# Three-Year Reinspection Report

#### Site:

Wiley Elementary School 1602 S. Anderson Street Urbana, IL 61801

Local Education Agency: Urbana S.D. 116 205 N. Race Street Urbana, IL 61802

Date: 2/22/2019

Ideal Number: 21302



### **Reinspection Introduction**

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

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

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

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

The inspector's assessments are reviewed by an EPA/AHERA-accredited, IDPH-licensed asbestos management planner. When assessment information was previously provided, whether it be from the initial inspection or a subsequent reinspection, the assessments for this reinspection will include any changing factors for each material, such as friability, vibration, deterioration, damage, use of room, etc. If the changes warrant revisions to previous response actions, then revised response actions are provided. Revised response action schedules, when provided, are completed by the management planner. When assessment information was *not* previously provided, this reinspection will only provide the current condition of the material.



## **Reinspection Report Description**

The following is a general description of the pages that may be found in this reinspection report.

#### **Reinspection Information**

A general information page is followed by an asbestos program overview. The overview, when available, provides a general overview of activities that have occurred since the onset of the asbestos program. After the overview are attestments by the inspector and management planner. They certify that they have performed the reinspection according to reinspection regulations.

The inventory of known and assumed asbestos containing materials (ACM) describes whether or not changes have occurred to the condition of these materials within the last three years and provides the inspector's assessment. It indicates a material's current physical condition and friability, and it summarizes the current response action for each friable material.

Directly following this data may be an inventory of any materials which were assumed to contain asbestos or which were sampled during the reinspection. Recommendations on how to treat these materials are provided.

The reinspection general overview provides comments about the asbestos program.

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

#### Materials Sampled/Assumed During Reinspection

If sampling or assuming of suspect ACM was done, the purpose will be summarized. Inspection report pages, diagrams, laboratory results and sampling protocol are typical supporting documentation. If sampling or assuming was not done, this section may be omitted from the report.

#### **Response Actions & Amendments**

All friable known or assumed ACM requires a response action. Response actions are prepared by management planners and provide the LEA with appropriate actions to take with their asbestos materials (i.e. repair or removal). If a material needs a new or revised response action, detailed documentation is in this section. The management planner will typically use a schematic guideline called a decision tree to assist in determining response actions.

Time lines for completing response actions are prepared by a management planner. If a time line has not been met for a material (i.e. repair the material within one year), then the response action has expired, and a new time line is necessary. New time lines are typically implemented by an amendment to the original response action. If amendments are prepared during this reinspection, the information can be found in this section.

If new or revised response actions or time lines were not done, this section may be omitted from the report.

#### School Information Form

The school information form is required to be filled out and sent to IDPH. This section may contain a transmittal sheet indicating that the completed form was sent to IDPH on the LEA's behalf.

Current license and accreditation certificates are provided for the inspector and management planner. If sampling was done, current accreditation is provided for the laboratory.

General definitions and comments are provided, which help explain some of the terminology of an asbestos program. A general information checklist describing the record-keeping requirements of an asbestos program is also provided.

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



## **General Information Page**

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

School Building:	Wiley Elementary School 1602 S. Anderson Street Urbana, IL 61801 Champaign County
Phone:	217-384-3670
School ID#:	09-010-1160-2013
Total Square Feet:	43,200
Approx. Bldg Construction Dates:	1951, 1954
Associated Outbuildings:	None
Three-Year Reinspection Date:	2/22/2019
IDEAL Number:	21302
Inspector:	Steve Rock
Inspector ID#:	100-05617
State of Accreditation:	IL .
Management Planner:	Jerry L. Wilson
Management Planner ID#:	100-01338
State of Accreditation:	IL
Local Education Agency:	Urbana S.D. 116
Loodi Ladoution / gonoy.	205 N Race Street
	Lirbana II 61802
	Champaign County
Dhana	217_38/_3636
	Mr. Matthew Abbatages, Director of Equilities Convictor
Contact:	with watthew Abbatessa, Director of Facilities Services



### Asbestos Program Overview

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

Additional Sampling*	Some additional sampling has taken place. Prior to any further sampling, school should review previous documentation to determine if materials have already been sampled.
	Please note that in January, 2007, a flooring materials sampling event took place. Please refer to the January 2007 supplement report for detailed information regarding flooring materials.
Abatement Projects*	In 6/1989, a large-scale abatement project took place involving the removal of some thermal system insulation materials (TSI) and floor tile. In 6/1994, the boiler room, tunnels and mechanical rooms were abated. In 6/1999, some areas of floor tile, floor tile mastic and carpet mastic were removed. In 6/2009 floor tile, base cove and all associated mastics were removed. Asbestos abatement design work also took place in 9/2007 and 6/2011.
Floor Tile Removal Projects*	Various floor tile removal projects have taken place, such as in 2004, 2006, 2008, and 2009.
Major Renovation	No major renovation activities have taken place.
Building Additions	No building additions have been added.
Demolition Activities	No demolition activities have taken place.
Tunnel/Crawlspace Information	A tunnel/crawlspace system is found in this school. The asbestos containing thermal system insulation materials in the tunnels were removed 6/1994.
Exterior Porticos, Covered Hallways & Covered Walkways	One or more porticos, covered hallways or covered walkways are present, and suspect asbestos containing materials in those areas have been accounted for during this reinspection.
Outbuilding Comments	No associated outbuildings are present at this site.
Additional Notes	None



\*See General Definitions page.

### **Inspector/Management Planner Attestment**

#### INSPECTOR REINSPECTION ATTESTMENT

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

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

- Vibration
- Deterioration
- Physical damage
- Accessibility
- Proximity of the material to areas requiring maintenance
- Barriers
- Ventilation
- Air movement
- Use of room
- Rooms used above and adjacent to the ACBM areas
- Not applicable, as no accessible friable or non-friable asbestos containing materials are in the building. However, it is important to note that known or assumed asbestos containing materials exist or may exist in the building in inaccessible areas such as behind walls and above ceilings.

Inspector Signature

<u>/00 50/7</u> <u>2/22/19</u> IDPH License # Date

#### MANAGEMENT PLANNER REINSPECTION ATTESTMENT

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

 100-01338
 4/1/19

 IDPH License #
 Date

Management Planner Signature





Inventory of known and assumed asbestos containing materials as identified prior to this inspection date - Page 1 of 4 Prior to any renovation or demolition, a specific inspection for localized and/or hidden suspect asbestos containing areas needs to be completed

	Inspector's Reinspection Findings & Reassessment												Management Planner's Comments						
			Sampled &				Prior Assessment		1. 11	CURRENT ASSESSMENT	Prior Assessment		CURRENT ASSESSMENT	100					
Area ID	Area Description	Area Location	Type of Analysis or Assumed	Materia Type	Damage Condition	Friable	Change in Physical Condition, Potential for Damage Assessment, & General Comments	Damage Condition	Friable	Change in Physical Condition, Polential for Damage Assessment, & General Comments	Management Planner Recommendations	Response Action #	Management Planner Recommendations	Response Action #					
1B (inaccessible)	Heat System Fitlings	1951 Orig Bldg Inaccessible Areas	Sampled PLM	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls,	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
1BZ (inaccessible)	Domestic Water Line Pipe Insulation	1951 Orig Bldg Inaccessible Areas	Assumed	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
1C (inaccessible)	Heat System Pipe Insulation	1951 Orig Bldg Inaccessible Areas	Sampled PLM	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
1E (inaccessible)	Domestic Water Line Fitting Insulation	1951 Orig Bldg Inaccessible Areas	Sampled PLM	т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
2B (inaccessible)	Heat System Pipe Insulation	1951 Orig Bldg Inaccessible Areas	Sampled PLM	т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
2E (inaccessible)	Domestic Water Line Fitting Insulation	1951 Orig Bldg Inaccessible Areas	Sampled PLM	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
2F (inaccessible)	Domestic Water Line Pipe Insulation	1951 Orig Bldg Inaccessible Areas	Sampled PLM	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
2H (inaccessible)	Heat System Fittings	1951 Orig Bldg Inaccessible Areas	Sampled PLM	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls,	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
3AZ (inaccessible)	Heat System Fittings	1954 Addtn Inaccessible Areas	Assumed	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls,	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
3BZ (inaccessible)	Heat System Pipe Cover	1954 Addtn Inaccessible Areas	Assumed	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls,	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					
3CZ (inaccessible)	Domestic Water Line Fitting Insulation	1954 Addtn Inaccessible Areas	Assumed	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	D	Yes	Material is assumed to be present and damaged in Inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4					

Known & assumed ACMs installed at the time of initial inspection and which remain in the building as of this date are noted. This report also includes any subsequently installed materials which are documented in the management plan as known or assumed ACMs. Information listed above reflects current information on file for the areas. The asbestos program is a compilation of ongoing and continually changing information. Therefore, this information and management plan report information and subsequent asbestos documentation prior to the date of this reinspection. Areas which were removed and clearly reported as such on previous reports are not listed. Changes in physical condition are observed changes since the last report. For change in physical condition, "no apparent changes" for inaccessible areas, tunnels or crawlspaces means an assumption of no changes. ACM = Asbestos Containing Material Non-ACM = Non-Asbestos Containing Material

Material Type:

Damage Condition:

ND=Not Damaged D=Damaged SD=Significantly Damaged

PLM = Polarized Light Microscopy TEM = Transmission Electron Microscopy N/A = Not Applicable

M=Miscellaneous S=Surfacing T=Thermal

Response Actions and Priority (lower numbers indicate higher priority for remediation):

1: For thermal system insulation materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access if needed, Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials. For surfacing and miscellaneous materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access. Remove all damaged materials in the functional space(s), unless enclosure or encapsulation is sufficient to contain fibers. For all ACM not removed: Maintain ACM in good condition under O&M program.

2: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.

Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program. 3

4 Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program.

5: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, response actions other than O&M, including area isolation, may be required. Maintain ACM in good condition under O&M program. 6: Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M Program.

7: Maintain ACM in good condition under O&M program.

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Wiley Elementary School School ID#: 09-010-1160-2013 Reinspection Date: 2/22/2019

O&M = operations & maintenance



Inventory of known and assumed asbestos containing materials as identified prior to this inspection date - Page 2 of 4 Prior to any renovation or demolition, a specific inspection for localized and/or hidden suspect asbestos containing areas needs to be completed.

Inspector's Reinspection Findings & Reassessment											Management Planner's Comments					
		Sampled &				Prior Assessment		IT IT ST	CURRENT ASSESSMENT	Prior Assessment		CURRENT ASSESSMENT				
Area ID	Area Description	Area Location	Type of Analysis or Assumed	Materia Type	Damage Condition	Friable	Change in Physical Condition, Potential for Damage Assessment, & General Comments	Damage Condition	Friable	Change in Physical Condition, Potential for Damage Assessment, & General Comments	Management Planner Recommendations	Response Action #	Management Planner Recommendations	Response Action #		
3DZ (inaccessible)	Domestic Water Line Pipe Insulation	1954 Addtn Inaccessible Areas	Assumed	Т	D	Yes	Material is assumed to be present and damaged in inaccessible areas.	d b	Yes	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4	Ensure care is taken if accessing areas where material is likely to be found, such as above ceilings and behind walls.	4		
28	Heat System Pipe Insulation	1951 Orig Bldg Above Ceilings By Stage & Custodial Office	Sampled PLM	Т	ND	Yes	No apparent changes in condition, Low potential for damage under normal conditions,	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions.	Monitor any damage, Ensure O&M is being completed.	7	Monitor any damage. Ensure O&M is being completed.	7		
2H	Heat System Fittings	1951 Orig Bldg Above Ceilings By Stage & Custodial Office	Sampled PLM	Т	ND	Yes	No apparent changes in condition, Low potential for damage under normal conditions,	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions.	Monitor any damage, Ensure O&M is being completed.	7	Monitor any damage. Ensure O&M is being completed.	7		
3AZ	· Heat System Fittings	1954 Addtn (except inaccessible areas)	Assumed	Т	ND	Yes	No apparent changes in condition, Low potential for damage under normal conditions, Sample to determine asbestos content.	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions.	Monitor any damage. Ensure O&M is being completed.	7	Monitor any damage. Ensure O&M is being completed.	7		
3BZ	Heat System Pipe Cover	1954 Addtn (except inaccessible areas)	Assumed	т	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions. Sample to determine asbestos content.	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions.	Monitor any damage, Ensure O&M is being completed,	7	Monitor any damage. Ensure O&M is being completed.	7		
3CZ	Domestic Water Line Fitting Insulation	1954 Addtn (except inaccessible areas)	Assumed	Т	ND	Yes	No apparent changes in condition, Low potential for damage under normal conditions, Sample to determine asbestos content.	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions.	Monitor any damage, Ensure O&M is being completed,	7	Monitor any damage. Ensure O&M is being completed.	7		
3DZ	Domestic Water Line Pipe Insulation	1954 Addtn (except inaccessible areas)	Assumed	Ŧ	ND	Yes	No apparent changes in condition Low potential for damage under normal conditions. Sample to determine asbestos content.	ND	Yes	No apparent changes in condition. Low potential for damage under normal conditions.	Monitor any damage, Ensure O&M is being completed,	7	Monitor any damage. Ensure O&M is being completed.	7		
51SPEA	Textured Plaster	1951 Orig Bldg & 1954 Addtn Exterior Overhangs, Eaves & Entries (homogenous across bldg years)	Sampled PLM	S	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change	N/A		
No#	Rough-Finished Plaster	1951 Orig Bldg Hall Areas by Boiler Room	Assumed	S	ND	No	Area location has been updated, No apparent changes in condition, Sample to determine asbestos content,	ND	No	Area location has been updated. No apparent changes in condition.	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A		
MCA	2x4 White Fissured Lay-In Ceiling Panels	1951 Orig Bldg Rooms 11, 11A & 22	Sampled PLM	М	ND	Yes		ND	Yes	Material appears to remain in good condition		5	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	5		
07MGF	Vapor Barrier Materials Below Wood Flooring	1951 Orig Bldg Gym	Assumed	М	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A		

Known & assumed ACMs installed at the time of initial inspection and which remain in the building as of this date are noted. This report also includes any subsequently installed materials which are documented in the management plan as known or assumed ACMs. Information listed above reflects current information on file for the areas. The asbestos program is a compilation of ongoing and continually changing information. Therefore, this information and management plan report information and subsequent asbestos documentation prior to the date of this reinspection. Areas which were removed and clearly reported as such on previous reports are not listed. Changes in physical condition are observed changes in physical condition, "no apparent changes" for inaccessible areas, tunnels or crawlspaces means an assumption of no changes. ACM = Asbestos Containing Material Non-ACM = Non-Asbestos Containing Material O&M = operations & maintenance Material Type:

M=Miscellaneous S=Surfacing T=Thermal

Damage Condition:

ND=Not Damaged D=Damaged SD=Significantly Damaged

PLM = Polarized Light Microscopy TEM = Transmission Electron Microscopy N/A = Not Applicable

Response Actions and Priority (lower numbers indicate higher priority for remediation):

1: For thermal system insulation materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials. For surfacing and miscellaneous materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access. Remove all damaged materials in the functional space(s), unless enclosure or encapsulation is sufficient to contain fibers. For all ACM not removed: Maintain ACM in good condition under O&M program.

2: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.

Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program. 3.

4: Remove, enclose, encapsulate or repair to correct damage, Maintain ACM in good condition under O&M program.

5: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, response actions other than O&M, including area isolation, may be required. Maintain ACM in good condition under O&M program 6: Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M Program.

7: Maintain ACM in good condition under O&M program.

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Wiley Elementary School School ID#: 09-010-1160-2013 Reinspection Date: 2/22/2019



Inventory of known and assumed asbestos containing materials as identified prior to this inspection date – Page 3 of 4 Prior to any renovation or demolition, a specific inspection for localized and/or hidden suspect asbestos containing areas needs to be completed.

				Management Planner's Comments										
			Sampled 8				Prior Assessment	120 10	i ceni	CURRENT ASSESSMENT	Prior Assessment		CURRENT ASSESSMENT	0.0
Area ID	Area Description	Area Location	Type of Analysis or Assumed	Materia Type	Damage Condition	Friable	Change in Physical Condition, Potential for Damage Assessment, & General Comments	Damage Condition	Friable	e Change in Physical Condition, Potential for Damage Assessment, & General Comments	Management Planner Recommendations	Response Action #	Management Planner Recommendations	Response Action #
1AZ	Fire Door	1951 Orig Bldg Boiler Room & Office	Assumed	Μ	ND	No	No apparent changes in condition,	ND	No	No apparent changes in condition,	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
2A	Flex Duct Connector	1951 Orig Bldg Above Ceilings by Stage	Assumed	Μ	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
2AZ	Transite Panels	1951 Orig Bldg Custodial Room/Copy Room Partition Wall (assumed to be below drywall)	Assumed	Μ	ND	No	This material was not accessed, It is assumed that no changes have taken place.	ND	No	Material is assumed to remain in good condition.	Ensure care is taken if accessing areas below drywall,	N/A	Ensure care is taken if accessing areas below drywall where material is assumed to exist.	N/A
2C	Duct Lining	1951 Orig Bldg Above Ceilings by Stage	Assumed	M	D	No	This material was not accessed. It is assumed that no changes have taken place.	D	No	Material is assumed to remain damaged.	Ensure care is taken if accessing areas above ceilings.	N/A	Ensure care is taken if accessing areas above ceilings where material exists.	N/A
2C (inaccessible)	Duct Lining	1951 Orig Bldg Inaccessible Areas	Assumed	Μ	D	No	Material is assumed to be present and damaged in inaccessible areas,	D	No	Material is assumed to be present and damaged in inaccessible areas.	Ensure care is taken if accessing areas where ducts are likely to be found, such as above ceilings and behind walls.	N/A	Ensure care is taken if accessing areas where ducts are likely to be found, such as above ceilings and behind walls.	N/A
2G	Vinyl Wall Covering Mastic	1951 Orig Bldg Various Classroom Walls	Assumed	М	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
3FZ	Gypsum Board & Compound	1954 Addtn Rooms 16 & 36, Janitor's Office/Copy Room	Assumed	Μ	ND	No	No apparent changes in condition. Area location updated.	ND	No	No apparent changes in condition.	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
51CTAM	1x1 Uniform Peghole Ceiling Tile Mastic	1951 Orig Bldg Corridors (except east/west hall adjacent to gym)	Sampled TEM	М	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Ceramic Tile Grout	1951 Orig Bldg Room 26 Men's Restroom	Assumed	Μ	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change,	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Ceramic Tile Mastic	1951 Orig Bldg Room 26 Men's Restroom	Assumed	M	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A
No#	Interior Window Caulk	1951 Orig Bldg & 1954 Addtn Throughout	Assumed	M	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A

Known & assumed ACMs installed at the time of initial inspection and which remain in the building as of this date are noted. This report also includes any subsequently installed materials which are documented in the management plan as known or assumed ACMs. Information listed above reflects current information on file for the areas. The asbestos program is a compilation of ongoing and continually changing information. Therefore, this information and management plan report information and subsequent asbestos documentation prior to the date of this reinspection. Areas which were removed and clearly reported as such on previous reports are not listed. Changes in physical condition are observed changes since the last report. For change in physical condition, "no apparent changes" for inaccessible areas, tunnels or crawlspaces means an assumption of no changes. ACM = Asbestos Containing Material Non-ACM = Non-Asbestos Containing Material PLM = Polarized Light Microscopy N/A = Not Applicable O&M = operations & maintenance Material Type: Damage Condition:

M=Miscellaneous S=Surfacing T=Thermal

ND=Not Damaged D=Damaged SD=Significantly Damaged TEM = Transmission Electron Microscopy

Response Actions and Priority (lower numbers indicate higher priority for remediation):

1: For thermal system insulation materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials. For surfacing and miscellaneous materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access. Remove all damaged materials in the functional space(s), unless enclosure or encapsulation is sufficient to contain fibers. For all ACM not removed: Maintain ACM in good condition under O&M program.

2: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.

Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program. 3:

Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program. 4.

5: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, response actions other than O&M, including area isolation, may be required. Maintain ACM in good condition under O&M program. 6: Take preventative measures to reduce likelihood that damage will occur. Maintain ACM in good condition under O&M Program.

7: Maintain ACM in good condition under O&M program.

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Wiley Elementary School School ID#: 09-010-1160-2013 Reinspection Date: 2/22/2019



Inventory of known and assumed asbestos containing materials as identified prior to this inspection date - Page 4 of 4 Prior to any renovation or demolition, a specific inspection for localized and/or hidden suspect asbestos containing areas needs to be completed.

Inspector's Reinspection Findings & Reassessment												Management Planner's Comments				
		Sampled &				Prior Assessment	CURRENT ASSESSMENT			Prior Assessment		CURRENT ASSESSMENT				
Area ID	Area Description	Area Location	Type of Analysis or Assumed	Materia Type	Damage Condition	Friable	Change in Physical Condition, Potential for Damage Assessment, & General Comments	Damage Condition	Friable	Change in Physical Condition, Potential for Damage Assessment, & General Comments	Management Planner Recommendations	Response Action #	Management Planner Recommendations	Response Action #		
No#	Sink Undercoating Insulation	Various Areas	Assumed	М	ND	No		ND	No	Material appears to remain in good condition.		N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A		
No#	Slate Interior Window Sills	1951 Orig Bldg & 1954 Addtn Throughout (some painted over)	Assumed	М	ND	No	No apparent changes in condition,	ND	No	Area Location clarified. No apparent changes in condition.	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A		
No#	Wall Board Mastic (blackboard, bulletin board)	1951 Orig Bldg & 1954 Addtn Various Areas	Assumed	M	ND	No	No apparent changes in condition.	ND	No	No apparent changes in condition.	Monitor any damage, Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A	Monitor any damage. Ensure O&M is being completed until renovation or demolition requires removal, or until assessment factors change.	N/A		

Known & assumed ACMs installed at the time of initial inspection and which remain in the building as of this date are noted. This report also includes any subsequently installed materials which are documented in the management plan as known or assumed ACMs. Information listed above reflects current information on file for the areas. The asbestos program is a compilation of ongoing and continually changing information may no longer coincide with original asbestos inspection and management plan report information and subsequent asbestos documentation prior to the date of this reinspection. Areas which were removed and clearly reported as such on previous reports are not listed. Changes in physical condition are observed changes ince the last report. For change in physical condition, "no apparent changes" for inaccessible areas, tunnels or crawlspaces means an assumption of no changes. ACM = Asbestos Containing Material Non-ACM = Non-Asbestos Containing Material PLM = Polarized Light Microscopy Damage Condition: N/A = Not Applicable O&M = operations & maintenance Material Type:

M=Miscellaneous S=Surfacing T=Thermal

D=Damaged SD=Significantly Damaged ND=Not Damaged

TEM = Transmission Electron Microscopy

Response Actions and Priority (lower numbers indicate higher priority for remediation):

1: For thermal system insulation materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access if needed. Repair all damaged materials in the functional space(s). If it is not feasible to repair, remove the damaged materials. For surfacing and miscellaneous materials: Immediately isolate the functional space(s) which is significantly damaged, and restrict access. Remove all damaged materials in the functional space(s), unless enclosure or encapsulation is sufficient to contain fibers. For all ACM not removed: Maintain ACM in good condition under O&M program.

2: Take preventative measures to reduce potential for significant damage. If preventative measures cannot be effectively implemented, isolate the area until the material can be removed, enclosed, encapsulated or repaired to correct damage. Maintain ACM in good condition under O&M program.

3: Take preventative measures to reduce likelihood further damage will occur. Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program

Remove, enclose, encapsulate or repair to correct damage. Maintain ACM in good condition under O&M program. 4:

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7: Maintain ACM in good condition under O&M program

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Wiley Elementary School School ID#: 09-010-1160-2013 Reinspection Date: 2/22/2019



## **Reinspection General Overview**

A general overview of the asbestos management plan, comments and recommendations for this building - Page 1 of 5

#### SAMPLING ADVISORY

Any time assumed asbestos containing plaster, spray-on ceiling materials, ceiling tile, ceiling panels and drywall/drywall joint compound are present in a school, they should be sampled to see if they contain asbestos. This is due to their disturbance and friability factors. They should also be sampled even if they are newly installed materials. If disturbed, each of these materials have a high potential for an asbestos major fiber release if they are asbestos containing.

All ceiling tile and ceiling panels were required to be sampled during the initial inspection per IDPH sampling regulations. Therefore, today, in a school's asbestos management plan documentation, all ceiling tile and panels should be documented as sampled. If they are still listed as assumed, they should be sampled to comply with the law.

It is recommended that all non-friable organically bound (NOB) materials, such as floor tiles, mastics, and terrazzo, be analyzed by Transmission Electron Microscopy (TEM) to verify asbestos content. Most laboratories recommend this on their analysis reports, as the asbestos fibers in NOB materials are very tiny and difficult to see and quantify under standard Polarized Light Microscopy (PLM).

Any terrazzo flooring, magnesite flooring, floor tile (9x9 or 12x12) or mastics (other than white- or clear-colored mastics) that have been sampled and found to be non-asbestos containing or found to contain trace amounts (<1%) of asbestos as determined by PLM are recommended to have additional analysis by TEM to verify asbestos content.

Regardless of installation date and/or the presence of safety data sheets, all suspect asbestos containing materials must be sampled to determine asbestos content prior to any disturbance, including removal or renovation.

Any time drywall and joint compound are present, there is a possibility of numerous drywall installation dates. It is our recommendation that drywall and drywall joint compound be sampled on a per renovation basis. Ensure that no drywall or drywall joint compound are nailed into or screwed into to hang items without first knowing their asbestos content. Never nail or screw into a material if it is asbestos containing.

#### ASBESTOS MAJOR FIBER RELEASE ADVISORY

An asbestos major fiber release is defined as the disturbance of any asbestos containing material greater than 3 square feet or 3 lineal feet. Asbestos major fiber releases pose a significant health and safety concern for building occupants and are very disruptive to school operations. A major fiber release can shut down a school until it is cleaned up, and it can be a public relations concern. The response action for a major fiber release is an immediate cleanup under an asbestos design plan. Major fiber releases are costly to clean up.

Due to the size of 2x2 and 2x4 ceiling panels, the disturbance of just one panel is considered a major fiber release. Therefore, they must not be displaced for any reason without first knowing their asbestos content and then without following the asbestos rules if they are asbestos containing. Also, asbestos containing spay-on ceiling materials pose a high asbestos major fiber release risk as well. Asbestos containing spray-on ceilings should not be present in a school building due to this risk.

#### SPRAY-ON CEILING ADVISORY

Any time asbestos containing spray-on ceiling material is present, do not disturb it under any circumstances without following applicable asbestos rules. Asbestos management plans should indicate that preventative measures are taken to reduce potential for disturbance. Even if the material is not damaged, it does not eliminate this



## **Reinspection General Overview**

A general overview of the asbestos management plan, comments and recommendations for this building – Page 2 of 5

requirement. Everyday maintenance activities, such as replacing light bulbs, using ladders, etc., can disturb the material. Roof leaks and pipe leaks can cause the material to fall, possibly creating a major asbestos fiber release. A major fiber release in a school can shut down the area (or an entire building) and displace students and personnel until the fiber release is cleaned up. Evidence over time supports that it is very difficult to prevent disturbance to a spray-on material. In absence of preventative measures, the material needs to be removed. High priority for the removal of the material is warranted because it is friable. Abate as soon as possible and in accordance with all asbestos rules.

#### CEILING TILES/PANELS ADVISORY

IDEAL recommends that asbestos containing ceiling tiles/panels not be present in schools, and most importantly, not in hallways. When present, they must not be disturbed. Even if the materials are not damaged, it does not eliminate this requirement. Everyday routine maintenance activities, such as replacing light bulbs, can cause disturbance to the materials. If disturbance is not preventable, they must be isolated, removed, enclosed or encapsulated. It is very important to:

- -- prevent kids from poking at the material(s), jumping to try to touch them or bouncing balls up to them.
- prevent teachers from hanging items from the material(s).
- -- prevent roof leaks and pipe leaks. Water damage will disturb the binding matrix of the material(s).
- -- prevent sports activities from disturbing them. For instance, a volleyball hit high to the ceiling will cause disturbance.

Do not use ceiling fans in rooms/areas with asbestos containing ceiling tiles/panels. The continual air movement and vibration caused by the fans create an asbestos fiber release potential, especially as ceilings age. Also, do not allow band practice/performances in and above rooms/areas with asbestos containing ceiling tile/panels, as the vibration from the band instruments creates a potential for fiber release. These materials should not be present in weight/workout rooms either, due to vibration factors.

Asbestos fiber release is a concern when asbestos containing ceiling tiles/panels fall and where they exist in high air erosion and vibration spaces. Strong evidence of past disturbance would be replacement or damaged tile/panels and water stains. Without effective measures in place to prevent disturbance, the response action needs to be completed. When asbestos containing ceiling tiles/panels are present throughout, it is recommended that the LEA budget for removing them over time, with priority on high potential disturbance areas. It is also recommended that the LEA budget for removal as part of its life/safety building needs.

Due to the hazards identified in this advisory, asbestos containing ceiling tiles/panels should be removed, even if the asbestos program documentation reports that the material is not damaged.

#### SUSPENDED CEILINGS ADVISORY:

In any building, the potential exists for asbestos containing thermal system insulation (TSI) or other asbestos containing materials to be present above a suspended ceiling and to not be documented in the asbestos management plan. Care should always be taken when accessing the space above suspended ceilings. Anyone accessing it should have two-hour asbestos awareness training and must use extreme caution. If the area above the suspended ceiling is accessed, and suspect asbestos containing material is observed, the person should immediately restore the ceiling panel to its position and cease planned operations. Report the observation to the LEA's asbestos designated person for appropriate action.

Remember – never move or otherwise disturb a ceiling tile/panel without first knowing its asbestos content and without following all applicable asbestos rules if it is asbestos containing.



## **Reinspection General Overview**

A general overview of the asbestos management plan, comments and recommendations for this building - Page 3 of 5

No asbestos containing materials should ever be present in any space used as an air plenum.

#### PLASTER ADVISORY

Any time asbestos containing plaster is present, measures must be in place to prevent damage to it. Do not allow it to be disturbed. Monitor it for any signs of water damage or damage due to delamination. Maintain the material in a not damaged condition. In the absence of measures to prevent disturbance to the ceiling plaster, complete the response action. If plaster falls, an asbestos major fiber release may occur. Damaged areas of plaster are always a concern and should be remediated.

#### **TSI ADVISORY**

When TSI is present, it is to be kept intact and in good condition (not damaged). Repair any damage to it on an annual basis under the asbestos management plan's operations and maintenance program. When discovered, damage needs to be repaired in a timely manner in accordance with the timelines established in your asbestos management plan. Minor damage should typically be repaired within six months. Significant damage and fiber releases must be remediated promptly.

TSI is often documented in three-year reinspection reports as assumed to be present in inaccessible areas. Regardless of whether the pipe insulation is documented as possibly existing in inaccessible areas, always use care when accessing areas where piping may be likely to be found, such as above ceilings and behind walls and in pipe chases.

FIRE BRICK ADVISORY Fire bricks should never be used for welding purposes. They may contain asbestos.

TERRAZZO FLOORING ADVISORY Do not sand, grind or remove terrazzo flooring unless it is found to be non-asbestos containing by TEM.

#### FOOD PREPARATION AREA ADVISORY

IDPH Food Sanitation Code requires food preparation areas to have smooth, non-absorbent, cleanable surfaces in good repair. Damaged known or assumed asbestos containing materials should not be present in a food preparation area for food safety reasons. When present, any damage should be remediated.

#### REPLACEMENT FLOORING ADVISORY

During the early years of the AHERA regulations, schools were not allowed to remove asbestos containing floor tile mastic unless it was removed under an abatement design plan. Also, floor tile could only be removed under an approved variance. Because of this, many schools removed the floor tile and left the old mastic in place and covered over it. The era was from 1988 to 1999. So, if you remove replacement flooring that was installed during that era, there is a good chance that the old asbestos containing black mastic remains present underneath it.

If the mastic was removed, it may or may not have been completely removed. Therefore, if old mastic is found in isolated areas or throughout under replacement flooring, even if not identified during an inspection, it should be treated as asbestos containing. Use caution, even if sample results say the underlying mastic is non-asbestos containing. If black mastic is discovered, it needs to be treated as asbestos containing.



## **Reinspection General Overview**

A general overview of the asbestos management plan, comments and recommendations for this building – Page 4 of 5

#### NEWLY INSTALLED BUILDING MATERIAL ADVISORY

For most buildings, the initial AHERA inspection date is at or around 1988/89. As defined in this report, a newly installed building material is a material installed in a building after the date of the building's initial AHERA inspection. For example, if purple floor tile was in a cafeteria at the time of the initial AHERA inspection and then subsequently removed and replaced with pink floor tile, the pink floor tile is considered a newly installed building material. Newly installed building materials are typically not inventoried in the reinspection report. All newly installed building materials are assumed to contain asbestos. The materials must be sampled prior to any disturbance to determine their asbestos content.

#### NEW CONSTRUCTION ADVISORY

Any building or addition constructed since the onset of the AHERA regulations (1988/89) must have an architect exclusionary statement for it on file in the asbestos management plan. If this letter is not on file, an asbestos inspection is necessary. The exclusionary letter must be written by the architect of record for the new construction. We recommend looking at any letters you may have on file to ensure they are written by the architect of record, as we have seen many letters written by construction companies and other trades. If a letter is written by an entity other than the architect of record, it may not be accepted by regulatory agencies. If your letter is not provided by the architect of record, we recommend obtaining the letter from the architect.

#### MANAGEMENT PLAN ADVISORY

The asbestos management plan needs to be kept up-to-date to help comply with the AHERA rule. The rule requires that all asbestos documentation be retained in the administration office, and each building is to also have an identical set of records. The task of keeping identical plans at each location can be overwhelming, regardless of the size of the LEA. However, the task is critical and is often overlooked, or its importance is understated. Ensure an individual is assigned to help keep the entire asbestos program documentation up-to-date in the administration office and in each school office.

#### NON-AHERA SUSPECT ASBESTOS CONTAINING MATERIALS ADVISORY

Some suspect asbestos containing materials may be present which are not covered under the AHERA rule. For instance, chalkboards, room dividers, lab table tops (without utilities installed), linoleum countertop/mastic, stage curtains, stage light wire insulation (for non-hard-wired lights), kilns and fire bricks (used in applications other than the building heating system). Ensure applicable asbestos regulations are followed prior to any disturbance of these materials.

#### CARPET ADVISORY

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

#### INSPECTION PRIOR TO RENOVATION/DEMOLITION ADVISORY

Ensure the building is inspected by an IDPH-licensed inspector prior to any building renovation and/or demolition work as required by the federal NESHAP law. Review of a school's AHERA-required asbestos documentation may be a helpful resource for reference purposes, but it does not meet NESHAP inspection requirements. Ensure that all suspect asbestos containing materials are sampled to determine asbestos content prior to any disturbance, including removal, renovation or demolition, regardless of installation date, to comply with all applicable regulations. Ensure sampling documentation is filed in the asbestos management plan.

FLOORING REMOVAL ADVISORY



## **Reinspection General Overview**

A general overview of the asbestos management plan, comments and recommendations for this building - Page 5 of 5

Care must be taken when removing any replacement flooring materials. Old ACM flooring may exist underneath the replacement flooring, even if such existence is not documented in this reinspection report. It is beyond the scope of this reinspection to determine if and where ACM flooring does or may exist under replacement flooring.

#### OTHER ADVISORIES

Most schools have some type of non-friable known or assumed asbestos containing materials. These materials can become friable due to unintentional damage and disturbances. When non-friable materials are present in your school, it is important to prevent damage to them so that they remain intact and do not release asbestos fibers into the air.

Review and follow the asbestos program requirements summarized in the policy statement within this reinspection report. In particular:

-Ensure a designated person is assigned, trained and documented in the asbestos management plan.

-Ensure annual asbestos awareness training for custodial/maintenance staff is done and documented in the management plan.

-Ensure annual parent/teacher notifications are issued and that copies of the dated notifications are filed in the asbestos management plan.

-Ensure a work permit program is in place and that copies of work permits are filed in the asbestos management plan.

-Ensure six-month surveillances are being completed and that copies of the surveillances are filed in the asbestos management plan.

-Ensure you obtain reports for all sampling events, abatement events and operations and maintenance events. Ensure all reports are filed in the asbestos management plan.

Document the location of newly installed building materials as well as the date of installation. All newly installed materials are assumed to contain asbestos until they have been sampled to determine asbestos content.

#### COMPLIANCE VISITS & FINES/PENALTIES ADVISORY

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

The fine was nearly \$20,000. During this three-year reinspection, we have provided you information and advisories that warrant attention. It is our sincere hope that, when acted upon, the information and advisories we provide to you will help your LEA achieve the necessary compliance with asbestos regulations in the AHERA Rule.

Documentation is important, and the LEA is responsible to ensure that all documentation is filed into each set of the school's management plan.

### ASBESTOS PROGRAM POLICY STATEMENT

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

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

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

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

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

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

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

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

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

Building occupants will be notified annually about the availability of the Asbestos Management Plan and about asbestosrelated activities. The dated notification will be filed in the Asbestos Management Plan. Even if all asbestos containing materials are removed or if all building materials are determined to be non-asbestos containing, the building occupants will be notified each year of the availability of the Asbestos Management Plan.

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

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

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

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

Name

Phone

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

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

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

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

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

LEA

LEA ADMINISTRATOR

DATE



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

#### Jessica Stearns

From:Jessica StearnsSent:Wednesday, March 20, 2019 10:24 AMTo:'dph.asbestos@illinois.gov'Subject:Submission of School Info Form(s): Urbana SD 116Attachments:20190320100653.pdf

Please find attached the completed school information forms for the following building(s):

Urbana BOE & Admin Offices – Urbana, IL Urbana Maintenance Complex – Urbana, IL Urbana High School – Urbana, IL Urbana Middle School – Urbana, IL M L King Jr. Elem. School – Urbana, IL Leal Elem. School – Urbana, IL Dr. Preston Williams Jr. Elem. School – Urbana, IL Thomas Paine Elem. School – Urbana, IL Yankee Ridge Elem. School – Urbana, IL Wiley Elem. School – Urbana, IL Special Education Facility – Urbana, IL (demolished)

If you have any questions or need additional information, please do not hesitate to call our office at (800)535-0964. Thanks,

Jessica Stearns Office & Laboratory Assistant Ideal Environmental Engineering, Inc. 2904 Tractor Lane Bloomington, IL 61704 Ph: 309-828-4259 or 800-535-0964 Fax: 309-828-5735 Email: jstearns@idealenvironmental.com

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#### ILLINOIS DEPARTMENT OF PUBLIC HEALTH AHERA THREE YEAR REINSPECTION ASBESTOS ABATEMENT PROGRAM SCHOOL INFORMATION FORM

NAME OF SCHOOL DISTRICT: URBANA SCHOOL DIST 116

#### **SECTION I-\***

3000

SCHOOL ID NUMBER SCHOOL NAME: ADDRESS OF SCHOOL: CITY:	09-010-1160-3001 WILEY ELEMENTARY SCHOOL 1602 S ANDERSON URBANA, IL 61801
DATE LAST THREE YEAR REINSPECTION WAS CO If the address on this form is different than the address	OMPLETED 02/11/2016 ss of the building, submit a written explanation.
SECTION II (Please type or print) PLEASE COMPLETE THE FOLLOWING FOR YOUR THREE	E YEAR REINSPECTION:
DATE REINSPECTION COMPLETED: 2221	9 ENROLLMENT 470
IDPH INSPECTOR LICENSE NUMBER: 100- 050	7
IDPH LICENSED INSPECTOR NAME (Please print):	Steve Porce
IDPH MP LICENSE NUMBER: 100- 01338	
IDPH LICENSED MANAGEMENT PLANNER NAME	(Please Print): Jeny L. Wilson
DESIGNATED DEPRODUCTION Month Able	PHONE: 217-384-3662
Signature of Designated Ferson Date	3-18-2019
SECTION III PLEASE COMPLETE THE FOLLOWING INFORMATION FO	OR ANY CHANGES WITHIN THE SCHOOL DISTRICT.
School building has been sold. Date of Sale: School has been closed. Date closed: School building has been demolished. Date: School building is <u>asbestos free</u> since last reinspection:	
Please explain in writing why the school building is no	w asbestos free and include the supporting documentation.
If a new school building has been added to the district, su and inspection report. Include the complete name, addres	bmit either and exclusionary statement or a management plan as and city of school building.

#### Explain in writing if the address of the building is different than the address on this form:

Revised 10/03



#### 525-535 West Jefferson Street + Springfield, Illinois 62761-0001 + www.dph.illinois.gov

STEVE ROCK

1/26/2018

05617

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Our WEB address is: dph.illinois.gov/topics-services/environmental-health-protection/asbestos EMAIL Address: dph.asbestos@illinois.gov



Certificate # ME81B5E0CDE82043F.

## Steve Rock

has on 11/13/2018, in Bloomington, IL completed the requirements for asbestos accreditation under Section 206 of TSCA Title II, 15 USC 2646

## 4-hr. Asbestos Building Inspector Refresher

as approved by the IDPH and the US EPA under 40 CFR 763 (AHERA) from 11/13/2018 to 11/13/2018 and passed the associated exam on 11/13/2018 with a score of at least 70%

Z. Briff Mf.

Thomas Mayhew Instructor

Thomas Mayhew President

800.444.6382



SSN: XXX-XX-5641 Expiration: 11/13/2019 P.O. Box 786 - Lawrence, KS: 66044 www.metaenvironmental.net



## 525-535 West Jefferson Street • Springfield, Illinois 62761-0001 • www.dph.illinois.gov

JERRY L WILSON

1/26/2018

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Certificate # MEE4783A1DC93D47C

## Jerry L. Wilson

has on 11/13/2018, in Bloomington, IL completed the requirements for asbestos accreditation under Section 206 of TSCA Title II, 15 USC 2646

### 4-hr. Asbestos Building Inspector Refresher

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Thomas Mayhew Instrúctor

Thomas Mayhew

President



SSN: 000008321 Expiration: 11/13/2019 P.O. Box 786 - Lawrence, KS: 66044 - 800.444.6382 www.metaenvironmental.net



Certificate # ME1FF373CA499F422

## Jerry L. Wilson

has on 11/13/2018, in Bloomington, IL completed the requirements for asbestos accreditation under Section 206 of TSCA Title II, 15 USC 2646

## 4-hr. Asbestos Management Planner Refresher

as approved by the IDPH and the US EPA under 40 CFR 763 (AHERA) from 11/13/2018 to 11/13/2018 and passed the associated exam on 11/13/2018 with a score of at least 70%

Thomas Mayhew Instructor

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SSN: 000008321 Expiration: 11/13/2019 - Lawrence, KS: 66044 www.metaenvironmental.net

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### **General Definitions**

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

Homogeneous Area – An area of material that is uniform in texture, size and color.

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

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

Surfacing Material – Material that is sprayed-on, troweled-on or otherwise applied to surfaces, such as: acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing and other purposes.

Thermal System Insulation (TSI) Material – Insulation applied to pipes, fittings, boilers, breeching, tanks, ducts and other structural components to prevent heat loss or gain.

Miscellaneous Material - Any material which is not categorized as surfacing or thermal.

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

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

Significantly Damaged – Material that has >25% localized damage or >10% distributed damage as determined by an asbestos inspector.

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

**O&M** – Operations and maintenance

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

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

Additional Sampling – For the purpose of this report, "additional sampling" on the Asbestos Program Overview page shall mean any asbestos sampling done since the date of the initial asbestos inspection report.

Abatement Projects – For the purpose of this report, "abatement projects" on the Asbestos Program Overview page shall mean any removal work, which, due to the type of removal or quantity of removal, is or should be documented by an abatement design plan and abatement log records.

Floor Tile Removal Projects – For the purpose of this report, "floor tile removal projects" on the Asbestos Program Overview page shall mean floor tile removal work which is or should be documented as having been removed in the building using non-friable removal methods, if not done using gross removal methods.

Area Estimate – The quantity of accessible material.

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

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



### **General Comments**

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

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

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

Tunnels, crawlspaces, pipe chases, above ceiling panels or any other area may not have been entered or may have only been partially entered due to condition of materials, limited accessibility and/or confined space concerns. It is the intent of IDEAL to perform a thorough inspection. However, all spaces, corners, surfaces, etc. may not be inspected due to classes being in session, restrooms and locker rooms occupied, meetings in session, rooms locked, stored items blocking areas, etc. While inaccessible materials, spaces or areas are excluded from the scope of this work, some may have been inspected.

In cases where installation methods are concealed or not readily apparent, it may be assumed that mastic is present.

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

Previous recommendations may not be noted but may still apply.

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

If available, care has been taken to accurately describe building years for the location of materials. The years noted must be considered general guidance. It is often difficult to determine one building addition from another. This combined with other factors, such as building renovations and onsite time constraints, may result in a material being documented in the wrong building year.

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

Please note that an inspection prior to renovation or demolition is required to meet NESHAP regulations. This report is not a substitute for such an inspection. If suspect asbestos containing materials not previously identified are found during demolition or renovation work, the work must stop, and the materials must be sampled and removed (if applicable) prior to proceeding with demolition or renovation work.

When an assumed asbestos containing material is damaged, the report may indicate to remediate the damage. It is still necessary to sample the material first, and the need to remediate is based on the material being found to contain asbestos once sampled.

Room numbers, room dimensions, occupant names, buildings years, etc. may not be accurate in this report if information provided to us, such as on a diagram, was not current.

A material may be called "fireproofing" in this report for general description purposes, however, such a description shall not mean that it is a fire-rated material.

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

The scope of work presented in this report was based on an understanding between IDEAL and client, whether the understanding was from verbal conversation or written document(s). The scope of work and report shall be deemed accepted by client unless client advises to the contrary in writing to IDEAL within 10 days of the date the report was sent.



## **General Information Checklist**

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

- The main LEA office must have a set of Management Plan Books for each building, and each building must have a copy of their respective plan. Books should be kept in an easy-to-find location, and school personnel should be aware of their location. A copy of any supplement book, including three-year reinspection reports, must also be kept at the main LEA office and each respective school building.
- The LEA must name a designated person. The designated person must be trained and must complete a designated person Assurances page. Copies of the Assurances page and training must go in each plan book.
- A parent/teacher notification letter must be sent out annually. Copies of the letter must go in each plan book. <u>The letters must be dated</u>. If a school uses their handbook or a newsletter to distribute the notification, a copy of the relevant dated page must be placed in each management plan book.
- All custodial and maintenance personnel, including summer employees, must receive two hours of asbestos awareness training. Documentation of this training for each person must be kept in each of the plan books. Any new custodial or maintenance personnel must be trained within 60 days of employment. (An annual refresher course is necessary to meet OSHA rules.)
- All short-term workers (phone workers, utility workers, exterminators, plumbers, electricians, etc.) must sign a work permit verifying that they were provided information regarding locations of known or assumed asbestos containing materials.
- Warning labels must be posted in routine maintenance areas such as mechanical rooms, boiler rooms, etc. on or adjacent to any known or assumed friable asbestos containing materials.
- Buildings leased, acquired, or put into use on or after October 12, 1988, as a school building (as defined by AHERA) must be inspected for asbestos and have a management plan developed prior to school use.
- Management plan updates such as six-month surveillance forms, notification letters, O&M activities, response action activities, reinspections, etc. must be in or with every plan book. If the plan book cannot be added to, or if it is full, a new three-ring binder should be started for this type of record-keeping.
- Some schools have made it a practice to document newly installed building materials in their management plan by obtaining Safety Data Sheets (SDSs) and product labels declaring the materials to contain no asbestos, and by noting the installation and location of the materials with diagrams, photos and/or detailed descriptions. Currently, even with this information, the only acceptable way to prove that a material is non-asbestos containing is through sampling. However, if your LEA does make it a practice to obtain and file SDSs and other verification of non-asbestos content, you may want to continue to do so in case the materials are ever accepted by IDPH and EPA as asbestos-free based on this type of documentation.
- Prior to doing any small or large renovation projects, including floor tile removal projects, the renovation area must be inspected to determine if all suspect asbestos containing materials that will be disturbed by the renovation work have been adequately sampled to determine asbestos content. If the materials have not been adequately sampled, they must be sampled prior to disturbance. This is a NESHAP requirement.
- If you are planning new building construction, please advise with your asbestos consultant and architect to help ensure that your new building can be excluded from your asbestos program.

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





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