



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

February 10, 2016

Ms. Dorothy Mohr, Principal
Pelham High School
85 Marsh Rd.
Pelham, NH 03076-3159

RE: AHERA Inspection, Pelham High School

Dear Ms. Mohr:

On January 8, 2016, the New Hampshire Department of Environmental Services Air Resources Division ("DES") conducted an inspection at Pelham High School. The inspection was conducted to determine conformance with US EPA Asbestos Hazard Emergency Response Act regulations, 40 C.F.R. 763, Subpart E (AHERA). DES staff member Thomas Livingston conducted the inspection.

The following deficiencies were identified during the inspection, and are detailed in the enclosed inspection report;

- 1) The school district was not maintaining a complete updated copy of the Management Plan at both the school and the SAU administrative office.
- 2) The Management Plan did not contain a statement signed by the Designated Person that LEA responsibilities have and will be met.

These deficiencies have been corrected and Pelham High School is now in compliance with the AHERA regulations. DES thanks you for your continued diligence in remaining in compliance with these important regulations. Should you have any questions regarding this inspection, or need assistance with any asbestos related issues, please feel free to contact either Thomas Livingston at 603-271-5891 (thomas.livingston@des.nh.gov) or myself at 603-271-1373 (Stephen.Cullinane@des.nh.gov).

Sincerely,

Stephen Cullinane
Asbestos Program Manager
Air Resources Division

Ms. Amanda Lecaroz, Superintendent, Pelham SAU 28 Office, 59A Marsh Road, Pelham NH 03076,
Mr. Alan Miller, Facilities Director, Pelham SAU 28 Office, 59A Marsh Road, Pelham NH 03076,

Local ID #: FY16-14

Contractor: 0000SAU28-Pelham & Windham School Districts

Inspection Date: January 08, 2016

Site : Pelham High School

Primary Inspector: Thomas Livingston

1. Reason for Inspection ("Yes" to all that apply)	
LEA selected under Neutral Administration Scheme.	1. YES
LEA selected under For Cause Inspection Scheme.	0. N/A - Not Applicable
New LEA or never Federal/State inspected.	1. YES
Last Federal/State inspection 3 years or more.	0. N/A - Not Applicable
LEA has history of violations.	0. N/A - Not Applicable
Newly acquired building/school within LEA	0. N/A - Not Applicable
Response action within last 3 years	1. YES

2. Opening Conference	
Show credentials.	1. YES
EPA Notice of Inspection signed by LEA representative.	1. YES
New Designated Person since last Federal/State Inspection?	0. N/A - Not Applicable
New LEA Superintendent since last Federal/State Inspection?	0. N/A - Not Applicable

3. Local Education Agency	
763.84(a) Did the LEA perform required activities in accordance with AHERA?	1. YES
763.84(d) Were short-term workers informed regarding the presence and location of ACBM?	1. YES
763.84(g)(1) The LEA has a "designated person" as required by AHERA.	1. YES
763.84(g)(2) Did the "designated person" receive adequate training to perform duties under AHERA?	1. YES

4. Custodial and Maintenance Training	
763.92(a)(1) Did maintenance and custodial staff who work in a building that contains ACBM receive at least 2 hours awareness training?	1. YES
763.92(a)(1) Did new maintenance and custodial staff receive awareness training within 60 days of hire?	1. YES
763.92(a)(2) Did maintenance and custodial staff who perform SSSD activities receive at least 2 hour awareness training and an additional 14 hours removal training?	0. N/A - Not Applicable

5. Operations and Maintenance	
763.91(a) Has the LEA implemented an Operations, Maintenance and Repair program?	1. YES
763.91(b) Were employees who perform SSSD activities protected (respirators, PPE, work practices)?	0. N/A - Not Applicable
763.91(d) Were required procedures (signs, restricting area, work practices, cleaning, disposal) followed during operations and maintenance activities disturbing friable ACM?	0. N/A - Not Applicable
763.91(f)(1) For minor release episodes (less than 3 linear/square feet) were required procedures followed?	0. N/A - Not Applicable
763.91(f)(2) For major release episodes (more than 3 linear/square feet) were required procedures followed?	0. N/A - Not Applicable

12. Response Actions (Abatement Projects within last 3 years)		
763.90(a)	Did the LEA implement in a timely manner the appropriate response action to protect human health and the environment?	1. YES
763.90(g)	Were response actions designed by persons accredited to design response actions?	1. YES
763.91(e)	Were response actions conducted by persons accredited to conduct response actions?	1. YES
763.90(i)(1)(i)	Was a visual inspection of each functional space where a response action was conducted performed?	1. YES
763.90(i)(2)(i)	Were clearance air samples collected after the response actions?	1. YES
763.90(i)(2)(ii)	Was an accredited laboratory utilized for the analysis of air samples?	1. YES
763.90(i)(3)	For response actions greater than 160 square feet or 260 linear feet were 13 air samples collected and analyzed by TEM?	1. YES
763.90(i)(5)	For response actions less than 160 square feet or 260 linear feet were 5 air samples collected and analyzed by PCM?	1. YES

13. Abatement Project Notification (NESHAP)		
61.145(b)	Did employer provide Asbestos NESHAP notification?	1. YES
61.145(b)(1)	Was notification provided 10 working days/14 calendar days prior to project?	1. YES

14. Closing Conference		
	Complete EPA Receipt for Samples if samples, photos, or documents taken.	1. YES
	Review findings and any additional steps to be taken.	1. YES
	Were violations of AHERA discovered during the inspection?	1. YES
	Will a Notice of Non-Compliance be issued?	3. NO (NOT A VIOLATION)

Comments

The facility is presently undergoing extensive renovation. Upon the completion of the project in fall of 2016 there will be no more asbestos in the facility.

Non-Compliance Items

- 1 - (9. Management Plans) - 763.93(g)(2) Did the LEA maintain a complete updated copy of a management plan in its administrative office for each school for inspection without cost or restriction?
- 2 - (9. Management Plans) - 763.93(i) Did the management plan contain a statement signed by the Designated Person that LEA responsibilities have and will be met?
- 3 - (10. Recordkeeping) - 763.94(a) Were records maintained in the administrative offices of both the school and LEA?

Corrected Items

All issues of non-compliance were corrected during the inspection except for the creation of a duplicate of the management plan documents to be kept at the SAU offices. The duplicate management plan documents were to be created and provided to the SAU office later that same day.