

Re: East Brunswick Township's Indoor Air Quality Designated Person

John Arthur <jarthur@EBPL.org>

Thu 3/30/2023 4:37 PM

To: Skelton, Paula D [DOH] <Paula.Skelton@doh.nj.gov>; Joseph Criscuolo <JCriscuolo@eastbrunswick.org>

Cc: Philip Maille <pmaille@eastbrunswick.org>; Michael J. Baker (mbaker@hoaglandlongo.com) <mbaker@hoaglandlongo.com>; Traci Randzio <trandzio@eastbrunswick.org>; Michael Bobish <mbobish@EBPL.org>; Karen Parry <KParry@EBPL.org>

 2 attachments (3 MB)

HVAC - Peterson Service Company 2022 - Present.pdf; HVAC - Air Group LLC 2018-2022.pdf;

Hi Paula,

Please see the attached records for the HVAC system for the past 60 months.

Best,

John Arthur
(he/him/his)
Library Director
East Brunswick Public Library
(732)390-6783
jarthur@ebpl.org

From: Skelton, Paula D [DOH] <Paula.Skelton@doh.nj.gov>

Sent: Wednesday, March 29, 2023 3:02 PM

To: Joseph Criscuolo <JCriscuolo@eastbrunswick.org>

Cc: Philip Maille <pmaille@eastbrunswick.org>; Michael J. Baker (mbaker@hoaglandlongo.com) <mbaker@hoaglandlongo.com>; John Arthur <jarthur@EBPL.org>; Traci Randzio <trandzio@eastbrunswick.org>; Michael Bobish <mbobish@EBPL.org>; Karen Parry <KParry@EBPL.org>

Subject: RE: East Brunswick Township's Indoor Air Quality Designated Person

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Good Afternoon Mr. Criscuolo,

As promised a summary of the PEOSH inspection conducted on March 21, 2023, due to a complaint renovation activities performed in the library. The following standards were covered, and potential violations will be issued due to the inspection. The number of days given to provide the documents (written in parentheses), will be listed on the Order to Comply (OTC) that will be issued by the NJ Department of Labor and Workforce Development (NJDLWD), PEOSH Program. Any documents that can be provided prior to the issuance of the OTC will be considered abated as of that date.

Standards covered:

Occupational Injury and Illness Reporting Std (29 CFR 1904):

NJOSHA 300 Injuries and Illness Logs and 300A Summary forms reported for 2020 through 2022 and the posting of the 300 A Summary Form for 2022. All documentation was provided and the posting of the 300A Summary was verified. No violations will be issued. No further action is required.

General Industry Asbestos (29 CFR 1910.1001):

There were concerns regarding the potential exposure to asbestos from contractors removal of the floor tiles in Office #2 and the bathrooms in the Youth Department Area. All facilities built in 1984 and prior must have an asbestos survey done to identify location, amount and condition of asbestos (ACM) in the building. If the employer is going to presume that the building has asbestos (PACM) due to the age of the building, the location of each type of material has to be identified and labeled. Prior to any construction, renovations, etc, the PACM must be handled as asbestos or tested for asbestos to document its absence in accordance with AHERA asbestos inspection protocols. Lab results for tiles removed from the library taken by the NJDOL Asbestos Control and Licensing Although came back less than 1% of ACM. Federal OSHA has recognized the hazard of worker exposure to asbestos in the workplace when damaging material containing less than 1% asbestos. Therefore, the presence of any amount of asbestos in building materials which may be disturbed initiates the General Industry or Construction Asbestos Standard. This would then require the employer to conduct an exposure assessment in order to ensure that the workplace is below the permissible exposure limit (PEL) for asbestos in air, which is 0.1 fiber/cc. Although the lab reports indicated that there was less than 1% asbestos found in the tiles removed from the area, the employer is still responsible to ensure air exposure levels do not exceed the PEL during work activities involving the disturbance of materials containing asbestos.

The requirements of the OSHA General Industry Standard must be implemented by the employer.

- An asbestos survey for the building was not provided **(60 days)**
- Asbestos Awareness training is a yearly training for custodial and maintenance staff who may come upon ACM/PACM while performing their work duties in the building. They must be made aware of the location and dangers of asbestos. **(60 days)**

Hazard Communication (HazCom) (29 CFR 1910.1200):

- A written Hazard Communication (HazCom) Program must be provided by the employer. The program must address the new Global Harmonization System (GHS) labeling requirements of the revised HazCom Standard. This should be addressed in the Policy and in the Labeling System section of the program. You may visit the PEOSH website at <https://www.nj.gov/health/workplacehealthandsafety/peosh/peosh-health-standards/hazcom.shtml> for more information. **(30 days)**
- HazCom training for staff is bi-annual (every two years). **(15 days to provide the records or 60 days to provide the training)**
- Safety data sheets were not available during the inspection for the products used by the custodial staff. **(45 days)**

Indoor Air Quality (IAQ) Standard (N.J.A.C. 12:100-13): based on the complaint during the renovation activities from November through December 2022, staff experienced various health symptoms from the exposure to construction dust and products being used during the renovation. The IAQ standard requires barriers be put in place prior to renovation activities to avoid contaminating work areas. All pertinent elements of the PEOSH Indoor Air Standard must be implemented by the employer. See the PEOSH Indoor Air Quality Standard website ([Department of Health | Workplace Health and Safety | New Jersey Indoor Air Quality Standard \(N.J.A.C. 12:100-13\) \(nj.gov\)](https://www.nj.gov/health/workplacehealthandsafety/peosh/peosh-health-standards/iaq.shtml)) for model programs, renovation checklists, compliance checklists, other guidance documents. One of the guidance documents is a PEOSH information bulletin for Policy on Building Renovation which provided pertinent information for renovations. Please go to the link for a copy <https://www.nj.gov/health/workplacehealthandsafety/documents/peosh/bldgreno.pdf>

- A written IAQ program must be provided by the employer. **(60 days)**
- The designated person was identified by the Township as Phillip Maille. **No citation will be issued, no further action required.**
- Documentation of the HVAC system(s) preventative maintenance records for the past 60 months. **(30 days)**
- Barriers were not in place, prior to the work being performed by the contractor. **There will be a citation issued, but no monetary value will be listed as the job has been completed.** No further action required.

During the opening conference, it was stated that the roof for the library had been replaced and so was the ceiling. If you could provide a copy of the roof and/or ceiling replacement purchase order or like document.

If you or your staff have any questions or concerns, please contact me.

Thank you

Paula Skelton
Occupational Health Consultant
NJDOH-PEOSH Program
(609) 913-5168 (office)
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(609) 984-2779 (fax)
paula.skelton@doh.nj.gov

From: Joseph Criscuolo <JCriscuolo@eastbrunswick.org>
Sent: Wednesday, March 22, 2023 9:06 AM
To: Skelton, Paula D [DOH] <Paula.Skelton@doh.nj.gov>
Cc: Philip Maille <pmaille@eastbrunswick.org>; Michael J. Baker (mbaker@hoaglandlongo.com) <mbaker@hoaglandlongo.com>; jarthur <jarthur@ebpl.org>; Traci Randzio <trandzio@eastbrunswick.org>; Michael Bobish <mbobish@ebpl.org>; Karen Parry <KParry@EBPL.org>
Subject: [EXTERNAL] East Brunswick Township's Indoor Air Quality Designated Person

Paula,

Philip Maille is East Brunswick Township's Indoor Air Quality Designated Person.

Attached is his Certification of Completion for the required Training .

Phil can be contacted at pmaille@eastbrunswick.org

Joseph Criscuolo
Business Administrator
Township of East Brunswick
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East Brunswick, NJ 08816
732-390-6815
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jcriscuolo@eastbrunswick.org

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