

August 18, 2022

Cody Staley
Ovid-Elsie Area Schools
8989 East Colony Road
Elsie, MI 48831

RE: 2022 AHERA Management Plan Update

Dear Cody,

Enclosed is the 2022 update of the Asbestos Hazard Emergency Response Act (AHERA) management plan for asbestos-containing materials. It is the result of the most recent 3-year re-inspection of school buildings conducted by DeLisle Associates LTD (DeLisle) on August 18, 2022. The following is a list of areas of response actions, which DeLisle recommends.

SCHOOL	AREA	SPECIFIC MATERIAL	RESPONSE ACTION
E.E. Knight Elementary	N/A	N/A	No response action required
Administration Building	N/A	N/A	No response action required
Ovid-Elsie High School	Room C10	9" x 9" Floor Tile	Partially Abated in 2020 – Update Management Plan
Ovid-Elsie High School	Room E9	9" x 9" Floor Tile	Abated in 2020 – Remove from Management Plan
Ovid-Elsie High School	Storage off Room E9	9" x 9" Floor Tile	Abated in 2020 – Remove from Management Plan
Ovid-Elsie High School	Room S10	9" x 9" Floor Tile	Abated in 2020 – Remove from Management Plan

The Environmental Protection Agency (EPA) has indicated in guidance documents provided by the agency, that asbestos-containing materials (ACM) not previously assessed by the original building inspection is not required to be documented in the most recent management plan update. However, the EPA *strongly* suggests that this material be included into the management plan update. DeLisle agrees with the EPA recommendation and suggests the Designated Person for this School District review the management plan update and incorporate the new inspection findings into the original plan. By signing the enclosed document (Page 6 of this submittal), Ovid-Elsie Area Schools agrees with the recommendations of this management plan update for inclusion of newly discovered material (where applicable). Asbestos containing material as it exists must be assessed, quantified, and removed prior to the start of any demolition or renovation activities as outlined by the National Emissions Standards for Hazardous Air Pollutants (NESHAP). Therefore, if Ovid-Elsie Area Schools is ever to update, renovate, or alter the aforementioned schools in any fashion, the asbestos-containing material should be

acknowledged and dealt with according to all state and local regulations. Keep in mind that the building exteriors were not required to be inspected and invasive sampling was not typically conducted on the interior materials in the initial inspections. DeLisle recommends before any renovation and/or demolition activities, a Michigan accredited asbestos building inspector conduct a comprehensive asbestos inspection in the affected areas.

As a component of this re-inspection requirement, DeLisle inspectors reviewed the present status of the school's management plan. Components of the plan that were reviewed included training documentation, community notification and periodic surveillance data as well as abatement records from past abatements since the most recent three-year inspection.

Ovid-Elsie Area Schools was required to produce the following documentation during DeLisle's Management Plan review:

- 1) Training documentation – Current
- 2) Six-month periodic surveillance inspections–Current
- 3) Community notification – Current
- 4) Abatement Records – Current/Added to Management Plan

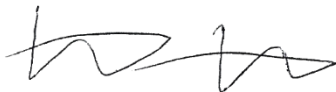
AHERA states this information must be kept current to remain in compliance with the regulation.

The EPA passed a Formal Rule amendment to the EPA Worker Protection Rule of 1982 and the AHERA regulation (1986-87, as amended) in November of 2000. This regulation amended previous requirements for schools to train maintenance and custodial personnel. The new standard incorporates an annual component to the training requirement and, as a result, Ovid-Elsie Area Schools must now train their affected employees each year on asbestos related issues and maintain appropriate documentation.

If you have any further questions regarding this three-year re-inspection report, please call DeLisle at (269) 373-4500. In the event that the schools management plan maintenance is needed, DeLisle can also assist in its annual requirements.

Sincerely,

DeLISLE ASSOCIATES LTD



Robert Bryant
Asbestos Building Inspector
Michigan Accreditation Number A46807

Encl.

STATEMENTS

AHERA INSPECTION

Company Statement

This Re-inspection Report and Management Plan Update was prepared by DeLisle Associates LTD (DeLisle) to help Ovid-Elsie Area Schools evaluate asbestos hazards associated with maintaining their facilities. In the preparation of this living document, every attempt has been made to recommend the least burdensome response actions consistent with protecting human health and the environment as specified by the Environmental Protection Agency's (EPA) Asbestos Hazard Emergency Response Act (AHERA). AHERA states that the management plan is the ultimate responsibility of the owner/operator of the facility. The owner/operator has the authority to make reasonable changes to the management plan. It is the responsibility of the owner/operator to read and understand the response actions, their obligations, timetables, and to determine if these actions are reasonable actions prior to signing the owner/operator statement. Any changes or additions to this document without written authorization from DeLisle will automatically void the inspection and management plan statements for year.

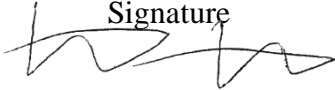
If the owner/operator decides to make changes to this report without authorization from DeLisle or decides to make changes, which conflict with the advice and/or professional judgment of DeLisle, a separate statement should accompany the management plan and should specify which recommended actions the owner/operator has decided to change, the actual changes, and rationale for the changes. Should this occur, DeLisle will not accept any responsibility for changes to any response actions that DeLisle did not previously state.

Please insert these pages into the existing Management Plan. If you have any questions, please contact us at (269) 373-4500.

AHERA INSPECTION SIGNATURE PAGE

Inspection Statement

The person(s) listed below hereby attest(s) that he did inspect, assess and perform sampling of suspect ACBM at the buildings listed in the inspection report for Ovid-Elsie Area Schools on August 18, 2022 in accordance with EPA AHERA regulations set forth in 40 CFR Section 763.85(a):

Name	Accreditation #	Signature	Date
Robert Bryant	A46807		August 18, 2022

Management Plan Statement

The person(s) listed below hereby attest(s) that he did review data which may have updated the management plan for Ovid-Elsie Area Schools. Any recommendations are based on the above referenced inspection report and completed on August 18, 2022 in accordance with EPA AHERA regulations herein set forth in 40 CFR Section 763.93(12), (ii).

Name	Accreditation #	Signature	Date
André DeLisle	A40887		August 30, 2022

AHERA INSPECTION

Local Education Agency statement

I, being the Local Education Agency "Designated Person", as defined by 40 CFR Section 763.84(g), Ovid-Elsie Area Schools, hereby attest that I have reviewed the update (3 year re-inspection) of the management plan conducted by DeLisle Associates LTD and further attest that it is acceptable to Ovid-Elsie Area Schools and meets the general LEA responsibilities as stipulated in 40 CFR Section 763.84. In addition, all person(s) who inspect for ACBM and who will design or carry out response actions, except O & M, are or will be accredited by the State of Michigan.

D.P. Name: _____

Title: _____

Phone: _____

Address: Ovid-Elsie Area Schools
8989 East Colony Road
Elsie, MI 48831

Signature: _____

Date: _____

Original Management Plan Implementation Date: July 9, 1989

Inspection Date: August 18, 2022

Next Re-inspection Before: August 18, 2025

PLEASE SIGN AND RETURN A COPY OF THIS PAGE TO:

DeLisle Associates LTD
5050 S. Sprinkle Road
Portage, MI 49002
(269) 373-4500 office
(269) 373-1044 fax

andred@delisleassoc.net

QUALIFICATIONS



Asbestos Inspector



Robert A. Bryant
13690 East P Avenue
Climax, MI 49034

Accreditation Number **A46807** Expiration Date **02/26/2023** DOB: 06/04/1993

This individual has satisfactorily met or exceeded the requirements of Michigan Public Act 440 of 1988, as amended, to be accredited as an Asbestos Inspector. Accreditation card is not valid if altered. 156446

DeLisle Associates LTD

Certificate of Training

Presented to

Robert Bryant

for successful completion of

Asbestos Inspector Refresher

in compliance with the United States Environmental Protection Agency's Asbestos Model Accreditation Plan, 40 CFR Part 763 (AHERA), Subpart E, Appendix C, and with Michigan P.A. 440 of 1988, as amended

Student Identification	<u>3817</u>
Certificate Number	<u>IR-1994</u>
Course Completion Date	<u>December 27, 2021</u>
Certificate Expiration Date	<u>December 27, 2022</u>




Mark A. DeLisle, Instructor

DeLisle Associates LTD
5050 S. Sprinkle Rd., Portage, Michigan 49002
delisleassoc.net 269.373-4500

Asbestos Management Planner



Andre T. DeLisle
242 Dunbarton Court
Kalamazoo, MI 49006

Accreditation Number A40887
Expiration Date 04/13/2023
DOB: 06/13/1992

This individual has satisfactorily met or exceeded the requirements of Section 206 of the Toxic Substances Control Act to be accredited in the above discipline.

Accreditation card is not valid if altered. 158017

 DeLisle Associates LTD

Certificate of Training

Presented to

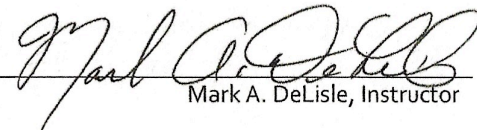
André DeLisle

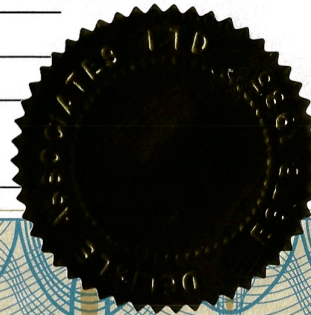
for successful completion of

Asbestos Management Planner Refresher Course

This Course fulfills the requisite training of TSCA Title II and is in compliance with the United States Environmental Protection Agency's Asbestos Model Accreditation Plan, 40 CFR part 763 (AHERA), Subpart E, Appendix C, and is in compliance with Michigan P.A. 440 of 1988, as amended.

Student Identification	<u>6411</u>
Exam Date	<u>December 27, 2021</u>
Certificate Number	<u>MPR-1161</u>
Course Date(s)	<u>December 27, 2021</u>
Certificate Expiration Date	<u>December 27, 2022</u>


Mark A. DeLisle, Instructor



INSPECTION DATA

Job #: IH22-183
Name of Building: E. E. Knight Elementary
Address: 215 Tyler Dr., Elsie, MI 48831

Ovid-Elsie Area Schools
Reinspection Form

DeLisle Associates LTD
Date:8/18/2022

<i>FUNCTION SPACE DESCRIPTION</i>	<i>FUN_NUM</i>	<i>T, S, M</i>	<i>SF</i>	<i>LF</i>	<i>MATERIAL DESCRIPTION</i>	<i>DAM</i>	<i>REASON FOR CHANGE</i>	<i>RA</i>	<i>Y, N, A</i>
LIBRARY OFFICE & AV	011	M	20	0	FIRE DOOR	L	CONTINUE O & M	1	A

(RA) Response Action

1. Operations and Maintenance
2. Repair
3. Encasement
4. Encapsulate
5. Removal

Job #: IH22-183

Name of Building: Administration

Address: 8989 East Colony Road, Elsie, MI 48831

Ovid-Elsie Area Schools

Reinspection Form

DeLisle Associates LTD

Date:8/18/2022

FUNCTION SPACE DESCRIPTION	FUN_NUM	T, S, M	SF	LF	MATERIAL DESCRIPTION	DAM	REASON FOR CHANGE	RA	Y, N, A
KITCHEN / STORAGE	OO2	M	160	0	9 X 9 FT	L	CONTINUE O & M	1	Y
VAULT	OO6	M	120	0	9 X 9 FT	L	CONTINUE O & M	1	Y
FRONT OFFICES	OO7	M	3600	0	9 X 9 FT/CO	L	CONTINUE O & M	1	A
FRONT OFFICES	OO7	M	160	0	FIRE DOORS	L	CONTINUE O & M	1	A
EXTERIOR	OO9	M	200	0	TRANSITE	L	CONTINUE O & M	1	Y

(RA) Response Action

1. Operations and Maintenance
2. Repair
3. Encasement
4. Encapsulate
5. Removal

Job #: IH22-183

Name of Building: High School

Address: 8989 East Colony Road, Elsie, MI 48831

Ovid-Elsie Area Schools

Reinspection Form

DeLisle Associates LTD

Date:8/18/2022

FUNCTION SPACE DESCRIPTION	FUN_NUM	T, S, M	SF	LF	MATERIAL DESCRIPTION	DAM	REASON FOR CHANGE	RA	Y, N, A
KITCHEN & SERVING AREA	002	M	65	0	9 X 9 FT	L	CONTINUE O & M	1	Y
KITCHEN & SERVING AREA	002	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
KITCHEN STORAGE	003	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
MAINT. RM	007	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM C2	030	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C4	029	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C6	028	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C7		M	200	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C8	027	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C10	025	M	650	0	9 X 9 FT	L	Partially Abated 2020	1	Y
RM C11	010	M	700	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C12	026	M	1000	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C13		M	81	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C13		M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM C14	013	M	80	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM C15		M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM E13	014	M	100	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E16	015	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM E16	015	M	125	0	LAB TABLE TOP	L	CONTINUE O & M	1	Y
RM E12	017	M	1300	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E10	018	M	250	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E11 & STORAGE ROOMS	021	M	1300	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E9	022	M	1200	0	9 X 9 FT	L	Abated 2020	1	Y
RM E9	022	M	250	0	LAB TABLE TOP	L	CONTINUE O & M	1	Y
STORAGE OFF RM E9	023	M	500	0	9 X 9 FT	L	Abated 2020	1	Y
STORAGE OFF RM E9	023	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
JANITOR'S RM	032	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM E1	035	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E3	036	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E5	037	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
STORAGE RM	041	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
STORAGE RM	041	M	150	0	9 X 9 FT	L	CONTINUE O & M	1	Y
JANITOR'S RM	042	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM E8	043	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E6	044	M	700	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM E4	045	M	700	0	9 X 9 FT	L	CONTINUE O & M	1	Y

(RA) Response Action

1. Operations and Maintenance
2. Repair
3. Encasement
4. Encapsulate
5. Removal

Job #: IH22-183

Name of Building: High School

Address: 8989 East Colony Road, Elsie, MI 48831

Ovid-Elsie Area Schools

Reinspection Form

DeLisle Associates LTD

Date:8/18/2022

FUNCTION SPACE DESCRIPTION	FUN_NUM	T, S, M	SF	LF	MATERIAL DESCRIPTION	DAM	REASON FOR CHANGE	RA	Y, N, A
RM E2	046	M	700	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM S18 & BACK ROOM	047	M	1100	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM S16	048	M	1100	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM S16	048	m	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM S13		M	215	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM S12	050	M	900	0	9 X 9 FT	L	CONTINUE O & M	1	Y
JANITOR CLOSET xS-12	050	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM S10	051	M	1600	0	9 X 9 FT	L	Abated 2020	1	Y
RM S8	052	M	1200	0	9 X 9 FT	L	Under floating floor	1	Y
RM S6	053	M	1600	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM S4	054	M	200	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM S4	054	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
RM S2 (Front Offices)	055	M	1800	0	9 X 9 FT CO	L	CONTINUE O & M	1	Y
CAFETERIA	065	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
AUDITORIUM & STAGE	066	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
STAGE OFFICE	067	M	0	2	FIREDOOR	L	CONTINUE O & M	1	A
AIR HAND RM ABV STAGE	068	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
UNIFORM STORAGE	069	M	120	0	9 X 9 FT	L	CONTINUE O & M	1	Y
UNIFORM STORAGE	069	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
BAND HALL & ELECT. RM	070	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
BAND OFFICE	074	M	150	0	9 X 9 FT	L	CONTINUE O & M	1	Y
PRACTICE ROOMS	075	M	150	0	9 X 9 FT	L	CONTINUE O & M	1	Y
STORAGE ROOMS	076	M	350	0	9 X 9 FT	L	CONTINUE O & M	1	Y
INSTRUMENT STORAGE ROOM	077	M	550	0	9 X 9 FT	L	CONTINUE O & M	1	Y
INSTRUMENT STORAGE ROOM	077	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
CHORAL OFFICE	079	M	150	0	9 X 9 FT	L	CONTINUE O & M	1	Y
GYM BALCONY	081	M	40	0	FIREDOOR	L	CONTINUE O & M	1	A
GYM BALCONY	081	M	6200	0	9 X 9 FT	L	CONTINUE O & M	1	Y
STOR.RMS BACK OF BALC.	082	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
EAST GYM MECH RM	083	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
W. GYM MECH RM	084	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
STRG & CONCESSIONS	085	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
GYM STOR & EQUIP RM	086	M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
POOL MECH ROOM	093	M	40	0	FIREDOOR	L	CONTINUE O & M	1	A
A.D. OFFICE		M	20	0	FIREDOOR	L	CONTINUE O & M	1	A
TANK ROOM		M	20	0	FIREDOOR	L	CONTINUE O & M	1	A

(RA) Response Action

1. Operations and Maintenance
2. Repair
3. Encasement
4. Encapsulate
5. Removal

Job #: IH22-183

Name of Building: High School

Address: 8989 East Colony Road, Elsie, MI 48831

Ovid-Elsie Area Schools

Reinspection Form

DeLisle Associates LTD

Date:8/18/2022

<i>FUNCTION SPACE DESCRIPTION</i>	<i>FUN_NUM</i>	<i>T, S, M</i>	<i>SF</i>	<i>LF</i>	<i>MATERIAL DESCRIPTION</i>	<i>DAM</i>	<i>REASON FOR CHANGE</i>	<i>RA</i>	<i>Y, N, A</i>
DARK RM		M	160	0	9 X 9 FT	L	CONTINUE O & M	1	Y
DARK RM		M	40	0	FIREDOOR	L	CONTINUE O & M	1	A
RM N16	039	M	200	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM N14	040	M	215	0	9 X 9 FT	L	CONTINUE O & M	1	Y
RM N12		M	350	0	9 X 9 FT	L	CONTINUE O & M	1	Y
Exterior		M	1200	0	TRANSITE	L	CONTINUE O & M	1	Y

(RA) Response Action

1. Operations and Maintenance
2. Repair
3. Encasement
4. Encapsulate
5. Removal