







AHERA Asbestos Management Plan Self-Audit Checklist for Designated Persons

Ready, Set, Go!

-  Inspections & Reinspections
-  Response Actions
-  Operations & Maintenance
-  Other AHERA Activities

AHERA Asbestos Management Plan Self-Audit Checklist for Designated Persons

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Introduction

Under the Asbestos Hazard Emergency Response Act (AHERA) of 1986, EPA published on October 30, 1987 the Asbestos-Containing Materials in Schools rule (hereinafter referred to as the AHERA rule), 40 CFR Part 763, Subpart E. The AHERA rule became effective on December 14, 1987 and applies to all non-profit elementary and secondary schools nationwide, both public and private. Local Education Agencies (LEAs) are responsible for ensuring compliance with the AHERA rule and are required, among other things, to develop and maintain an up-to-date Asbestos Management Plan (AMP), conduct training, inspections and sampling related to asbestos, manage asbestos properly and provide yearly notification to parents, teachers and employee organizations about the AMP and any asbestos-related activities.

LEAs are also responsible for designating a contact person known as the Designated Person (DP) to oversee asbestos-related activities in the school and ensure that the AHERA responsibilities of the LEA are met. The quality of a school's asbestos program depends heavily upon the dedication and work of the DP with the support of the LEA. The LEA and the DP work together to ensure that each school is in compliance with federal, state and local asbestos regulations and that there are no uncontrolled releases of asbestos fibers in the school which could pose a health threat to children and school workers.

Even though the AHERA rule has been in place for years, EPA and the states have found that compliance issues remain, particularly in the area of schools maintaining and updating their AMPs to reflect current reinspection information, operation and maintenance activities, periodic surveillance and response/post-response actions. An up-to-date compliant AMP is key to the success of a school's asbestos program and the protection of children's and school workers' health. In order to enhance compliance, EPA Region 2 has developed this **"AHERA Asbestos Management Plan Self-Audit Checklist for Designated Persons"** and a companion guidance document, a "Model AHERA Asbestos Management Plan for Local Education Agencies." It is recommended that the Checklist be reviewed first in order to quickly identify any potential deficiencies in the schools's AMP.

This AHERA Asbestos Management Plan Self Audit Checklist for Designated Persons is designed to help the DP determine whether or not the school has an up-to-date compliant AMP. The Checklist is divided into six sections: General Information, Inspections and Reinspections, Response Actions, Operations and Maintenance, Periodic Surveillance and Notification. Each section of the Checklist contains questions to guide the DP through a detailed compliance assessment of the school's AMP with check boxes for Yes, No or Not Applicable. Supporting regulatory citations are provided on the Checklist along with spaces for the DP to make notes. Following the Checklist is a Glossary and a list of Acronyms.

The companion guidance document, a Model AHERA Asbestos Management Plan for Local Education Agencies, provides step-by-step instructions for developing an AMP utilizing a suggested standardized format. This document contains suggested forms for including in the school's AMP and tracks the format of the Checklist: General Information, Inspections and Reinspections, Response Actions, Operations and Maintenance, Periodic Surveillance and Notification. Following the forms is a Glossary and a list of Acronyms. For convenience, tips are included in the Checklist which note the corresponding suggested forms that should be completed in the Model AHERA AMP.

Please note that the EPA Region 2 Model AMP forms and Checklist are not a substitute for the applicable legal requirements, are not regulations themselves, and are not required to be used/completed under AHERA. Rather, they are provided by EPA as guidance to enhance schools' compliance with EPA AHERA regulations regarding the required documentation that must be included in the AMP. These documents do not impose legally binding requirements on any party, including EPA, states, or the regulated community, and are not intended and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. Please contact your state asbestos coordinator for information on any applicable state regulations/AMP forms.

If you have any questions on these guidance documents, please call Deborah Craig, EPA Region 2 Asbestos Outreach Coordinator, at (212) 637-3521 or e-mail her at craig.deborah@epa.gov. These guidance documents are available on the EPA website at http://www.epa.gov/asbestos/pubs/asbestos_in_schools.html. For additional asbestos information, please contact the EPA Region 2 Asbestos Coordinator Gaetano LaVigna by phone at (212) 637- 4069 or by e-mail at lavigna.gaetano@epa.gov. The EPA Region 2 Caribbean Asbestos Contact is Carlos M. Rivera and he can be reached by phone at (787) 977-5846 or by e-mail at rivera.carlos@epa.gov.

For any additional asbestos information, please contact your state/EPA asbestos coordinator or call EPA's Toxic Substances Control Act (TSCA) Hotline at (202) 554-1404 or the EPA Asbestos Ombudsman at (800) 368-5888, or visit EPA's website at http://www.epa.gov/asbestos/pubs/asbestos_in_schools.html. A list of state/EPA asbestos coordinators is provided on the EPA website.

**AHERA Asbestos Management Plan
Self-Audit Checklist for Designated Persons***

School:		Phone:	
Address:			
County:			
Local Education Agency:		Phone:	
Address:			
Designated Person:		Phone:	
Address:			
Date Checklist Completed by Designated Person:			
Designated Person's Signature:			
Yes	No	N/A	School:
<small>N/A - Not Applicable</small>			
General Information			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1. Has an Asbestos Management Plan been developed for your school? <div style="text-align: right;"><small>(40 CFR § 763.93)</small></div>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Does the Local Education Agency (LEA) have a complete and up-to-date copy of the school's management plan in both the LEA's administrative office and the school's administrative office? <div style="text-align: right;"><small>(40 CFR § 763.93(g)(2)-(3))</small></div>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3. Was the management plan developed by an accredited management planner? Did you know? Your LEA <i>may</i> require each management plan to contain a statement signed by an accredited management plan developer that he/she has prepared or assisted in the preparation of the plan or has reviewed the plan and that the plan is in compliance with 40 CFR 763, Subpart E. The management plan developer that signs the statement may not also implement the plan (40 CFR § 763.93(f)). <div style="text-align: right;"><small>(40 CFR § 763.93(e))</small></div>

*References to Model Asbestos Management Plan (AMP) forms are to the forms contained in EPA Region 2's guidance manual entitled: "Model AHERA Asbestos Management Plan for Local Education Agencies." The Model AMP forms and this Self-Audit Checklist are not a substitute for the applicable legal requirements, are not regulations themselves, and are not required to be used/completed under AHERA. Rather, they are provided by EPA Region 2 as guidance to enhance schools' compliance with EPA AHERA regulations regarding the required documentation that must be included in the AMP. These documents do not impose legally binding requirements on any party, including EPA, states, or the regulated community, and are not intended and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. Please contact your state asbestos coordinator for any applicable state regulations/AMP Forms.

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>4. For each consultant who contributed to the management plan, does the plan include the following:</p> <ul style="list-style-type: none"> • consultant's name? • a statement that he/she is accredited under the state accreditation program or another state's accreditation program or an EPA-approved course? <p style="text-align: right;">(40 CFR § 763.93 (e)(12)(i)-(ii))</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each consultant.</p> <p>*Tip: See suggested Model AMP Form 1 - Contact Information</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>5. Does the management plan include a list of the name and address of each building used as a school building and identify whether the school building has:</p> <ul style="list-style-type: none"> • friable ACBM (asbestos-containing building material)? • non-friable ACBM? • friable and non-friable suspected ACBM assumed to be ACM (asbestos-containing material)? <p style="text-align: right;">(40 CFR §§ 763.93(a)(1)-(2) and 763.93(e)(1))</p> <p>*Tip: See Model AMP Form 2 - School Building List</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>6. If a new school building was constructed after October 12, 1988 and is asbestos-free, does the management plan include the following and has a copy of same been provided by the LEA to the EPA Regional Office:</p> <ul style="list-style-type: none"> • a statement signed by an architect or project engineer responsible for the construction of the building, or by an accredited inspector, indicating that no ACBM was specified as a building material in any construction document for the building, or, to the best of his or her knowledge, no ACBM was used as a building material in the building? <p style="text-align: right;">(40 CFR § 763.99(a)(7))</p> <p>*Tip: See Model AMP Form 2 - School Building List</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>7. Does the management plan include a copy of any of the statements required under 40 CFR § 763.99(a)(1)-(7) to support an exclusion from inspection that the school may qualify for under 40 CFR § 763.99 and has a copy of any such statement been provided by the LEA to the Regional Office?</p> <p style="text-align: right;">(40 CFR § 763.99)</p> <p>Note: The exclusion under 40 CFR § 763.99(a)(7) is also covered under Checklist question number 6.</p>

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>8. Does the management plan include the following information about the LEA Designated Person (DP):</p> <ul style="list-style-type: none"> • Name, address, and telephone number of the DP? • Course name, dates, and hours of training that the DP attended to carry out his or her AHERA duties? • Signed statement by the DP that the LEA's general responsibilities under 40 CFR § 763.84 have been or will be met? <p style="text-align: right;">(40 CFR § 763.93(e)(4) and (i))</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency and a copy of the DP's training certificates.</p> <p>*Tip: See Model AMP Form 1 - Contact Information and Form 3 - Designated Person Assurances</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>9. Does the management plan include the following recommendations:</p> <ul style="list-style-type: none"> • A plan for reinspection required under 40 CFR § 763.85? • A plan for operations and maintenance activities (including initial cleaning) required under 40 CFR § 763.91? • A plan for periodic surveillance required under 40 CFR § 763.92? • A description of the management planner's recommendation for additional cleaning under 40 CFR § 763.91(c)(2), as part of an operations and maintenance program, and the response of the LEA to that recommendation? <p style="text-align: right;">(40 CFR § 763.93(e)(9))</p> <p>*Tip: See Model AMP Form 10 - Plan for Reinspection, Form 14 - Plan for Operations and Maintenance Activities, Form 18 - Periodic Surveillance Plan/Report, and Form 16 Cleaning Record</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>10. Does the management plan include an evaluation of resources needed to carry out response actions, reinspections, operations and maintenance, and periodic surveillance and training?</p> <p style="text-align: right;">(40 CFR § 763.93(e)(11))</p> <p>*Tip: See suggested Model AMP Form 4 - Evaluation of Resources</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>11. Does the management plan include a record of the minimum 2 hours of awareness training required under 40 CFR § 763.92(a)(1) for all maintenance and custodial staff who may work in a building that contains ACBM, whether or not they are required to work with ACBM, and does the record include the following information:</p> <ul style="list-style-type: none"> • person's name and job title? • date training was completed? • location of training? • number of hours completed? <p style="text-align: right;">(40 CFR §§ 763.93(h) and 763.94(c))</p> <p>Did you know? New custodial and maintenance employees must be trained within 60 days after starting work (40 CFR §763.92(a)(1)).</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name, and a copy of the accreditation certificate for each staff person.</p> <p>*Tip: See Model AMP Form 5 - Training Record for Maintenance and Custodial Staff</p>

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>12. Does the management plan include a record of the additional 14 hours of training required under 40 CFR § 763.92(a)(2) for maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM and does the record include the following information:</p> <ul style="list-style-type: none"> • person's name and job title? • date training was completed? • location of training? • number of hours completed? <p style="text-align: right;">(40 CFR §§ 763.93(h) and 763.94(c))</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name, and a copy of the accreditation certificate for each staff person.</p> <p>*Tip: See Model AMP Form 5 - Training Record for Maintenance and Custodial Staff</p>
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Inspections and Reinspections

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>13. For inspections conducted before 12/14/87 (i.e., the effective date of the 10/30/87 EPA Asbestos-Containing Materials in Schools rule), does the management plan include the following information:</p> <ul style="list-style-type: none"> • date of inspection? • blueprint, diagram or written description of each school building that identifies clearly each location and approximate square or linear footage of homogenous /sampling area sampled for ACM? • if possible, the exact locations where the bulk samples were collected and the dates of collection? • a copy of the analyses of any bulk samples, dates of analyses, and a copy of any other laboratory reports pertaining to the analyses. • description of response actions or preventive measures taken, including, if possible, the names and addresses of all contractors, start and completion dates and air clearance sample results? • description of assessments of material identified prior to 12/14/87 as friable ACBM or friable suspected ACBM assumed to be ACM, and the name, signature, state of accreditation and if applicable, the accreditation number of the person making the assessments (i.e., inspector)? <p style="text-align: right;">(40 CFR § 763.93(e)(2)(i)-(v))</p> <p>*Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 8 - Homogeneous Area/Bulk Sample Summary, Form 9 - Homogeneous Area/Bulk Sample Diagram, Form 12 - Implementation of Response Actions, and Form 7 - Room/Functional Space Assessment</p>
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<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>14. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following information:</p> <ul style="list-style-type: none"> • date of the inspection or reinspection? • name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited inspector performing the inspection or reinspection? <p style="text-align: right;">(40 CFR § 763.93(e)(3)(i))</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each inspector.</p> <p>*Tip: See Model AMP Form 6 - Inspection Cover Sheet</p>
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<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>15. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following sampling information:</p> <ul style="list-style-type: none"> • Blueprint, diagram, or written description of each school building that identifies clearly each location and approximate square or linear footage of homogeneous areas where material was sampled for ACM? • Exact location where each bulk sample was collected and the date of collection of each bulk sample? • Homogeneous areas where friable suspected ACBM is assumed to be ACM? • Homogeneous areas where nonfriable suspected ACBM is assumed to be ACM? • Description of the manner used to determine sampling locations? • The name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited inspector that collected samples? <p style="text-align: right;">(40 CFR § 763.93(e)(3)(ii)-(iii))</p> <p>Note: For details on how to collect bulk samples, see 40 CFR § 763.86. Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each inspector that collected the samples.</p> <p>*Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 8 - Homogeneous Area/Bulk Sample Summary, and Form 9 - Homogeneous Area/Bulk Sample Diagram</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>16. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following information on the analysis of the bulk samples and has it been submitted to the DP for inclusion in the plan within 30 days of the analysis:</p> <ul style="list-style-type: none"> • Copy of the analysis of any bulk samples collected and analyzed? • Name and address of any laboratory that analyzed bulk samples? • A statement that any laboratory used meets the applicable laboratory accreditation requirements of 40 CFR § 763.87(a)? • Dates of any analyses performed? • Name and signature of the person performing each analysis? <p style="text-align: right;">(40 CFR §§ 763.87(d) and 763.93(e)(3)(iv))</p> <p>Note: For details on how to submit bulk samples for analysis, see 40 CFR § 763.87.</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>17. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following assessment information and has it been submitted to the DP for inclusion in the plan within 30 days of the assessment:</p> <ul style="list-style-type: none"> • Written assessments (signed and dated) required to be made under 40 CFR § 763.88 of all ACBM and suspected ACBM assumed to be ACM? • Name, signature, state of accreditation, and, if applicable, the accreditation number of each accredited person making the assessment (i.e., inspector(s)) <p style="text-align: right;">(40 CFR §§ 763.88(a)(2) and 763.93(e)(3)(v))</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each inspector making the assessment.</p> <p>*Tip: See Model AMP Form 6 - Inspection Cover Sheet and Form 7 - Room/Functional Space Assessment</p>

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>18. Has the following information about the inspection been recorded and submitted to the DP for inclusion in the management plan within 30 days of the inspection:</p> <ul style="list-style-type: none"> • Inspection report with the date of inspection signed by each accredited inspector making the inspection, the state of accreditation, and if applicable, his/her accreditation number? • Inventory of the locations of the homogeneous areas where samples are collected, exact location where each bulk sample is collected, dates that samples are collected, homogeneous areas where friable suspected ACBM is assumed to be ACM and homogeneous areas where nonfriable suspected ACBM is assumed to be ACM? • Description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, state of accreditation, and, if applicable, his or her accreditation number? • List of whether the homogeneous areas identified under 40 CFR § 763.85(a)(4)(vi)(B) of this section, are surfacing material, thermal system insulation, or miscellaneous material? • Assessments of friable material (signed and dated), the name and signature of each accredited inspector making the assessment, state of accreditation, and if applicable, his or her accreditation number? <p style="text-align: right;">(40 CFR §§ 763.85(a)(4)(vi)(A)-(E) and 763.88(a)(2))</p> <p>Note: For further details on activities conducted during an inspection (e.g., visually inspect/touch material), see 40 CFR § 763.85(a)(4)(i)-(v)</p> <p>*Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 7 - Room/Functional Space Assessment, Form 8 - Homogeneous Area/Bulk Sample Summary and Form 9 - Homogeneous Area /Bulk Sample Diagram</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>19. Has the following information about the reinspection been recorded and submitted to the DP for inclusion in the management plan within 30 days of the reinspection:</p> <ul style="list-style-type: none"> • Date of reinspection, name and signature of the person making the reinspection, state of accreditation, and if applicable, his or her accreditation number, and any changes in the condition of known or assumed ACBM? • Exact location where samples were collected during the reinspection, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, state of accreditation, and, if applicable, his or her accreditation number? • Any assessments or reassessments of friable material, date of the assessment or reassessment, the name and the signature of the accredited inspector making the assessments, state of accreditation, and if applicable, his or her accreditation number? <p style="text-align: right;">(40 CFR §§ 763.85(b)(3)(vii)(A) - (C) and 763.88(a)(2))</p> <p>Note: At least once every 3 years after a management plan has been in effect, a reinspection must be conducted by an accredited inspector of all friable and nonfriable known or assumed ACBM in each school building that the LEA leases, owns, or otherwise uses as a school building (40 CFR § 763.85(b)(1)-(2)). For further details on activities conducted during a reinspection (e.g., visually reinspect/touch material), see 40 CFR § 763.85(b)(3)(i)-(vi).</p> <p>*Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 7 - Room/Functional Space Assessment, Form 8 - Homogeneous Area/Bulk Sample Summary, Form 9 - Homogeneous Area /Bulk Sample Diagram</p>

Response Actions

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>20. Does the management plan include the recommendations made to the LEA regarding response actions under 40 CFR § 763.88(d) and the following information about the accredited management planner:</p> <ul style="list-style-type: none"> • name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited management planner making the recommendations? <p style="text-align: right;">(40 CFR §§ 763.88(d) and 763.93(e)(5))</p> <p>Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each accredited person making the recommendations.</p> <p>*Tip: See Model AMP Form 11 - Recommended Response Actions</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>21. Does the management plan include a detailed description of preventive measures and response actions to be taken, including the following:</p> <ul style="list-style-type: none"> • Methods to be used for any friable ACBM? • Locations where such measures and actions will be taken? • Reasons for selecting the response action or preventive measure? • Schedule for beginning and completing each preventive measure or response action? <p style="text-align: right;">(40 CFR § 763.93(e)(6))</p> <p>Note: For further details on how to conduct response actions, see 40 CFR § 763.90</p> <p>*Tip: See Model AMP Form 11 - Recommended Response Actions</p> <p>Did you know? The LEA may select, from the response actions which protect human health and the environment, the least burdensome action (40 CFR § 763.90(a)).</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>22. Does the management plan include one of the following statements for the person or persons who inspected for ACBM and who will design or carry out response actions, except for operations and maintenance, with respect to the ACBM:</p> <ul style="list-style-type: none"> • statement that he/she is accredited under the state accreditation program, or that the LEA has used (or will use) persons accredited under another state's accreditation program or an EPA-approved course? <p style="text-align: right;">(40 CFR § 763.93(e)(7))</p> <p>*Tip: See note on Model AMP Form 3 - Designated Persons Assurances</p>

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>23. Does the management plan include a detailed written description of each preventive measure and response action taken for friable and nonfriable ACBM and friable and nonfriable suspected ACBM assumed to be ACM, including the following:</p> <ul style="list-style-type: none"> • Methods used? • Location where the measure or action was taken? • Reasons for selecting the measure or action? • Start and completion dates of the work? • Names and addresses of all contractors involved and, if applicable, their state of accreditation and accreditation numbers? • If ACBM is removed, the name and location of storage or disposal site of the ACM? <p style="text-align: right;">(40 CFR § 763.94(b)(1))</p> <p>Note: Although not required, EPA suggests including in the AMP a copy of the accreditation.</p> <p>*Tip: See Model AMP Form 12 - Implementation of Response Actions</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>24. Does the management plan include the following sampling information required to be collected at the completion of certain response actions specified by 40 CFR § 763.90(i):</p> <ul style="list-style-type: none"> • Name and signature of any person collecting any air sample required to be collected? • Locations where samples were collected? • Date of collection? • Name and address of the laboratory analyzing the samples? • Date of analysis? • Results of analysis? • Method of analysis? • Name and signature of the person performing the analysis? • Statement that the laboratory meets the applicable laboratory accreditation requirements of 40 CFR § 763.90(i)(2)(ii)? <p style="text-align: right;">(40 CFR § 763.94(b)(2))</p> <p>*Tip: See Model AMP Form 12 - Implementation of Response Actions</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>25. Does the management plan include a detailed description in the form of a blueprint, diagram, or written description, of any ACBM or suspected ACBM assumed to be ACM that remains in the school once response actions are undertaken under 40 CFR § 763.90 and is the description updated as response actions are completed?</p> <p style="text-align: right;">(40 CFR § 763.93(e)(8))</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>26. For each homogeneous area where all ACBM has been removed, have records been retained in the management plan for at least 3 years after the next reinspection required under 40 CFR § 763.85(b)(1), or for an equivalent period?</p> <p>Did you know? Significantly damaged friable surfacing ACM or significantly damaged friable miscellaneous ACM must be immediately isolated and access must be restricted unless isolation is not necessary to protect human health and the environment. Then, this material must be removed, or depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclosed or encapsulated (40 CFR § 763.90(d)(1) - (2)).</p> <p style="text-align: right;">(40 CFR §§ 763.93(h) and 763.94(a))</p>

Operations and Maintenance

<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>27. Does the management plan include a record of each cleaning conducted under 40 CFR § 763.91(c), including the following:</p> <ul style="list-style-type: none"> • Name of each person performing the cleaning? • Date of the cleaning? • Locations cleaned? • Methods used to perform the cleaning? <p style="text-align: right;">(40 CFR §§ 763.93(h) and 763.94(e))</p> <p>Note: For details on initial cleaning after an inspection and before the initiation of any response action, other than O&M activities or repair, see 40 CFR § 763.91(c)(1) and for details on any additional cleaning recommended by the management planner and approved by the LEA, see 40 CFR § 763.91(c)(2).</p> <p>*Tip: See Model AMP Form 16 - Cleaning Record</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>28. Does the management plan include a record of each O&M activity and major asbestos activity, with the following information:</p> <ul style="list-style-type: none"> • Name of each person performing the activity? • For a major asbestos activity, the name, signature, state of accreditation and, if applicable, the accreditation number of each person performing the activity? • Start and completion date of each activity? • Location of the activity? • Description of the activity including preventative measures used? • If ACBM is removed, the name and location of the storage and disposal site for the ACM? <p style="text-align: right;">(40 CFR §§ 763.93(h) and 763.94(f) and(g))</p> <p>Note: The response actions for any maintenance activities disturbing friable ACBM, other than small-scale, short-duration maintenance activities, must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions (40 CFR § 763.91(e)). Although not required, EPA suggests including in the AMP a copy of the accreditation.</p> <p>*Tip: See Model AMP Form 15 - Operations and Maintenance Activities</p>
<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<p>29. Does the management plan include a record of each fiber release episode, whether major or minor, with the following information:</p> <ul style="list-style-type: none"> • Date and location of the episode? • Method of repair? • Preventive measure or response action taken? • Name of each person performing the work? • If ACBM is removed, the name and location of the storage and disposal site of the ACM? <p style="text-align: right;">(40 CFR §§ 763.93(h) and 763.94(h))</p> <p>Note: A major fiber release episode is the falling or dislodging of more than 3 square or linear feet of friable ACBM (40 CFR § 763.91(f)(2)). A minor fiber release episode is the falling or dislodging of 3 square or linear feet or less of friable ACBM (40 CFR § 763.91(f)(1)).</p> <p>*Tip: See Model AMP Form 17 - Major/Minor Fiber Release Episode Log</p>

Periodic Surveillance

30. Does the management plan include a record of each periodic surveillance performed under 40 CFR § 763.92(b), with the following information:

- Name of person performing the surveillance?
- Date of the surveillance?
- Any changes in the condition of the material?

(40 CFR §§ 763.92(b)(2)(ii)-(iii), 763.93(h) and 763.94(d))

Note: A periodic surveillance of each school building must be conducted at least once every 6 months after a management plan has been in effect (40 CFR § 763.92(b)).

*Tip: See Model AMP Form 18 - Periodic Surveillance Plan/Report

Notification

31. Does the management plan include the following notification information:

- Description of the steps taken to notify, in writing, at least once a year, parent, teacher and employee organizations of the availability of the management plan for review?
- Dated copies of all such management plan availability notifications (e.g., letter, newsletter)?
- Description of the steps taken to inform workers and 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 in progress? (Under 40 CFR § 763.84(c), the LEA must inform them about these activities at least once each school year.)

(40 CFR §§ 763.93(e)(10) and 763.93(g)(4))

*Tip: See Model AMP Form 19 - Plan to Inform

Appendix A - Glossary

Unless otherwise noted with an asterisk (*), the following definitions contained in this Glossary can be found under 40 CFR § 763.83:

Act means the Toxic Substances Control Act (TSCA), 15 U.S.C. 2601, et seq.

Accessible when referring to asbestos-containing material means that the material is subject to disturbance by school building occupants or custodial or maintenance personnel in the course of their normal activities.

Accredited or *accreditation* when referring to a person or laboratory means that such person or laboratory is accredited in accordance with section 206 of Title II of the Act.

Air erosion means the passage of air over friable asbestos-containing building material (ACBM) which may result in the release of asbestos fibers.

Asbestos means the asbestiform varieties of: Chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonitegrunerite); anthophyllite; tremolite; and actinolite.

Asbestos-containing material (ACM) when referring to school buildings means any material or product which contains more than 1 percent asbestos.

Asbestos-containing building material (ACBM) means surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school building.

Asbestos debris means pieces of ACBM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

Damaged friable miscellaneous ACM means friable miscellaneous ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that its bond to the substrate (adhesion) is inadequate or which for any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

Damaged friable surfacing ACM means friable surfacing ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or which has delaminated such that its bond to the substrate (adhesion) is inadequate, or which, for any other reason, lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

Damaged or significantly damaged thermal system insulation ACM means thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal system insulation equipment where the insulation has lost its

structural integrity, or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage.

Designated Person means a person appointed by the Local Education Agency (LEA), under 40 CFR § 763.84 (g), who is trained to ensure the proper implementation of AHERA in school buildings. *

Encapsulation means the treatment of ACBM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).

Enclosure means an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air.

Fiber release episode means any uncontrolled or unintentional disturbance of ACBM resulting in visible emission.

Friable when referring to material in a school building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously nonfriable material after such previously nonfriable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

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

High-efficiency particulate air (HEPA) refers to a filtering system capable of trapping and retaining at least 99.97 percent of all monodispersed particles 0.3 µm in diameter or larger.

Homogeneous area means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

Local education agency (LEA) means: (1) Any local educational agency as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 3381). (2) The owner of any nonpublic, nonprofit elementary, or secondary school building. (3) The governing authority of any school operated under the defense dependent's education system provided for under the Defense Dependents' Education Act of 1978 (20 U.S.C. 921, et seq.).

Miscellaneous ACM means miscellaneous material that is ACM in a school building.

Miscellaneous material means interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.

Nonfriable means material in a school building which when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

Operations and maintenance program means a program of work practices to maintain friable ACBM in good condition, ensure clean up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACBM disturbance or damage.

Phase contrast microscopy (PCM) refers to the procedure outlined in NIOSH Method 7400 for the evaluation of fibers in air samples.*

Polarized light microscopy (PLM) refers to the method outlined in 40 CFR § 763, Appendix E to Subpart E, for the identification of asbestos in bulk samples.*

Potential damage means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

Potential significant damage means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. (3) The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration or air erosion.

Preventive measures means actions taken to reduce disturbance of ACBM or otherwise eliminate the reasonable likelihood of the material's becoming damaged or significantly damaged.

Removal means the taking out or the stripping of substantially all ACBM from a damaged area, a functional space, or a homogeneous area in a school building.

Repair means returning damaged ACBM to an undamaged condition or to an intact state so as to prevent fiber release.

Response action means a method, including removal, encapsulation, enclosure, repair, operations and maintenance, that protects human health and the environment from friable ACBM.

Routine maintenance area means an area, such as a boiler room or mechanical room, that is not normally frequented by students and in which maintenance employees or contract workers regularly conduct maintenance activities.

School means any elementary or secondary school as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 2854).

School building means: (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food. (2) Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education. (3) Any other facility used for the instruction or housing of students or for the administration of educational or research programs. (4) Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described in this definition of "school building" under paragraphs (1), (2), or (3). (5) Any portico or covered exterior hallway or walkway. (6) Any exterior portion of a mechanical system used to condition interior space.

Significantly damaged friable miscellaneous ACM means damaged friable miscellaneous ACM where the damage is extensive and severe.

Significantly damaged friable surfacing ACM means damaged friable surfacing ACM in a functional space where the damage is extensive and severe.

State means a State, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Northern Marianas, the Trust Territory of the Pacific Islands, and the Virgin Islands.

Surfacing ACM means surfacing material that is ACM.

Surfacing material means material in a school building that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

Thermal system insulation (TSI) means material in a school building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.

Thermal system insulation ACM means thermal system insulation that is ACM.

Transmission electron microscopy (TEM) refers to the method outlined in 40 CFR § 763, Appendix A to Subpart E, for the identification of asbestos in air samples.*

Vibration means the periodic motion of friable ACBM which may result in the release of asbestos fibers.

Appendix B - Acronyms

ACM - Asbestos-containing material

ACBM - Asbestos-containing building material

AHERA - Asbestos Hazard Emergency Response Act

DOT - Department of Transportation

DP - AHERA Designated Person

EPA - U.S. Environmental Protection Agency

HEPA - High-efficiency particulate air

LEA - Local Education Agency

NIOSH - National Institute for Occupational Safety and Health

NIST - National Institute of Standards and Technology

NVLAP - National Voluntary Laboratory Accreditation Program

O&M - Operations and maintenance

OSHA - Occupational Safety and Health Administration

PCM - Phase contrast microscopy

PLM - Polarized light microscopy

TEM - Transmission electron microscopy

TSI - Thermal system insulation