

2020 AHERA THREE-YEAR RE-INSPECTION REPORT FOR THE BETHEL HIGH SCHOOL

Prepared for

Bethel Board of Education
Bethel, Connecticut

Prepared by

TRC
Windsor, Connecticut

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**2020 AHERA/CTDPH
THREE-YEAR REINSPECTION
REPORT FOR THE
BETHEL PUBLIC SCHOOLS**

TRC Inspector:

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Prepared By:

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Signature: 

The Local Education Agency's (LEA) Designated Person, as mandated by EPA AHERA regulation section 40 CFR 763.93(i) and CTDPH regulation section 19a-333-10(h), certifies that the LEA's responsibilities, as stipulated by EPA AHERA regulations 40 CFR 763.84 and CTDPH 19a-333-2 have been met and/or will be met:

LEA Designated Person:

Name: Robert Germinaro

Signature: 

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I. INTRODUCTION

TRC Environmental Corporation (TRC) was retained by the Town of Bethel, Board of Education to conduct the three year re-inspection of five (5) subject buildings and/or building areas currently owned and operated by the Bethel Public School System, in accordance with the United States Environmental Protection Agency's (USEPA) Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR Part 763 Subpart E, *Asbestos-Containing Materials in Schools*) and the State of Connecticut Department of Public Health (CTDPH) school asbestos regulations (19a-333-1 through 13, *Asbestos-Containing Materials in Schools*). All of the subject buildings, including the administrative offices of the Board of Education, are currently occupied and utilized for the purposes of Bethel Public Schools activities. The following is a list of the buildings and/or building areas and their addresses which are included in this report:

- Bethel High School, Bethel Educational Park, 300 Whittlesey Drive

The building had been previously surveyed for the presence of asbestos in compliance with USEPA Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR Part 763 Subpart E, *Asbestos-Containing Materials in Schools: Final Rule and Notice*, October 1987) and State of Connecticut Department of Public Health (CTDPH) school asbestos regulations (19a-333-1 through 13, *Asbestos-Containing Materials in Schools*). Under the AHERA and CTDPH regulations, each elementary and secondary school must be surveyed for the presence of asbestos-containing building material (ACBM) and an Asbestos Management Plan (AMP) must be prepared and implemented. The AHERA/CTDPH regulations further require periodic visual surveillance of the identified ACBM at least once every six (6) months and a formal re-inspection by accredited personnel at least every three (3) years.

The standard methodology for surveying and evaluating buildings to determine the presence of asbestos-containing materials involves a series of activities, conducted in accordance with current AHERA guidelines, which provide information concerning the presence, type, location, quantity and assessment of noted ACM. The existing AMP was created in October of 1990, based on the initial surveys of the Bethel Public Schools conducted in 1987-1989, and 1990 by TRC Environmental Corporation of Windsor, Connecticut. The School buildings were subsequently re-inspected by the same in November of 1993, July of 1996, December of 1999, December of 2002, July 2006, April 2008, August 2014 and March 2017. Eagle Environmental, Inc. (EEI) performed a pre-renovation survey of Bethel High School from October – November

2004. The existing AMP, which incorporates data from the original asbestos building inspection as well as the subsequent re-inspections, and the pre-renovation survey for Bethel High School, were utilized by TRC, to the extent to which the data could be validated, during the course of the 2020 re-inspections.

TRC, utilizing a State of Connecticut licensed asbestos inspector, performed the asbestos site re-inspections of the subject building on December 29, 2020. The responsibilities of the building inspector included: a visual re-inspection for the presence of all previously identified confirmed or assumed asbestos-containing building material (ACBM); a physical assessment of the materials to reassess their degree of friability; and the potential identification, assessment and sampling of suspect ACBM not identified during previous inspections. In order to fulfill these responsibilities, the site re-inspections included a visual survey of all accessible areas within each facility as well as covered walkways and roof top mechanical rooms. Note that inaccessible building areas including, but not limited to, permanent wall and ceiling spaces, pipe chases and interior mechanical units were not surveyed and may have been assumed by TRC to contain asbestos. TRC recommends that any inaccessible interior areas, as well as areas not covered under the AHERA program (such as roofs and exterior materials) be investigated and assessed by a licensed asbestos inspector in accordance with the USEPA Asbestos NESHAP prior to any renovation/demolition activities in order to prevent the disturbance of potential ACBM.

As recommended by the USEPA, the TRC inspector accounted for suspect ACBM which was not previously noted in the earlier inspections and/or the revised asbestos management plan (AMP) created for each specific building, was a recently added material requiring sample analysis to refute the presumption of asbestos content, and/or is a material not traditionally covered under the AHERA program (e.g. exterior materials) but requested to be included under CTDPH policy to avoid unintentional disturbances during any renovations/demolitions. Newly identified suspect ACBM materials would either assumed to contain asbestos or a required number of bulk samples would be collected following AHERA protocols and analyzed to confirm or refute the presumption of asbestos content. TRC is approved to perform bulk asbestos analysis by the CTDPH and the National Institute for Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP). A copy of TRC inspector and laboratory accreditations are included in this report as **Appendix A**. No new material bulk samples were collected during the 2020 re-inspection.

In accordance with the CTDPH regulations, 19a-333-3(b)(i), TRC completed the Local Education Agency Three Year Re-inspection Report Form for submission to the CTDPH by Bethel

Public Schools. The notification includes information regarding the buildings re-inspected and the dates of the re-inspections, as well as the names, signatures and accreditations of the Inspector, Management Planner and Local Education Agency (LEA) Designated Person. A copy of the submittal to the CTDPH is included in this report as **Appendix B**.

Based on the findings of the re-inspection, TRC, utilizing a State of Connecticut licensed Asbestos Management Planner, produced this re-inspection report. (See Appendix A for a copy of the TRC management planner accreditations) The report details all noted ACM, all confirmed non-ACM, ACM locations, estimated ACM quantities, assessments, recommended response actions, recommended schedules for response action implementation, and includes updated periodic surveillance forms. In particular, all materials which have had a change in assessment status, are no longer present or are newly identified materials are highlighted, along with their updated response action recommendations, so the materials can be appropriately maintained under the current Operations and Maintenance (O&M) Program for asbestos-containing building materials established for the Bethel Public School system within the AMP. TRC's three year re-inspection report shall be included with each current copy of the AMP developed for each school or facility. TRC recommends that a letter detailing the availability of the updated plan be sent to interested parties including but not limited to school principals, parent teacher organizations, employee organizations, and in the case of leased buildings, building tenants.

II. OBSERVATIONS AND FINDINGS

A. *General Items/Responsibilities*

An LEA has the following responsibilities under the AHERA/CTDPH asbestos in schools regulations with regards to the AMP program:

- Ensure all custodial and maintenance employees have received at least 2-hr asbestos awareness (OSHA Class IV/EPA Level 1) training annually. New employees shall be trained within 60 days after commencement of employment,
- Ensure workers and building occupants are informed at least once each school year about inspections, response actions, post-response action activity, re-inspections and periodic surveillance activities planned or in progress,
- Ensure short-term workers (contractors) who may come into contact with asbestos in a school are provided information regarding the locations of the ACBM,
- Ensure warning labels are attached adjacent to any ACBM in routine maintenance areas,
- Ensure management plans are available for inspection by the public at the central administrative office and each school building and notification of such availability has been provided in writing to parents, teachers and employee organizations at least once each school year
- Designate a person to ensure that these requirements are properly implemented, and properly train the designated person for such responsibility,
- Conduct periodic surveillance of the ACBM in each building at least every 6 months to identify changes in physical condition of the ACBM and implement proper response actions,
- Conduct re-inspections of the ACBM in each building at least every 3 years utilizing a licensed asbestos inspector,
- Maintain records at both the central administrative office and each school building of all related asbestos activity, training, surveillance, response action, notification, etc.
- Maintain records of all newly installed materials which indicate the materials are non-ACM (MSDS, sampling data, etc.),
- Receive and maintain a signed statement from an architect or project engineer responsible for the construction of a new school building, new school addition, new school area renovation, that no ACBM was specified as a building material in any construction document for the building/addition/etc., or, to the best of his or her knowledge, no ACBM was used as a building material in the building/addition/etc, in order to exclude these new buildings/additions from the requirements of the AHERA/CTDPH asbestos in schools regulations.

Based on a review of the existing AMP a more thorough documentation of annual employee training, 6-month periodic surveillance and labeling of ACM should be implemented.

In addition, updated copies of the original asbestos management plan, subsequent 3-yr re-inspections, and related response action (abatement) documentation needs to be maintained at each school building in addition to the central Board of Education offices.

B. Site Re-inspections

Following an asbestos investigation of the Bethel Public Schools and associated buildings, an Asbestos Management Plan (AMP) was originally drafted and submitted in 1990 to the State of Connecticut by TRC Environmental Corporation (TRC) formerly of East Hartford, Connecticut. Subsequent three year re-inspections were also conducted by TRC in November of 1993, July of 1996, December of 1999, December of 2002, July of 2006, April of 2008, August of 2014 and March of 2017. TRC has incorporated the findings of the original inspection, subsequent re-inspections and pre-renovation surveys into this re-inspection report.

The Bethel High School has undergone recent renovations to add a new wing to the building. The new addition was constructed circa 2007/2008 and did not require an asbestos inspection. A signed statement from the building architect documenting that no asbestos-containing materials were specified in the construction of the new addition was utilized in lieu of a comprehensive building inspection. Under CTDPH section 19a-333-13(a)(6) and AHERA section 40 CFR Part 763.99(a)(7) a signed statement such as this for a new school building or addition built after October 12, 1988 excludes the LEA from the requirement of performing an asbestos inspection/re-inspection of that building or addition. In April 2008, TRC developed a separate updated asbestos management plan submittal for the new Bethel High School addition based upon this documentation. A copy of the original statement from the architect is on file with the Bethel Board of Education. Based upon this statement, the 2007/2008 Bethel High School addition is not included in the scope of the AHERA/CTDPH three-year asbestos re-inspections.

The following sections detail the findings of the 2020 AHERA/CTDPH three-year re-inspection conducted by TRC for the Bethel Board of Education.

1.0 Bethel High School

Bethel High School is comprised of an original, three story building constructed circa 1970 with a three story addition constructed circa 1977 and a three story addition constructed circa 2007/2008. The present building consists of classrooms, library, gymnasium, kitchen/cafeteria, band/chorus, auditorium, administrative office areas, and vocational facilities. The original

building houses three boiler units which supply domestic hot water and heat to areas of the building.

1.1 Summary of Findings and Assessments

Extensive asbestos abatement operations have occurred at Bethel High School between 1988 and 1990, in which the majority of the friable asbestos-containing material (ACM) in the form of spray-applied fireproofing and thermal system insulation types as well as non-friable resilient floor tile and associated mastic have been removed. Recent asbestos abatement operations have occurred at Bethel High School in preparation for construction of the 2007/2008 addition. A portion of the remnant friable spray-applied fire-proofing, as well as non-friable resilient floor tile and associated mastic, window glazing compound and transite laboratory table tops have been removed. Complete abatement records from the 2007/2008 renovation were not provided for TRC's review, therefore identified/presumed ACBM may not actually be ACBM. Additional bulk material sample analysis or previous abatement records would be required to refute this. The current 2020 updated Asbestos Management Plan (AMP) addresses twelve (10) types of asbestos-containing building materials (ACBM): 12" x 12" resilient floor tile with associated mastic; internal boiler insulation cement/gasketing and boiler nipple underside packing; interior fire door insulation; sink undercoating; gray expansion joint caulk; dark brown vinyl cove base adhesive; joint compound; black window glazing compound; black glazing compound in windows of doors; and remnant spray-applied fireproofing.

The pre-renovation survey conducted by EEI, October – November 2004, identified the following asbestos containing materials in the 1970 wing: grey ceramic wall tile adhesive, sink undercoating, gray window glazing compound, black insulation tape, gray mudded pipe insulation, gray expansion joint caulk and dark brown vinyl cove base adhesive. The pre-renovation survey conducted by EEI, October – November 2004, identified the following asbestos containing materials in the 1977 wing: joint compound, dark brown vinyl cove base adhesive, black glazing compound in windows, gray caulk behind metal panels above windows, black glazing compound in windows of doors and sink undercoating.

The following sections address the locations and physical assessments of each ACBM noted.

1.1.1 Resilient Floor Tile and Associated Mastic

Accessible 12" x 12" resilient floor tile and its associated mastic types appear to be primarily in good condition throughout the hallways and rooms of the 1970 and 1977 wings of the building. Less than 3 square foot of damaged floor tile was noted at each of the following locations (mostly at doorways): Upper Level – Entrance south of Studio, Auditorium center & side entrances; Main Level – 3 locations in hallway outside Rooms 212 & 213; Lower Level – School entrance south east of team rooms and School entrance adjacent to Room 100. No floor tile was noted in the stairwells or gymnasium. A large percentage of the 12"x12" floor tile appears to be of a new vintage and may not actually be ACBM as assumed. Previous Abatement records, MSDS documentation for any floor tile/mastic installed following a previous abatement and/or material bulk sample analysis should be obtained to refute the presumption of asbestos content in such material.

1.1.2 Boiler Insulation Cement/Gasketing/Rib Packing & Nipple Underside Packing

The boiler insulation cement/gasketing/rib packing is located beneath the metal/fiberglass boiler jacket insulation as well as on the underside boiler nipple areas associated with the three boiler units. The friable interior cement/packing material was sampled in 1990 and determined to contain approximately 18% chrysotile asbestos. The underside packing was sampled in 2002 and determined to contain approximately 10% chrysotile asbestos. Additionally it is presumed that further ACM is likely to exist in the internal boiler areas (ropes, gaskets, fire brick, etc.) which are at the present time inaccessible. The boiler units are located in the basement mechanical room which is a restricted access area for the majority of the building occupants.

1.1.3 Interior Fire Door Insulation

Interior fire door insulation was noted during the original AHERA inspection of the high school in several of the 1970 vintage doors in which the interior insulation was accessible. The friable material was sampled in 1990 and determined to contain approximately 3% chrysotile and 25% amosite asbestos. Based on the similarities of the wooden interior door types noted, TRC estimates that there are approximately 45 fire doors containing asbestos insulation within the original 1970 section of the building. A large percentage of fire doors appear to be of a new vintage and may not actually be ACBM as assumed. Previous abatement records, MSDS documentation for any fire doors installed following a previous abatement and/or material bulk sample analysis should be obtained to refute the presumption of asbestos content in such material.

1.1.4 Remnant Spray-Applied Fireproofing

Spray-applied fireproofing was removed from all accessible areas of the school during extensive asbestos abatement programs conducted in 1988 through 1990 and re-insulated with spray-applied fiberglass. (Confirmatory sampling/analysis of the current existing spray-applied fireproofing that is accessible in both the 1970 and 1977 wings collected in 1999 , 2002 and 2006 confirmed the re-spray material as non-acm.) The asbestos abatement project did not however remove the over spray of original asbestos containing material which may be present between inaccessible structural walls, chases and ceilings.

1.1.5 Gray Ceramic Wall Tile Adhesive

All ceramic wall tile adhesive was abated during the 2007/2008 renovation of the high school. Areas which formerly contained ceramic wall tile adhesive are now CMU block walls. Ceramic wall tile adhesive will be removed from future reports.

1.1.6 Sink Undercoating

Sink undercoating was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), throughout 1970 and 1977 wing classrooms, offices and storage rooms. The material was sampled in 2004 and determined to contain asbestos. The non-friable material is in good condition with no signs of significant damage.

A large percentage of sinks may have been replaced during the 2007/2008 renovation and may not actually be ACM as assumed. Previous abatement records, MSDS documentation for any sink undercoating installed following a previous abatement and/or material bulk sample analysis should be obtained to refute the presumption of asbestos content in such material.

1.1.7 Gray Expansion Joint Caulk

Gray expansion joint caulk was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), in the 1970 wing Stairs # 1, # 3, # 4, and # 5. The material was sampled in 2004 and determined to contain asbestos. The non-friable material is in good condition with no signs of significant damage.

A large percentage of caulk may have been replaced during the 2007/2008 renovation and may not actually be ACM as assumed. Previous abatement records, MSDS documentation for

any caulk installed following a previous abatement and/or material bulk sample analysis should be obtained to refute the presumption of asbestos content in such material.

1.1.8 Dark Brown Vinyl Cove Base Adhesive

Dark brown vinyl cove base adhesive was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), throughout the 1970 and 1977 wings. The material was sampled in 2004 and determined to contain asbestos. The non-friable material is in good condition with no signs of significant damage.

Dark brown vinyl cove base adhesive was observed in areas of hallways and multiple rooms during the 2017 re-inspection and is still presumed to be in all areas previously identified in the re-inspection (following the 2007/2008 renovation).

1.1.9 Joint Compound

Joint compound was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), in the 1970 wing Entry to Stair #6 and the 1977 wing - Room 113 and Room 220. The material was sampled in 2004 and determined to contain asbestos. Following 2007/2008, rooms were renumbered and joint compound locations are Entry to Stair H, room 215 and room 315. The non-friable material is in good condition with no signs of significant damage.

1.1.10 Black Window Glazing Compound

Black window glazing compound was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), in 1977 wing - Room 222. The material was sampled in 2004 and determined to contain asbestos. During the 2020 re-inspection, black window glazing was observed in rooms 217, 222, 323 and 329. The non-friable material is in good condition with no signs of significant damage.

These windows may have been replaced during the 2007/2008 renovation and may not actually be ACM as assumed. Previous abatement records, MSDS documentation for window glazing installed following a previous abatement and/or material bulk sample analysis should be obtained to refute the presumption of asbestos content in such material.

1.1.11 Black Glazing Compound in Windows of Doors

Black glazing compound in windows of doors was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), in the 1977 wing - Room 118, Room 126, Room 234, Second Floor Corridor and the Passage at Social Services. The material was sampled in 2004 and determined to contain asbestos. During the 2020 re-inspection, black window door glazing was observed in Guidance rooms 226, 227, studio and AV room. The non-friable material is in good condition with no signs of significant damage.

These windows may have been replaced during the 2007/2008 renovation and may not actually be ACBM as assumed. Previous abatement records, MSDS documentation for window glazing installed following a previous abatement and/or material bulk sample analysis should be obtained to refute the presumption of asbestos content in such material.

1.1.12 Gray Caulk Behind Metal Panels Above Windows

All gray caulk behind metal panels above windows was abated during the 2007/2008 renovation of the high school. In previous inspections, no caulk was observed on metal panels above windows. In addition, all windows appeared to have been replaced. Gray caulk behind metal panels above windows will be removed from future reports.

Gray caulk behind metal panels above windows was noted during the pre-renovation survey, performed by Eagle Environmental, Inc. (EEI), in the 1977 wing - Room 113, Room 119 and Room 121. The material was sampled in 2004 and determined to contain asbestos. The non-friable material is in good condition with no signs of significant damage.

1.2 Confirmed Non-ACBM

The performance of a proper material bulk sampling program in accordance with current AHERA guidelines has documented the absence of asbestos in the following building materials:

- 2 x 4 cloth covered acoustical ceiling tiles - 1970 areas (1990)
- 2 x 4 typical dash pattern acoustical ceiling tiles - 1970 & 1977 areas (1990)
- 1 x 1 acoustical ceiling tiles - 1970 area (1990)
- Fibercane ceiling panels - 1970 gymnasium (1990)
- Sheetrock/joint compound wallboard system - 1970 & 1977 areas (1990)
- Cove base – 1970 (brown) & 1977 (black) areas (1990)
- Mudded pipe fitting insulation - 1970 areas (1987 & 1999)
- Acoustic plaster top coat - 1977 band room 118 areas (1999)
- Acoustic plaster top coat - 1970 auditorium & chorus room 112 areas (1999)

- Flat plaster base coat - 1970 auditorium entrances (1999)
- Textured ceiling paint - 1977 stairwell (1999)
- 2'x2' squiggle and dent pattern ceiling tiles - 1970 library (1999)
- Brown glue daubs from 1'x1' ceiling tile - 1970 area (1999)
- Newer accessible Respray-applied fireproofing – 1970 and 1977 areas (1999/2002)
- Hot Water Tank insulation – 1970 boiler room (2000)
- Boiler breeching re-insulation – 1970 boiler room (2002)
- Fiberglass pipe insulation mudded packings – 1970 boiler room piping (2002)
- Fiberglass pipe insulation mudded packings – 1970 basement G areas and locker rooms (2002)
- Fiberglass duct insulation tape/sealant – 1970 basement G areas (2002)
- 2'x4' dent pattern ceiling tile – 1970 locker room offices (2002)
- Interior window caulks – 1970 & 1977 replacement windows (silicone based non-suspect)
- Gray flooring cement top coat – Basement stair landing (2005)
- Brown glue daub on sheetrock ceiling (2005)
- Green spray applied fireproofing – Boiler Room (2004 EEI)
- Black mastic under 9"x9" floor tile – 1970 first floor (2004 EEI)
- Yellow streaked 12"x12" floor tile – 1970 first floor (2004 EEI)
- Green with white streaks 12"x12" floor tile - 1970 first floor (2004 EEI)
- Black flex duct connector – 1977 first floor (2004 EEI)
- White with blue 12"x12" floor tile – 1977 second floor (2004 EEI)
- Grey with blue 12"x12" floor tile – 1977 second floor (2004 EEI)

1.3 Additional Bulk Samples Collected

No additional bulk samples were collected during the 2020 re-inspection of Bethel High School.

1.4 History of Response Actions

On TRC's review of supporting documentation and compliance reports on file with the Bethel Board of Education, the following are recorded response actions for the ACBM noted at the Bethel High School:

- 1988 Spray-applied fireproofing insulation and a transite table top were removed and replaced from the ground floor.
- 1989 Spray-applied fireproofing insulation, thermal system pipe insulation, auditorium fire curtain and resilient floor tile and associated mastic was removed and replaced from the first floor areas.
- 1990 Spray-applied fireproofing insulation, thermal system pipe insulation, water tank insulation, boiler breeching insulation and resilient floor tile and associated mastic was removed and replaced from the front foyer, second floor areas and the basement mechanical room.

- 1998 Roof flashing and patching and duct wrapping were removed and replaced from the roof areas.
- 2006 Suspended ceiling tiles with asbestos dust were removed from classroom and cafeteria areas.
- 2006 Window frame caulk was removed from classroom areas.
- 2008 Original 9"x9" and 12"x12" floor tile and mastic were removed from Rooms 109, 110, 111, 113, G7, G10-G15. Original 9"x9" floor tile and mastic were removed from the passenger elevator, gym landings down to locker rooms and basement hall outside maintenance area. Transite laboratory table tops were removed from science wing rooms 205, 207-216 and G9. Remnant spray-applied fireproofing was removed from the basement men's locker room. Gray window glazing compound was removed from ladies and men's locker rooms and room 112. Black insulation tape was removed from the ladies shower storage and kitchen freezer. Dark brown vinyl cove base adhesive was removed from select 1970 wing corridors. Black window glazing compound was removed from room G7 and G15. Black glazing compound in windows of doors was removed from the corridor store.
- 2008 Cleaning of Bethel High School, of asbestos fibers, was performed by a licensed asbestos abatement contractor, in response to detected asbestos fiber levels above 0.005 s/cc outside an established work area.

1.5 Inventory and Classifications of ACBM

Refer to **Table II-1** for an inventory of the ACBM identified at the Bethel High School and material classifications using current USEPA AHERA guidelines. Any changes from the 2017 AMP re-inspection update in regards to the physical assessment of the ACBM were noted and the material reclassified accordingly. Refer to **Section III** of this report for ACBM hazard assessments and TRC's recommended response actions. Refer to **Section IV** for updated periodic surveillance forms for the ACBM identified at Bethel High School.

TABLE II-1
2020 AHERA REINSPECTION OF
BETHEL HIGH SCHOOL
INVENTORY AND CLASSIFICATIONS OF ACBM

DATE OF INSPECTION: December 29, 2020

Inspector/CT Lic. No.: Nicholas Selvo/001050

Location	ACBM	Assumed/ Sampled	Category*	Area	Friable	AHERA Assessment Category	Change in 2017 Assessment
Throughout 1970 and 1977 Wings (halls, classrooms, offices, etc.); Also, Rooms 118, 231, second floor telephone room/storage closet, nurses/health office, front foyer	12"x12" resilient floor tile and associated mastic or poured sheet flooring	Assumed	Misc.	~40,000 SF	No	Damaged friable miscellaneous ACBM	Yes, damaged floor tile observed at multiple locations.
Basement mechanical room boilers (beneath metal/fiberglass jacketing & on underside nipple packing)	Boiler insulation cement/gasketing/ri b packing (boiler internals assumed as well)	Sampled (1990 & 2002)	TSI	30 SF	Yes	ACBM with the potential for damage	No
1970 Internal building areas (general)	Interior fire door insulation	Sampled (1990)	TSI	900 SF (~45 doors)	Yes	ACBM with the potential for damage	No
Inaccessible building areas (chases, permanent wall spaces, etc.)	Remnant spray-applied fireproofing	Sampled (1987)	Surf.	Unknown	Yes	ACBM with the potential for damage	No
Classrooms, offices and storage rooms throughout 1970 and 1977 wings	Sink undercoating	Sampled (2004)	Misc.	~ 60 SF	No	ACBM with the potential for damage	No
Stairs #1, #3, #4 and #5 – 1970 wing	Gray expansion joint caulk	Sampled (2004)	Misc.	150 LF	No	ACBM with the potential for damage	No
Classrooms and hallways throughout 1970 and 1977 wing	Dark brown vinyl cove base adhesive	Sampled (2004)	Misc.	3,000 LF	No	ACBM with the potential for damage	No

Location	ACBM	Assumed/ Sampled	Category*	Area	Friable	AHERA Assessment Category	Change in 2017 Assessment
Entry to Stair H, Room 215 & 315	Joint compound	Sampled (2004)	Surf.	~ 8,700 SF	No	ACBM with the potential for damage	No
Rooms 217, 222, 323 & 329	Black window glazing compound	Sampled (2004)	Misc.	~ 26 LF	No	ACBM with the potential for damage	No
Doors to guidance 226, 227 & AV room	Black glazing compound in windows of doors	Sampled (2004)	Misc.	~ 72 LF	No	ACBM with the potential for damage	No
2007/2008 Addition	No ACBM identified. No ACM was used in the construction of the 2007/2008 Addition as verified by Architect's letter from Friar Associates. All materials currently in the 2007/2008 Addition are new.	NA	NA	NA	NA	NA	NA

III. ACBM HAZARD ASSESSMENT AND CONTROL RESPONSES

The performance of asbestos building investigations by an accredited inspector revealed that ACBM exists in a variety of forms within Bethel Public School buildings and administrative office areas. This section of report will assess the potential exposure to building occupants from these materials and prioritize the response actions necessary to effectively alleviate the potential hazards associated with asbestos.

The U.S. Environmental Agency has produced a document entitled *Guidance for Assessing and Managing Exposure to Asbestos in Buildings*. The USEPA report proposes the use of "decision trees" for estimating the risks posed by exposure to ACBM and recommends certain response actions which are consistent with the Asbestos Hazard Emergency Response Act (AHERA) and CTDPH Asbestos in Schools regulations. TRC's asbestos exposure assessment and recommended response actions are derived from these guidelines for each material noted. The two factors which must be evaluated when doing an exposure assessment for friable asbestos are the present condition of the ACBM and the potential for future disturbance of the ACBM. To use the USEPA's Decision Tree, the present condition of the friable ACBM is evaluated as either being significantly damaged, damaged or not damaged.

The potential for future disturbance takes into account a number of factors which include accessibility to building occupants, level of activity of building occupants, mechanical vibrations and air erosion. The response action selected for each type of ACM is sufficient to protect human health and the environment. Generally, there are five recognized courses of action to control ACBM: 1) removal and disposal; 2) repair; 3) enclose; 4) encapsulate; and 5) operations and maintenance (O&M) programs. The USEPA has indicated that there are no longer any grounds for deferring action in a building with ACBM. Even when ACBM is identified in a building and exists under ideal conditions (non-friable, minimum access, no physical damage, etc.), the absolute minimum corrective action that should be taken consists of a comprehensive O&M program and periodic surveillance/re-inspection of the building.

The recommendations for a specific corrective action or abatement measure are presented for each type of ACM in each homogeneous area. The response actions are based on the USEPA's Decision Tree, **Figure III-a**, and are in accordance with the requirements listed in CTDPH 19a-333-7 and EPA 40 CFR 763.90. The following are standard recommended response actions for various types of ACM:

Damaged or Significantly Damaged Thermal ACM:

- 1) Repair damaged areas.
- 2) Remove the damaged material if it is not feasible due to technological factors to repair the damage.
- 3) Maintain all thermal system ACM and its covering in an intact state and undamaged condition.
- 4) Implement Operation and Maintenance Program until eventual removal.

Damaged Surfacing ACM:

- 1) Repair damaged material.
- 2) Implement Operation and Maintenance Program until eventual removal.
- 3) If unable to repair damaged material, remove.

Damaged Miscellaneous ACM:

- 1) Repair damaged material.
- 2) Implement Operation and Maintenance Program until eventual removal.
- 3) If unable to repair damaged material, remove.

Significantly Damaged Surfacing ACM:

- 1) Immediately isolate the functional space and restrict access.
- 2) Remove material.

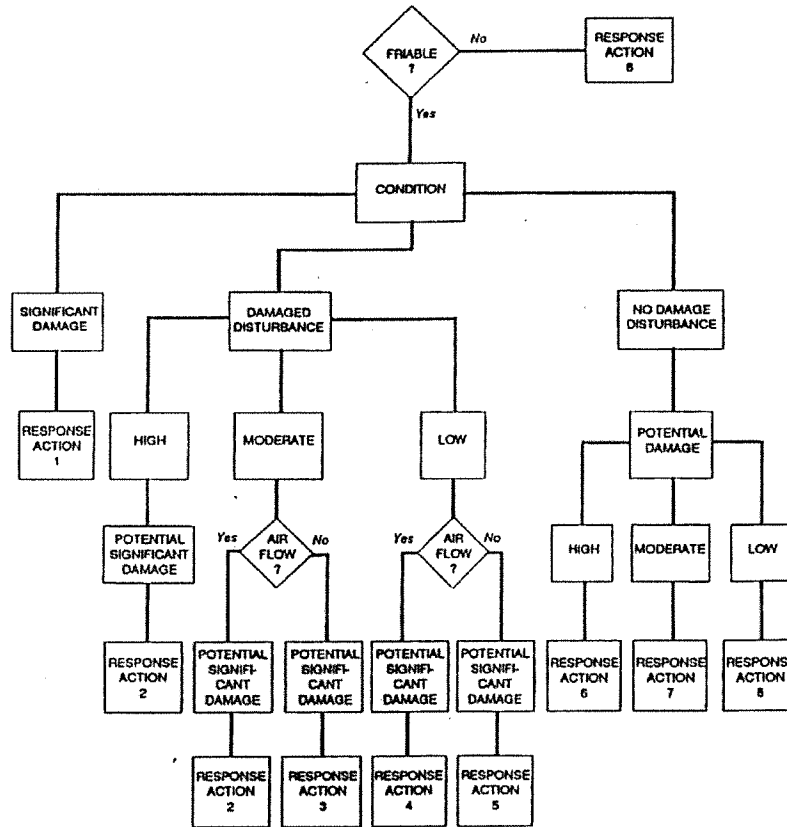
Significantly Damaged Miscellaneous ACM:

- 1) Immediately isolate the functional space and restrict access.
- 2) Remove material.

Hazard Assessment Summaries and specific recommended response actions for ACBM located in the Bethel Public School buildings and administrative office areas are included in the following tables. Refer to **Figure III-a** for the USEPA Decision Tree and subsequent response action key.

**FIGURE III-a
EPA Decision Tree and
Response Actions**

EPA DECISION TREE AND RESPONSE ACTION KEY



RESPONSE ACTIONS KEY:	
1.	Isolate area and restrict access. Remove as soon as possible.
2.	Implement O&M. Remove as soon as possible or reduce potential for disturbance.
3.	Implement O&M. Schedule removal when practical and cost-effective, or reduce disturbance.
4-5.	Implement O&M. Schedule removal when practical and cost-effective. Number indicates priority for removal.
6-7.	Implement O&M. Take preventive measures to reduce disturbance. Number indicates priority for removal.
8.	Implement O&M until major renovation or demolition requires removal under NESHAPS or until hazard assessment factors change.

Reference: Keyes, D., B. Price, and J. Chesson. *Guidance for Assessing and Managing Exposure to Asbestos in Buildings*. Draft, November 7, 1986. Section 2 (pp. 5-22), Section 3 (pp. 24-40), and Trees, p. 26 and 39.

**TABLE III-1
HAZARD ASSESSMENT AND RESPONSE ACTIONS
FOR ACBM AT THE
BETHEL HIGH SCHOOL**

ACBM	Location	Friable	Condition	Potential For Future Damage	Air Flow	Response Action *
12"x12" resilient floor tile and associated mastic or poured sheet flooring	Throughout 1970 and 1977 Wings (halls, classrooms, offices, etc.); Also, Rooms 118, 231, second floor telephone room/storage closet, nurses/health office, front foyer	No	No Damage	Moderate	No	3
Boiler insulation cement/gasketing/packing (boiler internals assumed as well)	Basement mechanical room boilers (beneath metal/fiberglass jacketing & on underside nipple packing)	Yes	No Damage	Moderate	No	7
Interior fire door insulation	1970 Internal building areas (general)	Yes	No Damage	Low	No	8
Remnant spray-applied fireproofing	Inaccessible building areas (chases, permanent wall spaces, etc.)	Yes	No Damage	Low	No	8
Sink undercoating	Classrooms, offices and storage rooms throughout 1970 and 1977 wings	No	No Damage	Low	No	8
Gray expansion joint caulk	Stairs #1, #3, #4 and #5 - 1970 wing	No	No Damage	Low	No	8

ACBM	Location	Friable	Condition	Potential For Future Damage	Air Flow	Response Action*
Dark brown vinyl cove base adhesive	Classrooms and hallways-1970 and 1977 wing	No	No Damage	Low	No	8
Joint compound	Entry to Stair H, Room 215 & 315	No	No Damage	Moderate	No	7
Black window glazing compound	Rooms 217, 222, 323 & 329	No	No Damage	Low	No	8
Black glazing compound in windows of doors	Doors to guidance 226, 227 & AV room	No	No Damage	Low	No	8
2007/2008 Addition	No ACBM identified. No ACM was used in the construction of the 2007/2008 Addition as verified by Architect's letter from Friar Associates. All materials currently in the 2007/2008 Addition are brand new.	NA	NA	NA	NA	NA

RECOMMENDED RESPONSE ACTIONS/PREVENTIVE MEASURES TO BE TAKEN AT BETHEL HIGH SCHOOL

Material	Location	Condition	Description/Recommended Response
12"x12" resilient floor tiles and associated mastic	Upper Level – Entrance south of Studio, Auditorium center & side entrances; Main Level – 3 locations in hallway outside Rooms 212 & 213; Lower Level – School entrance south east of team rooms and School entrance adjacent to Room 100	Damaged	<p><3 SF of damaged floor tile at the noted locations</p> <p>Recommended Action: Remove and replace damaged floor tiles</p>
Intact asbestos-containing materials	Throughout building	Intact	All asbestos-containing building materials and presumed asbestos-containing building materials should undergo periodic surveillance and preventive measures should be taken to avoid disturbance.
Presumed or not-sampled suspect asbestos-containing materials	Throughout building	Intact/ Damaged	Prior to any renovation/demolition activities, materials not yet confirmed as non-asbestos need to be sampled by a state of Connecticut licensed asbestos inspector and analyzed by a certified laboratory.

IV. PERIODIC SURVEILLANCE

In accordance with USEPA AHERA 40 CFR 763.92(b) and CTDPH 19a-333-9(b), periodic surveillance of the ACBM within the school buildings shall be conducted at least once every six (6) months. Each person performing periodic surveillance shall:

- (A) Visually inspect all areas that are identified in the management plan as ACBM or assumed ACBM;
- (B) Record the date of the surveillance, his or her name, and any changes in the physical condition of the materials; and
- (C) Submit a copy of such record to the designated person for inclusion in the management plan.

The following forms have been designed for periodic surveillance purposes and have been updated with the findings as of the 2020 AHERA/CTDPH re-inspection.

**TABLE IV-1
BETHEL HIGH SCHOOL
ACBM PERIODIC SURVEILLANCE FORM**

Surveillance Conducted By: _____

Signature: _____

Date Surveillance Conducted: _____

Location	ACBM Type	Condition of ACBM During 2020 AHERA Re-inspection	Current Condition of ACBM	Debris Present?	Response Actions Taken
Throughout 1970 and 1977 Wings (halls, classrooms, offices, etc.)	12"x12" resilient floor tile and associated mastic or poured sheet flooring	Damaged (See Recommended Response Actions Table for locations)			
Basement mechanical room boilers (beneath metal/fiberglass jacketing & on underside nipple packing)	Boiler insulation cement/gasketing/rib packing (boiler internals assumed as well)	No Damage			
1970 Internal building areas (general)	Interior fire door insulation	No Damage			
Inaccessible building areas (chases, permanent wall spaces, etc.)	Remnant spray-applied fireproofing	No Damage			
Classrooms, offices and storage rooms throughout 1970 and 1977 wings	Sink undercoating	No Damage			
Stairs #1, #3, #4 and #5 – 1970 wing	Gray expansion joint caulk	No Damage			
Classrooms and hallways throughout 1970 and 1977 wing	Dark brown vinyl cove base adhesive	No Damage			

Location	ACBM Type	Condition of ACBM During 2020 AHERA Re-inspection	Current Condition of ACBM	Debris Present?	Response Actions Taken
Entry to Stair H, Room 215 & 315	Joint compound	No Damage			
Rooms 217, 222, 323 & 329	Black window glazing compound	No Damage			
Doors to guidance 226, 227 & AV room	Black glazing compound in windows of doors	No Damage			
2007/2008 Addition	No ACBM identified. No ACM was used in the construction of the 2007/2008 Addition as verified by Architect's letter from Friar Associates. All materials currently in the 2007/2008 Addition are new.	---	---	---	---

APPENDIX A

**INSPECTOR/MANAGEMENT PLANNER AND
LABORATORY ACCREDITATIONS**

1000752 SP 1264 001 0007544



GREGORY A KACZYNSKI
21 LAKE DRIVE
HARWINTON CT 06791



Dear GREGORY A KACZYNSKI,

Attached you will find your validated certificate for the coming year. Should you have any questions about your certificate renewal, please do not hesitate to write or call:

Department of Public Health
P.O. Box 340308
M.S.#12MQA
Hartford, CT 06134-0308

(860) 509-7603
oplc.dph@ct.gov
www.ct.gov/dph/license

Sincerely,

DEIDRE S. GIFFORD, MD, MPH, ACTING COMMISSIONER
DEPARTMENT OF PUBLIC HEALTH

EMPLOYER'S COPY

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

NAME
GREGORY A KACZYNSKI

VALIDATION NO	CERTIFICATE NO	CURRENT THROUGH
03-833690	000329	07/31/21

PROFESSION
ASBESTOS CONSULTANT-INSP/MGMT PLANNER

SIGNATURE

ACTING COMMISSIONER

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

PURSUANT TO THE PROVISIONS OF THE GENERAL STATUTES OF CONNECTICUT
THE INDIVIDUAL NAMED BELOW IS CERTIFIED
BY THIS DEPARTMENT AS A
ASBESTOS CONSULTANT-INSP/MGMT PLANNER

GREGORY A KACZYNSKI	CERTIFICATE NO 000329
	CURRENT THROUGH 07/31/21
	VALIDATION NO 03-833690

SIGNATURE

ACTING COMMISSIONER

INSTRUCTIONS:

1. Detach and sign each of the cards on this form.
2. Display the large card in a prominent place in your office or place of business.
3. The wallet card is for you to carry on your person. If you do not wish to carry the wallet card, place it in a secure place.
4. The employer's copy is for persons who must demonstrate current licensure certification in order to retain employment or privileges. The employer's card is to be presented to the employer and kept by them as a part of your personnel file. Only one copy of this card can be supplied to you.

WALLET CARD

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

NAME
GREGORY A KACZYNSKI

VALIDATION NO	CERTIFICATE NO	CURRENT THROUGH
03-833690	000329	07/31/21

PROFESSION
ASBESTOS CONSULTANT-INSP/MGMT PLANNER

SIGNATURE

ACTING COMMISSIONER

CERT#: A-508-V591

**CHEMSCOPE TRAINING DIVISION
ASBESTOS INSPECTOR/MANAGEMENT PLANNER REFRESHER
8-HOUR TRAINING CERTIFICATE**

Gregory Kaczynski

21 Lake Drive, Harwinton CT

Has attended an 8-hour course on the subject discipline on
9/25/2020 and has passed a written examination.

"The person receiving this certificate has completed the requisite training required for asbestos accreditation as an inspector/management planner under TSCA Title II"

Course topics include a review and update on asbestos health hazards, functions of inspectors and management planners, building systems, planning, inspecting for asbestos, sampling and analysis, respiratory protection, government regulations and preparing the inspection report.

The training course has been accredited by the State of Connecticut.

Examination 1 Score: 92%

Examination 2 Score: 97%

Exam Date: 9/25/2020

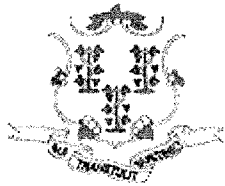
Expiration Date: 9/25/2021



Daniel Sullivan
Training Manager



Chem Scope, Inc.
15 Mouthrop Street
North Haven CT 06473
Phone: 203.865.5605
www.chem-scope.com



State of Connecticut

Lookup Detail View

Name

Name
NICHOLAS H SELVO

License Information

lookup

License Type	License Number	Expiration Date	Granted Date	License Name	License Status		Licensure Actions or Pending Charges
Asbestos Consultant-Inspector	1050	02/28/2021	08/30/2019	NICHOLAS H SELVO	ACTIVE	CURRENT	None

Generated on: 4/6/2020 10:36:40 AM

CERTIFICATE OF ACHIEVEMENT

This certifies that

Nicholas Selvo

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

Course training provided via
a live Webinar.

conducted by

Exam Score: 96

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

[Signature]
Principal Instructor: Thomas Dion

May 21, 2020

Date of Course

May 21, 2021

Expiration Date

[Signature]
Regional Training Manager: Gregory Morsch

SIAR - 6600
Certificate Number

May 21, 2020

Examination Date

APPENDIX B

**CTDPH LEA THREE-YEAR REINSPECTION REPORT
FORM**

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt Governor

LOCAL EDUCATION AGENCY (LEA) MANDATORY REPORT DOCUMENTATION OF THREE-YEAR REINSPECTION FOR ASBESTOS-CONTAINING MATERIALS

INSTRUCTIONS: Form must be typed or prepared electronically. Digital signatures are acceptable. The LEA may submit the form electronically to DPH.Asbestos@ct.gov or mail to the Department of Public Health at 410 Capitol Avenue, MS #51 AIR, PO Box 340308, Hartford, CT. 06134-0308

Sections 1-2: Management Planner (MP) shall complete and submit form electronically to the LEA Designated Person (DP). If MP recommends a response action **other than operations and maintenance (O&M) and/or Preventive Measures**, submit Attachment A, detailing the specific recommendations for each school.

Section 3: Local education agency (LEA) shall complete and submit to the DPH within thirty-(30) days of the date of the reinspection. The DP must list the course name, dates and hours of training received to carry out the LEA's duties. If the DP satisfied training requirement by reading the *DP's Self Study Guide*, specify the dates and number of hours it was read. Upon submittal to the DPH, the DP must place a copy of the form and Attachment A, if applicable, in the asbestos management plan for each school, and send a completed copy of the form to the MP.

SECTION 1:

LEA	Street Address	City and Zip code
Bethel Public Schools	1 School Street	Bethel, 06801
Initial Approval:	Last 3-Year Reinspection Date/s	Current Reinspection Date/s:
1990/1993	March 2017	December 2020
Management Planner	Lic # License Exp.	Accred Exp. Date Signature
Gregory Kaczynski	000329-07/31/21	09/25/21
Inspector 1	Lic # License Exp. 1	Accred Exp. Date 1 Signature 1
Nicholas Selvo	001050-02/28/21	05/21/21
Inspector 2	Lic # License Exp. 2	Accred Exp. Date 2 Signature 2
Inspector 3	Lic # License Exp. 3	Accred Exp. Date 3 Signature 3

DPH

Phone (860) 509-7367 • Fax (860) 509-7378
410 Capitol Avenue, MS #51 AIR • P.O. Box 340308
Hartford, Connecticut 06134-0308
www.ct.gov/dph

From us - A Non Equal Opportunity Employer

If the MP only recommends O&M (less than 3 square feet or 3 linear feet) or preventive measures, Section 2 and Appendix 1 are not applicable. MP recommendations other than O&M, please check the column below for each school. If MP recommends initial cleaning (IC) or additional cleaning (AC), as a result of the inspection findings, please note with IC or AC or leave blank.

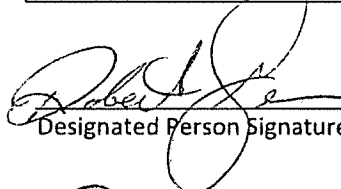
SECTION 2 (If space is inadequate, please attach additional pages)

School Name	Address	MP Recommendations	Cleaning (IC or AC)
Anna H. Rockwell School, 400 Whittlesey Drive	(Complete Renovation of School - No ACBM letter from Architect to follow)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Bethel High School	300 Whittlesey Drive	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Bethel Middle School, 600 Whittlesey Drive	(Previously Renovated - No ACBM letters are attached)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Frank A. Berry School	200 Whittlesey Drive	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
RMT Johnson School, 500 Whittlesey Drive	(Complete Renovation of School - No ACBM letter from Architect to follow)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	
		Yes <input type="checkbox"/> No <input type="checkbox"/>	


SECTION 3

Superintendent/Head of School	Designated Person	DP Training Course (Name, Date, #of Hours)
Dr. Christine Carver	Robert Germinaro	Online 2 hr Asbestos Awareness training for D.P. - 10/12/16
Designated Person Phone	Designated Person Cell	Designated Person Email
203-794-8609	203-948-2139	germinarob@bethel.k12.ct.us

I understand my responsibilities as the designated person, and have reviewed the management planner's recommendations. I certify that the general local education agency responsibilities, as stipulated by Section 19a-333-2 of the Regulations of Connecticut State Agencies, have been (or will be) met.


 Designated Person Signature

11/4/20
 Date


 Superintendent of Schools

11/4/20
 Date:



TRC Environmental Corporation

5 Waterside Crossing
Windsor, CT 06095
☎ (203) 289-8631 Fax (203) 298-6399

November 15, 1993

Mr. Joseph Zelensky
Bethel Public Schools
9 Nashville Road
Bethel, Connecticut 06801

Dear Mr. Zelensky:

As per the attached statements, the new middle school is free of asbestos. Under AHERA, the Bethel Board of Education is still required to maintain an Asbestos Management Plan in the central office and at the Middle School and to notify parents, teachers, and staff of the availability of this plan on an annual basis.

If there are further questions, please call me at (203) 289-8631.

Sincerely yours,

TRC ENVIRONMENTAL CORPORATION

Edmund J. Burke, P.E.
Management Planner

CARLIN • POZZI • CHIN
ARCHITECTS, P.C.

6 August, 1991

PAUL E. POZZI, A.I.A.
DAVID M. CHIN, A.I.A.

Environmental Protection Agency
Regional Administrator
J.F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

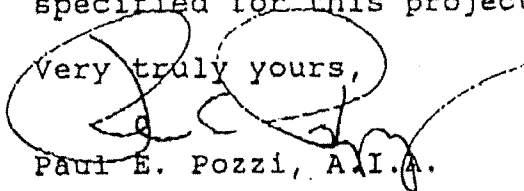
RE: NEW MIDDLE SCHOOL
BETHEL, CONNECTICUT

To the Regional Administrator:

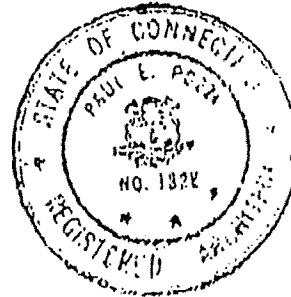
Enclosed please find reports from DiSalvo MacDonald Ericson,
Consulting Structural Engineers; and D.C.Allen, Inc.,
Mechanical and Electrical Engineers stating that upon
inspection asbestos materials were not specified in any
Construction Documents for the above referenced facility.

I am in concurrence with these two firms and their
conclusion that no materials containing asbestos were
specified for this project.

Very truly yours,


Paul E. Pozzi, A.I.A.

cc: C. Hurgin, R. Gilchrest



3 Lincoln Street
New Haven
Connecticut, 06510
(203) 777-7323
Fax: (203) 787-1912

D.C. ALLEN, INC.
800 Cottage Grove Road
BLOOMFIELD, CONNECTICUT 06002

(203) 243-1701

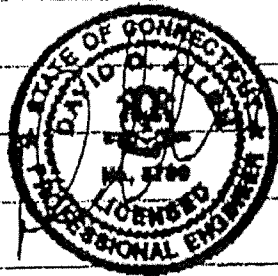
PAUL E. POZZI

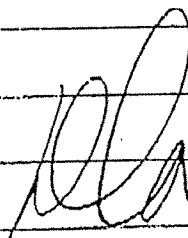
DATE 7/26/91

SUBJECT BETHEL M. S.

ASBESTOS

I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE,
NO ASBESTOS CONTAINING MATERIALS HAVE BEEN
SPECIFIED IN THE DOCUMENTS PREPARED BY THIS
OFFICE FOR THIS BUILDING



SIGNED 

PLEASE REPLY NO REPLY NECESSARY

Di Salvo MacDonald Ericson - consulting structural engineers

15 Danbury Road, Ridgefield, CT 06877
(203) 438 - 9581
(203) 431 - 6168 FAX

Richard S. Di Salvo, P.E.
John M. MacDonald, P.E.
Nils V. Ericson, P.E.

H. Clay Hines, P.E.
Ronald J. Kelly, P.E.
Kenneth D. Jones, P.E.
Robert W. Richardson, Jr., P.E.
Bruce D. Richardson, P.E.
Barry A. Cohen, P.E.
Edwin R. Springer, Jr., P.E.

July 31, 1991

Mr. Paul E. Pozzi, AIA
Carlin, Pozzi, Chin Architects
3 Lincoln Street
New Haven, CT 06510

Re: Bethel Middle School
Project No. 88403

Dear Mr. Pozzi:

I am writing in response to the request of Mr. Joseph Zelensky contained in his memo to the Permanent Building Committee dated, July 24, 1991.

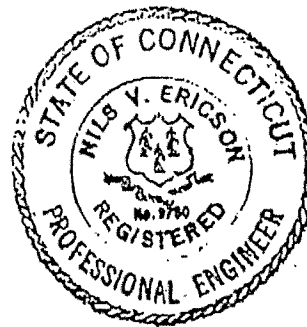
As the Structural Engineer-of-Record for the new school facility, we can state that to the best of our knowledge, information and belief, none of the primary structural system elements specified, detailed or described in our construction documents contains asbestos.

Sincerely,



Nils V. Ericson, P.E.

NVE:taf



Fishkill, NY
Middlebury, CT



American Consulting
Engineers Council Member
Supporting Excellence
In Engineering

APPENDIX C
SCHOOL NOTICE TO SHORT TERM WORKERS FORM

