



**United States Coast Guard**

Housing Unit in Jonesport, ME

Asbestos-Containing Material Survey and Condition/Risk Assessment Report



FINAL

# Asbestos-Containing Material Survey and Condition/Risk Assessment Report

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## U.S. Coast Guard Jonesport, Maine Housing Unit

9 Ferry Street, Jonesport, Maine

Contract No. GS-00P-14-CY-A-0002/Award No. GS-P-00-14-CY-5026

Prepared For:

### United States General Services Administration

Office of Real Property Utilization and Disposal

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Tetra Tech Project No: 103G1058243

Date of Site Visit: October 16, 2014

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Attachment A	Credere Associates, LLC Report
Attachment B	Northeast Test Consultants Report



## 1.0 INTRODUCTION

Information provided by the General Services Administration (GSA) indicates that an asbestos survey and condition/risk assessment had been previously conducted at the site on September 19, 2005. The results of the previous inspection were considered by the asbestos inspector in conducting this Scope of Work. The purpose of this asbestos-containing material (ACM) survey and condition/risk assessment is to determine whether ACM exists in the Jonesport housing unit and, if so, to define its type, condition, and location(s). In accordance with the Scope of Work (SOW) this was a non-destructive survey, and inaccessible areas (e.g. within wall cavities, above drop-ceilings, beneath the top flooring layer, etc.) were not surveyed. This survey and condition/risk assessment documents only general locations of ACM and does not determine the exact boundaries of ACM. ACM may be present in the areas of the site buildings that were not accessible without selective demolition or destructive sampling.

Asbestos is defined in applicable federal and state regulations as a group of 6 minerals consisting of fibrous hydrated silicates. Asbestos fibers were historically used to manufacture building products with desirable properties. Suspect asbestos containing materials (ACM) are those building materials that may have been manufactured with asbestos fibers. A Suspect ACM is an ACM if it contains 1% or greater asbestos by Polarized Light Microscopy (PLM). ACM can be either “friable” or “non-friable”. Friable materials can be readily crumbled using hand pressure. Boiler and pipe insulation are common examples of friable ACM. Non-friable materials cannot be crumbled or reduced to powder by hand pressure. They often contain a binding agent (such as tar or cement), preventing ready release of airborne fibers. Friable ACM are separated into two categories. Category I non-friable ACMs are asbestos-containing resilient floor coverings (like vinyl asbestos tile), asphalt roofing products, packings, and gaskets. These materials rarely become friable because the asbestos is locked securely into the material. All other non-friable ACMs are considered category II non-friable ACM. Category II non-friable ACMs are more likely to become friable because they are not as resistant to crushing or pulverizing.

Certain friable ACMs were banned in the United States in the 1970s, although many asbestos products were manufactured more recently. Non-friable ACMs such floor tile, mastic, and roofing products are found in more recent construction. A thorough inspection of all buildings regardless of age is required prior to renovation/demolition under the federal National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation, 40 CFR 61. The NESHAP regulation refers to the inspection and sampling protocol in the Asbestos Hazard Emergency Response Act (AHERA) 40 CFR 763. Prior to undertaking a renovation or demolition project, ACMs identified during the inspection must be abated in accordance with Maine DEP regulations and Occupational Safety and Health Administration (OSHA) Asbestos Standard for the Construction Industry (29 CFR 1926.1101).

Under 29 CFR 1910.1001, the OSHA Asbestos Standard for General Industry, a building owner must notify employees of the presence of ACM or presumed asbestos containing material (PACM). PACM is defined in the standard and includes thermal system insulation, surfacing material, and vinyl floor tile



that have not been shown to contain 1% or less asbestos. An asbestos operations and maintenance plan is one way of complying with the requirements of the OSHA General Industry Standard.

ACMs that are damaged or deteriorating may release asbestos fibers. We recommend damaged ACM be abated in accordance with applicable regulations to avoid potential release of asbestos fibers.

Information provided by the USCG indicates that an asbestos survey and condition/risk assessment had been previously conducted at the site by Northeast Test Consultants in 2005. The results of the previous inspection were identified and discussed by the asbestos inspector in conducting this ACM Survey and Condition/Risk Assessment as part of this Scope of Work. The Northeast Test Consultants report identified kitchen tiles from 9 Ferry Street that contained 1.3% chrysotile. The asbestos-containing floor tiles in the kitchen were observed to be removed prior to Site reconnaissance. During the current Site visit, the only suspect asbestos-containing materials (ACM) observed and identified by the asbestos inspector were plaster walls on the inside of the building that were previously sampled and confirmed to be non-ACM during the investigation completed by Northeast Test Consultants. In accordance with Maine Department of Environmental Protection Chapter 425 Section 6 Part A, areas of previously sampled materials not identified as ACM are not required to be sampled. No additional sampling was conducted because no other potential ACMs were observed. Roofing materials were not sampled due to safety concerns and are assumed to be positive for ACM. Figures associated with the ACM survey and condition/risk assessment are included as **Figure 1** and **Figure 2**. Roofing materials were not sampled due to safety concerns and is assumed to be positive for ACM. The Credere Associates, LLC report is included in **Attachment A**.



## 2.0 BULK SAMPLING METHODOLOGY

The asbestos inspector reviewed the results of the previous asbestos inspection report prepared by Northeast Test Consultants dated September 27, 2005 prior to conducting the current inspection. Homogeneous areas (HAs), which are defined in AHERA 40 CFR 763.83 as areas of materials that are similar in color and texture, were established. According to 40 CFR 763.87(c)(2), a homogenous area shall be determined to contain ACM based on a finding that the results of at least one sample collected from that area shows that asbestos is present in an amount greater than 1%. Kitchen floor tile was identified as asbestos containing in the Northeast Test Consultants report.

The USEPA's AHERA regulations include guidelines for conducting inspections and collecting samples of suspect ACM. These guidelines allow the inspector to assume homogeneous areas to be asbestos containing, absent sampling data. These guidelines were followed during the survey and condition/risk assessment, where appropriate. Maine DEP Chapter 425, Section 6.A states *"Specific building materials that do not require inspection, sampling, and analysis for asbestos include: wood, fiberglass, glass, plastic, metal, laminates, foam, rubber and gypsum board when joint compound was used only as a filler and not as a layered component, and intact caulking and glazings. Also, building materials do not need to be inspected when written documents exist confirming that no asbestos was used in the materials that will be impacted, or that the materials were previously inspected by a DEP-certified Asbestos Inspector and affirmatively determined through sampling and analysis to not be ACM."*

The previous asbestos survey and condition/risk assessment was limited to materials that could be sampled without damage to the material or the property. The only areas identified in the housing unit as potentially containing ACM were plaster walls which were previously sampled during the investigation completed by Northeast Test Consultants. In accordance with Maine Department of Environmental Protection Chapter 425 Section 6 Part A, areas of previously sampled materials not identified as ACM are not required to be sampled. Based on the identification of the plaster ceiling at the Site not containing ACM, no additional ACM samples were collected as part of this investigation in the plaster. ACM identified in the Northeast Test Consultants report included kitchen tiles from 9 Ferry Street that contained 1.3% chrysotile; however, the kitchen tiles were identified as removed. No other materials were identified as potentially containing ACM based on the Site visit; therefore, no ACM samples were collected. Roofing materials were not sampled due to safety concerns. The Northeast Test Consultants report is included in **Attachment B**.



### **3.0 RECOMMENDATIONS**

Based on the sampling previously completed at the Site and Site visit indicating that no additional potential ACMs were present, no ACMs were identified beyond assumed ACM in roofing materials. If the Site building is to be demolished, a destructive ACM survey and condition/risk assessment should be completed to determine if ACMs are present in inaccessible areas, such as the roofing materials where ACM is assumed. If ACM is determined to be present in inaccessible areas in the future, the ACMs should be handled accordingly by qualified individuals.

#### **3.1 LIMITATIONS**

The conclusions of the report are professional opinions based solely upon visual site observations, and interpretations of analyses as described in this report. The opinions presented within this report apply to the site conditions existing at the time of the investigations, and interpretation of current regulations. Therefore, opinions and recommendations provided within this report might not apply to future conditions that may exist at the Site.

The current regulations should always be verified prior to any work involving asbestos or other regulated materials. This survey and condition/risk assessment is not intended to be used as an abatement design document. All existing conditions, quantities, and locations should be verified prior to abatement. ACM may be found within wall cavities, above ceilings, in pipe chases, within attics, or other inaccessible areas. The survey and condition/risk assessment did not include an investigation of potentially buried piping within or in the vicinity of the structures.



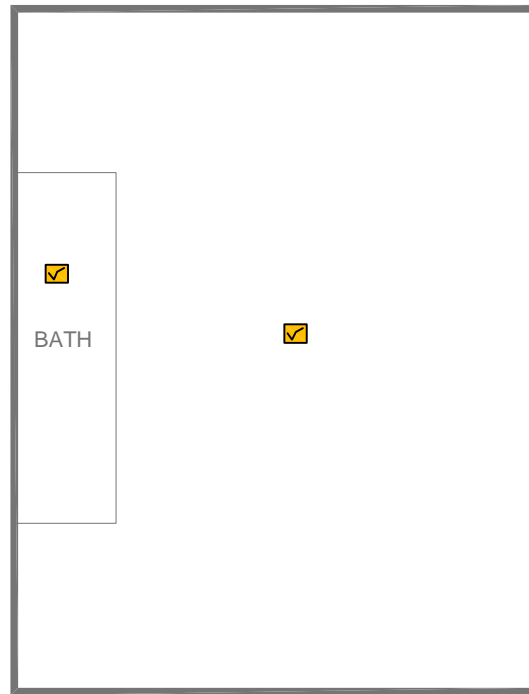
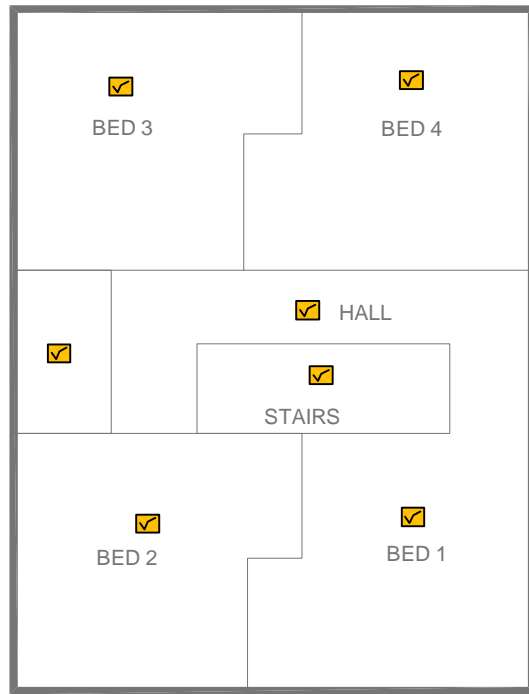
**United States Coast Guard**

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## FIGURES



LEGEND

-  Room visually inspected for potential ACM

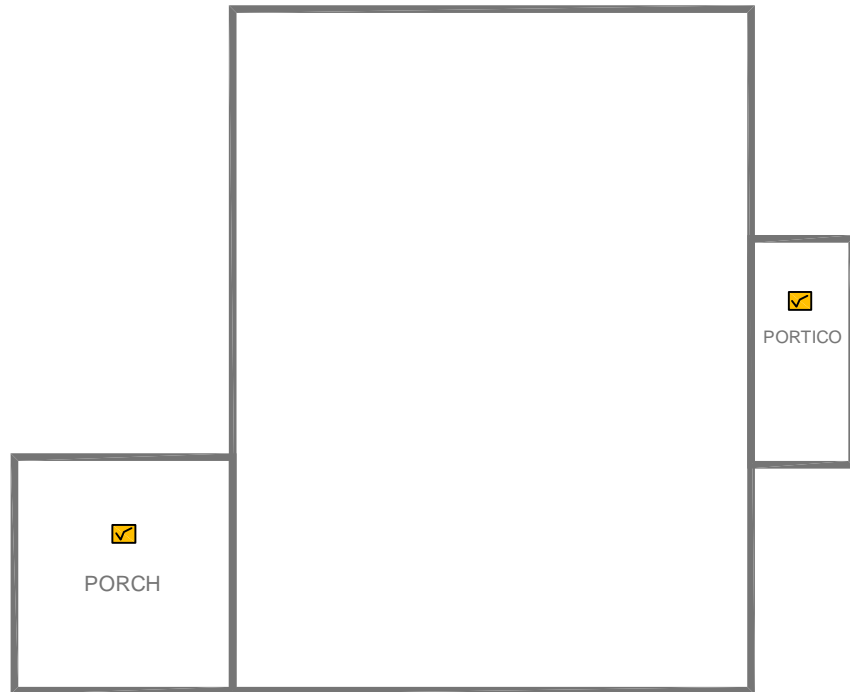
US COAST GUARD HOUSING UNIT  
9 FERRY STREET  
JONESPORT, ME 04649

FIGURE 2  
LBP INSPECTION LOCATIONS

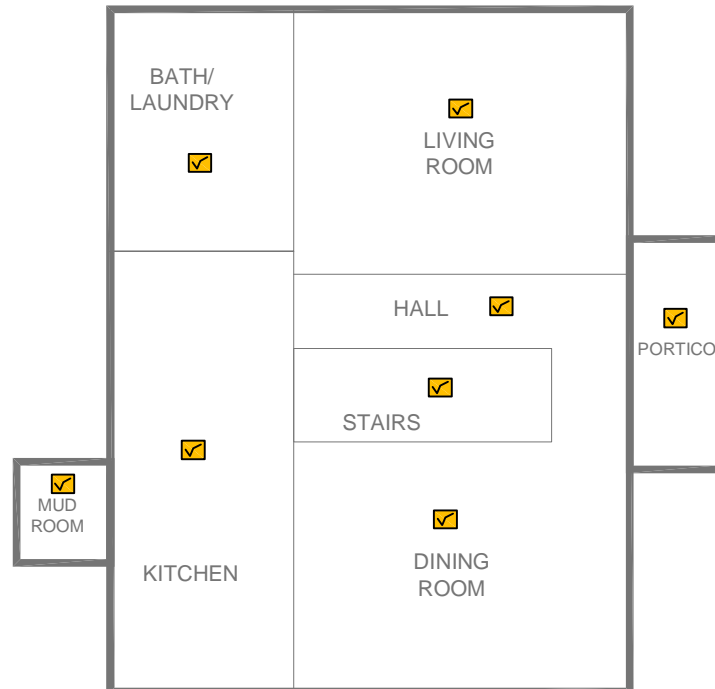
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EXTERIOR



FLOOR 1

LEGEND

-  Room visually inspected for potential ACM

US COAST GUARD HOUSING UNIT  
9 FERRY STREET  
JONESPORT, ME 04649

FIGURE 1  
ACM INSPECTION LOCATIONS

NOT TO SCALE

