

10 Lewis Street P.O. Box 284 Lincoln, MA 01773 617-259-0800 FAX #617-259-1355

ASBESTOS MANAGEMENT PLAN

FOR

Greenleaf Elementary School 58 Chadwick Street Haverhill, MA 01830

Prepared By:

HUNTER, INC.
Environmental Sciences
10 Lewis Street
Lincoln, Massachusetts 01773

Draft Report Dated: October 17, 1988

Final Report Dated: April 28, 1989



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### CITY OF HAVERHILL

MASSACHUSETTS 01830-5875

**AUDITING DEPARTMENT** Room 106 - City Hall (508) 374-2306 Fax (508) 521-4348

WILLIAM J. KLUEBER City Auditor

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May 5, 1989

To Whom It May Concern:

The City of Haverhill will float a Bond Issue to complete work required by AHERA Regulations as outlined in the Management Report. The recommendations of Hunter Environmental, Inc. will be carried out during a three-year period, beginning July 9,

Director of Finance

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### INTRODUCTION

The Management Plan is an ongoing system. It is altered after each reinspection, every operations and maintenance activity, and at the completion of all response actions.

In addition to the plan itself, AHERA requires the maintenance of records associated with various sections of the plan. The records will be maintained in a centralized location in the administrative offices of the school and of the Local Educational Agency ("LEA).

These records will be referred to in the Management Plan as the "associated records" and will constitute a part of this Management Plan.

The Haverhill School District is a local educational agency ("LEA") within the meaning of the Asbestos Hazard Emergency Response Act ("AHERA"). AHERA requires each LEA to prepare a Management Plan for each school building, submit it for approval by October 12, 1988 (unless an extension has been applied for by that date), and maintain copies in both the school district's administrative office and the school building to which it applies.

### Each Management Plan must provide:

- A description of inspections conducted before December 14, 1987 and response actions and preventive measures based on these inspections.
- o The date of the inspection (or reinspection) on which the Management Plan is based and, the credentials of the inspector.
- A diagram or written description of each school building identifying the location and square or linear footage of:
  - a) Homogeneous areas where material was sampled for asbestos-containing material ("ACM") with locations of samples and details of the sample collection.
  - b) Homogeneous areas where friable suspected asbestoscontaining building material ("ACBM") is assumed to be ACM.
  - c) Homogeneous areas where non-friable ACBM is assumed to be ACM.
- o A description of the manner used to determine sampling locations and the name, signature and credentials of the inspector who took the samples.

- o A copy of laboratory results and the credentials of the laboratory.
- o Assessments classifying all ACBM and suspected ACM according to the EPA seven category classification code, and the credentials of the person who made the assessments.

### Each plan must also provide:

- o The identity of the LEA's designated asbestos coordinator and a description of the designated person's training.
- o The recommendations for response actions made by the management planner and the management planner's credentials.
- o A detailed description of preventive measures and response actions to be taken for any friable ACBM including locations of such materials, reasons for selecting these measures and a time table for implementing them.
- o A statement that the LEA has used, and will use, accredited persons for inspections and response actions.
- A detailed description by diagram, or in writing, of any ACBM or suspected ACBM assumed to be ACM, which remains in the school once response actions have been taken (to be updated as these are completed).
- o Plans for: periodic reinspections, operations and maintenance activities and periodic surveillance.
- o The recommendations made by the management planner, regarding extra cleaning after the initial post-inspection cleaning of areas, where friable ACBM or damaged thermal system insulation has been identified, and the LEA's response to that recommendation.
- o A description of the plan and the steps taken to inform workers, building occupants or their guardians about inspections, planned response actions and periodic reinspection and surveillance.
- o An evaluation of the resources needed for response actions, reinspections, operations and maintenance, periodic surveillance and training.
- o Additional information on the credentials of each consultant contributing to the Management Plan.
- o At the option of the LEA, a statement by the management planner that the plan is in compliance with the applicable AHERA regulations.

- o A description of the steps taken to notify in writing, parent, teacher and employee organizations of the availability of the Management Plan and a dated copy of such notification. In the absence of such organizations, the steps taken to notify the groups in question including dated copies of written notifications.
- A certification by the LEA's designated asbestos coordinator that the LEA's responsibilities have been met or will be met.

### I. ASBESTOS COORDINATOR'S APPOINTMENT AND CERTIFICATIONS OF COMPLIANCE

The LEA has designated the following individual under 40 CFR Part 763.84(g.) as its asbestos coordinator. This individual will be referred to elsewhere in the Management Plan as the "designated person."

Designated under 40 CFR Part 763 & 763.84(g.):

FULL NAME;	Daniel Sweeney					
OFFICE ADDRESS:	4 Summer Street, Haverhill, MA 01830					
OFFICE TELEPHONE:	(508) 374-2355					
COURSES ATTENDED	DATE HOURS April					
Tufts Inspectors Course	10-12, 198924					
Tufts Management Planners	April 13-14, 1989 16					

The Haverhill School District will use accredited persons for all asbestos related work as approved under section 206(b) of Title II of the AHERA Act. The following information will be required; individuals' name and address, social security number, employer, course taken, date, state of accreditation and the accreditation number as well as the name and address of the training entity.

Certification by Designated Person:

I, Daniel Sweeney [insert name of designated person] certify as correct and true that the general local education agency responsibilities as stipulated by section 763.84 of 40 CFR Part 763, have all been or will be complied with to the best of my ability.

Signed: May 5, 1989



10 Lewis Street P.O. Box 284 Lincoln, MA 01773 617-259-0800 FAX #617-259-1355

### <u>MEMORANDUM</u>

TO:

Massachusetts Department of Labor & Industries

FROM:

Hunter, Inc.

SUBJECT:

AHERA Management Plans - Corrections, Additions

DATE:

April 12, 1989

- Statement that laboratory meets the applicable requirements of 763.87 (a). See attachment A.
- Recordkeeping name and signature of any person collecting any air sample required at the completion of the action.
   See Section VII Response Actions, B, 4.
- Employee Training which has occurred since December 14, 1987. See attachment B.
- Note revised forms AA006, AA007
- Homogeneous ACM/ACBM areas are categorized as follows:

### Thermal System Insulation

### Surfacing Material

Miscellaneous Material

Boiler coverings
Water tank covering
Compressors
Air handling
Pipe insulation
Pipe joint valve
Fitting elbow insulation
Breeching insulation
Duct insulation

Sprayed-on fireproofing
Friable acoustical plaster
Friable decorative plaster
Textured wall/ceiling surfaces,
except concrete like materials

Floor tiles
Ceiling tiles
Transite
Stage curtains
Lab gloves
Roofing fells
Vibration
Isolator
Linoleum

- A. Thermal System Insulation
- at least 3 bulk samples from each area
- at least 1 bulk sample from patched areas < 6 linear or square feet.

- sufficient number of samples from each insulated mechanical system to determine whether material is ACM
- B. Surfacing Material friable
- at least 3 bulk samples from each area ≤ 1000 square feet
- at least 5 bulk samples for area > 1000 square feet and
  < 5000 square feet</pre>
- at least 7 bulk samples for area > 5000 square feet
- C. Friable/Non-Friable Miscellaneous Material
- sufficient number to determine whether material is ACM
- D. For Non Friable Suspected ACBM
- sufficient number to determine whether material is ACM

### STATEMENTS AND CERTIFICATIONS

### USE OF ACCREDITED LABORATORY

ALL BULK SAMPLES COLLECTED WERE ANALYZED BY THE MICROSCOPY LABORATORY OF HUNTER, INC., 10 LEWIS STREET, LINCOLN, MASSACHUSETTS 01773. THE LABORATORY MEETS ALL REQUIREMENTS OF 40 CFR 763.87.

ALL SAMPLES TAKEN FROM THE SUSPECT MATERIALS WERE ANALYZED FOR ASBESTOS CONTENT BY PLM USING THE "INTERIM METHOD FOR THE DETERMINATION OF ASBESTOS IN BULK INSULATION SAMPLES" APPENDIX A, SUBPART F, 40 CFR PART 673.

Thomas a. Emm	<del></del>
(SIGNATURE)	
V.P. Lab Director	
(TITLE)	
MASS. STATE CERTIFICATION # _	AA000033
EPA # 1373, NVLAP #1560	



# THE COMMONWEALTH OF MASSACHUSETTS

## Department of Aubor and Industries

### **ASBESTOS ABATEMENT PROGRAM**

## CERTIFICATION FOR ANALYTICAL SERVICES

In accordance with 453 CMR 6.04

Certificate No. A A 000033

is issued by the Commissioner of the Department of Labor and Industries to:

HUNTER, INC. P.O. BOX 284 LINCOLN

for the purpose of providing analytical services as specified in Form CAAS.

This license is valid for a period of one (1) year.

from 06/29/88 to 06/29/89

James F. Snow, Commissioner

### II. GLOSSARY

"Abatement Project Designer" - A person who determines how asbestos abatement work should be conducted and who prepares for the abatement project, plans, designs, procedures, scope of work or other substantive direction or criteria.

"Action Level" - An airborne concentration of asbestos, 0.1 fibers per cubic centimeter of air calculated as an 8 hour TWA (time weighted average). This is the required level at which employee training, air monitoring and medical surveillance is needed. (OSHA 29 CFR)

"Amended Water" - Tap water to which a non-sudsing surfactant is added.

"ACBM" - Asbestos-containing building materials.

"ACM" - Asbestos-containing material and means any material containing more than one percent asbestos.

"AHERA" - The acronym for the federal law and regulations that require local education agencies to identify friable and non-friable asbestos-containing material (ACM) in public and private elementary and secondary schools. "AHERA" itself stands for "Asbestos Hazard Emergency Response Act."

"Asbestos" - Any naturally occurring hydrated mineral silicate separable into commercially usable fibers, including chrysotile (serpentine), amosite (cumingtonite-grunerite), crocidolite (riebeckite), tremolite, anthophyllite and actinolite.

"<u>Asbestos Abatement Worker</u>" - A person not acting as a foreperson or supervisor who performs asbestos abatement work.

"Asbestos Abatement Project Monitor" - A person who functions as the on-site representative of the facility owner or other persons by over-seeing the activities of the asbestos contractor.

"Asbestos Contaminated Objects" - Any objects which have been contaminated by asbestos or ACM.

"Baseline Monitoring" - A measurement or determination of airborne asbestos fiber concentration inside the work area and outside work area prior to starting abatement activities.

"DLI" - The Massachusetts Department of Labor and Industry.

"<u>Disturb</u>" - Any action taken which may alter, change or stir, such as, but not limited to the removal, encapsulation, enclosure or repair of ACM.

"Emergency Asbestos Project" is an asbestos abatement project resulting from an unforeseeable, sudden and unplanned event. This includes operations required by non-routine equipment failures.

"Encapsulant" - Spraying of ACM with a sealant, using an airless sprayer to reduce the tendency of the material to release fibers. Two types of encapsulant are commonly used, bridging(surface binding) and/or penetrating.

"Enclosure/Containment" - The covering or wrapping of friable ACM in, under, or behind air-tight barriers.

"EPA" - The U.S. Environmental Protection Agency.

"Fiber" - A particulate form of asbestos, tremolite, anthophyllite or actinolite, 5 micrometers or longer with a length to diameter ratio of at least 3 to 1. (OSHA definition)

"Fibrous" - Spongy, fluffy, composed of long strands of fibers.

"Friable" - Capable, when dry of being crumbled, pulverized or reduced to powder by hand pressure. (EPA definition) A further definition by the Mass. DLI is the characteristic of friability shall apply to the asbestos material and is not influenced or affected by coverings, coatings, or other means of separating asbestos materials by hand.

"Functional Space" - A room, group of rooms, or homogeneous areas (including crawl spaces on the space between a dropped ceiling and the floor or roof deck above) such as classroom(s), a cafeteria, gymnasium or hallway(s), designated by a person accredited to prepare management plans, design abatement projects or conduct response actions.

"High Efficiency Particulate Air (HEPA) Filter" - A filter capable of trapping and retaining at least 99.97 percent of all monodispersed particles of 0.3 micrometers in diameter or larger. (OSHA definition)

"Homogeneous" - Similar in appearance, color and texture. (EPA AHERA definition)

- "Incidental Exposure" Occupational exposure to asbestos fibers caused to oneself by disturbing ACM during the performance of one's job, except during the performance of an asbestos project or minor project.
- "Isolation Barrier" The construction of partitions, the placement of solid materials, and the plasticizing of apertures to seal off the work place from surrounding areas and to contain asbestos fibers in the work area.
- "Log" An official record of all activities involving the disturbance of ACM or asbestos fibers that occurred during each day.
- "Non-friable" Material in a school building which when dry may not be crumbled, pulverized or reduced to powder by hand pressure.
- "NIOSH" The National Institute for Occupational Safety and Health.
- "OSHA" The Occupational Safety and Health Administration.
- "PEL" Permissible Exposure Limit. The employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.2 fibers per cubic centimeter of air as an 8 hour time weighted average (TWA). (OSHA definition)
- "PCM" Phase Contrast Microscopy is used for measuring concentrations of airborne asbestos fibers. It will be gradually phased out for the analysis of final air clearance samples for all but small asbestos projects. (See "TEM" below) The acceptable release criterion using this method is less than 0.01 f/cc, the acceptable and EPA recommended analytical method is by NIOSH 7400.
- "PIM" Polarized Light Microscopy is used in the analysis of bulk samples, this method identifies particle properties such as, color, morphology, surface texture, reflectivity and refractivity.
- "<u>Personal Exposure Monitoring</u>" The taking of an air sample on an asbestos handler, or a person exposed to asbestos fibers to be in compliance with OSHA rules and regulations regarding worker protection and exposure to asbestos fibers.
- "Protective Clothing" Disposable clothing for covering head, hand, foot and full body; this shall also include hard hats, protective eye goggles, gloves and rubber boots.

"Regulation 453 CMR 6.00" - The Massachusetts regulation governing the removal, containment, or encapsulation of asbestos, effective 11/30/87, with the required licensing and certificates effective May 2, 1988.

"Renovation" - Means the modifying of any existing structure, or portion thereof where exposure to asbestos or ACM may result. (OSHA definition)

"Repair" - Corrective action using specified work practices; e.g. glove bag, plastic tent procedures, etc. to minimize and control the likelihood of fiber release from minor damaged areas of ACM. A further definition from the AHERA law means returning once damaged ACBM to an undamaged condition, or to an intact state to prevent fiber release. OSHA defines repair in 29 CFR 1926.58 to mean overhauling, rebuilding, reconstructing or reconditioning of structures or substrata where asbestos, or ACM is present.

"Replacement Material" - Any material used to replace ACM that contains no asbestos fibers.

"Risk" - The likelihood of developing a disease as a result of exposure to a contaminant.

"Small-Scale, Short Duration Activities" - Those activities that involve the disturbance of three square feet or three linear feet of ACM. (EPA definition. Please see pages 41894 and 41895 of the Final AHERA Rules and Regulations.)

"Spot Repair" - The removal, enclosure or encapsulation of asbestos or ACM, where such activity may involve or disturb less than three square feet or three linear feet of ACBM or ACM. (DLI definition)

"Surfactant" - A chemical added to water to allow for easy penetration of ACBM in preventing fiber release.

"TEM" - Transmission Electron Microscope (Microscopy) used for measuring concentrations of airborne asbestos fibers. This method of analysis, although much more expensive than PCM, will be phased in for final air clearance of all projects over 160 square ft or 260 linear ft within the next two years.

"Work Area" - Designated rooms, spaces, or areas of the building or structure where asbestos abatement activities take place.

### III. GOVERNMENTAL AGENCIES CONCERNED WITH ASBESTOS

Massachusetts Department of Environmental Quality Engineering
Laurel Jenny Carlson, Program Development
Division of Air Quality
One Winter Street, Eighth Floor
Boston, MA. 02108 (617) 292-5630

### Phone #'s

### DEQE Regional Office:

Metro Boston(617)	727-5194
Southeast(617)	727-1440
Central(617)	792-7653
West(413)	785-5327

Massachusetts Department of Labor and Industry Frank Kramarz, Project Engineer Division of Occupational Hygiene Asbestos Program 1001 Watertown Street West Newton, MA. 02165 (617) 727-3982 or 1932

EPA Asbestos Coordinator Alison Roberts EPA Region One JFK Federal Building Boston, MA. 02202 (63

(617) 565-3275

EPA NESHAPS Regional Coordinator
Donald Dahl, Regional Coordinator
EPA Region One
JFK Federal Building
Room 2311
Boston, MA. 02203 (617) 565-3266

### IV. INSPECTIONS CONDUCTED BEFORE DECEMBER 14, 1987

Inspections performed before December 17, 1987 were reviewed by the inspector who prepared the inspection report set forth in Appendix A. Copies of these previous reports are set forth in Appendix B to this Management Plan. These provide, to the extent available the dates of each inspection, diagrams or written descriptions of the square or linear footage of areas sampled for ACM locations or samples and dates of their collection as well as laboratory documentation of sampling results and dates of analyses.

### V. RESPONSE ACTIONS OR PREVENTIVE MEASURES TAKEN BEFORE INITIATING MANAGEMENT PLAN

The LEA had taken the following abatement projects or preventive measures prior to the initiation of this Management Plan.

SEE	ENCLOSED	PROJECT	REPORT			
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Descriptions of these projects are set forth on copies of Form AA012 appearing in Appendix B to this report and contain, to the extent available, the names and addresses of all removal contractors and removal consultants involved, start and completion dates of the work, and results of any air samples analyzed during and upon completion of the work.

### VI. SUMMARY OF 1988 INSPECTION REPORT

An inspection report was prepared on October 17, 1988 by C. R. Coe, an AHERA accredited inspector certified to conduct inspections in Massachusetts under Massachusetts State Accreditation number I00133.

The inspection report provided:

- o A written description of each school building that identifies clearly each location and the approximate square or linear footage of homogeneous areas where material was sampled for ACM, the exact locations where each bulk sample was collected, the date of collection, homogeneous areas where friable suspected ACBM is assumed to be ACM and areas where non-friable suspected ACBM is assumed to be ACM.
- o A description of the manner used to determine sampling locations, the name, state of accreditation, state accreditation number and signature of each inspector collecting samples.
- o A copy of the analyses of bulk samples collected and analyzed, the name and address of the laboratory that analyzed them, a statement that the laboratory meets the applicable AHERA requirements and the name and signature of the person performing the analysis.
- o A description of the assessments required to be made under AHERA of all ACBM and suspected ACBM assumed to be ACM, the name, signature, state of accreditation and accreditation number of each person making the assessments.

A copy of the inspection report appears as Appendix A to this Management Plan. A written description that identifies the location and dates of samples taken, and homogeneous areas containing friable and non-friable suspected ACBM assumed to be ACM, is found in Appendix A of the inspection report.

### VII. RESPONSE ACTIONS

### A. GENERAL

AHERA regulations state that the response actions chosen for other than small scale/short duration repairs, must be designed and conducted by persons accredited to design and conduct response actions. Massachusetts DLI Regulation 453 CMR 6.07 requires the services of certified Abatement Project Designers who meet the requirements set forth in 453 CMR 6.07.

### B. CONDUCTING RESPONSE ACTIONS

- The LEA will incorporate into the Management Plan a record of asbestos removal contractors, abatement project designers and asbestos abatement project monitors involved in response actions undertaken after the submission of the Management Plan, and their accreditation.
- 2. Future response actions will comply with the permit system governing work performed involving asbestos. Application forms for such permits are provided in section XV of this Management Plan.
- 3. All worker documentation is included in the associated records.
- 4. The LEA will incorporate into the associated records for any future response actions, all air monitoring and sample documentation, including the name and signature of each person collecting air samples, location where taken, date of collection, name and address of laboratory, date of analysis, results, methods, name and signature that the laboratory meets AHERA and Massachusetts requirements.
- 5. The LEA will incorporate into the associated records for any future response actions, all related disposal documentation including hauling permits and signed chain of custody sheets.
- 6. For any future response actions, the LEA will incorporate into the associated records copies of all notification documentation. The required notification, typically will be sent by the removal contractor to EPA Air Pollution Control-Region I; DEQE, Northeast Regional Office; and DLI Asbestos Control Technical Service, Division of Industrial Safety.

7. The LEA will incorporate all other submittals required by project specifications in the associated records.

### C. RESPONSE ACTION CHOSEN

At the end of Appendix D, Response Actions, the accredited Management Planner has put in writing his or appropriate response her recommendations for the Included with the recommendations are the actions. data, the certification numbers and the management These recommendations were planner's signature. submitted to the designated person. The LEA has considered these recommendations and adopted them or the alternatives shown for the reasons indicated below. all cases, the selection was made only after a that all the alternatives under determination consideration would protect public health and the environment.

The following legend has been used to show the reasons for the choices made:

- A The selected action is required by applicable law.
- B To avoid the cost and inconvenience of long-term O & M.
- C To avoid the possibility of future damage.
- D The cost of the selected action compared favorably with the costs of possible alternative actions.
- E Other reasons: (An explanation is provided by the LEA at the conclusion of this section).

### 1. REMOVAL

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12" x 12")	7/9/89	Indefinite	D
Linoleum			
Rooms 104A	7 /0 /00	- 1 Cl to	
& Bathrooms	7/9/89	Indefinite	D
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D. OTHER REASONS FOR SELECTING THE CHOSEN RESPONSE ACTIONS, INDICATED BY AN "E" IN THE COLUMN "REASON FOR CHOICE" ARE SET FORTH BELOW.

NOTE: All areas will be treated under Operation and Maintenance prior to and subsequent to response action as long as asbestos (ACBM) exist.

### VIII. OPERATIONS AND MAINTENANCE PROGRAM

- Α. The O&M program's objective is to minimize fiber release and exposure to building occupants, while limiting the areas of potential liability. This can be accomplished by cleaning existing contamination and controlling access to friable or potentially friable asbestos. The procedures for establishing and carrying out the O&M program are set forth in Appendix E: Operations and Maintenance Manual. Each worker will be provided with a copy of the manual. O&M procedures are not sufficient for ACM that is severely damaged or located in certain areas, such as those that are especially vulnerable to such damage. All M&O activities to be performed will be documented and included in the associated records.
- B. The following factors are to be considered in implementing the O&M program:
  - 1. Adherence to the EPA "Worker Protection Rule" 40 CFR Part 763, effective March 27, 1987: This rule applies major provisions of OSHA's regulation Occupational Exposure to Asbestos.
    - a. The LEA must report to the EPA Regional Asbestos Coordinator and the DLI at least 10 days before the LEA begins abatement of more than 3 linear or 3 square feet of friable asbestos material.
    - b. This law protects all employees in the building from occupational exposure to airborne asbestos. Provisions of this law allow for:

Employee Personal Air Monitoring: Must be taken on those employees who are or may reasonably expect to be exposed to airborne concentrations at or above the action level. Monitoring does not have to be performed, if the LEA has historical documentation or has sufficient objective data that demonstrates asbestos can not be released in airborne concentrations at or above the action level.

Regulated Areas: Access must be limited in areas where the PEL is exceeded.

Respiratory Protection: Respirators must be used in maintenance and repair activities, emergencies, and in situations where engineering controls and work practices preventing fiber release are not feasible.

<u>Protective Clothing</u>: Includes coveralls, head covering, gloves and foot covering.

Hygiene Facilities and Practices: Employer shall provide clean change rooms and shower facilities for areas where employee exposure to airborne asbestos is deemed high.

<u>Communications of Hazards</u>: Warning signs must be posted at all regulated areas.

Housekeeping: Surfaces must be kept free of asbestos containing dust, waste and debris. Any spills must be cleaned as soon as possible by wet cleaning or vacuuming. HEPA-filtered vacuums will be used for vacuuming. Asbestos waste shall be disposed of in sealed, impermeable bags or containers. See Cleaning, Section X.

Medical Surveillance: A recorded medical surveillance program shall be instituted for employees exposed to airborne concentrations of asbestos at or above the action level. Medical exams will be given to an employee prior to assignment to an occupation where there is exposure to airborne asbestos. A licensed physician knowledgeable in the requirements of this rule will be used. Use Form AA001 for documentation.

Recordkeeping: Accurate records of all monitoring will be kept for at least 30 years.

- Training: Prior to any repairs or O&M activities involving the disturbance of ACM, all workers must undergo the respective training as discussed in Section IX Training.
- 3. <u>Cleaning</u>: Initial (and subsequent) cleaning utilizing HEPA vacuuming and wet methods is discussed in <u>Section X Cleaning</u> and in Appendix D: <u>Operations and Maintenance Manual</u>.

- C. Accredited persons will be used for any projects that are not small in scale or of short duration.
  - 1. An accredited project designer shall design any projects larger than small scale.
  - 2. The persons conducting the response action will be accredited.
- D. Fiber Release Episodes, See Section XIII
  - 1. Minor release episodes can be handled by the O&M personnel. Major fiber release episodes involve O&M only so far as to have the O&M personnel post signs, restrict access and shut down the HVAC system.
- E. Cost Considerations For O&M

The following elements have been taken into consideration in estimating O&M costs:

- Initial purchases of supplies and equipment.
- Training fees, including estimate of payroll expense for trainees, expendable supplies used in training, and increase in salaries or fringe benefits of employees who perform O&M activities.
- 3. Clerical costs for the upkeep of the records on all O&M activities. These include cost of supervision, inspection and management of clerical staff.
- 4. Medical surveillance for O&M employees.
- 5. Cost of the actual repair work performed.
- 6. Professional fees, including consultants' fees and legal expenses.
- Air monitoring, including the cost of sample analysis and sampling equipment.

### IX. TRAINING

- A. There are three levels of training for worker personnel. The appropriate level for an individual depends upon the nature of his or her work.
  - 1. Training for all custodians and maintenance workers involved in cleaning or simple building maintenance.
    - a) A yearly 2 hour awareness program.
    - b) Every new employee must have the awareness training within 60 days of his or her hiring date.
    - c) Training for each employee shall include, but not be limited to, the following:
      - o Information regarding asbestos and its various forms and uses.
      - o Information on related health effects.
      - o Locations of ACBM identified throughout the building in which the employee works.
      - o Recognition of damage, deterioration, and delamination of ACBM.
      - o Name, address, and phone numbers of the school's designated person, plus the availability and location of the Management Plan.
  - 2. Training for maintenance workers involved in general building maintenance and more complex tasks that will result in the disturbance of ACBM including repairs of ACBM or conduct of O&M small scale/short duration projects:
    - a. The EPA AHERA training regulations require a 14 hour course, plus the two hour awareness training.

- b. The 14 hour course will include, but not be limited to the requirements of paragraph (a)(1) of section 763.92 of the AHERA document. These requirements are:
  - o Descriptions of the proper methods of handling ACBM.
  - o Information on the use of respiratory protection, as well as other personal protective measures.
  - o The provisions of sections 763.91, and 763.92 of AHERA, Appendixes A, B, C, D, of the Subpart E of AHERA, EPA 40 CFR Part 763 and in 40 CFR Part 61, Subpart M and OSHA regulations in 29 CFR 1926.58. These items are covered in this section, section VIII Operations and Maintenance Program and in the O&M Manual.
  - o Hands on training in the use of respirators, personal protection and good work practices.
- c. Massachusetts 453 CMR requires a two day training course with a minimum of 4 hours hands on training. If approved by the DLI, the same course can meet the requirements of both the EPA AHERA and the DLI.
- 3. Training for workers who may conduct asbestos abatement (removal, enclosure & encapsulation) greater than O&M small scale/short duration activities:
  - a. To work on asbestos abatement projects involving 3 linear on square feet or more, the workers must obtain EPA accredited Asbestos Abatement Workers training (a three day course) and/or training for asbestos abatement workers required under 453 CMR.

### B. Additional Training

1. Any abatement project that is designed by an accredited project designer must be supervised by an accredited on-site supervisor to oversee the abatement workers. The supervision this person must take an EPA accredited 4 day Asbestos Abatement Contractor's and Supervisor's course as required by AHERA.

AHERA requires at least one supervisor be present at the work site at all times when work is in progress.

### C. Retraining

- 1. EPA accredited asbestos workers and supervisors are required to receive a one day refresher course every year to obtain recertification. State licensed asbestos abatement workers and asbestos associated project workers are required to undergo one day retraining to obtain renewal of State certification.
- 2. All workers will undergo updated retaining programs when it is deemed necessary by the LEA. These programs will be offered to respective personnel to maintain state of the art work practices, to introduce new equipment, and at any other times when new ideas or products are introduced.

### X. CLEANING

### A. Initial Cleaning

- 1. Unless the building has been cleaned using equivalent methods within the previous 6 months, all areas of a school building where friable ACBM, damaged or significantly damaged thermal system insulation ACM or friable suspected ACBM assumed to be ACM are present shall be cleaned at least once after the completion of the accredited inspection and before the initiation of any response action, other than O&M repairs or activity, according to the following procedures:
  - a. HEPA vacuum or steam clean all carpets.
  - b. HEPA vacuum or wet clean all other floors or other horizontal surfaces.
  - c. Dispose of all debris, filters, mop heads and cloths in sealed leak-tight containers.

### B. Additional Cleaning

 The accredited management planner shall make a written recommendation to the LEA on whether additional cleaning is necessary, and if so, the methods and frequency of such cleaning.

Note:
All abatement activities will include a precleaning of the contaminated areas. This pre-requisite is in conformance with the EPA and AHERA, and will be written into all specifications prepared by the accredited designer. This precleaning will also be performed before any Small-Scale or Short Duration Activities.

### XI. SURVEILLANCE/REINSPECTION

### A. <u>Periodic Surveillance</u>

- 1. Scheduled surveillance will be performed every six months, Form AA010 will be used.
- 2. The 2 hour awareness training includes the training of personnel to recognize changes in the condition of ACBM or ACM, and to report it to the appropriate supervisor.
- 3. During the scheduled surveillance, a review of training procedures and protocol will be conducted. This will include notice of any changes in the "state of the art" in the asbestos industry.
- 4. Non-scheduled surveillance is an ongoing event and all maintenance and custodial personnel are trained in the correct procedures.

### B. Reinspection

A reinspection of conditions of all ACBM and ACM located in this building by an EPA accredited inspector, is scheduled every three years. The next scheduled reinspection will be performed in July of 1991.

### XII. RENOVATION/SMALL SCALE ABATEMENT INVOLVING OUTSIDE PERSONNEL

### A. <u>Contractor License</u>

1. No outside contractor shall engage in an asbestos project unless such contractor has a valid asbestos contractor's license issued by the State of Massachusetts.

### B. Worker Documentation

- 1. All workers involved in the disturbance of asbestos containing materials in the course of their scheduled work, must have certified training to handle asbestos.
  - a. The training course attended must be approved by the State of Massachusetts, as well as the EPA.
  - b. Appropriate asbestos abatement workers' certificates and worker documentation must accompany the Contractor Permit Request Form AA006.

### C. Permit System

- 1. The contractor must obtain a Contractor Permit Request, Form AA006 and submit it to the school's Designated Person. Accompanying the permit request must be the contractor's asbestos contractor's license and the supervisor's and worker's asbestos abatement certificates. Also, the contractor must submit the supervisor's and worker's EPA accreditation documentation.
  - a. The contractor must also submit the name of the environmental firm being used for taking air samples and the name of the lab being used for the analytical, as well as the Massachusetts DLI lab certification number. Massachusetts requires separate certification for air sample analysis and bulk sample analysis. Further documentation can be required.
  - b. The workers must also submit a copy of their signed medical release form when working with asbestos and a copy of their respirator fit test documentation.

- Upon submitting and reviewing the permit request, a work permit will be given on Form AA007 or the request will be denied.
- At the completion of the work performed, the Designated Person will complete an Evaluation of Renovation/Small Scale Abatement Work, Form AA011 and include it in the record.

### XIII. FIBER RELEASE EPISODES

### A. Minor Fiber Release Episode

- 1. A minor release episode is defined as one that involves less than 3 square ft or 3 linear ft of ACM or ACBM. The worker discovering the release must fill out Form AA009.
- 2. In the event of a minor release, trained workers must immediately don respirators and disposable clothing, thoroughly saturate the debris using wet methods, place the debris in appropriately labeled bags and clean the floor and all affected surfaces by wet mopping and/or HEPA vacuuming. Discard all asbestos debris in appropriate labeled leak-tight containers (including the disposable clothing), and then proceed to a shower.

The area of damage should be patched using appropriate precautions and methods or immediately have an appropriate response action implemented as required in Appendix D of this document.

- 3. Air monitoring personal air samples will be taken on all workers involved in the cleanup of the debris. Final air samples will be taken in each area where a fiber release has occurred. PCM can be used, unless TEM is required. PCM analytical procedures shall be used in accordance with the NIOSH 7400 method. Note: Although Mass. 453 CMR allows the use of NIOSH Method P&CAM 239 the EPA AHERA does not.
- 4. Once the release has been handled, the Designated Person will fill out Form AA008, the Fiber Release Episode Report.

### B. Major Fiber Release Episode

1. In the event of a major fiber release (such as the falling or dislodging of more than 3 square or 3 linear feet or a breach in an abatement containment), the air handling units must immediately be modified or shut down to the affected area, all openings to the area must be sealed off and the area should be provided negative air pressure using HEPA filtration, if available. Warning signs must then be posted and access restricted to the area.

- 2. The discoverer will fill out a Fiber Release Notification, Form AA009 and submit it to the Designated Person.
- 3. Photographs may be taken of all measures performed to ensure the safety of building occupants and for documentation.
- 4. An appropriate response action must be designed by an accredited project designer, and the response action must be conducted by accredited persons. This work will include all necessary air sampling and analysis. The work performed must adhere to all applicable laws, including state and federal notifications and the acquisition of a project number, if needed.
- 5. Upon completion of the cleanup, response action, and the final air clearance, the Designated Person will fill out Form AA011.

#### XIV. RECORDKEEPING/UPDATING THE MANAGEMENT PLAN

#### A. Records

Personal air monitoring records and medical monitoring records for employees must be maintained for the duration of employment plus 30 years. For each homogeneous area where all ACBM has been removed, records will be retained for 3 years after the next reinspection required under AHERA regulation 763.85 (b) (1).

#### B. <u>Drawings</u>

Drawings which accompanied the initial inspection report will be revised to reflect abatement activities performed. Drawings that have been revised will be sent to all building workers.

#### C. <u>Updating Assessment Codes</u>

The codes will be revamped as response activities are completed.

#### D. Reinspections

All appropriate forms and documentation for surveillance and reinspections will be included in the Management Plan files.

#### E. Additional Documentation

- 1. Descriptions of all response actions performed. The documentation will include, but not be limited to the information described in Section VII of this report at paragraph B, subparagraphs 1 through 7.
- All fiber release documentation and forms.
- 3. Any asbestos related photographs and videos taken by school personnel or the schools representatives.
- 4. All documentation of air sampling taken within the building. This includes the personal air samples taken of the schools personnel.
- 5. All personnel training and retraining documentation and certifications, including that of outside personnel.

- 6. All disposal documentation and chain of custody sheets for removal of asbestos containing materials from the building.
- 7. Copies of the notifications given to the building occupants and/or their guardians.
- 8. Documentation of all the meetings conducted in reference to asbestos within the building.
- 9. Any correspondence related to asbestos and this building.
- 10. All requests for work permits and copies of the permits issued.

#### F. Resubmission of the Management Plan to the State

- 1. A revised Management Plan will be resubmitted to the state annually.
- 2. A copy of the resubmitted Management Plan will be included in the records.

#### G. Publications to be Kept On File

The LEA will retain copies of the following publications in the associated records which should be readily accessible to the designated person.

- These publications are required by the EPA 1982 "Asbestos In Schools Rule" (40 CFR Part 763);
  - a. One copy of <u>Asbestos Containing Material</u>
    <u>School Buildings: A Guidance Document, Parts</u>
    I (March 1979 and 2 June 1984) or <u>Guidance</u>
    <u>for Controlling Asbestos Containing Material</u>
    <u>in Buildings</u> (EPA 560/5-85-024), referred to
    as the Purple Book.
  - b. Copies of EPA form 7730-2(6-82), <u>Guide For Reducing Asbestos Exposure.</u>
- The management planner recommends that the LEA also have one copy of 453 CMR 6.00 "The Removal, Containment or Encapsulation of Asbestos". It is available from the State Bookstore, Room 116, State House, Boston, MA. 02133 at a cost of \$4.40, plus \$1.60 postage. Make check payable to the Commonwealth of Massachusetts.

#### XV. NOTIFICATION

A.	AHERA requires that the Management Plan include a
	description of steps taken to notify workers,
	building occupants or their legal guardians about
	inspections, reinspections, response actions, and
	post response action activities, including
	periodic reinspection and surveillance activities
	that are planned or are in the process of being
	completed. The following steps have been, or will
	be, implemented by the LEA:

1.	Upon completion of t	he building's inspection
	report, a written	public notification, Form
	AA003, was given to	the PTA, all workers and
	building occupants	or their legal guardians.
	Dated: May 5, 1989	

In ad	ditio	n, the	notifica	ation	For	m AA003	is
post	ed in	room(s)	notifica Bulletin	Board	Main	Office	

 of	the	Greenleaf	School School

- Notification forms are given for all scheduled response actions and reinspections.
   Copies of these are retained in the records.
- 3. All other non-scheduled surveillance, response actions and post response activities are documented within the Management Plan.
- B. Availability of the Management Plan.
  - 1. A written notification, Form AA013, addressed to parent, teacher, and employee organizations was mailed to the organization on May 5, 1989.
  - 2. An optional public awareness seminar discussing the Management Plan and related asbestos concerns has been scheduled on:

	at	
in	the	 •

a. Documentation of the public meeting will be incorporated into the Management Plan records.

- b. The awareness program may cover, but not be limited to:
  - 1. Defining asbestos and its uses.
  - 2. Health affects associated with exposure.
  - 3. What types of ACBM and ACM are present in the building.
  - 4. The exact locations of the materials.
  - 5. How to avoid disturbing ACM.
  - 6. How to recognize and report damages.
  - 7. How custodial and maintenance personnel are dealing with the materials to prevent fiber release.
  - 8. What will be done periodically and over the long run to protect the health and safety of building occupants. Including the list of the response actions selected.
  - 9. A question and answer period.

## XVI. FORMS

The 15 forms that are referred to in the text of this Management Plan are on the following pages.

In addition, copies of the special forms that pertain to the O&M Program are included with the O&M Manual.

## Haverhill School District

# DOCUMENTATION FOR ASBESTOS WORKER Form AA001

I.	Worker's Name:
	Address:
QQ	Signature:
II.	Medical Exam & Pulmonary Function Tests
•	Physician's OK to Work Using Respirator: (Date)
	Physician's Name & Address:
III.	Respirator Fit Test
,	Date of Negative/Positive Pressure Test Instruction:
	Qualitative Fit Test: Date: Testing Agent:
	Type of Respirator:
	Tester's Name & Title:
IV.	Worker's Training On Asbestos
	Type of Training:

V. Previous Abatement Work Performed:

Use of the state o

Title

Date

AA001 Continued...

Signature

### ASBESTOS DISPOSAL DOCUMENTATION Form AA002

Owner or Operator of La	ndfill		
Name		Phone (	
Address			
City	State		
Name of Landfill			
Address		· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
city	State		
Generator of Hazardous	Material _		
Generator's Address			
City	State		_ Zip
School Representatives	Signature		
Date Turned Over To Hau	ler/Transp	orter	
Hauler		Address	
City	State		_ Zip
Hauler Permit Numbers_			License Plate
Hauler Representatives	Signature		
Approximate Volume of A	sbestos Tr	ansported	
Type of Containers			

AA002 Continued
Asbestos Containers Labeled?YesNo
•
I certify to the best of my knowledge that the above statements are true and that this landfill is approved by the appropriate governmental agencies for the disposal of asbestos. The asbestos-containing material will be covered with 6 inches of non-asbestos fill within 24 hours of acceptance.
Landfill Owner-Operator Date

#### NOTICE TO ALL BUILDING OCCUPANTS Form AA003

Federal and Massachusetts laws require that every school be inspected for asbestos. In accordance with EPA regulations and Massachusetts "Right To Know" Law, this school has been inspected for asbestos containing material and the building occupants must be notified as to the presence of asbestos. The existence of friable asbestos within a school constitutes an imminent health hazard.

Asbestos-Containing Material Is Present In

GRI	EENLEAF SCHOOL			
Name of School			•	
Building No. N/A Address:	58 Chadwick Str	eet, Haverh	ill, MA 01835	
A record of the inspection of any asbestos-containing information contained in the available for review in:	materials, an	d other p	ertinent	
GREENLEAF SCHOOL		Assistant	Principal's Offi	ice
Building		Room		
For further information, Coordinator:	please cont	act the	designated	AHERA
Daniel Sweeney	at(508)	374-23.55		
Name	Phone #			
Assistant Director of Public Build Title Signed	Date			

AA004 Continued...

NOTE: A permit request number must be submitted for all maintenance work whether or not asbestos containing material might be affected. A permit number must be received before any work can proceed.

Permit	Request	No					
				Granted	Ye	s	_ No
			:	Initial		. <b>-</b>	

# WORK PERMIT FOR IN-HOUSE MAINTENANCE/RENOVATION

	cation of area involved (including building nuer, location within room, etc.):
Descriptio	n of work involved:
Start Date	: Anticipated Finish Date:
Approxima	ate amount of ACM present (not to exceed 3
re/linear	
Asbestos	control methods to be used (i.e. glovebag, et methods, etc.):
Asbestos vacuum, w	control methods to be used (i.e. glovebag,
Asbestos vacuum, w	control methods to be used (i.e. glovebag, et methods, etc.):
Asbestos vacuum, w	control methods to be used (i.e. glovebag, et methods, etc.):
Asbestos vacuum, w	control methods to be used (i.e. glovebag, et methods, etc.):  equipment to be used (respirator, coveralls, et

Wood Collettinger		
9. Work to be supervised by:		
SIGNED:	DATE:	
Designated Person		
9		
Copies to:	<del></del>	
	<del></del>	
	<u></u>	
•		

••

Form AA006

# CONTRACTOR PERMIT REQUEST FOR REPAIR/RENOVATION WORK

NAM	E: DATE:
COMI	PANY: TEL.:
ADDI	RESS:
MASS	SACHUSETTS STATE ASBESTOS HANDLING LICENSE NUMBER:
1.	Exact location of area involved (including building number, room number, location within room, etc.):
2.	Description of work involved:
3.	Starting Date:
	Anticipated Finish Date
4.	Has work been approved by a school representataive? Yes No
5.	P.O. Number:
6.	Does the personnel assigned to the work have asbestos worker training and a respirator fit test?  Yes No
	Does the supervisor have EPA certification?
	Yes No
	NOTE: If yes to the above question, please supply appropriate documentation.
7.	Name of environmental firm to be used for air sampling:
	DOH Lab Accreditation No.

# AA006 Continued...

## AIR MONITORING DOCUMENTATION

ROOM NUMBER	SAMPLE CODE	LABORATORY	TIME VOLUME	RESULTS F/CC
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		<del> </del>		
				······
	·			
			<del></del>	
	<del></del>		<del></del>	
			<del></del>	
<u> </u>	· · · · · · · · · · · · · · · · · · ·			
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<u></u>	<u> </u>			
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	•	· · · · · · · · · · · · · · · · · · ·		
<del></del>				
Signed:		Da	te:	
Name•		ញា i ·	tle•	

## AA006 Continued...

Submit this work permit request to the designated AHERA Coordinator.

NOTE:

A permit request number must be submitted for all outside contractor work, whether or not asbestos-containing material might be affected. A permit number must be received before any work can proceed.

			-	-			
Permit	Request	No.		<del></del>			
				Granted	 Yes	 No	
				Tnitial			

#### <u>CONTRACTOR PERMIT FOR</u> REPAIR/RENOVATION WORK

	Exact location of area involved (including building
	number, room number, location within room, etc.):
٠	
	Description of work involved:
	Is the disturbance of ACM likely: Yes N
	If no, complete #5 and sign the bottom of second pag
•	Description of the ACM that might be affected, if kr
	(location and type):
-	
•	Start Date:
į	Anticipated Finish Date:
	Approximate amount of ACM present (not to exceed 3
٤	square/linear ft):
-	
,	
	Asbestos control methods to be used (i.e. glovebag, vacuum, wet methods, etc.):
7	

AA007 Continued...

et.	c.):	ne to be used	(respirator, co	overalis,
	) TP Wo	VITTODING DOCUM		-
9.		VITORING DOCUM	ENTATION	
ROOM NUMBER	SAMPLE CODE	LABORATORY	TIME VOLUME	RESULTS F/CC
			<u> </u>	
			· 	
	<del></del>			
				<u> </u>
		<u> </u>		
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<del></del>				
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				<u>.                                    </u>
				·
Signed:		Da	te:	
Name:	· · · · · · · · · · · · · · · · · · ·	Ti	tle:	

AA007 Co	ntinued					
10. Work to be performed by (list all workers):						
		<u>.</u>				
11.	Work to be supervised by:					
12.	If asbestos workers are sub-contract company please supply appropriate do attach to the work permit request for	cumentation and				
NAMI	OF COMPANY:	PHONE:				
ADDRESS:						
	· ·					
NOTI	Remember to fill out and submit documentation. Wear badges wit all times when on the property.	h PERMIT NUMBER at				
SIGN						
	Designated Person	Date				
Copi	es to:	• .				

# FIBER RELEASE EPISODE REPORT Form AA008

1.	Exact location of area involved (including building number, room number, location within room, etc.):
2.=	To whom was the episode verbally reported to?
3.	Was the episode a minor or major release?
	If a major release occurred, was the area immediately sealed off?YesNo If not, please explain why:
	,
4.	The release episode was reported by:
	on:(date),(time).
5.	Describe the episode and include the source of contamination:
6.	The ACM was / was not cleaned up according to approved procedures. Describe the cleanup:
7.	Was air monitoring initiated?YesNo Date:
	Was clearance given? Yes No Date: Please attach a copy of the air monitoring report to this sheet.
SIGN	ED:
	Designated Person Date

# 

Please submit this notification to the Designated Person

# PERIODIC SURVEILLANCE

Form AA010

1.	Building:		
2.	Date of Surveillance:		
3.	Name of person conducting surveillance:		······································
4.	Did you visually inspect all areas that are identified in the Management Plan as asbestos-containing building materials?	yes	no
5.	Is there any change in the condition of these materials since the last periodic surveillance?	yes	no
Comm			
			<u></u>

# EVALUATION OF RENOVATION/REPAIR WORK INVOLVING ACM Form AA011

PERMIT NO.\_\_\_\_\_ 1. Location of work zone: Were outside personnel involved? \_\_\_\_Yes \_\_\_\_No 2. If yes, contractor's name: 3. Description of work:\_\_\_\_\_\_ 4. Date(s) of work: Evaluation of work practices employed to minimize the disturbance of asbestos: Evaluation of work practices employed to contain released fibers and to clean up the work area: Evaluation of equipment and procedures used to protect workers: Asbestos Waste Handling: Number of Bags:\_ Number of Barrels:\_\_\_\_\_ Results of Air Monitoring: Sample ID #:\_\_\_\_\_ f/cc\_\_\_\_

erring.	AA011 Continued			
e t	Attach Copies of Air Sample S	ummary	<del></del>	
	Sheets and Disposal Documenta	tion		
	SIGNED:	DATE:	<u>.</u>	
	Designated Person			÷

÷.

# PREVIOUS ABATEMENT WORK PERFORMED

Form AA012

GREENLEAF SCHOOL

PROJECT NUMBI	ER:	BUILDING	NO.
CONTRACTOR:_	National Surface Cle	aning	
ADDRESS:	49 Danton Drive		
	Methuen, MA 01844		
	4		
			es, Inc.
ENVIRONMENTA	L FIRM: Hunter En	vironmental Science	es, Inc.
WORK ZONES	START UP DATE	COMPLETION DATE	AIR SAMPLE RESULTS
	•		See attached Report
	<del></del>		
		<u>.</u>	