

SECTION 1 INTRODUCTION

On October 22, 1986, President Reagan signed into law the Asbestos Hazard Emergency Response Act of 1986 (AHERA). This enacted among other provisions, Title II of the Toxic Substances Control Act. AHERA directed the Environmental Protection Agency (EPA) to develop and promulgate new regulations for asbestos in schools, from kindergarten through grade 12, in accordance with the act.

Asbestos is a recognized human carcinogen; it can cause cancer. It is also associated with other respiratory diseases. Since the lungs of young children are still growing and developing, there is felt to be greater risk of damage to children than to adults. Since the latency period, or the time it takes for asbestos diseases to appear after the exposure takes place, can be 20 to 30 years, these children would be in the prime of life before the disease ever appeared. There are also diseases associated with asbestos exposure that do not necessarily require "large" doses or heavy exposures. Recent studies are now showing digestive disorders which appear to be related to the ingestion of asbestos.

It is for these reasons that the EPA has targeted the inspection of schools as the first step in their attack on asbestos in buildings in this country. It is generally felt that the same type of requirements will shortly be required in publicly owned and then commercially owned buildings.

The purpose of AHERA is to require school systems to develop a plan for coping with Asbestos Containing Materials (ACM) found in their buildings. The

concept is to eliminate the hazard from damaged ACM found in occupied areas and to minimize the potential for further damage and subsequent exposure to building occupants.

The act requires each Local Education Agency (LEA - the name EPA uses for school districts, administrative units or supervisory unions) to conduct inspections of their buildings for the presence of Asbestos Containing Materials (ACM), collect samples of materials to determine which contain asbestos, assess the condition of the materials and to recommend "response actions" or corrective measures. This inspection report is to be used to develop a Management Plan, the basic blueprint the school will use to manage all ACM in each school building until it is ultimately removed.

The **management plan** is intended to be a **dynamic document**, it changes as it is implemented, and must be **maintained** until all asbestos has been removed. One of the most important aspects of the AHERA act is the ongoing requirement for the proper handling, repair and removal of all ACM.

Accredited people must be used for the appropriate activities required under the act.

Proper documentation must be maintained across the life of the management plan.

The simple "**bottom line**" with respect to AHERA compliance is that **all asbestos containing materials in buildings must be properly managed so as not to create exposures to building occupants - students, faculty and**

employees alike - until all asbestos containing materials can be properly removed.

AOHS has provided the foundation for what is believed to be a maintainable program across the life of the management plan. The AOHS format includes two volumes that make up the combined inspection report and management plan. Volume I is essentially the Management Plan and should be regarded as a reference volume. Volume II is the inspection report and the "active" part of the Operations and Maintenance Program. It is to be used by custodial and maintenance people as well as outside contractors to verify the presence of ACM before beginning work. The contents of the two volumes comprise the compliance activity for AHERA and should be kept together and use together. LEA's should feel that they are allowed to call on experts for answers to the questions that they may have regarding asbestos and the different regulations that impact their schools.

The inspection report for each school must include:

1. Identification of all areas of a building that contain ACBM; Surfacing, Thermal System Insulation or Miscellaneous ACBM,
2. Location of homogeneous sampling areas,
3. Results of the laboratory analysis of all bulk samples collected, and
4. Physical assessments of the condition of all ACBM observed using the 7 EPA assessment categories.

The AOHS inspection report also provides the following:

1. A report by specific response action recommended for each assessment of ACM, and
2. A system for custodians, maintenance and contractor personnel to verify by room, the presence or absence of ACM before the start of any construction or maintenance projects. Positive verification would default them into proper work procedures to be followed for that condition.

The Management Plan must include:

1. A general building description,
2. A description of hazard assessments,
3. A record of preventive measures (Operations & Maintenance Plan) and/or response actions for friable ACBM,
4. Identification of ACBM remaining after response actions have been taken,
5. Plans for conducting reinspections,
6. A program for informing workers and building occupants of inspections and response actions,
7. An evaluation of resources to implement the management plan, and

8. Recordkeeping for documentation

- A. Notification statement
- B. Training Records
- C. Air Sampling Collected
- D. Preventive measures/response actions taken
- E. Periodic Surveillance
- F. Cleaning
- G. O&M Plan Implementation (Response actions)
- H. Renovations and repairs involving ACBM
- I. Fiber release episodes

AOHS has provided a number of forms to assist in the record keeping and documentation process. The forms provided are listed on the following page and copies are provided at the back of this section.

FORM NUMBER**FORM DESCRIPTION**

1. LEA Asbestos Coordinator/Key Persons Training Record
2. Individual Maintenance Employee Training Record
3. Annual Notification of Building Occupants
- 3A. Notification of Asbestos Related Activities
4. Surveillance Inspection Report Form
5. Fiber Release Episode Report Form
6. Cleaning and Maintenance Record
7. Contractor/Maintenance Work Permit
8. Abatement Project Notification
9. Small Scale, Short Duration Activity Report
10. Response Action Summary Record
11. Asbestos Containing Materials Disposal Record
12. Air Sampling for Verification of Response Actions