
 Albemarle County Public Schools		 Subject: Asbestos Management			
Document No.:	Issue Date:	Last Revised:	Page:	Prepared By:	Approved By:
SOP-ASB-01	2-18-2008	2-18-2008	1 of 5	LAC	EDB, JL, GS, AK

1.0 PURPOSE

This Standard Operating Procedure (SOP) outlines the Asbestos Management Program for Albemarle County Public Schools. EPA's asbestos program for schools, Asbestos Hazard Emergency Response Act (AHERA) per Code of Federal Regulations, Chapter 40, Part 763, Subpart E, and its guidance for other building owners is founded on the principle of "in-place" management of asbestos-containing material (ACM). This SOP also provides requirements for asbestos abatement projects. The original inspections for the Asbestos Management Plans for each school built prior to October 12, 1988 were conducted in 1988 to determine where asbestos was present create an operations, maintenance and repair plan.



2.0 DEFINITIONS

- A. *Asbestos* is a naturally occurring mineral fiber, once widely used in building materials for its thermal insulating properties and fire resistance. The presence of asbestos in high-activity public buildings makes accidental damage or disturbance of the materials possible and increases the potential for exposure.
- B. *Asbestos-Containing Material (ACM)* is any material or product that contains more than one percent asbestos.
- C. *Asbestos-Containing Building Material (ACBM)* is 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.
- D. The *Asbestos Hazard Emergency Response Act (AHERA)*¹, a provision of the Toxic Substances Control Act, was passed by Congress in 1986. AHERA requires local educational agencies to inspect their schools for asbestos-containing building material and prepare management plans that make recommendations for the reduction of asbestos hazards.



Public school districts and non-profit private schools (collectively called local educational agencies) are subject to AHERA's requirements. AHERA requires that local education agencies take the following actions:

- Perform an original inspection and re-inspection every three years of asbestos-containing material
- Develop, maintain, and update an asbestos management plan and keep a copy at the school
- Provide yearly notification to parent, teacher, and employee organizations regarding the availability of the school's asbestos management plan and any asbestos abatement actions taken or planned in the school
- Designate a contact person to ensure the responsibilities of the local education agency are properly implemented
- Perform periodic surveillance of known or suspected asbestos-containing building material

¹ 40 CFR Part 763, Subpart E.

 Albemarle County Public Schools			 Subject: Asbestos Management		
Document No.:	Issue Date:	Last Revised:	Page:	Prepared By:	Approved By:
SOP-ASB-01	2-18-2008	2-18-2008	2 of 5	LAC	EDB, JL, GS, AK

- Ensure that properly-accredited professionals perform inspections and response actions and prepare management plans
 - Provide custodial staff with asbestos-awareness training
- E. The *Asbestos Management Plan* is the local education agency's documentation of its recommended actions in response to asbestos. It cites the location of asbestos within the school and any action taken to repair or remove the material. The local education agency must maintain records to be included in the asbestos management plan. These records include:
- A list of the name and address of each school building and whether the building has asbestos-containing building material and what type of material contains asbestos
 - The date of the original school inspection
 - The plan for reinspections
 - A blueprint, diagram or written description that clearly identifies the location of any asbestos-containing building material remaining in the school
 - A description of any response action or preventive measures taken to reduce asbestos exposure
 - A copy of the analysis of any building material and the name and address of any laboratory that sampled the materials
 - The name, address, and telephone number of the person designated by the local education agency to carry out the plan
 - A description of steps taken to inform workers, teachers, and students or their legal guardians about inspections, reinspections, response actions and periodic surveillance
- F. *Friable ACBM* is material that may be crumbled, pulverized, or reduced to powder by hand pressure when dry. Friable ACBM also includes previously nonfriable material when it becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.
- G. *Local Education Agency (LEA)* must designate a person (designated person) to ensure the responsibilities of the LEA, as detailed in 40 CFR Part 763, are properly implemented. The LEA must retain the services of a licensed asbestos inspector or management planner to conduct a reinspection every three years subsequent to implementation of a management plan.
- H. *Miscellaneous ACM* is other, mostly nonfriable, products and materials (found on structural components, structural members or fixtures) such as floor tile, ceiling tile, construction mastic for floor and ceiling materials, sheet flooring, fire doors, asbestos cement pipe and board, wallboard, acoustical wall tile, and vibration damping cloth.
- I. *Nonfriable ACBM* is material that, when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure.
- J. *Surfacing ACM* is interior ACM that has been sprayed on, troweled on, or otherwise applied to surfaces (structural members, walls, ceilings, etc.) for acoustical, decorative, fireproofing or other purposes.
- K. *Thermal System ACM* is insulation used to control heat transfer or prevent condensation on pipes and pipe fittings, boilers, breeching, tanks, ducts, and other parts of hot and cold water systems; heating, ventilations, and air-conditioning (HVAC) systems; or other mechanical systems.

 Albemarle County Public Schools			 Subject: Asbestos Management		
Document No.: SOP-ASB-01	Issue Date: 2-18-2008	Last Revised: 2-18-2008	Page: 3 of 5	Prepared By: LAC	Approved By: EDB, JL, GS, AK

3.0 PROCEDURES

Responsibility:

Environmental Compliance Manager

The Environmental Compliance Manager will be the local education agency's designated person to ensure the responsibilities of the LEA are properly implemented. If the Environmental Compliance Manager cannot serve as the designated person, the Assistant Director of Facilities should first perform the duties of the designated person. In the event that the Assistant Director of Facilities cannot serve as the designated person, then the Deputy Director of Building Services should perform the necessary duties. Duties include:

- Provide yearly notification to parent, teacher, and employee organizations regarding the availability of the school's asbestos management plan and any asbestos abatement actions taken or planned in the school
- Perform surveillance every six months of known or suspected asbestos-containing building material
- Ensure that properly-accredited professionals perform inspections, response actions and prepare management plans
- Maintain Asbestos Management Plans for each school
- Schedule abatement projects during times when students are not in session. Only emergency abatement needs can be scheduled during school hours.

Project Managers for Capital Improvement and Maintenance Projects

- Ensure specifications include a requirement for a letter that no asbestos or asbestos-containing materials have been incorporated into the project
- Provide documentation to the Environmental Compliance Manager



Abatement Contractors

Abatement contractors must follow all applicable regulations and training requirements. Contractors must incorporate the time required for clearance testing, if applicable, when considering the project deadline.

A. State Notification

Under Virginia regulations, a notification is required for any asbestos abatement project greater than ten linear or ten square feet. Notifications are also required for essentially all demolition projects, regardless of whether asbestos containing materials are not present in the structure. Notification must be submitted 20 calendar days before the abatement project commences.

A notification is not required for nonfriable asbestos containing material, roofing, flooring and siding materials which when installed, encapsulated or removed do not become friable. If the material is in good shape and removed using Occupational Safety and Health Administration's (OSHA) compliant work practices, then notification is not generally required. If the material is not in good shape, the matrix binding the asbestos fibers has deteriorated, or mechanical means are used to remove the material, resulting in more than incidental breakage, then notification is required. Activities such as grinding, mechanical chipping, sawing or drilling can make the asbestos containing material friable

 Albemarle County Public Schools		 Subject: Asbestos Management			
Document No.: SOP-ASB-01	Issue Date: 2-18-2008	Last Revised: 2-18-2008	Page: 4 of 5	Prepared By: LAC	Approved By: EDB, JL, GS, AK

and would require notification. Demolition of residential structures which do not meet the National Emission Standards for Hazardous Air Pollutants (NESHAPS) definition of facility does not require notification.

B. Federal Notification

United States Environmental Protection Agency (EPA) notification is required for any asbestos abatement project greater than 260 linear or 160 square feet. Notifications required by the EPA's NESHAPS regulation must be sent to the EPA as described above except the notification period is 10 working days.

C. Permit Fee

The contractor is responsible for any applicable permit fees that must be submitted with the completed project notification for non-residential structures. The Virginia fee is in accordance with the following schedule²

- \$50 for each project equal to or greater than 10 linear feet or 10 square feet up to and including 260 linear feet and 160 square feet
- \$160 for each project equal to or greater than 260 linear feet or 160 square feet up to and including 2600 linear feet and 1600 square feet
- \$470 for each project equal to or greater than 2600 linear feet or 1600 square feet
- If the amount of the asbestos is reported in both linear feet and square feet the amounts will be added and treated as if the total were in all square feet for this subsection
- \$15 for each amended notification



Professional Services Contractors

The LEA, through the designated person, must retain the services of a licensed asbestos inspector or management planner to conduct a reinspection every three years subsequent to implementation of the management plan. A professional service contractor will also be utilized as the Project Monitor for abatement projects.

Assistant Director for Custodial Services

The Assistant Director for Custodial Services must ensure that all new custodians receive two hours of general awareness training for asbestos. The Assistant Director for Custodial Services must instruct lead custodians to report any potential damage to the Environmental Compliance Manager.

² Permit fees per Virginia Department of Labor and Industry as of November 2007 (http://www.doli.virginia.gov/whatwedo/lead_asbestos/leadasb_faq.html)

 Albemarle County Public Schools		 Subject: Asbestos Management			
Document No.: SOP-ASB-01	Issue Date: 2-18-2008	Last Revised: 2-18-2008	Page: 5 of 5	Prepared By: LAC	Approved By: EDB, JL, GS, AK

Recordkeeping:

Asbestos Management Plans are maintained in two locations: (1) Albemarle County Public Schools, Building Services Department³ and (2) the front office of each school. The Environmental Compliance Manager maintains the Asbestos Management Plan at Building Services and sends materials to each school to have the front office maintain the school copy.

Training:

Asbestos Inspector Training

Requirement: 24-hour initial course with half-day annual refresher course

Purpose: The building inspector is responsible for determining whether asbestos containing material is present in a building and assessing physical characteristics of that ACM and of the building.

Required Attendees: Environmental Compliance Manager

Optional Attendees: Deputy Director of Building Services

Asbestos Management Planner

Requirement: 16-hour initial course with half-day annual refresher course

Purpose: The Management Planner uses the information from the inspections to estimate the degree of current or potential hazard posed by the ACM, and to develop a plan for managing the ACM.

Required Attendees: Environmental Compliance Manager

Optional Attendees: Deputy Director of Building Services

Custodial Training

Each custodian must receive 2 hours of asbestos general awareness training. The training is conducted by a designee of the Assistant Director for Custodial Services or the Environmental Compliance Manager. Training records are maintained by the Environmental Compliance Manager.

Asbestos SOP Attachments:

- AHERA Division Superintendents Memo No. 232 (F-SOP-ASB-01)
- 6-Month Surveillance Form (F-SOP-ASB-02)
- Summer Removal Recommendations (F-SOP-ASB-03)

³ 2751 Hydraulic Road, Charlottesville, VA 22901

COMMONWEALTH OF VIRGINIA
DEPARTMENT OF EDUCATION
P.O. BOX 2120
RICHMOND, VIRGINIA 23218-2120

SUPTS. MEMO NO. 232

October 26, 2007

INFORMATIONAL

TO: Division Superintendents

FROM: Billy K. Cannaday, Jr.
Superintendent of Public Instruction

SUBJECT: Asbestos Hazard Emergency Response Act (AHERA) -
Responsibilities of School Divisions

The purpose of this memo is to advise you that the United States Environmental Protection Agency, Region III, Pesticides Asbestos Programs and Enforcement Branch Waste and Management Division, is enforcing the Federal AHERA laws in Virginia. The Department of Education is reminding public school divisions of their obligations and responsibilities with regards to these Federal requirements. The rules that pertain to the AHERA laws are published in the Code of Federal Regulations, Chapter 40, Part 763, Subpart E. These rules may be obtained electronically through the U. S. Government Printing Office Web page at <http://www.gpoaccess.gov/cfr/index.html>.

The AHERA rules require schools (referred in AHERA as "local education agencies") to designate a "LEA designee," whose job it is under the regulations to ensure their implementation within the school system. A LEA designee may choose to obtain the training needed to carry out this responsibility by attending an Asbestos Inspector and Management Planner class taught by a training provider approved by the Virginia Department of Professional and Occupational Regulation. Their Web page is located at http://www.dpor.virginia.gov/dporweb/asb_main.cfm.

Specifically, public schools in Virginia must provide AHERA oversight in the following key areas:

1. Perform an original inspection on all school buildings built prior to October 12, 1988, and document the location of asbestos materials found in the building. Schools built after that date can have a letter provided by the architect which certifies that no ACBM was specified in the construction of the building.
2. Develop, maintain, and update an asbestos management plan and keep a copy at the school (new schools must have a plan which certifies that they are asbestos free) and perform the required re-inspection every three years for all schools which contain

asbestos building materials.

3. Provide yearly notification to parent, teacher, and employee organizations regarding the availability of the school's asbestos management plan and any asbestos actions taken or planned in the school.
4. Perform periodic surveillance of known or suspected asbestos-containing building materials.
5. Ensure that properly-accredited and/or licensed professionals perform inspections and response actions, prepare management plans, and are responsible for the planning and execution of any asbestos abatement project.
6. Provide custodial staff with asbestos awareness training. An excellent resource is the EPA's "asbestos in schools" Web page at:
http://www.epa.gov/asbestos/pubs/asbestos_in_schools.html.

Finally, should you be contacted by the EPA Region III office for non-compliance in any area of the AHERA regulations, we would advise you to take corrective actions immediately. Also, document and keep up-to-date your three year re-inspections and perform any asbestos work called for in a school's management plan. For additional information, please contact Hunter.Barnes@doe.virginia.gov or Vijay.Ramnarain@doe.virginia.gov, or by telephone at (804) 225-2035.

BKCJr/HB/aam