



2199 Norse Drive, Suite B, Pleasant Hill, CA 94523
Phone (925) 689-2174 • Fax (855) 710-6294

March 25, 2025

Proposal: P1196

Mr. Chris Hansen
Assistant Director of Maint., Ops. & Facilities
Mt. Diablo Unified School District
1480 Gasoline Alley
Concord, CA 94520

Re: Three (3) Year Agreement Proposal for AHERA Inspections & Report Updates for 49 Sites

Dear Mr. Hansen:

Aurora Environmental Services, Inc. (Aurora) appreciates the opportunity to submit this proposal to assist Mt. Diablo Unified School District (MDUSD) with the AHERA inspection updates and training compliance requirements of Environmental Protection Agency (40 CFR, Part 763, Section 763.92(b) and OSHA (29 CFR 1910.1001(j)(7)(iv)).

Aurora provides unprecedented commitment and superior environmental consulting services to its clients. We have years of demonstrated experience providing comprehensive environmental health & safety services at School Districts in California. Our Certified Asbestos Consultants, and Certified Site Safety Technicians routinely identify, sample & report on hazardous materials (asbestos) in a way that results in minimal disturbance to classes in session. Our industry experienced personnel responsible for conducting all field activities have participated in projects involving the maintenance of AHERA Programs and NESHAP engineering services required during modernization and demolition projects.

Aurora personnel wear company uniforms to ensure that school personnel readily identify them. Furthermore, to comply with the Michele Montoya Act, Aurora certifies that all employees assigned to MDUSD are permitted to work on school sites, around children, and have been cleared under California Law and the Education Code, including fingerprint clearance through the California Department of Justice.

This proposal covers 49 MDUSD sites, including 29 elementary schools, 8 middle schools, 5 high schools and 7 "Other Sites". All MDUSD sites covered under this proposal are listed on the following page.

Mt. Diablo Unified School District – AHERA Inspection Sites

- | | | |
|--|--|---|
| 1. Ayers ES | 19. Silverwood ES | 36. Sequoia MS |
| 2. Bancroft ES | 20. Strandwood ES | 37. Valley View MS |
| 3. Bel Air ES | 21. Sun Terrace ES | 38. College Park HS |
| 4. Cambridge ES | 22. Sunrise ES | 39. Concord HS |
| 5. El Monte ES | 23. Valhalla ES | 40. Mt. Diablo HS |
| 6. Fair Oaks ES | 24. Valle Verde ES | 41. Northgate HS |
| 7. Gregory Gardens ES/
Robert R. Shearer
Preschool | 25. Walnut Acres ES | 42. Ygnacio Valley HS |
| 8. Hidden Valley ES | 26. Westwood ES | 43. District Office |
| 9. Highlands ES | 27. Woodside ES | 44. Olympic HS/
Crossroads |
| 10. Holbrook Language | 28. Wren Avenue ES | 45. Diablo Community
Day/ Willow Creek |
| 11. Meadow Homes ES | 29. Ygnacio Valley ES | 46. Glenbrook Academy |
| 12. Monte Gardens ES | 30. El Dorado MS | 47. Shadelands Preschool |
| 13. Mt. Diablo ES | 31. Foothill MS | 48. Mt. Diablo Adult
Education/ Loma Vista |
| 14. Mountain View ES | 32. Oak Grove MS | 49. Clayton Valley HS |
| 15. Pleasant Hill ES | 33. Pine Hollow MS | |
| 16. Rio Vista ES | 34. Pleasant Hill MS/
Prospect/ Horizons/
Pleasant Hill Adult Ed | |
| 17. Sequoia ES | 35. Riverview MS/
Gateway | |
| 18. Shore Acres ES | | |

Sites excluded that will require evidence of delisiting: Delta View ES, Eagle Peak ES, Diablo View MS, Central Services

1.0 Scope of Work – Triennial Re-Inspections (Due March 2025)

The Triennial Asbestos Re-inspections are due every three years following the EPA publication titled *A Guide to Performing Re-inspections Under the Asbestos Hazard Emergency Response Act (AHERA)* to ensure compliance with 40 CFR 763, subpart E to Appendix C, Asbestos Hazard Emergency Response Act (AHERA). See the anticipated schedule in section 4.0.

Aurora’s State of California certified staff will conduct site visits to all 49 locations on the MDUSD District-Wide site list to catalogue and reassess conditions and touch all known asbestos-containing building materials (ACBM) as defined in AHERA to determine whether they have become friable since the last assessment. Aurora will need access to all interior areas of the buildings, including but not limited to classrooms, restrooms, offices, storage areas, common areas (example, cafeterias and MPRs), heater/custodial closets, attics, and crawl spaces, etc. Areas not accessible at the time of the scheduled site visits will be deemed inaccessible in the 3-year re-inspection documentation/database. Any previous inspection or reinspection report(s) and any response action records to verify that the quantities and locations of ACM are updated. Reports will be submitted to the MDUSD for inclusion into the District’s AHERA Management Program Manual.

Step 1 – Existing Document Review

Aurora will first review the following documents, if available:

- Previous AHERA 3-year re-inspection reports
- Asbestos assessment reports and design drawings from modernization projects
- Asbestos abatement records
- Manufacturer “Asbestos Free” letters for all “New” Portables.

Aurora requests that the documents be provided in electronic versions when available, hard copy if no electronic version is available. As per regulatory requirements, suspect building materials that do not have SDSs, Architectural/Contractor, Manufacturer, or laboratory analytical results designating them as “Asbestos-Free” must be designated as “assumed” to contain asbestos until laboratory analytical results prove otherwise.

Step 2 – Re-Inspection Field Work

Aurora’s State of California certified staff will conduct site visits to all 49 locations on the MDUSD District-Wide site list to catalogue and assess conditions of asbestos-containing building materials (ACBM) as defined in AHERA.

Areas not accessible at the time of the scheduled site visits will be deemed inaccessible in the 3-year re-inspection documentation/database. Aurora requests to be provided with access keys for each site or that a district staff member open all areas for access.

For each Re-Inspection Aurora will:

- Visually inspect and assess the condition of all known or assumed Asbestos Containing Building Material (ACBM) at each site.
- Access all areas, including, but not limited to classrooms, restrooms, offices, MPRs, heater closets, custodian closets, attic spaces, and crawl spaces.
- Identify homogenous areas with material that has become friable since the last inspection or re-inspection. Only materials that are uniform in color, texture, and size will be considered homogeneous.

Step 3 – AHERA Reporting

Aurora will:

- Submit re-inspection reports to the MDUSD for inclusion into the District’s AHERA Management Program Manual.
- Identify in the re-inspection reports homogeneous areas consistent with the terms and intent of AHERA.
- Include the identification of both negative and positive sample results in reporting.
- Submit the re-inspection reports in a user-friendly document that, when reviewed by parents, teachers, or other interested parties, clearly identifies the types, locations,

amounts and condition of the following: a) Any ACBM that is assumed to be ACM (Asbestos Containing Materials); b) Any materials that were sampled and determined to be non-asbestos, and c) Any material that was sampled and determined to be ACM.

- Ensure all reporting will be signed by an inspector and/or management planner who contributes to the reinspection.
- Provide one hardcopy of each site report that must be maintained by the site, along with a PDF copy of all reports for the district.
- Provide responsive action recommendations that are consistent with AHERA pursuant to 763.93(b) in the final report.

2.0 Scope of Work – Biannual Surveillance (every 6 months)

Mt. Diablo Unified School District has requested a professional services cost proposal to ensure compliance with 40 CFR 763, subpart E to Appendix C, Asbestos Hazard Emergency Response Act (AHERA). See the anticipated schedule in section 4.0.

By law, as part of the Asbestos Management Plan for the district, AHERA biannual surveillance must be conducted every six months 40 CFR, Part 762, Sections 763.92(b) by qualified individuals who have been trained to assess the asbestos containing materials for report updates. During the biannual surveillance, Aurora will visually inspect and assess the change in condition of all known or assumed Asbestos Containing Building Material (ACBM) at each site.

It is the district's responsibility as the Local Education Agency (LEA) to develop an Asbestos Management Plan and designate a person to ensure requirements under section 763.84 of the AHERA rule are properly implemented. Aurora will train the district's LEA under the terms of this proposal. LEAs are also required to provide, at a minimum, asbestos awareness training for all service workers (maintenance and custodial staff) whose job requires them to work in buildings which contains asbestos even if they do not come in contact with the materials.

3.0 Training

❖ Asbestos Awareness Training

This training is a minimum requirement for all service workers, such as maintenance and custodial staff, whose jobs require them to be in contact with, though not disturbing, asbestos materials. The course covers the uses of asbestos, potential health effects, avoiding, recognizing and reporting damage to asbestos-containing materials, and a regulatory overview.

❖ LEA AHERA Designated Person (DP) Required Training

AHERA requires that the DP be *adequately* trained to carry out his or her responsibilities. Due to the differing needs of school districts based on the size of the district and the amount and condition of the ACBM, AHERA does not list a specific training course or specific number of hours of training for the DP. Further, AHERA does not require the DP to be accredited. Specifically, the regulations note the training must include the following topics:

- health effects of asbestos;

- detection, identification and assessment of asbestos-containing building materials (ACBM);
- options for controlling asbestos-containing building materials;
- asbestos management programs;
- relevant Federal and State regulations concerning asbestos, including AHERA and its implementing regulations and the regulations of the Occupational Safety and Health Administration, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency;
- Aurora will use the current AHERA reports to train DPs on how to read, interpret, post and when to disseminate information.

4.0 Proposed Fees and Schedule

Aurora proposes a 3-year agreement contract period which includes five biannual surveillance and one triennial re-inspection for all 49 sites. Included is training for 2-Hours Asbestos Awareness and LEA at no additional costs, up to four sessions per year. Sampling is not typically conducted during biannual surveillance. When requested, sampling can be conducted for an additional fee.

FISCAL YEAR	DESCRIPTION	SCHEDULE	FEE
2024-2025	AHERA Triennial Re-Inspections	March 2025	\$131,175
2025-2026	AHERA Biannual Surveillance	September 2025	\$33,025
2025-2026	AHERA Biannual Surveillance	March 2026	\$33,025
2026-2027	AHERA Biannual Surveillance	September 2026	\$33,025
2026-2027	AHERA Biannual Surveillance	March 2027	\$33,025
2027-2028	AHERA Biannual Surveillance	September 2027	\$33,025

The lump sum 3-year agreement total for this project, as outlined above, is **\$303,070**.

Roofs and exterior areas not included in the AHERA regulations will not be assessed. It should be noted that the documentation provided by Aurora for this project cannot be used for compliance with the local Air Quality Management District or OSHA survey requirements for renovations or demolitions, since AHERA excludes some materials/areas from its regulations. Also excluded are assessments/inspections for other regulated materials, such as lead, PCBs, universal waste (UW), underground storage tanks (UST's), chemical or other potentially hazardous materials.

5.0 Terms and Conditions

1. This proposal is valid for a period of 60 days.
2. The work proposed in this proposal is limited to the sites listed on Page 2.
3. Laboratory fees incurred as requested will be billed at cost plus 15% markup.
4. Progress payment invoices will be submitted on a bi-weekly basis for completed work.
5. Payment terms are net 30 days.

Mr. Hansen, thank you again for allowing us to submit this proposal. Aurora is looking forward to providing MDUSD with highly responsive and professional services. If you have any questions involving this proposal, please do not hesitate to contact me at (925) 689-2174.

Sincerely,



Kimberley Casey
School Program Manager