



The Commonwealth of Massachusetts
Department of Labor and Workforce Development
Division of Occupational Safety

ANGELO BUONOPANE
Director

ROBERT J. PREZIOSO
Deputy Director

January 24, 2001

Mr. Edward Dufresne
Haverhill Public Schools
4 Summer Street
Haverhill, MA 01830

Dear Mr. Dufresne:

On January 4, 2001, a representative of the Massachusetts Division of Occupational Safety (DOS) conducted a visual inspection of the Consentino School, 685 Washington Street, Haverhill, MA as part of an AHERA audit. The inspection was conducted in response to concerns of Computer Cable Company workers who alleged exposure to asbestos while installing cable wiring above the suspended ceiling in the hallways of the school. Those present during the AHERA audit included yourself, Rick Renny, Roger Young and Susan Boyle.

BACKGROUND

The area of concern was on the second floor near the computer room. It was reported that asbestos containing material (ACM) was disturbed during the installation of new cable wires. It was further reported that the workers had commenced this job during the school break while the building was not occupied, without giving prior notice to the school of their start date. Consequently, school personnel were unable to enforce certain provisions of their management plan. At the time of the inspection, all work had ceased. Shortly after the incident occurred, DOS personnel had conducted a visual inspection above the ceiling on the second floor, including the area near the computer room, and did not detect any evidence of a contamination problem.

It was reported that at the end of the day of the incident, school personnel had washed and waxed all the corridor floors. Subsequent to that cleaning, the consultant for the school, HUB Testing, conducted ambient air sampling, bulk sampling of suspect materials in the exposed areas above the tiles, and wipe samples on various horizontal surfaces below the exposed areas. Pursuant to the Hub report dated January 2, 2001, no structures were detected in air samples analyzed by TEM (transmission electron microscopy). Results of wipe samples taken near the work areas did not indicate the presence of asbestos.

Bulk sample analysis by Hub Testing, however, indicates that there is friable asbestos on some of the I-beams above the ceiling tiles that are not covered with cementitious material. The presence of this friable asbestos establishes the need to have stringent controls in place.

OBSERVATIONS:

Cable installers had removed small groups of ceiling tiles at multiple locations throughout the first and second floor corridors, where work had been and/or was going to be done. No ceiling tiles in the classrooms were removed. At the time of the inspection, the floors appeared to be clean and buffed, with no accumulation of visible dust or debris in any areas below the openings in the ceiling.

Both the management plan and the recent bulk samples indicate the presence of asbestos on the I-beams above the spline ceiling. In some areas the I-beams are enclosed with a wire mesh covered with non asbestos containing cementitious mortar. It was reported by Hub Testing that in the majority of the work areas on the first and second floors, where the ceiling tiles had been removed, the I-beams were behind the cementitious mortar. This was confirmed during the walk through of the building on January 4th.

CONCLUSION

After the incident occurred, the thorough cleaning of the hallways was the appropriate measure to take, and minimizes the associated risk of asbestos exposure for general occupants of the building. There is no evidence that a contamination hazard exists at this time. Additional assurance is provided by the dust wipe analysis.

The potential for exposure exists any time friable material is disturbed. To ensure the continued protection of building occupants, access to the space above the ceiling tiles must be restricted. All areas where ceiling tiles have been removed must be covered. Spaces below the ceiling tiles, including floors and other horizontal surfaces, must continue to be adequately cleaned. All other appropriate Operations & Maintenance (O&M) procedures outlined in the asbestos management plan for the schools, including routine cleaning measures, periodic inspections, work log in/out procedures for tradespeople accessing the space, must be implemented and enforced.

If any work is to be conducted in the space above the ceiling tiles, it shall be performed in accordance with the Massachusetts DOS asbestos regulation, 453 CMR 6.00, The Removal, Containment or Encapsulation of Asbestos. This regulation sets forth training, licensing, and certification requirements for persons engaged in asbestos and asbestos associated work and establishes work standards and notification requirements. Only those who are properly trained/licensed and who use the appropriate personal protective equipment will be allowed to enter the area.

Specific actions that must be implemented are as follows:

1. All openings in the ceiling must be sealed promptly to prevent air exchange between the space above the ceiling and the corridors below. This will also prevent uncontrolled access to the space above the ceiling tiles and subsequent unintentional fiber release.
2. Wet cleaning of all floors must be done daily to inhibit the spread of any released fibers until all openings in the ceilings are covered.

3. Ensure that no future uncontrolled access to the space above the ceiling is permitted. This will require enforcement of the Operations & Maintenance Program provision whereby workers must sign the log book and verify that they have the requisite 2-day training before disturbing asbestos during the course of their duties.

4. All records regarding this incident must be documented in the school's management plan, including what happened, when, where, what was done in response to the problem, and who performed the work. Be sure to include work practices and other controls used to prevent fiber migration. Sample recordkeeping forms are included with this report, and were also provided by your consultant in your recent reinspection report.

5. The school will need to develop a plan, or project design, to complete the cable installation, and indicate how the school plans to treat those areas in the future. Part of this plan must include the use of properly trained personnel, the use of personal protective equipment, and the employment of all work practices specified in the AHERA regulation.

DOS has been delegated enforcement authority for AHERA by the USEPA. In formulating the assessments and recommended corrective actions of this letter it has consulted with the Region I USEPA coordinators for both AHERA and the National Emission Standard for Hazardous Air Pollutants (NESHAP).

Please contact this office with any matters of concern regarding this report or related matters.

Sincerely,



Janet McKenna
Environmental Engineer

Approved:


for Frank Kramarz
Program Supervisor