

Addendum 1- June 3, 1988 Behringer-Tully
property athletic restroom asbestos
management report

ASBESTOS MANAGEMENT PLAN
FOR
SANTA FE I.S.D.
ATHELETIC FIELD RESTROOMS
SANTA FE, TEXAS

17 JUNE 1988

PREFACE

Santa Fe I.S.D. Atheletic Field Restrooms was inspected on June 3, 1988 by Michael K. Fell of P & H Asbestos Removal, Inc. of Pasadena, TX. Michael Fell is accredited as an inspector by the state of Texas and completed his/her required training on April 13, 1988.

The school was inspected as required by the U.S. Environmental Protection Agency's (USEPA) Asbestos containing materials in schools Rule as amended in 40 CFR part 763 on October 17, 1987.

The following management plan has been prepared by Michael K. Fell of P & H Asbestos Removal, Inc.. Michael Fell is certified as an inspector and management plan writer by the state of Texas and completed his/her training at Gebco Associates on April 13, 1988.

I. INSPECTION REVIEW

A. Building Description

Santa Fe I.S.D. Atheletic Field Restrooms is composed of TWO SEPERATE CINDER BLOCK BUILDINGS. It is a CINDER BLOCK, WOOD, TRANSITE PANELING structure. The building was constructed in 1980, has 500 square feet of area, and an occupancy of approximately 0. There have been no additions constructed to the building.

The floor plans for the building are not included.

B. Summary of Inspection Report

One homogeneous areas were identified. The homogenous area sheets indicating the condition of the material are provided below.

II. HAZARD ASSESSMENT

A review of the inspection data and the inspector's initial assessment of homogeneous area conditions was made.

The judgements of the inspector will be adopted except for the following:

NOT NOTED ON THE INSPECTION REPORT FORM IS THE FACT THAT AT THE ENTRANCE TO THE RESTROOMS ARE CORRUGATED TRANSITE PANELS USED AS A SHIELDING MATERIAL. AS ALL OTHER TRANSITE SAMPLES TAKEN IN THIS SURVEY HAVE HAD POSITIVE RESULTS CONCERNING ASBESTOS CONTENT, THESE PANELS SHOULD BE CONSIDERED SUSPECT AND HANDLED AS SUCH.

The final description of each area is given in the Hazard Assessment Summary Sheet.

A. Potential for Fiber Release

A AREA ID: J1-01, BACK WALL OF RESTROOM
STATUS: Potential Damage

THE SAMPLED MATERIAL HAS A CONTENT OF 5% CHRYSOTILE ASBESTOS. THE AREA HAS LOW PHYSICAL DAMAGE AND THE ACM APPEARS TO BE IN GOOD CONDITION. PLACE UNDER O & M PROGRAM. POTENTIAL FOR ACM DISTURBANCE IS LOW, UNLESS ANY SERVICE WORKERS CONTACT THE AREA IN A MANNER WHICH COULD RESULT IN A FIBER RELEASE (EX. DRILLING, HAMMERING, CHIPPING, OR THE USE OF ABRASIVE MATERIALS).

B. Hazard Priority

Based on existing conditions and potential for damage, the priority for response actions is as follows:

A 1 AREA: J1-01, BACK WALL OF RESTROOM

III. RESPONSE ACTIONS

A. Proposed Response Actions

- 4 Sample Area: J1-01, BACK WALL
Condition: Damage
Action: Maintain

PLACE UNDER O & M PROGRAM.

B. Staging of Abatement Actions

C. Proposed Work Practices

The removal contractor will be required to submit a review of the company's removal work practices. The review will include a description of the following:

- A. Cleaning and furniture/fixture removal practices
- B. Construction of containment (plastic cover use and negative pressure maintenance in the containment area)
- C. Decontamination procedures
- D. Isolation of ventilation systems
- E. Notification of procedures that removal activity is in progress
- F. Disposal of material
- G. Final clearance sampling

The contractor's practices will be evaluated using a checklist based upon the contract specifications.

IV. COST ESTIMATION

A. Abatement Costs

AREA: J1-01, BACK WALL

	UNITS	UNIT COST	TOTAL
Surface Area	500.00	0.00	0.00

Area Estimate Subtotal:			\$ 0.00

*** Cost Estimation Summary ***

Sample Areas Subtotal	\$	0.00

Total Estimated Cost	\$	0.00

NOTE: The estimate includes replacement of materials in affected areas. Also, price is based on local contractors' prices and does not reflect actual price. Actual price will be determined after bidding process is complete.

B. Contractor Selection

The procedure for selecting contractors will include:

1. Soliciting prequalification information from at least six contractors (see "Checklist for Determining Contractor Qualifications")
2. Generating a short list of three bidders
3. Holding pre-bid conference with bidders to discuss removal projects

4. Sending out final specifications on removal jobs and receiving fixed fee bid
5. Selection of lowest bid among three pre-qualified bidders

V. OPERATIONS AND MAINTENANCE PLAN

A. Asbestos Program Coordinator - Responsibilities

The Asbestos Program Coordinator shall be responsible for the following:

1. Arranging and coordinating of training of all faculty and staff with annual updates for new personnel.
2. Arranging for abatement procedures called for in the abatement/response section.
3. Complying with all State, OSHA, or EPA rules or regulations regarding asbestos abatement activities.
4. Routine maintenance activities by in-house personnel.
5. Coordinating and overseeing work done by outside contractors when the possibility exists that ACM can be disturbed by this work.
6. Establishment of a respiratory protection program for "Asbestos Maintenance" in accordance with OSHA recommendations.
7. Procurement and maintenance of specialized equipment and supplies needed for implementation of this plan.
8. Monitoring of all asbestos containing materials in the building.
9. Ensure that all asbestos waste generated at the building is packaged, transported and disposed of in accordance with EPA requirements and that the necessary chain of custody documentation is maintained.
10. Warnings, notifications, and record keeping as outlined in U.S. EPA Regulation 40 CFR Part 763.
11. Maintenance of all medical records required by OSHA for any employees involved in in-house repair or removal of ACM.

12. Updating existing management program every six months.
13. Labeling asbestos containing materials.

The physical plant director will be appointed the asbestos coordinator.

B. Worker Classification and Training

The custodian/staff relies heavily on outside contracting for implementing repair work and all activities but routine maintenance. Of the full-time and part-time personnel presently working on the staff, one shall be given a 14 hour operations and maintenance course and all others shall be given a two-hour awareness course. The person with the 14 hours training will be given responsibilities for any small removal jobs or repair jobs that are likely to disturb the asbestos that will remain in the building after the proposed removal action.

C. Public and Building Occupant Protection Measures

The occupant protection measures will be described fully in the Operations and Maintenance plan. The O & M plan will describe in detail:

1. Monitoring program for remaining asbestos:
All asbestos containing materials shall be monitored every six months. Monitoring shall include an evaluation of the surrounding areas, such as leaking roofs, that may eventually impact the ACM. All building staff and maintenance personnel shall report promptly to the asbestos program coordinator the presence of any damaged asbestos containing material or any damage to the barriers covering any ACM. Appropriate assessment and repairs should be made immediately if damage is detected.
2. Minimizing fiber release in all areas:
In order to minimize fiber release, there shall be no nailing, tacking, taping or hanging objects from the suspended ceiling or from ACM. All staff and

maintenance/custodial personnel shall promptly report to their supervisors when any ceiling has been disturbed or when there is evidence of leaks. Any transite material contained in any room must not be drilled, sanded or sawed. Any damage will be reported to supervisory personnel as soon as possible. Routine maintenance activities or repairs above the ceiling will take place after normal working hours.

Boiler, pipe tunnels, mechanical rooms: In these areas care must be taken until removal not to disturb ACM material on the boilers, breeching, hot water tanks, pipe fittings, or insulations, etc. There should be no stepping on these items or storing equipment against or on top of ACM materials.

3. Reducing potential for exposure:

In all areas containing ACMs, proper cleaning techniques shall be used. When it is necessary to work above the suspended ceiling or in areas with pipe fitting insulation or in boiler/fan rooms, proper work practices will be observed. Work practices will be described in the O & M Plan. Any dust or debris resulting from routine maintenance must be cleaned up promptly and disposed of properly. HEPA vacuuming, wet mopping or damp wiping of surfaces shall be used. All waste and cleaning materials must be disposed of in sealed and labeled 6 mil plastic bags. These bags shall be placed in a sealed, labeled container. Periodically, this waste shall be transported and disposed of in a landfill approved by the Department of Environmental Protection for asbestos waste disposal.

4. Major Repairs

If major repairs to the remaining asbestos need to be carried out, certified asbestos contractors will be employed. A major repair is any action involving more than 5 feet of piping covered with asbestos or 10 square feet of surface material.

D. Recordkeeping

The O & M plan will contain the specifications and forms for keeping records regarding any repair or removal work involving ACM. The recordkeeping procedure should assure that:

1. Major repair work carried out by outside contractors is documented
2. Minor repair work by the qualified in-house worker is documented
3. The monitoring of remaining asbestos is recorded
4. The necessary personnel records for training and medical monitoring are kept.

VI. MANAGEMENT PLAN IMPLEMENTATION

- A. Choose Asbestos Program Coordinator - Immediately
- B. Implement Education Program - First Quarter 1988
- C. Select and Train Maintenance Team - First Quarter 1988
- D. Begin Patch, Repair Work - As soon as possible
- E. Monitor Physical Condition of all ACM - Immediately

CHECKLIST FOR DETERMINING CONTRACTOR QUALIFICATIONS

- A. Contractors shall demonstrate reliability in performance of general contracting activities through the submission of a list of references of persons who can attest to the quality of work performed by the contractor.
- B. Contractors must demonstrate ability to perform asbestos abatement activities by submitting evidence of the successful completion of training courses covering asbestos abatement. At a minimum, the contractor shall furnish proof that employees have had instruction on the dangers of asbestos exposure, on respirator use, decontamination, and OSHA regulations.
- C. Contractors must be able to demonstrate prior experience in performing previous abatement projects through the submission of a list of prior contracts, including: the names, addresses, and telephone numbers of building owners for whom the projects were performed. In rare circumstances inexperienced contractors may be qualified if they can demonstrate exceptional qualifications in the other contractor standards.
- D. Additional evidence of successful completion of prior abatement projects should be demonstrated by contractors through the submission of air monitoring data, if any, taken during and after completion of previous projects in accordance with 29 CFR 1910.1001 (e).
- E. Contractors must possess written standard operating procedures and employee protection plans which include specific reference to OSHA medical monitoring and respirator training programs. In addition, the contractor must be prepared to make available for viewing at the job site a copy of OSHA regulations at 29 CFR 1910.1001 governing asbestos controls, and Environmental Protection Agency regulations at 40 CFR Part 61, Subpart M, (NESHAPS) governing asbestos stripping work practices, and disposal of asbestos waste.
- F. In those States which have contractor certification programs, contractors must possess State certifications for the performance of asbestos abatement projects.

- G. Contractors must be able to provide a description of any asbestos abatement projects which have been prematurely terminated, including the circumstances surrounding the termination.
- H. Contractors must provide a list of any contractual penalties which the contractor has paid for breach or noncompliance with contract specifications, such as overruns of completion time or liquidated damages.
- I. Any citations levied against the contractor by any Federal, State, or local government agencies for violations related to asbestos abatement, shall be identified by contractors, including the name or location of the project, the date(s), and how the allegations were resolved.
- J. Contractors must submit a description detailing all legal proceedings, lawsuits or claims which have been filed or levied against the contractor or any of his past or present employees for asbestos-related activities.
- K. Contractors must supply a list of equipment that they have available for asbestos work. This should include negative air machines, type "C" supplied air systems, scaffolding, decontamination facilities, disposable clothing, etc.

P & H ASBESTOS REMOVAL, INC.
 HAZARD ASSESSMENT FACTORS
 SAMPLE AREA ID: J1-01

DAMAGE FACTORS

PHYSICAL DAMAGE: Low WATER DAMAGE: No FRIABILITY: None

DISTURBANCE FACTORS

PROXIMITY TO REPAIR ITEMS: 1' - 5' EXISTENCE OF BARRIERS: NONE

ABOVE ROOM: ROOF
 ADJACENT TO ROOM: ATHELETIC FIELD

AIR FLOW FACTORS

VENTILATION GRILLE: None AIR MOVEMENT: Medium

GENERAL OCCUPANCY FACTORS

	Population	Duration
SAMPLE AREA OCCUPANCY: General Public:	0	-----
Maintenance:	-----	-----

MOST IMPORTANT FACTOR THAT MAY INCREASE CHANCE OF FIBER RELEASE:

MAINTENANCE OR REMOVAL

CONDITION ASSESSMENT

SUSPECTED	CONFIRMED	FRIABLE	%
	✓	No	5
DAMAGE CONDITION	POTENTIAL DAMAGE		
ND=No Damage	NPD=No Pot. Dam.		
D=Damage	PD=Pot. Damage		
SD=Sig. Damage	PSD=Pot. Sig. Dam.		

Abnormal access features:

NONE

How much area of ACM never accessed by anyone?

 N/A Sq Ft

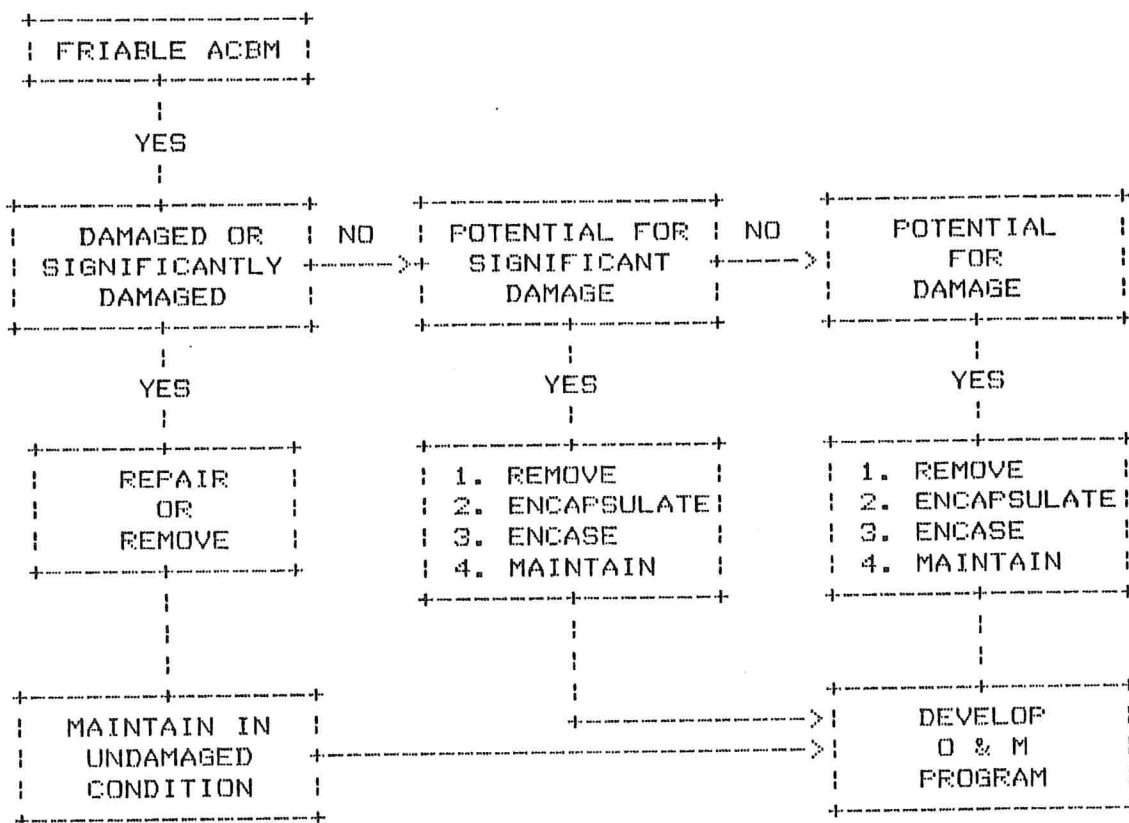
How much area is ACM accessed by maintenance personnel?

 N/A Sq Ft

THE A.H.E.R.A. MANAGER
P & H ASBESTOS REMOVAL, INC.
CURRENT HAZARD PRIORITIES
SURVEY ID: SS8810J

<u>NEW PRIORITY</u>	<u>CURRENT PRIORITY</u>	<u>SAMPLE AREA ID</u>	<u>SAMPLE AREA NAME</u>
-----	1	J1-01	BACK WALL OF RESTROOM

THERMAL SYSTEM INSULATION
E.P.A. DECISION TREE
20 OCTOBER 1987



FRIABLE SURFACING & MISCELLANEOUS ACBM
 E.P.A. DECISION TREE
 20 OCTOBER 1987

