

## School District 85



**ATCO Double Wide Trailer  
6150 Brass Road, Port Hardy, BC  
Asbestos Management Inventory**



**North West  
Environmental Group Ltd.**

NWest File: 39957 AMI1 V1.0

Date Issued: April 20, 2021

### Report Information

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Issued on:	April 20, 2021
NWest File Number:	39957 AMI1 V1.0
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**Warning:** in the event any additional suspect materials are encountered during renovation/repair activities, work on those materials must stop immediately and remain undisturbed until testing confirms the presence or absence of asbestos or other hazardous materials.

## 1 Introduction

North West Environmental Group Ltd. (NWest) was retained by School District 85 (the Client) to conduct an asbestos management inventory (AMI) at ATCO Double Wide Trailer located at 6150 Brass Road, Port Hardy, BC (site). The non-destructive assessment was conducted by NWest representative, Paddy Greig on August 24, 2020.

The purpose of this assessment is to provide information regarding the presence and condition of asbestos and suspect asbestos containing building materials in the building structure. This inventory assessment involved the identification of asbestos containing materials and a condition assessment in support of the building owner/manager's regular monitoring of asbestos containing material conditions so that materials in good condition may be safely managed in place until they are removed, and damaged materials can be repaired or otherwise addressed in a timely manner. Regular inspections of asbestos containing building materials are required to mitigate the potential for occupant and worker exposure. This report may be used for day to day building maintenance activities involving minor disturbance of materials.

This assessment supports compliance with the following provincial legislation:

- ) BC Workers Compensation Act – Part 2, Division 4 (General Duties of Employers, Workers and Others), Section 25 (General duties of owner).
- ) BC Occupational Health and Safety Regulation – Part 6.4 (Asbestos-General Requirements, Inventory).

This asbestos management inventory assessment does not replace the requirement for the owner to undertake a pre-renovation or pre-demolition project-specific hazardous materials assessment as required by the BC Occupational Health and Safety Regulation section 20.112.

Note: ongoing repairs, maintenance, and renovations may result in some changes to the building after this report was printed.

## 2 Scope of Work and Exclusions

All accessible areas of the facility were included in this assessment. Whenever practicable, representative building material samples were collected for asbestos analysis. See Appendix E for assessment methodologies.

This assessment was non-destructive (e.g., inspection holes to assess otherwise intact systems such as wall cavities were not made) and non-invasive (e.g., assessment of cupboards, closets, and similar personal spaces were not undertaken; ceiling tiles were not removed to assess above-ceiling materials). As such, concealed asbestos containing materials may be present.

The following NWest historical data and information is included herein:

- ) Project number 30014, "Asbestos Inventory and Condition Assessment ATCO Double Wide Trailer", issued on November 10, 2016.

Areas/systems not included in the assessment are summarised in the following table.

**Table 2-1. Assessment Exclusions**

Area/System	Rationale
Roof	Non-destructive assessment
Attic	Non-destructive assessment
Wall/ceiling cavities	Non-destructive assessment
Equipment/System	Outside assessment scope of work
Underground/buried equipment and systems	Outside assessment scope of work
Indoor air quality assessment	Outside assessment scope of work
Contents	Outside assessment scope of work

### 3 Regulatory Framework

The methods used for assessment, sample collection, and analysis were in accordance with applicable regulations and are acceptable to WorkSafeBC. See Appendix D for details on the applicable regulatory framework and additional standards that apply to this project.

### 4 Facility Description

The following is a summary of the building. Area calculations are approximate.

**Table 4-1. Building Summary**

Building System	Details
Construction date	Construction date unknown
Number of floors/levels	1
Area	1,070 ft <sup>2</sup>
<b>Exterior Materials</b>	
Roofing	Asphalt
Exterior	Metal siding
<b>Interior Materials</b>	
Ceiling	Drywall and wood
Walls	Drywall and wood
Floors	Sheet flooring
Insulation	Fibreglass
HVAC (system type and insulation type)	Forced air furnace
Lighting	Fluorescent

## 5 Asbestos Management Inventory and Recommendations

This section summarises the observations made, and the analytical results for material samples collected during the site assessment. Photo plates are presented in Appendix A, analytical laboratory reports are included in Appendix B, and drawings showing sample locations are presented in Appendix C.

The following table summarizes the results of the inventory, condition assessment, and recommended management actions for known and suspect asbestos-containing materials (ACMs). The recommendations are derived by the friability, accessibility, and condition of the ACMs. See Appendix F for details. Quantities are estimated.

**Table 5-1. Asbestos-Containing Materials Summary**

Description	System	Locations	Status	Quantity	Accessibility	Friability	Condition	Mgmt Recommendation
Caulking – off white	Windows	Main Room	Confirmed	6 windows	Access A – Accessible to all building users	Non friable	Good	Action 5 – Proactive ACM removal / Action 7 – Routinely monitor condition Test prior to impact
Drywall joint compound	Ceiling	Main Room, Storage Room	Suspect	1,070 ft <sup>2</sup>	Access A – Accessible to all building users	Non friable	Good	Action 5 – Proactive ACM removal / Action 7 – Routinely monitor condition Test prior to impact
Drywall joint compound	Wall	Main Room, Storage Room	Suspect	1,580 ft <sup>2</sup>	Access A – Accessible to all building users	Non friable	Good	Action 5 – Proactive ACM removal / Action 7 – Routinely monitor condition Test prior to impact
Asphalt stair tread	Stair	Exterior stairs	Suspect	100 ft <sup>2</sup>	Access A – Accessible to all building users	Non friable	Good	Action 5 – Proactive ACM removal / Action 7 – Routinely monitor condition Test prior to impact
Mastic – grey	Ducting	Beneath Trailer	Suspect	Assume on ducting throughout	Access A – Accessible to all building users	Non friable	Good	Action 5 – Proactive ACM removal / Action 7 – Routinely monitor condition Test prior to impact

Note: asbestos-containing materials may be present in concealed or excluded locations and/or systems. See Section 2 of this report.

Materials suspected to contain asbestos which are often concealed in buildings and require destructive assessment to evaluate may be present which include, but are not limited to:



**Warning:** in the event any additional suspect materials are encountered during renovation/repair activities, work on those materials should stop immediately and remain undisturbed until testing confirms the presence or absence of asbestos or other hazardous material

- |   |  |   |                                     |
|---|--|---|-------------------------------------|
| ) | Electrical wiring and cables               | ) | Floor leveling compound             |
| ) | Buried asbestos cement pipes               | ) | Penetration caulking and/or parging |
| ) | Formed cement products                     |   |                                     |
| ) | Bell and spigot piping gaskets             |   |                                     |
| ) | Incandescent light fixtures (heat shields) |   |                                     |

Materials assumed not to contain asbestos include:

- ) post-1990 construction materials with the exception of formed cement products, vermiculite, fire stop caulking, gaskets.
- ) wood and wood composite materials
- ) carpet
- ) plastics in non-industrial applications
- ) metals
- ) glazing
- ) exterior below-grade drainage and plumbing systems
- ) ceramic tile, excluding adhesives, grout, and thinset mortar

## 6 General Recommendations

Based on observations made and analytical results, NWest makes the following recommendations.

1. Ensure that the inventory is kept current with respect to presence and condition of asbestos-containing materials, and a record is kept of any changes made to the inventory.
2. Retain a current version of the inventory until all the asbestos-containing materials are removed from the Site.
3. Ensure that a copy of the current version of the inventory is readily available at the Site.
4. Ensure that all asbestos-containing materials present at the Site are identified by signs, labels or, when these are not practicable, other effective means.
5. A qualified person must undertake a pre-renovation/demolition project-specific hazardous materials assessment prior to planned work other than minor maintenance activities that impacts building materials or systems that conforms to the requirements of the BC Occupational Health and Safety Regulation section 20.112. A qualified person must complete a risk assessment and safe work procedures for all hazardous materials that may be impacted by maintenance and/or renovation work. Removal or disturbance of hazardous materials must be undertaken by a qualified contractor employing WorkSafeBC-approved procedures.
6. Maintenance work must STOP if previously unidentified suspected hazardous materials are encountered or inadvertently damaged or disturbed during maintenance activities. These suspect materials must be left undisturbed until a qualified person has determined the status of the material.
7. Damage to asbestos-containing materials must be repaired or otherwise rendered non-hazardous to unprotected workers and occupants without delay (e.g. enclose damaged materials with a dust barrier).

### Appendix A. Photo Plates

The following photo plates provide a general documentation of the building materials that were sampled and analyzed, and observations made during the assessment. They are meant to summarize the results of analysis and observations and are not intended to include all hazardous materials, or their locations, observed during the assessment.



Photo 1  
Description: Caulking – off white  
Location: Main Room  
**Asbestos:** 15% Chrysotile  
Sample(s): 30014-15



Photo 2  
Description: Drywall joint compound  
Location: Storage Room  
**Asbestos:** Suspect



Photo 3  
Description: Asphalt stair tread  
Location: Exterior stairs  
**Asbestos:** Suspect



Photo 4  
Description: Mastic – grey  
Location: Ductwork Beneath Trailer  
**Asbestos:** Suspect

## Appendix B. Analytical Reports



## Bulk Sample Report

### Asbestos Analysis of Bulk Materials using Polarized Light Microscopy

**Client:** School District 85 - Vancouver Island North

**Date:** September 26, 2016

**Contractor:** School District 85 - Vancouver Island North

**Client Job or PO#:**

**Project:** Tacan AB Inventory

**Project number:** 30014

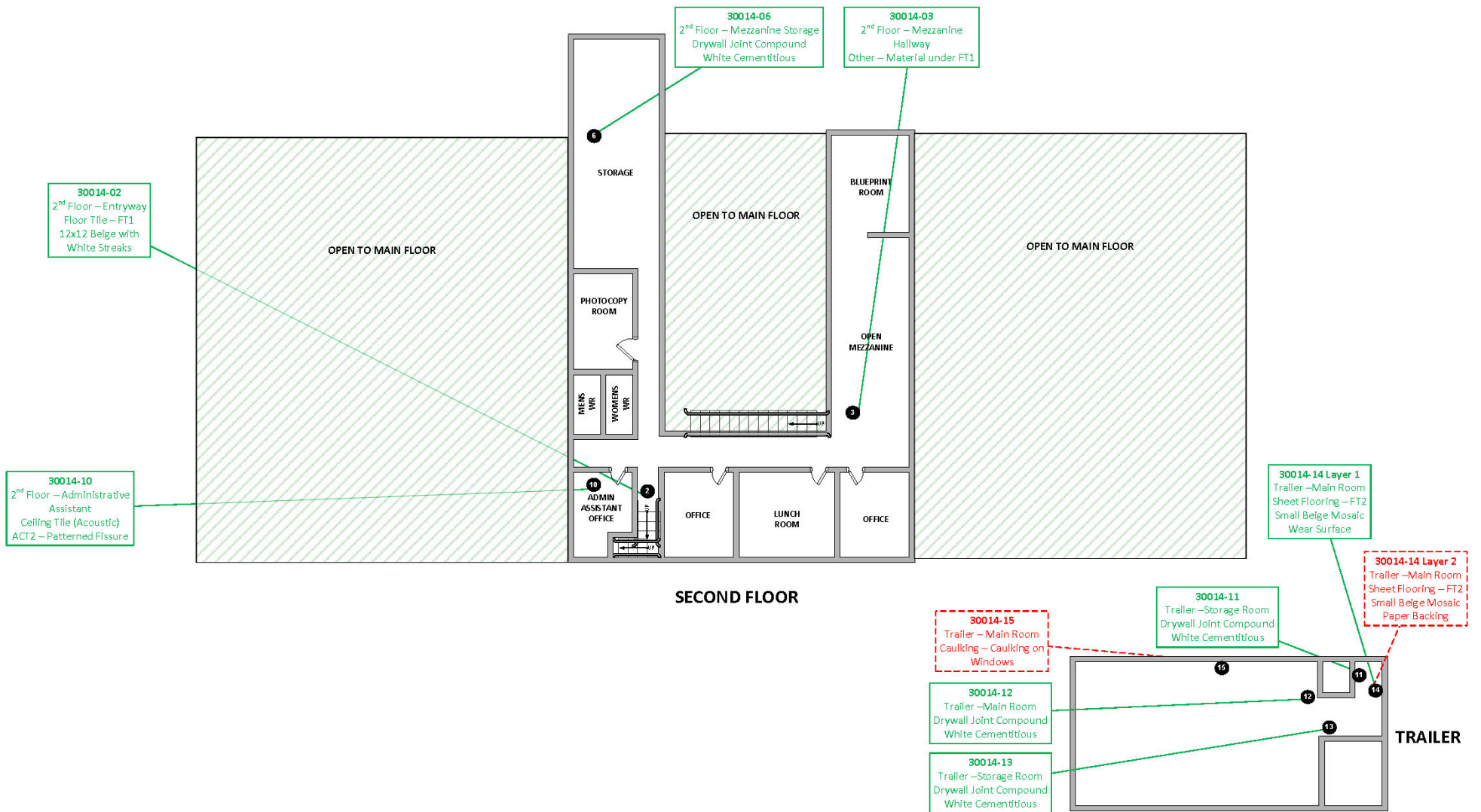
Sample No	Location	Date Analysed	Analyst	Client Description	Phase	%	Asbestos	%	Other Materials	%	Comments
30014-1	Part Storage	Aug-25-2016	PG	Gasket - Stores	Brown	100	None Detected	0	Cellulose (25%) Glass (3%) Non-Fibrous (72%)	100	
30014-2	Entryway	Aug-25-2016	PG	Floor Tile - FT1-12x12 Beige with White Streaks	Beige	100	None Detected	0	Non-Fibrous	100	
30014-3	2nd Floor-Mezzanine Hallway	Aug-25-2016	PG	Other - Material Under FT1	Drywall Board - Off White	100	None Detected	0	Cellulose (2%) Non-Fibrous (98%)	100	
30014-4	Electrical Room	Aug-25-2016	PG	Ceiling Tile (Acoustic) - ACT1 - Vertical Fissure and Pinholes	Grey/ White	100	None Detected	0	Cellulose (25%) Glass (20%) Non-Fibrous (55%)	100	
30014-5 Layer 1	Office A	Aug-25-2016	PG	Sheet Flooring - SF1 - Gray with White and Black Specks	Wear Surface (Speckled) - Grey/ White	50	None Detected	0	Non-Fibrous	100	
30014-5 Layer 2	Office A	Aug-25-2016	PG	Sheet Flooring - SF1 - Gray with White and Black Specks	Backing - White	50	None Detected	0	Synthetic	100	
30014-6	2nd Floor-Mezzanine Storage	Aug-25-2016	PG	Drywall Joint Compound - White Cementitious	White	100	None Detected	0	Non-Fibrous	100	
30014-7	Hallway from Carpentry Shop to Entryway	Aug-25-2016	PG	Floor Tile - FT1-12x12 Beige with White Streaks	Beige	100	None Detected	0	Non-Fibrous	100	
30014-8	Hallway from Carpentry Shop to Entryway	Aug-25-2016	PG	Drywall Joint Compound - White Cementitious	White	100	None Detected	0	Non-Fibrous	100	

Note: Samples were analyzed by method: EPA/600/R-93/116" Bulk Asbestos Analysis by Polarized Light Microscopy". For heterogenous materials the concentration may vary. No reproduction without permission.

Sample No	Location	Date Analysed	Analyst	Client Description	Phase	%	Asbestos	%	Other Materials	%	Comments
30014-9	Electrical Room	Aug-25-2016	PG	Drywall Joint Compound - White Cementitious	White	100	None Detected	0	Non-Fibrous	100	
30014-10	2nd Floor-Administrative Assistant	Sep-01-2016	PG	Ceiling Tile (Acoustic) - ACT2 - Patterned Fissure	Grey/ White	100	None Detected	0	Cellulose (30%) Glass (30%) Non-Fibrous (40%)	100	
30014-11	Trailer - Storage Room	Sep-01-2016	PG	Drywall Joint Compound - White Cementitious	White	100	None Detected	0	Non-Fibrous	100	
30014-12	Trailer - Main Room	Sep-01-2016	PG	Drywall Joint Compound - White Cementitious	White	100	None Detected	0	Non-Fibrous	100	
30014-13	Trailer - Main Room	Sep-01-2016	PG	Drywall Joint Compound - White Cementitious	White	100	None Detected	0	Non-Fibrous	100	
30014-14 Layer 1	Trailer - Main Room	Sep-01-2016	PG	Sheet Flooring - SF2- Small Beige Mosaic	Wear Surface - Red/ Grey	50	None Detected	0	Non-Fibrous	100	
30014-14 Layer 2	Trailer - Main Room	Sep-01-2016	PG	Sheet Flooring - SF2- Small Beige Mosaic	Paper Backing - Grey	50	<b>Chrysotile</b>	<b>30</b>	Cellulose (5%) Non-Fibrous (65%)	70	
30014-15	Trailer - Main Room	Sep-01-2016	PG	Caulking - Caulking on Windows	Off White	100	<b>Chrysotile</b>	<b>15</b>	Non-Fibrous	85	

Note: Samples were analyzed by method: EPA/600/R-93/116" Bulk Asbestos Analysis by Polarized Light Microscopy". For heterogenous materials the concentration may vary. No reproduction without permission.

**Appendix C. Sample Location Drawings**



Drawing Not to Scale

**Sample Result Key**

- 123 No Asbestos Detected
- 123 Material Contains Asbestos
- 123 Lead (Pb) Sample

ADDRESS/LOCATION:  
School District 85 TACAN Site  
6150 Brass Road  
Port Hardy, B.C. V0N 2P0  
DRAWING TITLE:  
School District 85

PROJECT NO.: 30014

DATE: 08/30/2016

SURVEYED BY: Julie Scott/Moncrieff/  
Bill Sullivan

DRAWING NO.: 014



#201-415 Gorge Road East  
Victoria B.C. V8T 2W1

## Appendix D. Regulatory Framework

1. **Workers Compensation Act**, Part 2, Division 4 (General Duties of Employers, Workers and Others), Section 25 (General duties of owner).
2. **BC Occupational Health and Safety Regulation**, BC Reg. 296/97, including amendments.
3. **Safe Work Practices for Handling Asbestos**, WorkSafeBC, current edition.
4. **Hazardous Waste Regulation**, BC Ministry of Environment, including amendments.
5. **Transportation of Dangerous Goods Regulations SOR / 2008-34**, Transportation of Dangerous Goods Act, SOR/2008/34 including amendments.

## Appendix E. Methodology

The assessment adhered to applicable regulations and followed industry-accepted standards and methodologies.

**Note:** Not all of the following materials and/or methods were necessarily included in this assessment.

### Asbestos

An initial walk-through was conducted of the assessment areas for building materials and machinery or equipment to make a preliminary determination if asbestos could be present.

To confirm or discount the presence of asbestos, representative bulk samples were collected. The sample locations in the building are identified with a unique sample number. Whenever practicable, a representative number of material samples were collected as per WorkSafeBC guidance. Some materials could not be representatively sampled due to accessibility or if sample collection would damage the remaining material.

Bulk samples were submitted for analysis in accordance with the following method: EPA 600 R-93 / 116-1993. Samples consisting of greater than 0.5% asbestos were reported as an asbestos-containing material as per WorkSafeBC. See Appendix G for details on how asbestos-containing materials are evaluated to determine management actions.

Vermiculite samples were submitted for analysis in accordance with the Research Method for Sampling and Analysis of Fibrous Amphibole in Vermiculite Attic Insulation (EPA/600/R-04/004, January 2004, US EPA.) Samples of loose fill vermiculite insulation found to contain any trace of asbestos were reported as

**Appendix F. Evaluation of Asbestos-Containing Materials**

Evaluation of asbestos-containing materials (ACMs) is based on the condition of the material, its accessibility, and its friability. The following are guidelines used to evaluate ACMs and the action, if any, required to safely manage them.

**Spray Applied Fireproofing, Insulation and Texture Finishes**

In evaluating the condition of ACM spray applied as fireproofing, thermal insulation or texture, decorative or acoustic finishes, the following criteria apply.

<b>GOOD</b>	Surface of material shows no significant signs of damage, deterioration or delamination. Up to one percent visible damage to surface is allowed within range of GOOD. Evaluation of sprayed fireproofing requires the assessor to be familiar with the irregular surface texture typical of sprayed asbestos products. GOOD condition includes un-encapsulated or unpainted fireproofing or texture finishes, where no delamination or damage is observed, and encapsulated fireproofing or texture finishes where the encapsulation has been applied after the damage or fallout occurred.
<b>POOR</b>	Sprayed materials show signs of damage, delamination or deterioration. More than one percent damage to surface of ACM spray.
<b>DEBRIS</b>	Spray materials are dislodged from surface application source. The identified debris is noted as being separated from the original source.

**Mechanical Insulation**

In evaluating the condition of mechanical insulation (on boilers, breeching, ductwork, piping, tanks, equipment etc.) the following criteria are used.

<b>GOOD</b>	Insulation is completely covered in jacketing and exhibits no evidence of damage or deterioration. No insulation is exposed. Includes conditions where the jacketing has minor surface damage (i.e., scuffs or stains), but the jacketing is not penetrated.
<b>FAIR</b>	Minor penetration damage to jacketed insulation (cuts, tears, nicks, deterioration or delamination) or undamaged insulation that has never been jacketed. Insulation is exposed but not showing surface disintegration. The extent of missing insulation should be minor to none.
<b>POOR</b>	Original insulation jacket is missing, damaged, deteriorated or delaminated. Insulation is exposed and significant areas have been dislodged. Damage cannot be readily repaired.
<b>DEBRIS</b>	Insulation materials are dislodged from surface application source. The identified debris is noted as being separated from the original source.

**Non-Friable and Potentially Friable Materials**

Non-friable materials generally have little potential to release airborne fibres, even when damaged by mechanical breakage. However, some non-friable materials, i.e., exterior asbestos concrete products, may have deteriorated so that the binder no longer effectively contains the asbestos fibres. In such cases of significantly deteriorated non-friable material, the material will be treated as a friable product.

**Accessibility**

The accessibility of building materials known or suspect of being ACM is rated according to the following criteria.

<b>Access (A)</b>	Areas of the building within reach (from floor level) of all building users. Includes areas such as gymnasiums, workshops, and storage areas where activities of the building users may result in disturbance of ACM not normally within reach from floor level.
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<b>Access (B)</b>	Frequently entered maintenance areas within reach of maintenance staff, without need for a ladder. Includes: frequently entered pipe chases, tunnels and service areas or areas within reach from a fixed ladder or catwalk (e.g., tops of equipment, mezzanines).
<b>Access (C) Exposed</b>	Areas of the building above 2.5 metres where use of a ladder is required to reach the ACM. Only refers to ACM materials that are exposed to view, from the floor or ladder, without removing or opening other building components such as ceiling tiles, or service access doors or hatches. Does not include infrequently accessed service areas of the building.
<b>Access (C) Concealed</b>	Areas of the building which require removal of a building component including lay-in ceilings and access panels into solid ceiling systems. Includes rarely entered crawlspaces, attic spaces etc. Observations are limited to the extent visible from the access points.
<b>Access (D)</b>	Areas of the building behind inaccessible solid ceiling systems, walls, or mechanical equipment, etc., where demolition of the ceiling, wall or equipment etc., is required to reach the ACM. Evaluation of condition and extent of ACM is limited or impossible, depending on the assessor's ability to visually examine the materials in Access D.
<b>ACM in Plenum</b>	Areas of the building where air movement through open or closed air spaces or plenums can be accesses by Access X, where X is any of the Accesses A-D, inclusive.

### Action Matrix

The following Action Matrix determines what, if any, action is required to safely manage ACMs.

Access	Condition			
	Good	Fair	Poor	Debris
(A)	Action 5/7	Action 5/6	Action 3	Action 1
(B)	Action 7	Action 6/5	Action 3	Action 1
(C) Exposed	Action 7	Action 6	Action 4	Action 2
(C) Concealed	Action 7	Action 7	Action 4	Action 2
(D)	Action 7	Action 7	Action 7	Action 7
(X)	Action 5/7	Action 5/6	Action 3	Action 1

### Action Table

The following is a description of the action required to manage ACMs, based on the outcome of the evaluation.

<b>Action 1</b>	<b>Immediate Clean Up of Debris That is Likely to be Disturbed</b> Restrict access/shut off air handling system if disturbance of the ACM DEBRIS is likely, and clean up ACM DEBRIS immediately. Utilize proper asbestos procedures. This action is required for compliance with regulatory requirements.
<b>Action 2</b>	<b>Entry into Areas with ACM Debris</b> At locations where ACM DEBRIS can be isolated in lieu of removal or clean up, use appropriate means to limit entry to the area. Restrict access to the area to persons utilizing moderate risk asbestos-work precautions. The precautions will be required until the ACM DEBRIS has been cleaned up, and the source of the DEBRIS has been stabilized or removed.
<b>Action 3</b>	<b>ACM Removal Required for Compliance</b> Remove ACM for compliance with regulatory requirements. Utilize asbestos procedures appropriate to the scope of the removal work.
<b>Action 4</b>	<b>Access into Areas Where ACM is Present and Likely to be Disturbed by Access</b> Use asbestos precautions when entry or access into an area is likely to disturb the ACM. ACTION 4 must be used until the ACM is removed (Use ACTION 1 or 2 if DEBRIS is present).
<b>Action 5</b>	<b>Proactive ACM Removal</b>

	Remove ACM in lieu of repair, or at locations where the presence of asbestos in GOOD condition is not desirable.
<b>Action 6</b>	<b>ACM Repair</b> Repair ACM found in FAIR condition, and not likely to be damaged again or disturbed by normal use of the area or room. Upon completion of the repair work, treat ACM as material in GOOD condition and implement ACTION 7. If ACM is likely to be damaged or disturbed during normal use of the area or room, implement ACTION 5.
<b>Action 7</b>	<b>Routine Surveillance</b> Institute routine surveillance of the ACM. Trained workers or contractors must use appropriate asbestos precaution during disturbance of the remaining ACM.

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