

-
-
-
-
-

1805 Glenn Eagle
Edmond Oklahoma 73025
Cell (405) 831.9670

ENVIRONMENTAL MEASUREMENTS, LLC

Asbestos Inspection Report and Management Plan
April 2023



Gracemont Public Schools
417 East McCall
Gracemont, OK 73042



-
-
-
-
-

1805 Glenn Eagle Edmond Oklahoma 73003 (405) 359.8868 Cell (405) 831.9670
--

ENVIRONMENTAL MEASUREMENTS, LLC

1.0 EXECUTIVE SUMMARY

An Asbestos Hazard Emergency Response Act (AHERA) Asbestos Inspection was completed at the Gracemont Public Schools on April 19th, 2023. This asbestos inspection and management plan was conducted by James Gaylor, an Oklahoma Department of Labor Licensed Asbestos Management Planner/Inspector.

This required three year re-inspection was accomplished following the established AHERA protocol and following good industrial hygiene practice without prejudice toward any of the parties (occupants, owners, insurers, builders, contractors, or others) who may have a direct or indirect interest in the property or outcome of this evaluation. Neither JR Gaylor nor staff has any interest in the property that would persuade or influence the outcome of this evaluation. This report has been developed with the purpose and intent to disclose any potentially significant asbestos containing material that might pose a health threat or other environmental concern.

All asbestos containing materials (ACM) must be re-inspected every three years as a part of the management plan by a licensed management Planner. Periodic surveillance must be conducted in all buildings that the district leases, owns, or otherwise uses as a school building every six months as stated in 40CFR 763.92(b)(3) of the AHERA Act. This can be completed by a Management Planner or Designated Person. Custodial and maintenance staff should report any ACM damage to the Designated Person. All documentation involving renovation and demolition must be retained and included with the management plan to provide correct and revised information for future management plans.

As part of this management plan, required asbestos awareness training was conducted and documentation of this included in Appendix E. Annual notification letters are to be delivered to employees and parents of students. Sample letter is included in Appendix D.

.....

23-1112: Gracemont PS (0223)
AHERA Reinspection 2020

Thank you for the opportunity to assist you with this matter. If you have any questions, please contact me.

James Gaylor
ODOL Management Planner/Inspector

LOCAL EDUCATION AGENCY (LEA) GENERAL RESPONSIBILITIES UNDER AHERA

Pursuant to Section 763.84 and Section 763.93 of the EPA Asbestos in Schools Regulation (40 CFR Part 763), each management plan must contain a true and correct statement, signed by the LEA designated person, that certifies that the general LEA responsibilities have been met. This form is provided to assist you in complying with this portion of AHERA.

LEA Name: ***Gracemont Public Schools***

LEA Address: ***417 E. McCall, Gracemont, OK. 73042***

Designated Person:

Designated Person Address: ***417 E. McCall, Gracemont, OK 73042***

ASSURANCES

1. This AHERA management plan was developed and has been submitted pursuant to the Asbestos Hazard Emergency Response Act of 1986, Public Law 99-519; and the United States Environmental Protection Agency Rule; Asbestos Containing Materials in Schools, 40 CFR Part 763; and the undersigned does hereby certify that the LEA has and will ensure the following:
2. The activities of any persons, who perform inspections, re-inspections, and periodic surveillance, develop and update management plans, and develop and implement response actions, including operations and maintenance, are carried out in accordance with Part 763.
3. All custodial and maintenance employees are properly trained as required in Part 763 and all other applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration Asbestos Standard for Construction, the EPA Worker Protection Rule, or applicable State regulations).
4. All workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, post-response action activities, including periodic re-inspection and surveillance activities, that are planned or in progress.

5. All short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may come in contact with asbestos in a school are provided information regarding the locations of ACBM and suspected ACBM assumed to be ACM.
6. All warning labels are posted in accordance with Section 763.95.
7. All management plans are available for inspection and notification of such availability has been provided as specified in the management plan under Section 763.93(g).
8. The undersigned person designated by the LEA pursuant to Section 763.84(g)(1) has received adequate training as stipulated in Section 763.84(g)(2).
9. The LEA has and will consider whether any conflict on interest may arise from the interrelationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under Part 763.

Signed: _____ Date: _____

(LEA Designated Person, pursuant to 40 CFR 763.93(i) and 763.84)

4.0 Designated Person Statement

In accordance with 40CFR §763.93(e) of the Environmental Protection Agency Asbestos-Containing Material in Schools regulation, the undersigned Local Education Agency (LEA) Designated Person hereby certifies that the following general responsibilities of the LEA under 40CFR § 763.84 have been or will be met:

Ensure that the activities of any persons, who perform inspections, re-inspections, and periodic surveillance, develop and update management plans, and develop and implement response actions, including operations and maintenance, are carried out in accordance with Part 763, Subpart E.

Ensure that all custodial and maintenance employees are properly trained as required by Part 763, Subpart E and other applicable Federal and/or State regulations (e.g., the occupational Safety and Health Administration asbestos standard for construction, the EPA worker protection rule, or applicable State regulations).

Ensure that workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress.

Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may come in contact with asbestos in a school are provided information regarding the locations for ACBM and ACBM assumed to be Asbestos-Containing Materials (ACM).

Ensure that warning labels are posted in accordance with § 40 CFR 793.95.

Ensure that management plans are available for inspection and notification of such availability has been provided as specified in the management plan under § 40 CFR 763.03(g).

Designate a person to ensure that requirements under § 763.84 are properly implemented and ensure that the designated person receives adequate training to perform duties assigned under § 763.84. Such training shall provide, as necessary, basic knowledge of; health effects of asbestos management programs; relevant Federal and State regulations concerning asbestos, including those in Part 763, Subpart E and those of the

Occupational Safety and Health Administration, U.S. Department of Transportation and the U.S. Environmental Protection Agency.

Consider whether any conflict of interest may arise from the inter-relationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under Part 763, Subpart E.

Signature of Designated Person

Date : _____

5.0 TRAINING RECORD FOR MAINTENANCE AND CUSTODIAL STAFF

No employee of Gracemont Public Schools shall perform any type of asbestos work. All removal or disturbance of ACM shall be performed under controlled conditions by outside contractors whose employees have been properly trained and licensed by the Oklahoma Department of Labor.

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

Gracemont Public Schools conducts a two hour training annually consistent with the Occupational Safety and Health Administration (OSHA) training requirements covering the following:

- Asbestos uses and forms, the health effects of asbestos, and locations of ACBM within the buildings in which they work.

- Who to call should they find suspect damaged materials

- Information regarding the recognition of deterioration, damage and delaminating of ACBM, and the location and availability of the O&M plan.

- Working knowledge of the O&M Plan including safety, access to ACBM, and re-inspections.

- Importance of record keeping as well as employee record generation requirements.

- State licenses and training requirements.

Documentation of training is included in Appendix E. For all New Custodial and Maintenance Employee New Hires, Initial Asbestos Awareness Training must be completed within 30 days of hire. Asbestos Awareness Training is required to be refreshed annually.

23-1112: Gracemont PS (0223)
AHERA Reinspection 2020

Independent contractors and temporary works must be made aware of potential asbestos exposure and sign the contractor letter included in Appendix E. Retain a copy of this book as backup documentation.

6.0 ASBESTOS INSPECTION INFORMATION

The facility was initially inspected for asbestos James Gaylor and re-inspected by Mr. Gaylor according to AHERA guidelines. These reports are available at the facility.

This inspection has followed all the rules and guidelines as established by the AHERA Program and is inclusive of the following:

- Review Approved Management Plan
- Review Previous Three Year Inspection
- Review Six Month Inspections
- Review Yearly Parent/Occupation Notification
- Review Identified Friable Asbestos Containing Materials
- Interview Designated Person
- Review Training Documentation

After review of the above mentioned items and visual inspection of the facility the following current list was compiled to assist with future re-inspections and periodic surveillance.

Asbestos Containing Building Material Inventory as of April 2023.

Building	Material	Location	Condition
High School	No Asbestos Present	NA	NA
Auditorium & Shop	Floor Tile & Ceiling Tile	Shop Area	Good
Bus Shop & Gym Concession	No Asbestos Present	NA	NA
Gymnasium	Floor Tile & Adhesive	Gymnasium	Good
Elementary School	No Asbestos Present	NA	NA

**23-1112: Gracemont PS (0223)
 AHERA Reinspection 2020**

Crosswalk @ High School	No Asbestos Present	NA	NA
Music Building	No Asbestos Present	NA	NA
Multi-Purpose Building	No Asbestos Present	NA	NA
Wooden Storage Building	No Asbestos Present	Na	NA

All suspect building materials were previously sampled. All friable asbestos containing building materials (ACBM) has been removed or is non-accessible. Enclosure is an effective way to manage friable ACM in place. **All ACM are in satisfactory condition and management in place should continue until renovation or demolition occurs.**

7.0 PLAN FOR REINSPECTION

In accordance with 40CFR 763.85(b)(1) of that Act, at least once every three years, after a management plan is in effect, each local education agency shall conduct a re-inspection of all friable and non-friable, known or assumed, ACBM in each school building that they lease, own, or otherwise use as a school building. In accordance with AHERA, the facility needs to be re-inspected by an ODOL Licensed Inspector/Management Planner. Please contact JR Gaylor at 405-831-9670 to schedule the May 2022 inspection.

Periodic surveillance is also conducted in all buildings that the district leases, owns, or otherwise uses as a school building every six months as stated in 40CFR 763.92(b)(3) of the AHERA Act. Re-inspection can be conducted by the Designated Person or a Licensed Management Planner. All surveillance

data should be retained and incorporated into the AMP. A form to assist with the surveillance has been created for Gracemont Public Schools and is located in Appendix G.

8.0 RESPONSE ACTIONS

The Gracemont Public Schools will select and implement in a timely manner the appropriate response actions in this section. The response actions selected shall be sufficient to protect human health and the environment. The local education agency may then select, from the response actions that protect human health and the environment, that action which is the least burdensome method. Nothing in this section shall be construed to prohibit removal of ACBM from a school building at any time, should removal be the preferred response action of the local education agency.

Response actions including removal, encapsulation, enclosure, or repair, other than small-scale, short duration repairs, shall be designed and conducted by persons accredited to design and conduct response actions.

All friable and non-friable ACBM is to be monitored as part of the O&M program.

9.0 OPERATIONS AND MAINTENANCE ACTIVITIES

The Oklahoma Department of Environmental Quality shall be notified of any activities that may result in the disturbance of RACM. Employees shall not remove or disturb any suspect ACM until the materials are verified by the AMP and it has been determined that it does not contain asbestos.

Asbestos Emergencies

A licensed asbestos abatement contractor shall conduct all emergency asbestos work. Emergencies include situations where a rapid response is necessary to mitigate damage or prevent further serious damage to the building or its

occupants in which ACM becomes damaged and has the potential to become airborne. Examples include:

- Malfunction in equipment that if not addressed immediately would cause damage to the building; or
- Ruptured steam or pipe lines; or
- The discovery of ACM during renovation or demolition activities

Minor fiber release episode: The local education agency shall ensure that the procedures described below are followed in the event of a minor fiber release episode (i.e., the falling or dislodging of 3 square or linear feet or less of friable ACBM):

- (1) Thoroughly saturate the debris using wet methods.
- (2) Clean the area, utilizing ODOL Licensed Asbestos Contractor with Licensed Asbestos Workers.
- (3) Place the asbestos in a sealed, leak-tight container.
- (4) Repair the area of damaged ACM with materials such as asbestos-free spackling, plaster, cement, or insulation, or seal with latex paint or an encapsulant.

Major fiber release episode: The local education agency shall ensure that the procedures described below are followed in the event of a major fiber release episode (i.e., the falling or dislodging of more than 3 square feet of friable ACBM):

- (1) Restrict entry into the area and post signs to prevent entry into the area by persons other than those necessary to perform the response action
- (2) Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas of the building.
- (3) The response action for any major fiber release episode must be designed by ODOL Licensed Project Designer and completed by ODOL Licensed Asbestos Contractor with Licensed Asbestos Workers.

In the event of an emergency, immediately contact the designated person, at Gracemont Public Schools.

10.0 DEMOLITION AND/OR REMODELING ACTIVITIES

All ACM is in satisfactory condition and management in place should continue until renovation or demolition occurs. A licensed Project Designer shall have designed any abatement or response action that takes place in a school, which falls under the AHERA regulations, other than small-scale short duration projects.

The purpose of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Regulations is to protect public health and the environment by minimizing the release of asbestos dust (fibers) into the air. These regulations apply both to the facility owner and to the contractor. The asbestos NESHAP requires that renovation and/or demolition notices be submitted to the Oklahoma Department of Environmental Quality (ODEQ) Air Quality Division (ADQ) when certain conditions are met.

NOTICES ARE REQUIRED:

- For all demolitions, whether asbestos is present or not.
- When the quantity of RACM to be disturbed is greater than 260 linear feet, 160 square feet or 35 cubic feet.

NOTICES ARE NOT REQUIRED:

For Renovations:

- When no asbestos is present during a renovation.
- When the RACM to be disturbed is less than 260 linear feet, 160 square feet or 35 cubic feet.

Even though the regulations address only material that is presently friable, it does not limit itself to material that is friable at the time of notification. If at any point during the renovation or demolition, additional friable ACM is created from non-

friable forms, then this additional friable material becomes subject to the regulations from the time of creation.

- All asbestos containing waste must be deposited at a waste disposal site that is operated in accordance with 40 CFR 61.154
- When handling demolition or renovation of school (K-12) structures, contractors should be aware of additional requirements under the EPS AHERA. The Oklahoma Department of Labor (ODOL), Asbestos Division hands this function. The telephone number is 405-521-6463.
- All contractors who remove asbestos materials must be licensed by the Oklahoma Department of Labor. The telephone number 405-521-6463.

Sample Annual Notification Letter

Date:

All Parents

All Students

All Employees

SUBJECT: Asbestos Inspection, Re-inspection and Availability of AHERA Management Plan

I am pleased to advise you that the Gracemont Public School District is continuing to work diligently for the students, parents, and employees to maintain a safe learning environment and insure the compliance of Federal Asbestos Hazard Emergency Response Act (AHERA) regulations.

Gracemont Public School conducted an initial inspection of all school facilities for the purpose of defining asbestos-containing building materials (ACBM) in the summer of 1987. An accredited asbestos inspector performed the inspection. A management plan was developed for the facility, detailing the findings of the inspection in compliance with the Environmental Protection Agency's AHERA regulation.

In accordance with 40CFR 763.85(b)(1) of that Act, at least once every three years, after a management plan is in effect, each local education agency shall conduct a re-inspection of all friable and non-friable, known or assumed, ACBM in each school building that they lease, own, or otherwise use as a school building. Periodic surveillance is also conducted in all buildings that the district leases, owns, or otherwise uses as a school building every six months as stated in 40CFR 763.85(b)(3) of the AHERA act.

No significant changes in the asbestos materials were noted during the (2023) surveillance of this school/facility. All asbestos material is in satisfactory condition

23-1112: Gracemont PS (0223)
AHERA Reinspection 2020

and we shall continue to manage them in place, as recommended by the accredited management planner.

The AHERA Management Plan is maintained in the Administrative Office and is available to the public during regular working hours (8:00 a.m. – 4:30 p.m.). The school superintendent is the asbestos program's designated coordinator for the Gracemont School System. If you would like additional information regarding the asbestos program please contact him /her at their office.

23-1112: Gracemont PS (0223)
AHERA Reinspection 2020

UPDATED AHERA MANAGEMENT PLAN
Based on
AHERA THREE YEAR REINSPECTION

Gracemont Public Schools
417 East McCall
Gracemont, Ok. 73042
Telephone: 405.966.2551
LEA #: 0223

Superintendent
417 East McCall
Gracemont, OK 73042
Telephone: 405.996.2551

Designated Person: Superintendent
417 East McCall
Gracemont, OK 73042
Training: Designated Person Self-Study Guide

Inspector & Management Planner: James Gaylor, CHMM, OKMP 134957

Date of Inspection: 19 April 2023



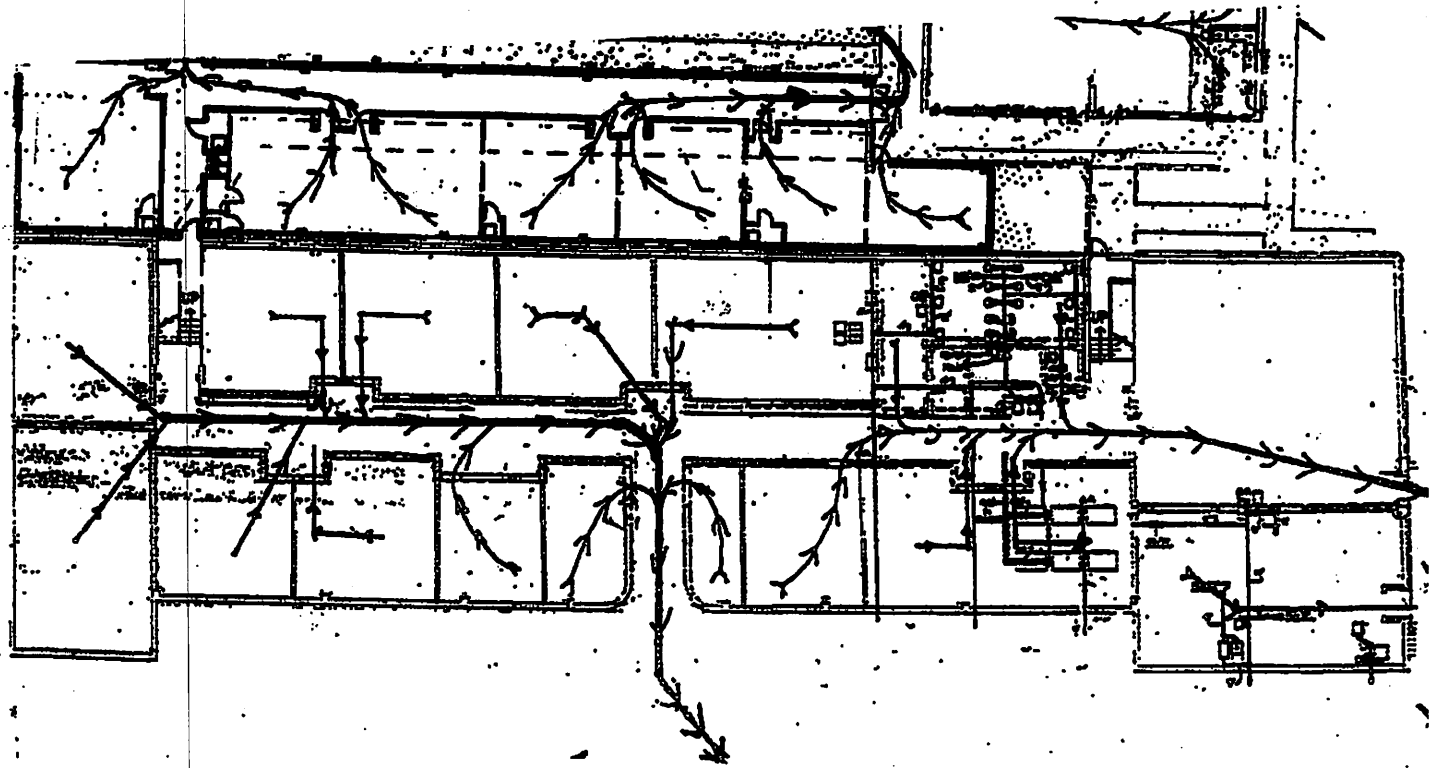
SIX MONTH SURVEILLIANCE TABLE

Location	October 2023	April 2024	October 2024	April 2025	October 2025	April 2026
Auditorium and Shop						
Gymnasium Floor Tile						

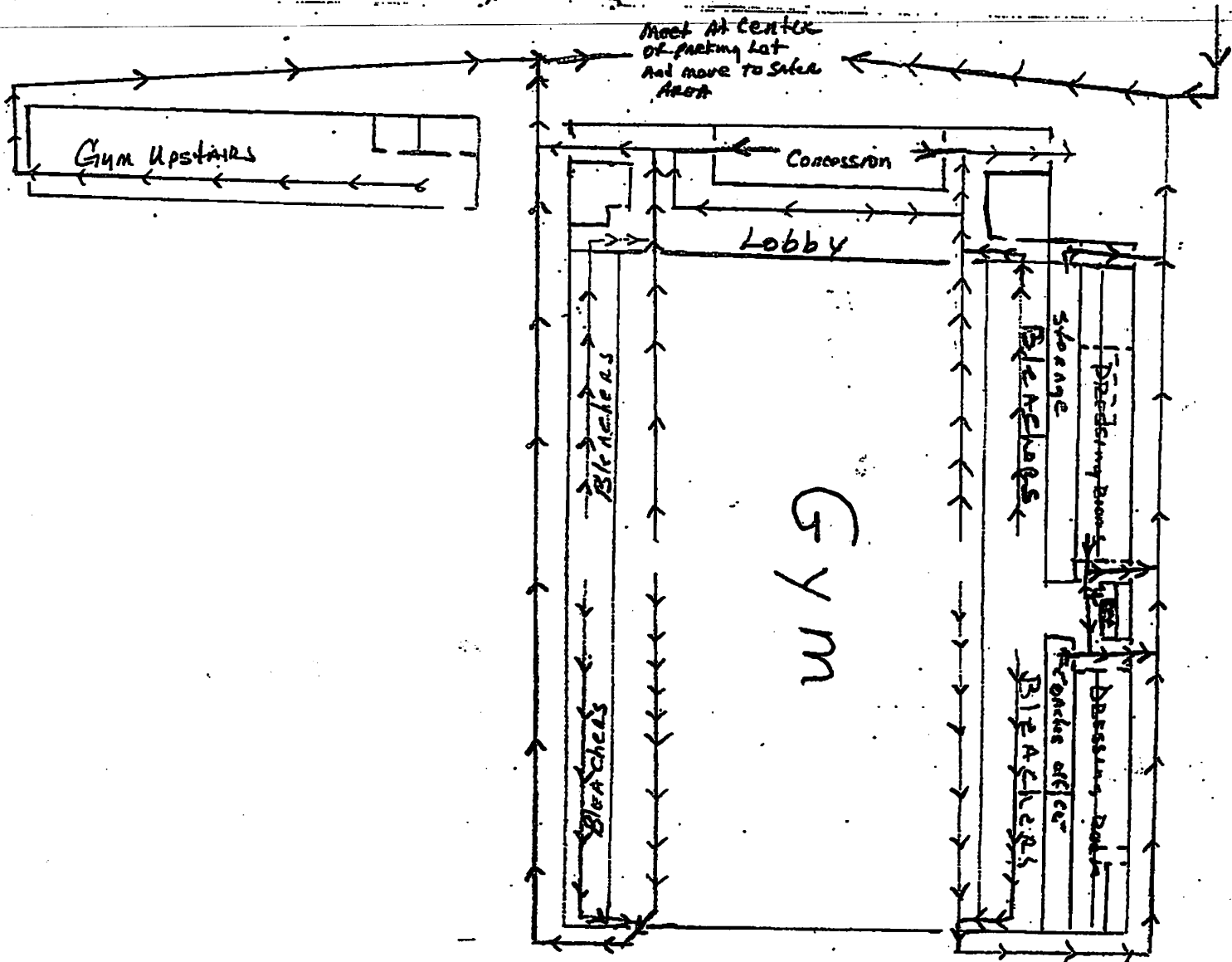
APPENDIX A
ASBESTOS INSPECTION SHEETS

JR Gaylor, CHMM

1805 Glenn Eagle ♦ Edmond, OK 73003 ♦ Office: 405-359-8868 ♦ Cell: 405-831-9670 ♦ Fax: 405-216-9227

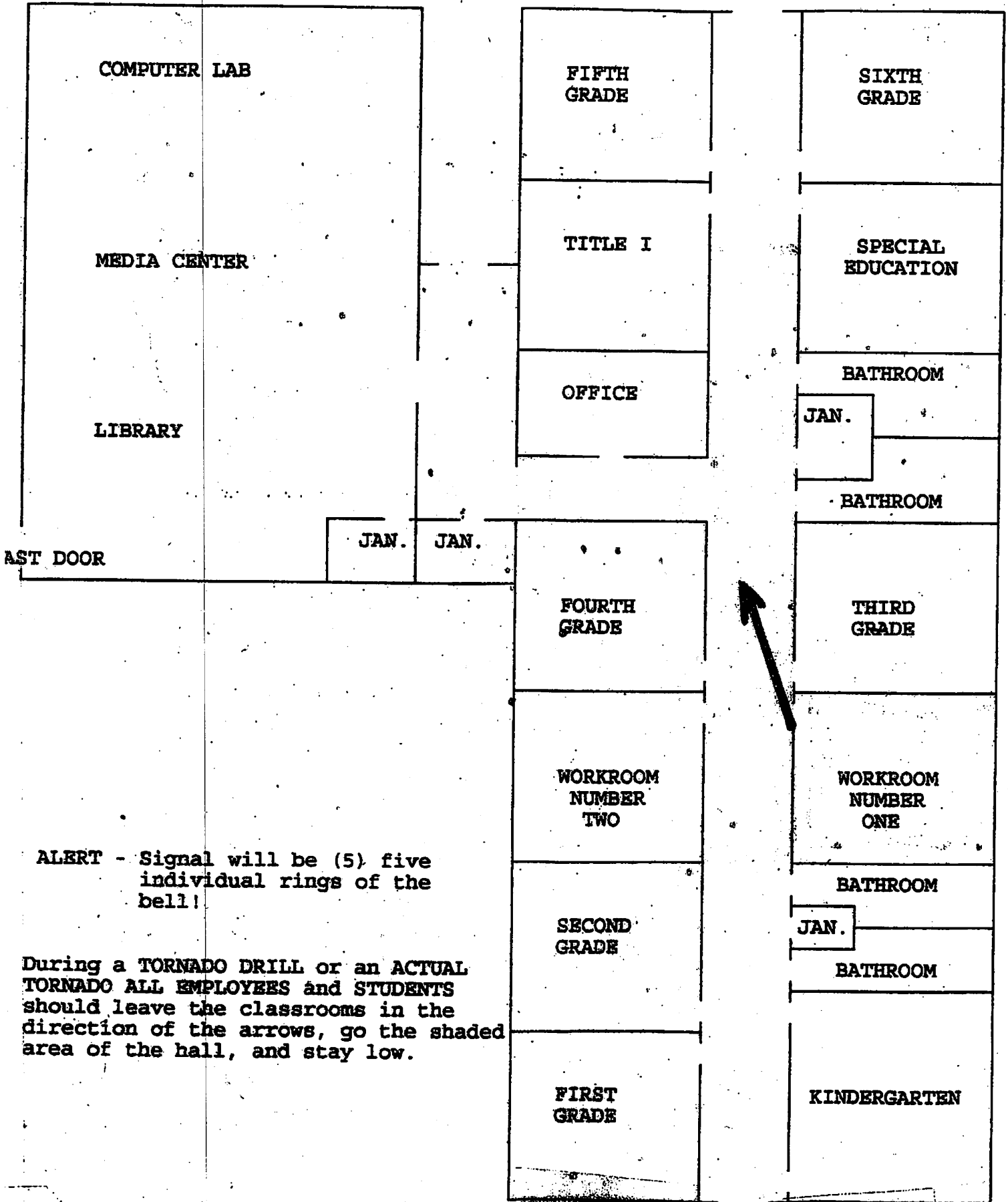


High School



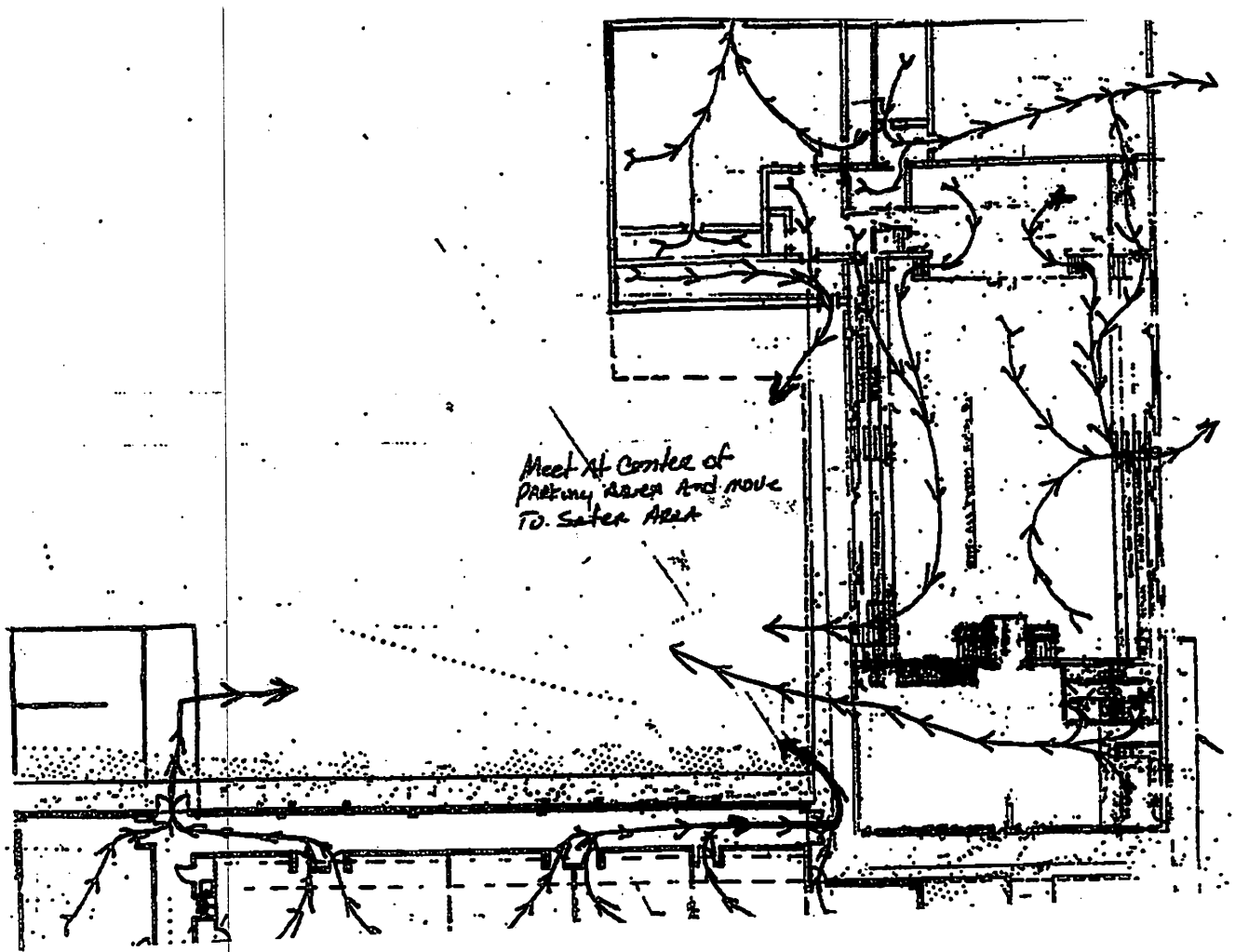
GRACEMONT ELEMENTARY SCHOOL TORNADO DRILL

SOUTH DOOR



ALERT - Signal will be (5) five individual rings of the bell!

During a TORNADO DRILL or an ACTUAL TORNADO ALL EMPLOYEES and STUDENTS should leave the classrooms in the direction of the arrows, go the shaded area of the hall, and stay low.



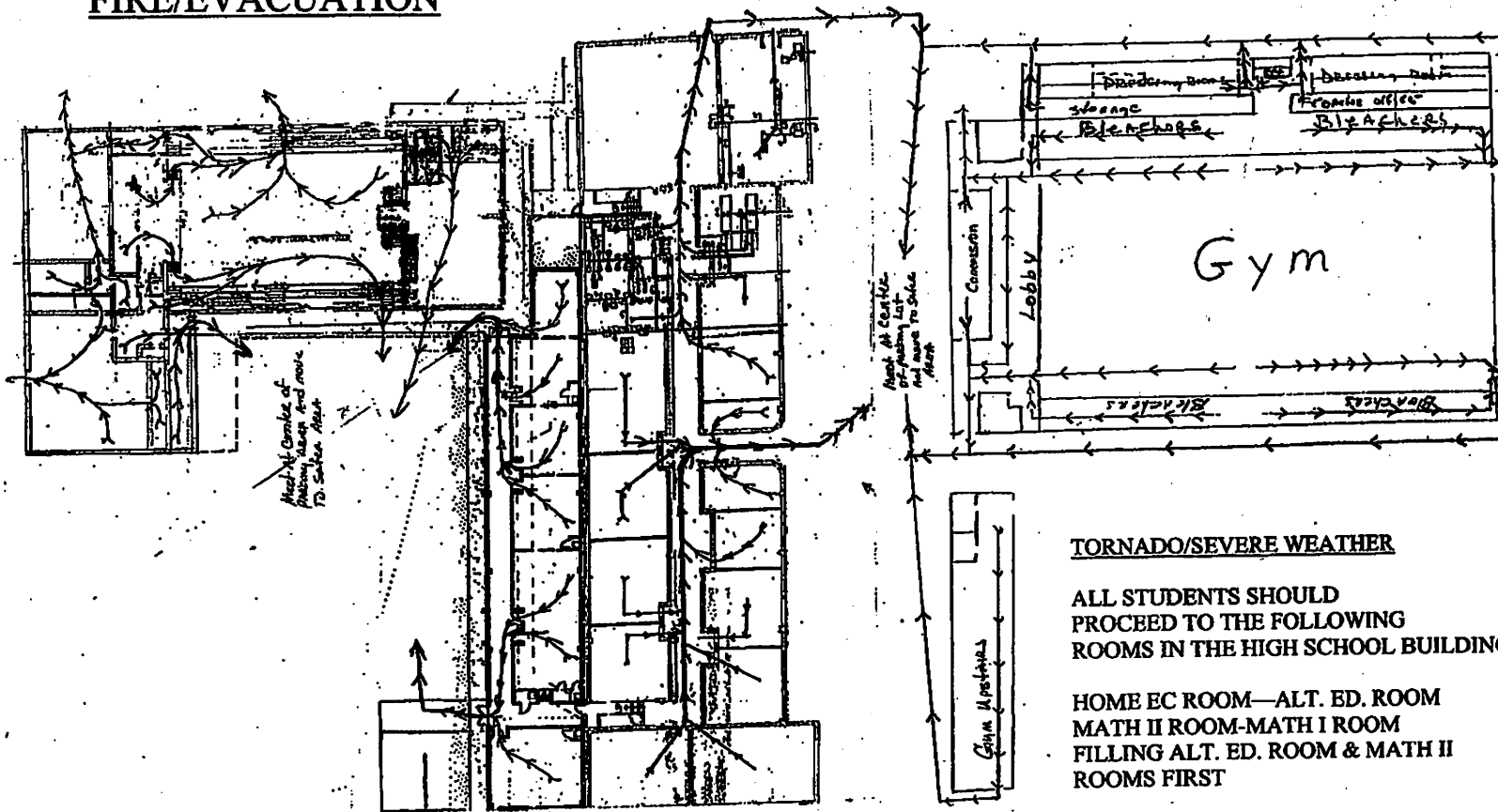
Auditorium

Auditorium

High School

Gym

FIRE/EVACUATION



TORNADO/SEVERE WEATHER

ALL STUDENTS SHOULD
PROCEED TO THE FOLLOWING
ROOMS IN THE HIGH SCHOOL BUILDING

HOME EC ROOM—ALT. ED. ROOM
MATH II ROOM—MATH I ROOM
FILLING ALT. ED. ROOM & MATH II
ROOMS FIRST

Oklahoma Department of Labor



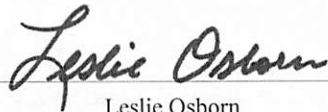
James Robert Gaylor

has filed in the office of the Commissioner of Labor of the State of Oklahoma
an application for a Limited Asbestos Contractor's license for

AHERA MANAGEMENT PLANNER

Now, therefore, The Commissioner of Labor of the State of Oklahoma, by virtue of
the power vested in her by law hereby issues to the applicant license

No. OK-MP134957.



Leslie Osborn

Commissioner of Labor

September 20, 2022

Date of Issuance

EXPIRES: September 16, 2023