

Additional Inspection 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:

July 9, 2020

Ideal Number:

23473



General Information Page

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

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

Additional Inspection Date: July 9, 2020
IDEAL Number: 23473

Inspector: William Dodd
Inspector ID#: 100-20194
State of Accreditation: IL

Management Planner:
Management Planner ID#:
State of Accreditation:

Local Education Agency: Urbana S.D. 116
205 N. Race Street
Urbana, IL 61802
Champaign County
Phone: 217-384-3636
Contact: Mr. Randy Ashman, Director of Facility Services



Narration

On July 9, 2020, EPA/AHERA-accredited, IDPH-licensed inspector William Dodd inspected Wiley Elementary School in Urbana, Illinois. The purpose of the inspection was to identify and sample accessible suspect asbestos containing materials located in various classrooms which could be disturbed by the replacement of steam convector coil assemblies. The areas where the new coil assemblies are to be installed were determined after review of installation plans provided by IGW Architecture, dated May 26, 2020 (pages M1.0 & M1.1).

Renovation Inspection Summary

The accessible suspect ACM which are expected to be disturbed by planned renovation work were identified. The school's available asbestos management plan documentation was reviewed to determine if any of the materials identified had been previously sampled. Materials for which sampling documentation was not located or for which additional sampling was deemed necessary were sampled.

If a building material in a renovation area is to be disturbed which is *not* noted as: ACM, non-ACM or not suspected to contain asbestos in this report, additional inspection and sampling is necessary. (Suspect asbestos containing materials are generally any materials which are not metal, concrete, rubber, fiberglass, PVC, black foam glass, Armaflex, silicone or wood.)

If renovation work is to take place in an area not identified in this report or any prior project-specific inspection report(s), additional inspection and sampling is necessary. Architect's plans, when provided to IDEAL, are not included in this report; however, they are an integral part of the inspection phase of the project. If there is a question during renovation work regarding a building material and its asbestos content, the asbestos consultant for the renovation project should be contacted. IDEAL shall not be held responsible for any misunderstanding of the renovation plans.

The inspection was completed within the time constraints provided to IDEAL. Care was taken to account for the materials suspected to contain asbestos and planned for disturbance. Inaccessible areas were not accessed.

The following is a summary of the renovation inspection. *All reference to materials is specific to those materials in the renovation areas which are expected to be disturbed by the renovations.*

Renovation Information: Steam Convector Coil Assembly Replacement

No suspect asbestos containing materials were observed.

This inspection was performed to help comply with AHERA and NESHAP rules governing asbestos.

Only the materials noted in this report were inspected during this inspection. If renovation work is to take place in areas not inspected and/or identified in this report, or if materials other than those inspected and/or identified in this report will be disturbed, additional inspection service is necessary. IDEAL shall not be held responsible for any misunderstanding of renovation plans.

All other suspect materials not found in the original survey, any additional management plan supplement reports or this management plan supplement, should be assumed as Asbestos Containing Material (ACM) until sampled and proven otherwise such as; gaskets, packing, built-up roof field, etc.

In an effort to maintain compliance, the management plan supplement identifies and documents the above sample areas as known or assumed asbestos containing or non-asbestos containing. Lab results and inspection data are included as a part of this report when applicable. Please retain this Asbestos Management Plan Supplement with your entire asbestos program documentation.

This report, including the General Definitions and General Comments, is intended to be read in whole and not in part.

If you have any questions or comments, please feel free to contact Ideal Environmental Engineering, Inc. at 309-828-4259 or 1-800-535-0964.



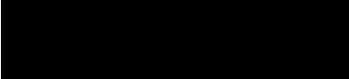
Accreditation



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WILLIAM W DODD

1/22/2020




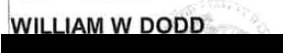

ASBESTOS PROFESSIONAL LICENSE ID NUMBER: 20194

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Front of License

Back of License

		ASBESTOS PROFESSIONAL LICENSE		ENDORSEMENTS	TC EXPIRES
ID NUMBER	ISSUED	EXPIRES		INSPECTOR	11/11/2020
100 - 20194	1/22/2020	05/15/2021			
WILLIAM W DODD  Environmental Health			Alteration of this license shall result in legal action This license issued under authority of the State of Illinois Department of Public Health This license is valid only when accompanied by a valid training course certificate.		

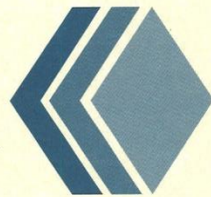
If you have any questions or need further assistance, contact the Asbestos Program at (217)782-3517 or fax (217)785-5897.

Our WEB address is: dph.illinois.gov/topics-services/environmental-health-protection/asbestos
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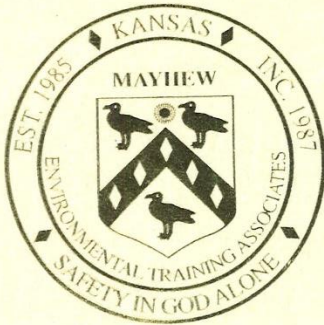
Certificate # 8WNRDZUGVFMY

William Dodd

*has on 11/11/2019, in Bloomington IL
completed the requirements for asbestos accreditation under Section 206 of TSCA Title II, 15 USC 2646*

4-hour Asbestos Building Inspector Refresher

*as approved by the IDPH and the US EPA under 40 CFR 763 (AHERA)
from 11/11/2019 to 11/11/2019 and passed the associated exam on
11/11/2019 with a score of at least 70%*



Dean Althage
Instructor

Thomas Mayhew
President

SSN: XXX-XX-4027

Expiration: 11/11/2020

P.O. Box 786 - Lawrence, KS. 66044 - 800.444.6382

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Sampling Protocol

763.86 Sampling

1. **Surfacing Material.**
An accredited inspector shall collect, in a statistically random manner that is representative of the homogeneous area, bulk samples from each homogeneous area of friable surfacing material that is not assumed to contain ACM, and shall collect samples as follows:
 - a. At least three (3) bulk samples shall be collected from each homogeneous area that is one thousand square feet or less, except as provided in 763.87 (c) (2).
 - b. At least five (5) bulk samples shall be collected from each homogeneous area that is greater than one thousand square feet but less than or equal to five thousand square feet, except as provided in 796.87 (c) (2).
 - c. At least seven (7) bulk samples shall be collected from each homogeneous area that is greater than five thousand square feet, except as provided in 763.87 (c) (2).
2. **Thermal System Insulation.**
 - a. Except as provided in paragraph (b) (2) through (4) of this section and 763.87 (c), an accredited inspector shall collect, in a randomly distributed manner, at least three bulk samples from each homogeneous area of thermal insulation that is not assumed to be ACM.
 - b. Collect at least one bulk sample from each homogeneous area of patched thermal system insulation that is not assumed to be ACM if the patched section is less than six (6) lineal or square feet.
 - c. In a manner sufficient to determine whether the material is ACM or not ACM, collect bulk samples from each insulation mechanical system that is not assumed to be ACM where cement or plaster is used on fittings, such as tees, elbows or valves, except as provided under 763.87 (c) (2).
 - d. Bulk samples are not required to be collected from any homogeneous area where the accredited inspector has determined that the thermal system insulation is fiberglass, foam glass, rubber, or other non-ACM.
3. **Miscellaneous Material.**
In a manner sufficient to determine whether material is ACM or not ACM, an accredited inspector shall collect bulk samples from each homogeneous area of friable miscellaneous material that is not assumed to be ACM.
4. **Non-friable Suspect ACBM.**
If any homogeneous area of non-friable suspect ACBM is not assumed to be ACM, then an accredited inspector shall collect, in a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from the homogeneous area of non-friable suspect ACBM that is not assumed to be ACM.

IDPH Section 855.345 was also followed.



The AHERA rule is commonly known to be applicable to school buildings. The general definitions and comments which follow may cite rules from other regulations which may also affect this inspection.

General Definitions

Asbestos Containing Material (ACM) - Material containing greater than 1% asbestos as determined by Polarized Light Microscopy (PLM). [Refer also to General Comments paragraph about qualitative analysis.]

Homogeneous Area - An area of material that appears uniform in texture, size, color and apparent or known date of installation.

Area ID/Sample Area & Sample ID: The alpha-numeric code given to each sampled homogenous area and each sample taken.

Area Name & Area Description: The name and a description of each homogenous area.

Area Estimate - The estimated quantity of accessible material.

Area Location - The area location as noted in written text and on diagram(s) (if provided) may be a general description and may not include all locations.

Friable Material - Any material that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Non-Friable Material - Any material that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Non-Friable Organically Bound Material (NOB): Material where the asbestos (if present) is tightly bound to the matrix material (generally asphalt- or vinyl-based). Examples include flooring, mastics, caulks, and roofing materials.

Category I Non-Friable ACM - Non-friable asbestos containing packing, gaskets, resilient floor covering and asphalt roofing products.

Category II Non-Friable ACM - Non-friable asbestos containing materials other than Category I.

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

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

Miscellaneous Material: Any material not categorized as surfacing or thermal system insulation (TSI).

Damage Condition – The condition of the material in regard 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

Regulated Asbestos Containing Material (RACM) - 1). Friable ACM. 2). Category I non-friable ACM that has become friable. 3). Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, abrading or pulverized. 4). Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition operations. [Materials may be reported as regulated ACM if qualitative analysis indicates that asbestos is present, even though it is not quantified.]

Trace Amounts of Asbestos - According to laboratory results, sample found to contain less than or equal to 1% asbestos.



Demolition - The wrecking or extracting of any load-supporting structural member of a facility along with any related handling operations or the intentional burning of any facility.

Renovation - Altering a facility of one or more of its components by any means, including stripping or removal of RACM from a facility component. A component is any part of a facility including equipment.

Accessible - AHERA defines “accessible” as a material subject to disturbance by school building occupants or custodial or maintenance personnel in the course of their normal activities. For the purposes of this report, “accessible” materials, spaces or areas shall also 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 purposes 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).

Federal Agencies Governing Asbestos

EPA Environmental Protection Agency
OSHA Occupational Safety and Health Administration

State of Illinois Agencies Governing Asbestos

ILEPA Illinois Environmental Protection Agency
IDPH Illinois Department of Public Health

Regulations Governing Asbestos

Federal EPA regulations:

NESHAP National Emission Standard for Hazardous Air Pollutants
The regulation governs storage, transportation and disposal of asbestos.
[Any references to NESHAP in this report shall mean the asbestos portion of NESHAP.]

AHERA Asbestos Hazard Emergency Response Act
The regulation governs asbestos containing material in schools. It also regulates minimum training requirements for asbestos abatement personnel under the “Model Accreditation Plan”.

ASHARA Asbestos School Hazard Abatement Re-Authorization Act
The regulation extends the AHERA regulation to Public and commercial buildings in that if any action is taken in a Public or commercial building, it must be performed by accredited personnel.

IL EPA regulations:

Illinois Environmental Protection Act

The act establishes a unified, state-wide program supplemented by private remedies to restore, protect and enhance the quality of the environment, and to assure that adverse effects upon the environment are fully considered and borne by those who cause them.

OSHA standards:

Occupational Exposure to Asbestos Final Rule

The standard limits exposure to asbestos in the workplace.

IDPH regulations:

Asbestos Abatement Code for Public and Private Schools

The code establishes regulations for asbestos abatement in Public and private schools.

Commercial and Public Building Asbestos Abatement Act

The act requires licensure by the Illinois Department of Public Health for persons designing or conducting asbestos response actions or inspecting for asbestos in Public and commercial buildings. It also gives IDPH the authority to approve training courses for persons engaged in these activities.



General Comments

Asbestos Survey

Accessible building areas were visually inspected for suspect asbestos containing materials within the scope of this inspection. Materials suspected to contain asbestos are determined by EPA guidance materials, industry standards and the inspector's experience. Suspect asbestos containing materials are *generally* any materials which are not metal, concrete, rubber, fiberglass, PVC, black foam glass, Armaflex, silicone or wood. However, the inspector ultimately determines what is suspected to contain asbestos, and, based on their own discretion, may include any of these materials in certain situations.

A thorough inspection was completed, including, where applicable, checking above ceiling panels, behind walls, below carpet, etc., to attempt to locate hidden materials. This was conducted within reason, within time constraints, in line with inspector safety and building occupancy constraints, and adhering to any desires of the client to avoid damage. Any suspect asbestos containing materials not found in the survey must be assumed to be ACM until sampled. Additional suspect asbestos containing materials may be found in pipe chases, hidden building cavities, behind walls, under floors, inside duct work, behind existing finishes or other similar areas. Materials may be misidentified if covered by paint, wallpaper, carpet, etc. The inspection did not include removal, dismantling or demolition of building components, unless otherwise noted. Unless specifically included in this report, mechanical equipment, electrical systems, elevators and confined spaces are excluded from the inspection. A return visit can always be requested for additional inspection service of opened wall cavities, discovered hidden spaces, HVAC systems, etc., to access previously excluded areas.

This survey was completed with generally accepted industry-standard inspection practices within the constraints of the client's directive and time frame. To help comply with the OSHA asbestos general industry standard 29 CFR 1910.1001 and the OSHA asbestos construction standard 29 CFR 1926.1101, the results of this report should be communicated to employees and other employers at the project site.

This inspection was prepared for the building owner or client as noted. If plans for the building change, additional inspection service may be necessary. It was not prepared for others. Any reliance on or use of this report by any third party is done at the risk of the third party. Reliance on this report by any third party does not make the third party a beneficiary to IDEAL's contract with the building owner or client as noted.

During random sampling, the Grid Method may not be used to avoid destructive sampling in visible areas.

The inspector's determination of homogeneous areas and inferences for friability, damage condition, and whether a material is regulated, category I or category II are guided by regulations but remain subjective and may differ from another inspector.

Sometimes, materials may appear to be homogeneous but may not be. While care has been taken to accurately determine homogeneous materials, installation dates may differ unbeknownst to the inspector, different product brands may have been used, or manufacturers may produce batches with different sources for raw materials. Determining homogeneity of drywall systems (i.e. drywall, joint compound, tape) is especially difficult due to possible multiple installations, renovations, repairs and since drywall systems are intentionally finished so these occurrences are not noticeable.

If only one sample of a material has been collected, it is likely due to limited quantities or accessibility. If for any other reason and analysis indicates that no asbestos was detected, additional samples should be considered to ensure that asbestos is not present in the material prior to any disturbance, including renovation or demolition.

If the inspection included the building exterior, it was not an exhaustive inspection of the entire exterior surface area, but, rather, random areas were inspected. Additionally, on multi-level buildings, exterior materials may appear homogeneous from the ground to the top levels, but it is possible that different building materials are present. Care should be taken during renovation and/or demolition activities of multi-level buildings to ensure that exterior materials identified are homogeneous.

If a prior inspection report exists for any of the materials sampled within this report, the results may be contradictory. If client knows a prior report exists and was not provided to IDEAL for review, IDEAL recommends materials to be analyzed by TEM prior to any disturbance.

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, and in the future if building information changes after the date of the inspection.

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.

While inaccessible materials, spaces or areas are excluded from the scope of the inspection, some may have been inspected.

Photos may not be provided for all materials.



Samples are analyzed by a laboratory approved or accredited (as applicable) by the National Voluntary Laboratory Accreditation Program (NVLAP) or American Industrial Hygiene Association (AIHA).

The analysis results above relate only to the materials sampled and only as found in the locations described in this report.

Laboratory analytical results may vary for a sampled material. Additional analysis for a material may be done or recommended if it is discovered that differing results for the same material exist. The definition of a homogeneous area as used by an asbestos inspector may differ from a laboratory's usage of the word homogeneous.

For qualitative analysis: If asbestos was detected, a material will be reported as an asbestos containing material, even though the asbestos was not quantified. If no asbestos was detected, a material will be reported as a non-asbestos containing material.

Asbestos content within a homogeneous area may vary. Therefore, random samples of a homogeneous area may indicate an asbestos content of less than 1% or no asbestos detected, while other random samples taken from the same material may indicate an asbestos content of greater than 1%. IDEAL sampled according to accepted sampling protocol (unless otherwise noted by limitations in the description of the scope of work) and is not liable if materials are re-sampled and found to contain asbestos.

All asbestos containing friable materials are regulated. The process of renovation/demolition may cause non-friable category I or non-friable category II materials to become friable, and therefore regulated. Unless otherwise noted, for the purpose of this inspection report, all asbestos containing non-friable category II materials are reported as regulated, as they are likely to become friable during the process of renovation/demolition.

Friable and non-friable category II materials containing less than 10% asbestos as determined by PLM, EPA Method 600/R-93/116 must be point counted*, analyzed by TEM or treated as assumed asbestos containing materials prior to removal/renovation in commercial buildings or apartments with more than four units. TEM is recommended. Additional analysis to verify asbestos content is an option for any material analyzed with amounts of asbestos less than 10% as determined by PLM. [*PLM Point Count is a method specified in EPA regulations (NESHAP Final Rule). However, bulk sample analysis methods are continually improving, and other analysis methods are now available to help verify asbestos content. One of these methods is TEM, and EPA has subsequently specified that it is an acceptable alternative to PLM Point Count.]

Non-friable category I materials that contain trace amounts of asbestos as determined by PLM are reported as non-asbestos containing materials. Additional sampling is recommended for renovation projects.

When trace amounts of asbestos are detected by TEM, a material is reported as non-asbestos containing.

TEM analysis, when done for a non-friable organically bound (NOB) material, is to verify asbestos content.

The area estimates shall not be used for bidding purposes. All quantities and conditions that affect costs for asbestos removal and disposal must be verified. Area estimates may include materials known/assumed to be present behind walls, above ceilings, inside boilers, under floors, etc.

This report is not a specification for removal of asbestos containing material, nor shall it be used as such.

The inspection service excluded any inspection for the presence of mold or other contaminants. IDEAL shall not be held responsible for disturbance of any mold or other contaminants or amplification of same.

At least one representative trained in the provisions of 40 CFR Part 61, Subpart M, is to be on site during demolition or renovation. The person is to have in his or her possession evidence that the requisite training has been accomplished. The person is to ensure that if additional quantities of known or suspect asbestos containing materials are found, applicable asbestos rules will be followed.

This report was completed based on our interpretations of the EPA's NESHAP and AHERA regulations affecting K-12 school buildings. Changes in accepted practices or in applicable regulations cannot be anticipated and have not been addressed.

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The scope of work 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 is sent.

No warranty or guarantee, expressed or implied, is made as to the conclusions, findings and/or professional advice included in this report.



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