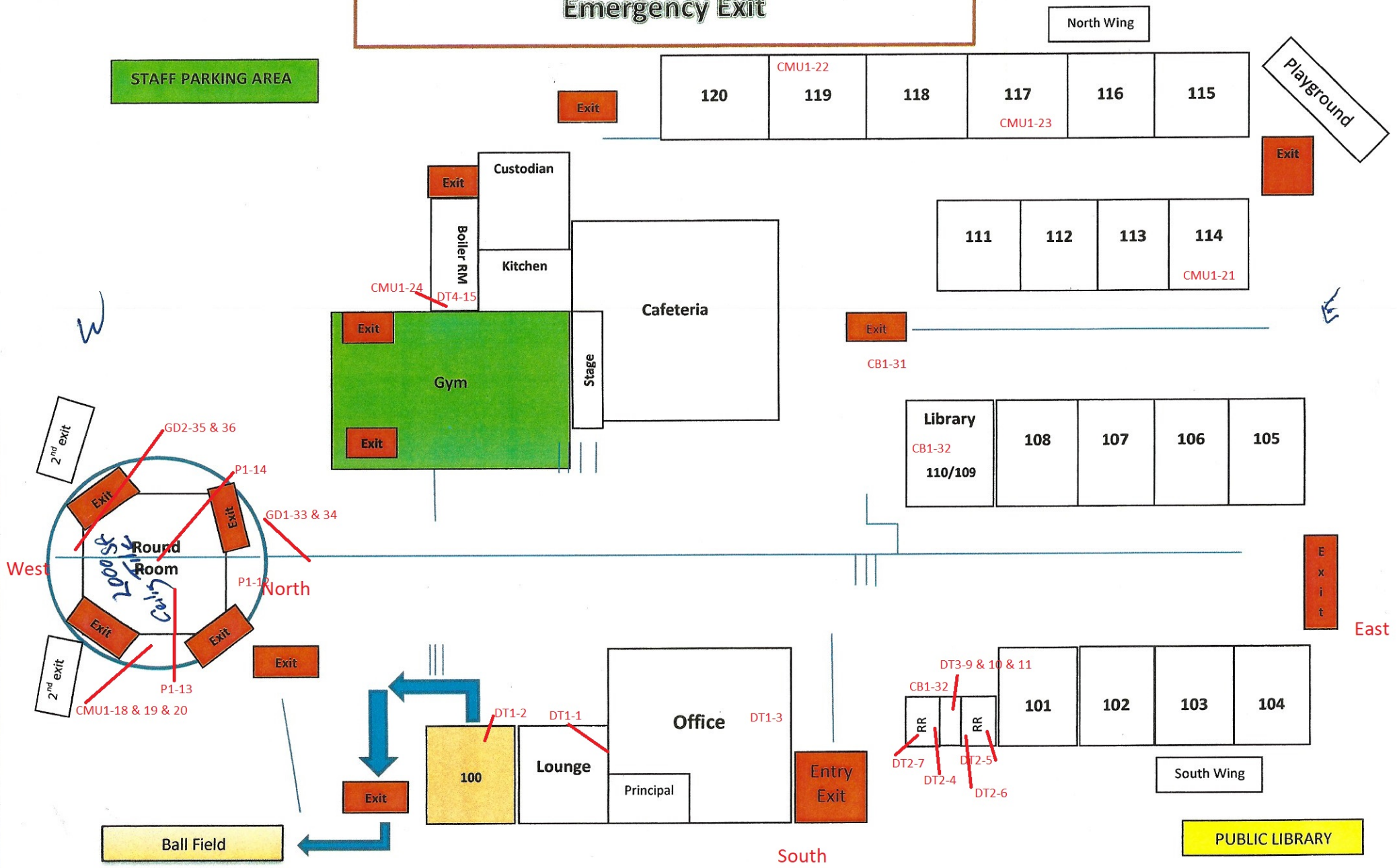
WEST PARK ELEMENTARY SCHOOL
Emergency Exit

Floors



WEST PARK ELEMENTARY SCHOOL
Emergency Exit

Walls and Ceilings



CERTIFICATION LETTER

None available from Architect or Contractor