School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

*Transmitted via Electronic Mail*

Ms. Kyla L. Townsend-McIntyre
U.S. Environmental Protection Agency, Region III
Pesticides/Asbestos Programs and Enforcement Branch (3WC32)
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Self Disclosure Agreement - AHERA
Comegys Elementary School ULCS #1260

Dear Ms. Townsend-McIntyre

As part of the School District of Philadelphia agreement, effective March 9, 2007 and amended January 18, 2008 with the United States Environmental Protection Agency (EPA), this letter is intended to transmit and certify the Corrective Action Plan (CAP) for the Comegys Elementary School.

This Disclosure Report was written in accordance with the above noted agreement and the "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Federal Register 19618 (4/11/00) (the Policy).

As the Responsible Official, I hereby certify that the attached report entitled *CAP – Comegys Elementary School ULCS #1260* submitted to EPA is true, accurate and complete in the form set forth in 40 C.F.R. § 270.11(d).

If you have any questions or comments please feel free to contact me or Ms. Elizabeth Gutman, Esq.

Sincerely,

Francine Locke

Francine Locke, MS
Director, Environmental Management & Services

Attachment 1 – *CAP – Comegys Elementary School ULCS #1260*

# SELF AUDIT DISCLOSURE REPORT CORRECTIVE ACTION PLAN

**Updated as of: May 8, 2008**

**Facility Name:** Comegys Elementary School #1260
**Facility Address:** 5100 Greenway Avenue Philadelphia, PA 19143
**Date of Audit:** 03/24/07
**Date CAP due to EPA:** 5/23/08

| Finding Number | Regulatory Citation | Finding | Corrective Action | Corrective Action Status (include date when closed) | Preventative Measure | Preventative Measures Status (include date when closed) | Extension Filed (Y/N) | Exhibit Reference | Approximate Cost to Close Finding | Potential Reduction of Pollutants *INCLUDE AMT OF OIL |
|---|---|---|---|---|---|---|---|---|---|---|
| **ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) PROGRAM 40 CFR § 763 Subpart E** | | | | | | | | | | |
| 1 | 40 CFR § 763.93(e)(9) | The school is required to maintain a schedule for completing the 3 Year Reinspections and 6 Month Periodic Surveillance Inspections in the Asbestos Management Plan. No written schedule was identified as part of the Asbestos Management Plan. | A written schedule must be established and implemented for the 3 Year Reinspections and 6 Month Periodic Surveillance Inspections. These schedules must be included as part of the Asbestos Management Plan. | **Closed 5/8/08-** A written schedule/outline was developed by Jerry Junod and Michael Cooper. A copy of this schedule was reviewed by URS. Copies have been inserted into the latest reinspection report in the Environmental Library and at the School. | A compliance calendar should be established and implemented to ensure the timely completion of the inspections. | **In Progress -** A draft compliance calendar was created by URS for the 30 day tracking of the 6 month and 3 Year Reinspections and is currently being reviewed by the School District. | N | 1 | $1,600 | Recordkeeping violation |
| 2 | (40 CFR § 763.85(b)) | The school is required to complete 3 Year Reinspections. A one month data gap was identified following the 1991 - 3 Year Reinspection where this inspection was not completed with in the required time frame. | The school must complete the Reinspections every 3 years. This is a historical finding as the school can not complete missing data gaps. | Historical finding. Corrective Action can not be completed. | A compliance calendar should be established and implemented to ensure the timely completion of the 3 Year reinspections. | **In Progress -** A draft compliance calendar was created by URS for tracking the 3 Year Reinspection and is currently being reviewed by the School District. | N | 2 | N/A | Recordkeeping violation |
| 3 | (40 CFR § 763.85(b)(1)(vii)) | The regulations require that the 3 Year Reinspections records be updated within 30 days of the inspection. The most recent Reinspection Report is dated October 2006 and was available for review at the central file and the school building; however it was recently printed/distributed and was not completed within the required 30 day time frame from the inspection date in October 2006. | The 3 Year Reinspection records must be updated within 30 days of the actual inspection. This is a historical finding. | Historical finding. Corrective Action can not be completed. | A compliance calendar should be established and implemented so that the 30 day update can be tracked by the personnel in the central office for the next 3 Year Reinspection in 2009. | **In Progress -** A draft compliance calendar was created by URS for the 30 day tracking of the inspections and is currently being reviewed by the School District. | N | 3 | N/A | Recordkeeping violation |
| 4 | (40 CFR § 763.94)(d) | The school is required to complete 6 Month Periodic Surveillance Inspections. Varied data gaps exist between 6 Month Periodic Surveillance Inspections 1990-2006, ranging from 1-19 months. | The school must complete Periodic Surveillance Inspections every 6 months. This is a historical finding as the school can not complete past missed inspections. | Historical finding. Corrective Action can not be completed. | A compliance calendar should be established and implemented to ensure the timely completion of the 6 Month Periodic Surveillance Inspections. | **In Progress -** A draft compliance calendar was created by URS tracking the 6 Month Inspections and is currently being reviewed by the School District. | N | 4 | N/A | Recordkeeping violation |
| 5 | (40 CFR § 763.91(a)) | The school must maintain an Operation and Maintenance program as part of the Asbestos Management Plan. No written plan was identified for operations, maintenance, and repair to address facility ACBM including cleaning, maintenance activities, and fiber release episodes | Develop a written plan for operations, maintenance, and repair to address facility ACBM including cleaning, maintenance activities, and fiber release episodes and incorporate this document into the management plan. | **Closed 5/8/08-** The Asbestos Management Program for Operations and Maintenance Activities was prepared by Jerry Junod and was inserted into the latest reinspection report in the Environmental Library and at the School. | The operations and maintenance plan must be updated if there are any changes in procedures. A review, which is tracked on a compliance calendar, of the Asbestos Management Plan should be completed annually to identify these types of plan elements changes. | **In Progress -** A draft compliance calendar was created by URS for the School District to perform an annual review of the Operations and Maintenance Plan and track / update changes as needed. | N | 5 | $2,400 | Recordkeeping violation |
| 6 | (40 CFR § 763.94) | The preventive measures, response actions, training records, and periodic surveillances are a required part of an Asbestos Management Plan. These documents are maintained separately with no link to the Asbestos Management Plan. | The records regarding all preventive measures, response actions, training and periodic surveillance must be included in the Asbestos Management Plan. Documents could be linked to the management plan via cross reference table while incorporating the cross reference table into the management plan. | **Closed 5/8/08-**A Cross Reference table was prepared by URS and inserted into the latest reinspection report in the Environmental Library and at the school. | The cross reference table must be updated if there are any changes to the record keeping documents. A review, which is tracked on a compliance calendar, of the Asbestos Management Plan should be completed annually to identify these types of record keeping changes. | **In Progress -** A draft compliance calendar was created by URS for the School District to perform an annual review of the Cross Reference Table and track / update changes as needed. | N | 6 | $1,600 | Recordkeeping violation |

| Finding Number | Regulatory Citation | Finding | Corrective Action | Corrective Action Status (include date when closed) | Preventative Measure | Preventative Measures Status (include date when closed) | Extension Filed (Y/N) | Exhibit Reference | Approximate Cost to Close Finding | Potential Reduction of Pollutants *INCLUDE AMT OF OIL |
|---|---|---|---|---|---|---|---|---|---|---|
| 7 | (40 CFR § 763.94) | The regulations require the school to maintain all Operations and Maintenance (O&M) records, only partial records were found at the school. | Prepare copies of the missing O&M records and distribute to the administration office for inclusion in the management plan. The following report was not found at the school. Synertech 010-2178 4/30/04 | **Closed 5/8/08-** A copy of the missing response actions were prepared by the School District and distributed to the School for their records. | A letter should be sent to all school administers reminding them of the AHERA record keeping procedures and the importance of maintaining all asbestos documentation. | **Closed 5/8/08-**The missing response action reports were submitted with a letter titled "AHERA Compliance Update Reports" from the Office of Capital Programs regarding the importance of maintaining these reports with the management plan records. | N | 7 | $600 | Recordkeeping violation |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |

School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

May 7, 2008

Mr. Franklin Gantz
Comegys Elementary School
5100 Greenway Avenue
Philadelphia, PA 19143

Re: Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit Documentation Related to Corrective Action Plan

Dear Mr. Gantz:

Following the AHERA Environmental Compliance Audit conducted at the Comegys Elementary School on March 24, 2008 the attached documents have been prepared for inclusion into the AHERA environmental management plan at your school and at the Environmental Library located at 440 N. Broad Street.

**The following documents were prepared for the Comegys School and must be inserted into the latest reinspection report (black binder) dated October 2006:**

Exhibit 1 - 3 Year Reinspection and 6 Month Periodic Surveillance Schedule/Outline

Exhibit 5 - Asbestos Management Program regarding Operations & Maintenance

Exhibit 6 - Cross Reference Table linking associated documentation to the management plan

Exhibit 8 - Annual Training Schedule for asbestos abatement workers and new employees (included in the Asbestos Management Program and on the Cross Reference Table)

**The following documents were prepared for the Comegys School and must be kept with the AHERA environmental management plan records:**

Exhibit 7 –Response Action Report not found at the school during the audit

**School Principal:**

Print Name: Franklin Gantz

Sign Name: [signature]

Date: 5-9-05

**Witnessed by:**

Title: URS

Print Name: Brian Joseph

Sign Name: Brian Joseph

Date:

**The following documents were prepared for the AHERA environmental management plan for inclusion in the central files at 440 N. Broad Street:**

Exhibit 1 - 3 Year Reinspection and 6 Month Periodic Surveillance Schedule/Outline

Exhibit 5 - Asbestos Management Program regarding Operations & Maintenance

Exhibit 6 - Cross Reference Table linking associated documentation to the management plan

Exhibit 8 - Annual Training Schedule for asbestos abatement workers and new employees
(included in the Asbestos Management Program and on the Cross Reference Table)

**Designated Person:**

Print Name: MICHAEL COOPER

Sign Name: Michael Cooper

Date:

**Witnessed by:**

Title: URS

Print Name: Brian Joseph

Sign Name: Brian Joseph

Date: 5/8/08

If you have any questions or comments, please feel free to contact Francine Locke at 215-400-4750 or Jerry Junod at 215 400-6738.

Sincerely,

Francine Locke

Francine Locke, MS
Director, Environmental Management & Services

# School District of Philadelphia
# Asbestos Hazard Emergency Response Act (AHERA)
# Compliance Audit

## Principal Interview Form

The School District of Philadelphia (School District) and the U.S. Environmental Protection Agency, Region III (EPA) entered into a Self-Audit/Self Disclosure Agreement. The purpose of the agreement is to gauge the School District's compliance with the Asbestos Hazard Emergency Response Act (AHERA) requirements for your school/ facility.

The School District obtained the services of URS Corporation (URS) to conduct the AHERA environmental compliance audit. The audit will focus on the compliance of general information, inspections and reinspections, response actions, operations and maintenance, periodic surveillance, and notifications. This document acknowledges that all environmental documents relevant to the building asbestos management plan have been made available to URS at the time of the audit.

| | |
|---|---|
| **School/ Facility:** | Comegys Elementary School #1260 |
| **Address:** | 5100 Greenway Avenue |
| **Date of Audit:** | ~~3/19/08~~ 3/24/08 |

**School Principal:**

Print Name: Franklin Gantz

Sign Name: [signature]

Date: March 24, 2008

# Asbestos Hazard Emergency Response Act (AHERA)
# Environmental Compliance Audit
# Cross Reference Table

In response to the AHERA Environmental Compliance Audit, a Cross Reference Table has been prepared for inclusion into the AHERA Management Plan. The purpose of this Cross Reference Table is to link the following documents to the AHERA Management Plan.

**Cross Reference Table**

3 Year Reinspection Report follows this Cross Reference Table documentation.

| Subject Matter | Location of Required Documents |
|---|---|
| Designated Person | Pages 1 - 2 |
| Annual Notification | Pages 3 - 5 |
| 6 Month Periodic Surveillance Outline of Events | Page 6 |
| 3 Year Reinspections Outline of Events | Page 7 |
| Asbestos Management Program (operations and maintenance) | Pages 8 - 19 |
| Asbestos Investigation Report (AIR) Demolition Directive Procedure | • Attachment 1<br>• Letter Dated August 4, 2006 |
| Training (included in the Asbestos Management Program) | The original records are centralized at the School District's Environmental Library. Copies are maintained on staff and are required to be maintained in the latest Re-inspection Report.<br><br>2 hour awareness training records for all Building Engineers, Custodian Assistants and maintenance personnel.<br><br>40 hour worker/supervisor training records for the OEMS A-Team and various AST tradesmen. |
| Response Actions (monthly mailings if applicable) | The original documents are on file at the School District's Environmental Library. |
| | Copies of the original are mailed to the School's Main Office for retention with the Management Plan documentation. These documents are typically kept separate from the management plan in an update binder due to the potential volume of response action reports. |

**SCHOOL DISTRICT OF PHILADELPHIA**
**ASBESTOS DESIGNATED PERSON**

**Gerald F Junod**
**Office of Capital Programs**
**Environmental Management & Services**
**440 N Broad Street, 3rd Floor**
**Philadelphia, PA 19130**
**Telephone: 215 400 6738**
**Fax: 215 400 4751**

| | |
|---|---|
| **Drexel University- Asbestos Building Inspector Course** | **January 9-11, 1989 24 Hours** |
| **Drexel University- Asbestos Management Planner Course** | **January 12-13, 1989 16 Hours** |

**Annual Building Inspector Refreshers** — **1990 through 2007 4 Hours**
**Drexel University**
**Criterion Laboratories, Inc**
**Access Training Services, Inc.**

**Annual Building Management Planner Refreshers** — **1990 through 1994 4 Hours**
**Drexel University**
**Criterion Laboratories, Inc**

**Manager, City of Philadelphia Asbestos Control Program**
**Served as the Asbestos Control Program Manager for the City of Philadelphia, Department of Public Health, Air Management Services, Asbestos Control Unit from August 1, 2003 through October 23, 2006.**

**Mid Atlantic Regional Environmental Consortium (MAREC)**
**Former member with attendance and participation commitments of all quarterly EPA Region III and yearly National Asbestos Regulatory Conferences sponsored by the EPA and the National Conference of State Legislators respectively as a representative for the City of Philadelphia Department of Public Health Air Management Services from 1994 through 2006.**

**Philadelphia Environmental Task Force**
**Former member of the Philadelphia Environmental Task force as a representative and point of contact for the City of Philadelphia Department of Public Health Air Management Services Asbestos Control Unit from 2002 through 2006.**

**Asbestos Instructor**
**Worked as the primary instructor for the initial and annual Asbestos Project Inspector training and licensing program as mandated by City of Philadelphia Department of Pubic Health Asbestos Control Regulations from August 1994 through October 2006.**
**Worked as a lead instructor with an Environmental Consulting Firm and approved by the US EPA for the initial and annual refresher training courses for various asbestos occupational disciplines such as the Building Inspector, Management Planner and Worker/Supervisor from 1991 through 1994.**

**I certify that the general, local agency responsibilities as stipulated in Section 763.84 will be met.**

**Gerald F. Junod**
**Asbestos Designated Person**
**Assistant Environmental Manager**
**Office of Environmental Management and Services**

**SCHOOL DISTRICT OF PHILADELPHIA**

**Accreditation Information Statement**

**All persons who inspect for Asbestos Containing Building Materials (ACBM) and who will design or carry our response actions with respect to assumed and confirmed ACBM, will be accredited by an EPA approved course and/or a State Contractors Accreditation Program under Sections 206 (c) and 206 (b) of Title II of the ACT**

**Gerald F. Junod**
**Asbestos Designated Person**
**Assistant Environmental Manager**
**Office of Environmental Management and Services**

SCHOOL DISTRICT OF PHILADELPHIA
OFFICE OF CAPITAL PROGRAMS
440 NORTH BROAD STREET, SUITE 373
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT AND SERVICES / PHONE (215)-400-4750

September 4, 2007

TO: All Principals
All Building Administrators
All Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President
Office of Capital Programs

Francine Locke, Manager
Office of Environmental Management and Services

SUBJECT: Annual EPA Notification Letter

Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 C.F.R. 763.93(g)(4) of public access to environmental records, this letter is to acknowledge the availability of your facility's Asbestos Hazard Emergency Response Act (AHERA) Management Plan.

Enclosed please find a copy of the Notification Letter and a Parents' Signature form informing them of the availability of this information for review. Each member of the school staff is also required to receive a copy of the Notification Letter. At the direction of the Principal, a copy is to be posted on the bulletin boards and an appropriate amount of copies are to be generated for distribution. The signed Parent forms are to be returned to the school and retained with the existing AHERA Management Plan, Three Year Reinspection reports, etc., in a central location by the Principal.

Note: The AHERA Three Year Reinspection reports, in colored binders; Red, Dark Blue, Green, Yellow and White, are Federal EPA mandated inspection documents. The School District of Philadelphia is subject to severe penalties ($) if the reports and associated paperwork are not available to the EPA and the public upon request.

It is incumbent on designated school personnel to gather and retain this data as it is delivered, in one location for future review. Acceptable locations include the Principal's/Main Office for the primary data and the Building Engineer's Office for the secondary duplicate copies.

If you have any questions, please call 215-400-4750. Thank you for your cooperation.

Patrick A. Henwood
Senior Vice President
Office of Capital Programs

Francine Locke, Manager
Office of Environmental Management
and Services

File #204
September 4, 2007

**OFFICIAL NOTICE**

**PLEASE POST**

TO: Principals
Building Administrators
Building Engineers
Building Occupants
Parents/Guardians

FROM: Patrick A. Henwood, Senior Vice President
Office of Capital Programs

Francine Locke, Manager
Office of Environmental Management and Services

SUBJECT: Annual Notice: Asbestos Hazard Emergency Response Act

The Federal Register published on October 30, 1987, part III, in Schools: Final Rule and Notice, 763.84 states that each local education agency shall ensure that workers and building occupants or guardians are to be informed at least once each school year about inspections, response actions and post-response action activities including periodic re-inspections and surveillance activities. The School District as the local education agency retains such reports that are available for public inspection in the Office of the Principal or Building Administrator.

The Principal or Building Administrator is required to do the following with this notification:

1) Post in a Public Place
2) Inform Building Occupants
3) A copy of the notification sent to Parents/Guardians (along with the Notification Form to be returned to school)
4) Insert a copy in the latest AHERA Three Year Reinspection report (red binder) in your office or facility

Patrick A. Henwood, Senior Vice President
Office of Capital Programs

Francine Locke, Manager
Office of Environmental Management and Services

# SCHOOL DISTRICT OF PHILADELPHIA

## Annual EPA Notification Form

September 4, 2007

TO: All Parents or Guardians

FROM: Francine Locke, Manager
Environmental Management and Services

This form is to acknowledge receipt of the Annual EPA Notification Letter regarding the availability of the Asbestos Hazard Emergency Response Act (AHERA) Management Plan and Three Year Reinspection reports for review.

This form shall be signed and returned to school for filing with the AHERA Management Plan, etc., by the designated school staff.

Thank you for your timely response.

Students Name (PRINT) _____

School (PRINT) _____

Grade Level (PRINT) _____

Parent/Guardian (PRINT) _____

Parent/Guardian Signature _____

SCHOOL DISTRICT OF PHILADELPHIA
Education Center
440 North Broad Street
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services 215-400-4750

# AHERA
## Six Month Surveillance
## Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.92(b), the following procedure is to be implemented. At least once every six (6) months after a management plan is in effect, each Local Education Agency (LEA) shall conduct a periodic surveillance in each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.

- The first bi-annual inspection starts in the Spring (March, April, May) and again in the Fall (October, November, December) of each year. The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspaces/Attics) and rooms in the facility. There is no action required of the Principal.

- The Building Inspector shall visually inspect all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials.

- The Building Inspector shall make a copy of the inspection document and insert into the front of the latest Management Plan (AHERA Three Year Reinspection report). The original document is returned to the LEA's environmental library and filed.

SCHOOL DISTRICT OF PHILADELPHIA
Education Center
440 North Broad Street
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services 215-400-4750

# AHERA
## Three Year Reinspection
## Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.85(b) the following procedure is to be implemented. At least once every three (3) years after a management plan is in effect, each Local Education Agency (LEA) shall conduct a reinspection of each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.

- Subsequent three year reinspections (2009, 2012, 2015, etc) shall start in the Fall (October, November, December, January). The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspaces/Attics) and rooms in the facility. There is no action required of the Principal.

- An accredited Building Inspector shall visually inspect and touch to determine friability, all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials. The inspectors state of accreditation and license number is required.

- The Building Inspector shall return the reinspection data to the Management Planner to be assessed and determine appropriate response actions and a report issued (AHERA Three Year Reinspection report). One copy of the report is delivered to the schools principal to be permanently retained with all previous environmental data. Another copy is retained in the LEA's environmental library.

School District of Philadelphia
Office of Environmental Management & Services
440 North Broad Street
Philadelphia, PA 19130
(215) 400-4750

# School District of Philadelphia
# Asbestos Management Program

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## DEFINITIONS/ACRONYMS

| | |
|---|---|
| **ACM/PACM** | **Asbestos Containing Material /Potential Asbestos Containing Material** |
| **AHERA** | **Asbestos Hazard Emergency Response Act** |
| **AIR FORM** | **Asbestos Inspection Report Form** |
| **Amended Water** | **Water to which a surfactant (soap) has been added.** |
| **AMP** | **Asbestos Management Program/Asbestos Management Plan** |
| **Asbestos Designated Person** | **Individual assigned by the district to oversee asbestos related issues** |
| **Asbestos Regulated Area** | **Location that is posted as an asbestos work area in which only approved and accredited personnel are permitted to enter.** |
| **AST** | **Asbestos Support Team involving approved and accredited school district tradespersons personnel that are school district person** |
| **A-TEAM** | **School District of Philadelphia asbestos workers** |
| **CIP** | **Capital Improvement Program** |
| **Consultant** | **Asbestos consulting firm hired by the District** |
| **Demolition Directive** | **Memorandum - August 4, 2006 from Patrick Henwood** |
| **EPA** | **Environmental Protection Agency** |
| **In House Personnel** | **School District of Philadelphia asbestos workers** |
| **LEA** | **Local Education Agency** |
| **O&M** | **Operations and Maintenance** |
| **OEMS** | **Office of Environmental Management and Services** |
| **OSHA** | **Occupational Safety and Health Administration** |
| **PEL** | **Permissible Exposure Limit** |
| **PSD or SDP** | **Philadelphia School District/School District of Philadelphia** |
| **PSIT** | **Philadelphia School Improvement Team** |
| **STEL** | **Short Term Excursion Limit** |

## 1. Introduction

The School District of Philadelphia, Asbestos Policy Statement:

> The School District of Philadelphia is dedicated to providing a safe and healthful work environment for its employees, students, faculty, contractors and visitors. In recognition of the potential health problems associated with asbestos, the School District of Philadelphia is committed to a comprehensive asbestos control program. This program is implemented and maintained through the School District of Philadelphia's Office of Environmental Management and Services (OEMS).
>
> OEMS has the responsibility of establishing procedures for asbestos abatement, asbestos inspection, air monitoring, renovation and demolition activities within all School District of Philadelphia owned or leased facilities.
>
> These procedures are developed to ensure that:
>
> (1) People are not exposed to significant levels of asbestos fibers;
> (2) Asbestos waste is handled and disposed of properly;
> (3) Members of the School District of Philadelphia community have access to the Office of Environmental Management and Services for information, assistance, guidance, and interpretation regarding asbestos related matters;
> (4) Members of the School District of Philadelphia community have access to the Asbestos Management Plans as required and outlined in the US EPA AHERA regulations including annual written notification to all parents;
> (5) Compliance with all applicable Federal, State and Local Asbestos Regulations.
>
> Requirements outlined in this manual are mandatory in nature where the word "SHALL" is used and are advisory in nature where the word "SHOULD" is used.

## 2) Summary of Asbestos Management Program

The School District of Philadelphia's Asbestos Management Program was established to meet the requirements of Federal, State and Local Regulations.

These regulations include, but are not limited to:

- US Environmental Protection Agency Asbestos Hazard Emergency Response Act (US EPA AHERA) and National Emissions Standard for Hazardous Air Pollutants subpart M, Part 61 (NESHAP);

- US Department of Labor, Occupational Safety and Health Administration (OSHA) General Industry Standard (29 CFR 1910.1001) and the OSHA Asbestos Standard for the Construction Industry (29 CFR 1926.1101);

- The Commonwealth of Pennsylvania, Department of Labor and Industry, Asbestos Occupations, Accreditation and Certification Act;

- The City of Philadelphia, Department of Public Health, Asbestos Control Regulations.

3) **Asbestos Management Program Execution**
   a) **General Execution**

The Office of Environmental Management and Services(OEMS) develops, implements and manages safety and health programs for the School District of Philadelphia faculty, staff and students and assists with ensuring that all contractors comply with Federal, State and Local Environmental Regulations. The OEMS provides the oversight of School District of Philadelphia employees (Asbestos A-Team), environmental consultants, and asbestos abatement contractors for all projects within the School District of Philadelphia concerning Asbestos Containing Materials.

The control of safety and health hazards at the School District of Philadelphia is primarily through the implementation of engineering, work practice and administrative controls. Personal Protective Equipment (PPE) is used to supplement these controls or whenever the controls are not feasible or are in the process of being implemented. PPE is also recommended whenever exposures to chemical, physical or biological agents can be prevented or reduced by its use.

This written program establishes the procedures necessary to:

1) meet established standards and federal regulations for occupational exposure to asbestos fibers;
2) meet the requirements of the City of Philadelphia Asbestos Control Regulations which encompasses the disturbance and/or abatement of asbestos containing building materials;
3) provide the necessary health and safety protection to School District of Philadelphia staff, faculty, students, contractors and visitors.

This program is strengthened by input and cooperation with the Philadelphia Federation of Teachers (PFT), Health & Welfare Fund.

4) **Summary of Program Execution**
   a) **Asbestos Management Program Execution**

The Asbestos Management Program is administered by the Office of Environmental Management and Services (OEMS). OEMS provides the following services primarily through professional consultants:

(1) exposure monitoring services;
(2) building inspection/surveys (bulk sampling) for the identification of asbestos containing materials;
(3) asbestos project design services;
(4) asbestos abatement project and air monitoring services;
(5) emergency response to fiber release episodes;
(6) education/information;
(7) medical monitoring;
(8) training for School District of Philadelphia personnel

5) **Responsibilities**
   a) **Office of Environmental Management and Services**
   OEMS is responsible for performing the following functions:

(1) Developing and administering of the Asbestos Management Program.
(2) Providing asbestos-related services to all School District of Philadelphia departments.
(3) Conducting required training of the Asbestos Management Program and working jointly with departments to schedule training.
(4) Identifying and posting areas where labeling/signage is required.

(5) Medical Monitoring of OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.
(6) Certification and training as required for OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.
(7) Record keeping as outlined in Section 3.5 and all records as by required by US EPA AHERA regulations.

b) **Asbestos Worker/ Supervisor-"A-TEAM"**

(1) OEMS shall ensure that all "A-TEAM" workers/supervisors adhere to the following requirements:
   (a) Attend an initial Worker/Supervisor Asbestos Course;
   (b) Maintain the annual re-certification per EPA AHERA requirements and Commonwealth of Pennsylvania Asbestos Occupations, Accreditation and Certifications Act;
   (c) Undergo an annual Asbestos Medical Evaluation;
   (d) Undergo an annual Respirator Medical Clearance;
   (e) Undergo an annual Respirator Fit Testing.

c) **Asbestos Designated Person**
The Asbestos Designated Person is responsible for:

(1) Assuring the health and safety of employees, students and visitors in the School District of Philadelphia facilities under his/her control.
(2) Being kept informed of all areas under his or her jurisdiction where potential asbestos exposures exist and initiating protection programs that adhere to the Asbestos Management Program requirements of this manual.
(3) Assuring that Asbestos Management Program requirements are adhered to by principal investigators, project managers, supervisors, or division heads, and School District of Philadelphia personnel under their supervision.
(4) Ensuring that all employees within the Asbestos Management Program comply with (OSHA 1910.1001 (j) (7) (iv)) and the US EPA AHERA regulations by attending the required training.
(5) Ensure the posting of:
   (a) warning labels/signage
   (b) Commonwealth of Pennsylvania Asbestos Abatement and Demolition/ Renovation Notification form
   (c) Asbestos Inspection Reports (AIR) form (where required)

d) **Supervisor or Project Manager (Capital, Maintenance and Facilities)**
Each person in charge of a project, maintenance/repair, renovation/demolition, or other activity from the Departments of Capital, Maintenance, and/or Facilities, where asbestos containing materials may be present is responsible for:

Identifying, with the assistance of OEMS, asbestos containing building materials prior to any disturbance of these materials. Various Federal (EPA and OSHA) and Local (City of Philadelphia Asbestos Control Regulations) require Asbestos Inspections prior to renovation/demolition activities. This shall be accomplished by always following the Asbestos Management Program Procedures as follows:

(1) Ensure that the requirements of the Asbestos Management Program Procedures are followed by all personnel, trades, and contractors who are involved with the project;

(2) Review of the required Asbestos Inspections Report (AIR) form (Attachment 1) and AHERA Management Plan documents prior to activities that may disturb any Asbestos Containing Materials;
(3) Perform all project related duties as outlined in the Project Manager Responsibilities;
(4) Keep the department chairperson or director informed of any actions proposed or taken regarding the Asbestos Management Program.

**e) Employee – Capital**

School District of Philadelphia Capital employees and/or consultants shall:

(1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of the projects they are performing or managing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit (a.k.a PSIT Service Request Form) and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
(2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.

The types of projects represented as part of the Capital Improvement Program are as follows:

(1) Complete Renovation of an existing building that addresses all facility component concerns and educational program needs;
(2) Major Renovation of an existing building addressing significant facility component and educational improvements;
(3) Addition to an existing building (either as an attachment or stand-alone structure) to accommodate needed program space;
(4) Conversion of an existing facility to accommodate a change in educational program;
(5) Facility Component Improvement of specific facility needs (i.e. electrical or HVAC system upgrades, ADA improvements, life safety improvements, exterior renovations, etc.).

**f) Employee - Maintenance**

School District of Philadelphia Maintenance employees shall:

(1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
(2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
(3) All employees involved in maintenance activities shall attend required Asbestos Awareness training program within 60 days of employment

**g) Employee – Facilities & Custodial**
School District of Philadelphia Facilities and Custodial employees shall:

(1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information

is not available or verification has not been made, these materials should not be disturbed;

(2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.

(3) All employees involved in Facilities and Custodial activities shall attend required Asbestos Awareness training program within 60 days of employment.

6) **Requirements**

a) **Employee Exposure Monitoring**

When information indicates that an employee's exposure to asbestos fibers may equal or exceed an 8-hour time-weighted average of 0.1 f/cc * (per OSHA 1910.1001 & 1926.1101), OEMS shall develop and implement an asbestos exposure monitoring program. The sampling strategy shall be designed to identify employees by work task (job classification) that is exposed to asbestos fibers that exceed an 8-hour time-weighted average of 0.1 f/cc.

b) **Employee Notification**

OEMS shall notify in writing, each employee exposed to asbestos fibers at or above an 8-hour time weighted average of 0.1 f/cc.

c) **Observation of Monitoring**

OEMS shall provide employees or their representatives with an opportunity to observe any exposure measurements conducted.

d) **Training Program**

OEMS shall institute a training program which meets the requirements of AHERA for all employees who perform maintenance operations in a facility/school which contains asbestos containing materials or presumed asbestos containing materials and 1910.1001 (j), and the Commonwealth of Pennsylvania Department of Labor and Industry and the City of Philadelphia Asbestos Control Regulations. The affected departments shall ensure employee participation in this program. The OEMS "A-TEAM" and other departments "AST" Asbestos Program staff training shall be conducted annually for each employee as required by all Federal, State and Local for each asbestos discipline.

All Asbestos Awareness training as required by AHERA shall be performed within 60 days of employment and shall include:

- health effects of asbestos
- locations of ACM and PACM in the building/facility
- recognition of ACM and PACM damage and deterioration
- requirements of the OSHA 1910.1001 standard relating to maintenance
- proper response to fiber release episodes
- procedure to be followed to isolate areas affected by fiber releases

e) **Access to Information**

OEMS shall make available to affected employees or their representative's copies of the Occupational Safety and Health Administration (OSHA) General Industry Standard Part 1910.1001 and the department shall post a copy in the workplace.

f) **Record keeping**

OEMS shall maintain an accurate record of all employee exposure measurements. OEMS and/or the School District of Philadelphia Human Resources Department shall maintain records of employee medical monitoring program. OEMS shall maintain all employee training records. All records shall be provided upon request to employees, former employees, representatives designated by the individual employee.

# 7) AHERA OPERATIONS AND MAINTENANCE PLAN

## a) CONTROLS

### i) Work Order System

Minimizing disruption of ACM/PACM during maintenance and renovation activities is the primary goal and task encountered by OEMS. Operations and maintenance employees and contractors should be warned to avoid conducting any maintenance work which may disturb ACM/PACM. Initiating a work order system, where all work orders or requests are channeled through the Office of Environmental Management and Services (OEMS), will be the method used to control and minimize disruption of ACM/PACM.

Any work performed by in-house personnel or contractors that could or will impact ACM/PACM shall be coordinated by OEMS. A completed Asbestos Inspection Report Form (Attachment 1) shall be issued to in-house personnel and/or all contractors whose work could impact ACM/PACM. This form should accompany each contract issued to an outside contractor and posted on the jobsite.

All work order requests for maintenance and renovation activities in areas where ACM/PACM is suspected or known to be present are to be submitted to OEMS prior to proceeding with work. OEMS is responsible for reviewing asbestos survey records for information about the presence of ACM/PACM in the area where the work is to be performed. OEMS should physically inspect the area to ensure existing records reflect actual conditions. If no asbestos is present, a work order is not necessary and the planned actions can proceed. If ACM/PACM is found to be present in the area, OEMS will sign the work order application and obtain an approved and accredited asbestos contractor or assign OEMS "A-TEAM" to abate the ACM/PACM.

### ii) Regulated Areas

The owner will identify and regulate all areas where airborne concentrations of ACM/PACM exceed the Permissible Exposure Limit (PEL)* (Per OSHA determined to be 0.1 f/cc) and/or short-term exposure limit (STEL) (Per OSHA determined to be 1.0 f/cc), or there is reasonable possibility that the (PEL) and/or (STEL) may be exceeded. All ACM/PACM removal activities involving thermal system insulation ACM/PACM (Class I), surfacing ACM/PACM (Class I), and miscellaneous ACM/PACM such as floor tile, roofing, and siding mastic, etc. (Class II), and repair and maintenance operations where thermal system insulation and surfacing ACM/PACM is likely to be disturbed (Class III) will be performed in accordance with federal, state, and local regulations. All asbestos abatement work and activities will be designated and managed as asbestos regulated areas. These areas will be demarcated and labeled.

### iii) Warning Signs

Warning signs shall be displayed at all approaches to each asbestos regulated area. The asbestos abatement contractor will provide OSHA warning signs in all regulated areas during removal, repair, and other maintenance activities. OEMS will provide AIRs to all contractors who must inform all employees and supervisors working in locations contiguous to asbestos regulated areas of the potential hazards and work practices required.

### iv) Warning Labels

Warning labels and/or signage shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers. Generally, the asbestos abatement contractor or OEMS A-Team personnel will provide all warning labels for ACM/PACM containment.

## 8) O &M RESPONSE ACTIONS

The Asbestos Management Program general O&M procedures are outlined in this section. Additional requirements specific to asbestos abatement activities are included the Project Design documents for all Asbestos Abatement Work. Regular cleaning, inspection, and reporting of ACM/PACM deterioration or other problems must be diligently practiced by all employees including custodial and maintenance personnel.

### a) Facility Maintenance Isolation of Area Responsibilities

Maintenance personnel are often required to work in areas where ACM/PACM may potentially be disturbed. Most maintenance activities are conducted by in-house staff, outside contractors, or a combination.

Emergency fiber release episodes, such as pipe fitting or valve breaks, emergency boiler work, or mechanical equipment repair will be responded to by OEMS A-Team personnel or asbestos abatement contractor personnel. The owner's maintenance staff will: (1) isolate the emergency fiber release area; (2) post warning signs to prevent unauthorized access, and (3) notify their supervisor and OEMS. OEMS will ensure that the fiber release area remains isolated and is properly cleaned by an approved and accredited abatement contractor or by OEMS A-TEAM personnel.

### b) Unlikely Contact with ACM/PACM

Maintenance activities or repairs which can be performed without contacting or disturbing the ACM/PACM require little more than normal care and good workmanship. For example, valves which are either uncovered or covered with non-asbestos insulation can be packed or repaired without disturbing asbestos insulation on nearby pipes. The major precaution is to ensure that maintenance and custodial personnel are familiar with procedures such as isolating the area, posting warning signs, and notifying OEMS in the event of any accidental ACM/PACM disturbance.

### c) Accidental Disturbance of ACM/PACM

Maintenance & facilities personnel shall notify OEMS any time a fiber release is suspected. If friable ACM/PACM becomes airborne in the building,

### d) Planned Disturbance of ACM/PACM

Maintenance activities that may impact ACM/PACM include access to a valve, flange, duct, or related system component.

Where asbestos-containing insulation must be removed to maintain or repair the thermal system, the ACM/PACM will imminently be disturbed. ACM/PACM removal work shall be conducted by OEMS A Team personnel or an approved and accredited asbestos abatement contractor.

If friable ACM/PACM becomes airborne in the building, maintenance and facilities personnel shall secure the area and contact OEMS. OEMS shall respond accordingly.

**e) Miscellaneous ACM/PACM**

Miscellaneous types of ACM/PACM may include vinyl asbestos floor tiles, mastics/adhesives and woven vibration dampers. Disturbance of these materials should be avoided. Routine maintenance activities involving these materials should not pose a problem if handled properly. Questions on the proper removal and disposal of miscellaneous ACM/PACM should be directed to OEMS. OEMS will contact an approved and accredited asbestos abatement contractor or utilize OEMS A-TEAM personnel to assist with miscellaneous ACM/PACM clean-up activities.

**f) Vinyl Asbestos Floor Tile**

Asbestos-containing floor tiles in good condition are considered non-friable unless they are crushed, drilled, sawed, sanded or disturbed by any activity that breaks up the material. Routine maintenance of these materials should employ the use of non-abrasive buffers and wet cleaning techniques. Broken or loose floor tiles should be removed and disposed of as asbestos waste by OEMS. Remaining debris should be vacuumed with a HEPA vacuum and the area wet mopped using amended water.

**g) Mastics/Adhesives**

Mastics and adhesives containing asbestos in good condition are considered non-friable and do not pose a potential health concern unless crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**h) Woven Vibration Dampers**

Woven vibration dampers in good condition are considered non-friable and do not pose a potential health concern unless cut, crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**i) Other Work Practices**

Any special work not included in this section should be addressed directly to OEMS for review prior to the initiation of work that may involve the disturbance of ACM/PACM.

**j) Fiber Release Episodes**

Facilities and maintenance staff should report to OEMS the presence of asbestos debris, water or physical damage to ACM/PACM, or any other evidence of possible fiber release. OEMS should have the OEMS A-Team personnel or an approved and accredited abatement contractor respond to the site to clean up debris and make repairs as soon as possible. OEMS will also contact a consultant to conduct air monitoring and prepare a report and submit at project completion to OEMS for each episode. OEMS will forward the reports for each site location AHERA Management Plan accordingly.

## 9) REFERENCES and RESOURCES

Applicable regulations for asbestos projects impacted by renovation, demolition, and maintenance activities.

- **Philadelphia Air Management Services - Asbestos Control Unit**

  http://www.phila.gov/health/units/ams/Asbestos/asbestos.html

- **Pennsylvania Asbestos Occupations, Accreditation and Certification Act**

  http://www.dli.state.pa.us/landi/cwp/view.asp?a=185&q=56262&landiNav=

- **United States Environmental Protection Agency Asbestos Home Page**

  http://www.epa.gov/asbestos/

- **Occupational Health and Safety Administration (OSHA) Asbestos Home Page**

  http://www.osha.gov/SLTC/asbestos/

City of Philadelphia - Department of Public Health
Public Health Services - Air Management Services
Asbestos Control Unit - 321 University Av., 19104

# Asbestos Inspection Report
# School District of Philadelphia projects ONLY

| Office Use Only | | |
|---|---|---|
| | Date Received L&I: | Date Received AMS: |
| | Date Inspected: | Inspector # |

1. Name of Building: Phone #

2. Name of Building Owner: School District of Philadelphia Phone # 215-400-4750
440 North Broad Street, Philadelphia, PA 19130

3. Name of Licensed Investigator: License # Phone #

4. Name of Certified Lab: License # Phone #

5. Scope of Work: (include all locations)

Asbestos Containing Material Present? ☐ Yes (List Below) ☐ No

6. List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. You (Investigator) must label all ACM that may be left in the work area. Page 1 of __

| Location | Description | Type (Code 1) | Amount Square | Amount Linear | Condition (Code 2) | Action (Code 3) |
|---|---|---|---|---|---|---|
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| Code 1 | Code 2 | Code 3 |
|---|---|---|
| FRI - Friable | DD - Deteriorated or Delaminated | REM - Removal necessary prior to Demo/Reno |
| NF1 - Non-Friable, Cat. 1 | ND - Non-Damaged | NRN - No removal necessary, label ACM |
| NF2 - Non-Friable, Cat. 2 | | REP - Repair & Label ACM, removal not necessary |

I hereby certify that the foregoing statements are true and the information contained in this report is true. This certification is made subject to the penalties set forth in 18 PA. C.S. S4904 relating to unsworn falsification to authorities. Furthermore I certify that the inspection, sampling, and labeling requirements of section X of the Asbestos Control Regulation (ACR) have been met. The building owner has been notified of the ACR requirements and given a copy of this report. If the inspection has revealed ACM which will be disturbed by the proposed work or if it has revealed ACM in bad condition, the building owner has been notified to remove or repair the ACM in accordance with the ACR prior to renovation or demolition activity.

| Signature of Licensed Asbestos Investigator: | Date: | Signature of Building Owner: | Date: |
|---|---|---|---|
| | | | |

Attachment #1

City of Philadelphia - Department of Public Health
Public Health Services - Air Management Services
Asbestos Control Unit - 321 University Av., 19104

# Asbestos Inspection Report
## School District of Philadelphia projects ONLY

 *Project Name:* _____ *Project No.* _____

6. *continued*
List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. You (Investigator) must label all ACM that may be left in the work area.

| Location | Description | Type (Code 1) | Amount Square Ft. | Amount Linear Ft. | Condition (Code 2) | Action (Code 3) |
|---|---|---|---|---|---|---|
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7. List all locations inspected that do **NOT** have asbestos containing material present:

| Location | Location | Location | Location |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

8. List all homogeneous materials present in this school:

| ASBESTOS CONTAINING MATERIALS | NON-ASBESTOS MATERIALS |
|---|---|
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9. Caution labels affixed to all ACM ? ☐ Yes ☐ No

*All contractors' employees involved in the demolition or renovation activity must receive a copy or have access to this Asbestos Inspection Report.*

Signature _____ Date _____

Attachment #1

**THE SCHOOL DISTRICT OF PHILADELPHIA**
**OFFICE OF CAPITAL PROGRAMS**
440 NORTH BROAD STREET, 3RD FLOOR
PHILADELPHIA, PENNSYLVANIA 19130-4015

TELEPHONE (215) 400-4730 FAX (215) 400-4731

August 4, 2006

TO: All Project Management Personnel

FROM: Patrick Henwood, Director
Office of Capital Programs

SUBJECT: Construction Projects

Effective immediately, if it is necessary to demolish or open a wall, ceiling or floor as part of a construction project, it is now required that a special assessment be made by the PSIT environmental consultant, prior to commencement. The purpose of this new control is to prevent construction workers from unknowingly being exposed to asbestos containing materials.

The procedure will be as follows: the Construction Manager (CM) will provide the Project Manager (PM) with a two week look-ahead indicating exact locations of surfaces that will need to be demolished or altered. If possible, the CM will clearly mark/label the effected surfaces and/or items. The PM will then notify the Environmental Department who will send a City of Philadelphia licensed investigator to inspect and test the areas. The work may not proceed unless and until the investigator provides a report that clears the area.

Additionally, please ensure that, for all projects, a copy of the latest AHERA report, the appropriate Asbestos Inspection Report and all MSDS are available and posted in conspicuous locations. If environmental concerns are expressed to the CM by construction workers and can not be resolved, please have the CM contact you and the Environmental Department at (215) 400-4750 as soon as possible.

Thank you for your cooperation in this matter.

C: Fred Farlino
Len Dillinger, PE
Joel Jackson
Joe Joseph
Francine Locke
Gene Becker
Vince Pagliaro