



**DISTRICT-WIDE
ASBESTOS COMPLIANCE MANAGEMENT PLAN**

LOCAL EDUCATION AGENCY

**Minneapolis Public Schools
Special School District # 1
1225 N 7TH Street
Minneapolis, MN 55411**

**AHERA Designated Person:
Lee Setter**

**Telephone:
612-668-0308**

**Regulatory Coordinator
Jason Karpe**

612-668-0307

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*Please Contact EH&S department for current Appendix pages

Introduction

The Asbestos Hazard Emergency Response Act (AHERA) required the Minneapolis Public Schools (MPS), as the local education authority, to inspect each District facility for asbestos-containing building materials and to develop a building specific asbestos management plan. A copy of the AHERA regulations is maintained in [Appendix A](#) of this management plan.

Lee Setter, Environmental Health & Safety Manager, has been designated Asbestos Program Manager by Minneapolis Public Schools. Mr. Setters' office is located at the Plant Operations and Maintenance building, 1225 N 7th Street, Minneapolis, MN 55411. His telephone number is **(612) 668-0308**. Mr. Setter certifies that this document and documents referenced are true and accurate and the local education authority responsibilities have been met or will be met.



Lee Setter
Designated Asbestos Program Manager

Individual facility management plans are reassessed every six months and a complete building reinspection is performed every three years to ensure that asbestos materials are maintained in good condition. A computer inventory of all known asbestos materials for each building is maintained. Information identified includes the material quantity, material condition assessment and removal priority. Each building specific management plan is maintained in the main office area for the facility and is available for public review. **Appendix B** provides a listing of all MPS facilities for which a building specific management plan is maintained.

Asbestos containing materials (ACM) are scheduled for removal from District Facilities if the material cannot be maintained in a safe condition or if there is a significant potential for disturbance. All remaining ACM is managed in place according to Environmental Protection Agency (EPA) guidelines until it is removed prior to renovation or demolition. Licensed abatement contractors are used to perform response actions exceeding normal operations and maintenance activities.

Certifications

The MPS Environmental Health & Safety Division (EH&S) is responsible for management of the asbestos program. **Lee Setter** and **Jason Karpe** maintain EPA/Minnesota Department of Health Certifications as Building Inspector, Management Planner, Project Designer and Contractor Supervisor. All District custodial and trades personnel receive, at a minimum, two-hour asbestos awareness training. **Jason Kapre** is responsible for developing/updating asbestos management plans, reinspections, training, implementing response

actions and recordkeeping. This Districtwide Asbestos Management Plan is reviewed annually and updated as required. This management plan is to be used as a guideline for compliance with applicable state and federal regulations. Where discrepancies may exist, regulations supercede this document.

Part 1: Building Specific Asbestos Management Plans

Prior to October 12, 1988, MPS was required to submit an asbestos management plan for each District building to the State of Minnesota AHERA designee. AAC Inc., an industrial hygiene consulting firm, contracted with the District to develop the original asbestos management plans. AAC Inc. developed the format, content and recommendations in the management plans. When facilities are purchased, leased or built by the District, asbestos management plans are developed for the site prior to use as a school. The required information maintained in each asbestos management plan includes:

- The name and address of the school building and identification of the existence of confirmed or assumed friable and non-friable asbestos-containing building materials (ACBM),
- The name, signature, accreditation, address and phone number of the AHERA designated person, the date of the inspection, a written description of ACBM and where bulk samples were taken, bulk sample analysis information, material condition assessments and material quantities,
- Response action schedules and recommendations, abatement cost estimates and management budgeting requirements, response action documentation,
- Management plan availability and notification, and a plan for reinspections and periodic surveillance.

A computer inventory of asbestos materials is maintained. Each room in a facility has a corresponding page in the asbestos management plan identifying all known or assumed ACBM. The room numbers are as identified on the management plan drawings and not always as labeled on the door. The inventory is organized to identify ACBM in walls, floors, ceilings and mechanical systems. The inventory also identifies the asbestos material quantity, material condition assessment and removal priority. If there is a change in any of this information, it is updated in the management plan database during re-inspection or periodic surveillance.

Part 2: Management Plan Availability and AHERA Notification

Each building specific asbestos management plan will be maintained in the Engineers office area for the facility and in the EH&S office.

Plan Availability

All plans are available from the EHS office in electronic form and are available during normal school hours. Access will be made available upon request within 5 days of request, either by printed copy or viewing at our district office which is identified on this management plan. Any request to review the plan including, but not limited to, the EPA, Minnesota State agencies, teachers, school personnel and parents, will be honored.

AHERA Notification

District personnel, short term workers, parents/guardians and the general public are notified of the existence and location of building specific asbestos management plans by means of a public asbestos notice printed annually in school newsletters, District-wide publications and community newspapers.

The printed notice identifies that ACM exist in District facilities, that materials are surveyed every six months and maintained in a good condition. The Engineering staff is also made aware of this information during the initial 2 hour Asbestos Awareness training.

When asbestos response actions are performed at a site, specific information on the project is provided to school administration, staff and parents/guardians. Information available includes a question and answer guideline and an informational booklet on the Asbestos Abatement Program. Examples of the "Update" newsletter, the Q & A flyer and the Asbestos Abatement Program booklet are maintained in **Appendix C** of this management plan.

Part 3: Six-Month Periodic Surveillance

Every six months after the management plan has gone into effect, identified EHS staff members will perform a periodic asbestos surveillance in each building which MPS leases or owns that contains ACM or is assumed to contain ACM. MPS uses licensed asbestos inspectors to perform periodic surveillances.

The inspector performing the periodic surveillance will:

- Visually inspect all materials that are identified in the management plan as ACM or assumed ACM,
- Record the date of the surveillance, the inspector's name and any changes in the condition of the materials, and submit to the designated person a copy of the surveillance report to be added to the building specific asbestos management plan.

Part 4: Three-Year Re-inspections

Every three years after the management plan went into effect, identified EHS staff members performs a re-inspection in each building that MPS leases, owns

or otherwise uses as a school building that contains friable or non-friable ACBM or is assumed to contain ACBM. Licensed asbestos inspectors perform all re-inspections. In the case of Management plan changes, some EHS staff hold multiple MDH certifications and can perform both inspection and Management plan changes.

Because of the large number of facilities requiring reinspection every three years, MPS obtained authorization from the EPA to stagger the dates for reinspection. The total number of MPS buildings requiring asbestos management plans is divided into six groups. Every six months, 1/6th of the buildings are re-inspected.

The inspector performing the reinspection will:

1. Visually reinspect and reassess the condition of all friable known or assumed ACBM.
2. Visually inspect material that was previously considered non-friable ACBM and touch the material to determine whether it has become friable since the last inspection or reinspection.
3. Identify any homogeneous areas with material that has become friable since the last inspection or reinspection.
4. For each homogeneous area of newly friable material that is already assumed to be ACBM, bulk samples may be collected and submitted for analysis.
5. Assess the condition of the newly friable material in areas where samples are collected and newly friable materials in areas that are assumed to be ACBM.
6. Reassess the condition of friable known or assumed ACBM previously identified.
7. Record the following and submit it to the designated person*, for inclusion in the management plan within 30 days of the reinspection:
 - The date of the reinspection, the name, signature and certification information of the person making the reinspection.
 - Any changes in the condition of known or assumed ACBM.
 - The location and description of any samples taken during the reinspection.
 - Any assessments or re-assessments made of friable material.
8. Thermal systems insulation that has retained its integrity and which has an undamaged protective jacket or wrap that prevents fiber release shall be treated as non-friable.

In the event that no asbestos was found in a specific school building during the initial inspection, reinspection of that building is not required. As stated above, to insure that the condition of ACBM is scrutinized adequately, a certified inspector must perform all re-inspections and re-assessments. Each reinspection provides opportunity to identify and respond to changes in the ACBM. A copy of the Field Reinspection Outline is maintained in **Appendix D** of this management plan.

Part 5: Operations & Maintenance

Operations and Maintenance (O&M) is a program of cleaning activities, work practices and training used to ensure the cleanup of asbestos fibers previously released and to prevent further release by minimizing and controlling friable ACBM disturbance. The O&M program is required in all MPS buildings where friable ACBM is present or assumed to be present or non-friable materials are about to become friable as a result of activities in the building.

- **Cleaning Procedures:** Prior to O&M cleaning activities, permission must be obtained from the Designated Asbestos Program Manager. When feasible, activities should be scheduled after normal school hours. Access to the work area should be controlled and signs posted to prevent unauthorized persons from entering the work area (e.g. "MAINTENANCE WORK IN PROGRESS, DO NOT ENTER"). If asbestos levels are anticipated to reach the action level, signage must read: **"DANGER – ASBESTOS. MAY CAUSE CANCER CAUSES DAMAGE TO LUNGS"**.

In addition, where the use of respirators and protective clothing is required in the regulated area under this section, the warning signs shall include the following: **"AUTHORIZED PERSONNEL ONLY. WEAR RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING IN THIS AREA."** Air handling equipment to the area must be shut off and isolated.

A combination of wet mopping/wiping and vacuuming should be used to clean all required surfaces within a building. Irregular surfaces such as curtains, carpeting, books, and furniture should be cleaned using High Efficiency Particulate Air (HEPA) equipped vacuum cleaners. Other surfaces such as walls, non-carpeted floors, light fixtures, equipment housings, the exterior of air handling ducts, and file cabinets should be cleaned using mops and rags that are wetted with amended water. Amended water is a mixture of water and a non-sudsing surfactant.

- **Initial Cleaning:** Initial cleaning is required by AHERA in school buildings where friable or suspected friable ACBM is present and where damaged thermal systems insulation is present. The purpose of initial cleaning is to remove all previously released asbestos debris from the facility. This includes both visible debris and non-visible asbestos fibers that may have spread throughout the facility. Initial cleaning includes, at a minimum, steam cleaning or HEPA-vacuuuming of all carpeted areas, and wet cleaning or HEPA-vacuuuming of bare floors and horizontal surfaces. This includes details such as vacuuming or wet wiping the tops of books and shelves in libraries. Debris, filters, mop heads and cloths must be disposed of in sealed, leak-tight containers.

The initial cleaning is performed after completion of the asbestos inspection, unless the building has been properly cleaned within six months prior to inspection. Areas will also be cleaned prior to any response action other than

O&M repair. The location of initial cleaning is performed as required and as identified by the asbestos management planner.

- **Additional Cleaning:** Periodic or routine cleaning is less rigorous than initial cleaning and is implemented, as determined during six-month reinspection. Locations with friable surfacing material are specifically targeted for periodic cleaning. Surfaces identified must be wet wiped and/or HEPA vacuumed. Respiratory protection is not required for custodial crew performing periodic cleaning. Periodic cleaning is performed as a precaution in concerned areas where ACM is in a good condition. Periodic cleaning activities are not to be used to clean up damaged surfacing or damaged thermal systems insulation.
- **Warning Labels:** In routine maintenance areas where friable and non-friable ACM and suspected ACM are located, warning labels must be prominently displayed. Routine maintenance areas include, but are not limited to, boiler rooms, fan rooms, crawlspaces, tunnels, attics and ceiling spaces. The warning label reads as follows: **CAUTION. ASBESTOS HAZARD. DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT**. In addition to the warning labels, an inventory of asbestos regulated areas (**Appendix E**) has been prepared to educate custodial and maintenance personnel on the location of asbestos hazards. The inventory identifies attics, tunnels and crawlspaces throughout the District that have friable asbestos material located in them.

Part 6: Worker Protection

As a result of the known adverse health effects of asbestos exposure and the contracting of asbestos related diseases, MPS has established procedures to protect employees who frequently enter and work in areas that contain asbestos. MPS employees performing O&M and repair activities will comply with procedures identified by the Occupational Safety & Health Administration (OSHA) Asbestos Standard 29 CFR 1926.1101 (**Appendix A**). Additionally we follow [EPA- MDH](#) rules and all other applicable federal, state and local regulatory rules not cited at the time this management plan was written.

Air monitoring will be performed periodically to assure that workers performing O&M activities will not reach airborne asbestos fiber levels exceeding the permissible exposure level of 0.1 fibers per cubic centimeter measured on an eight-hour time weighted average. MPS provides respirators and protective clothing to employees working in areas with friable asbestos or performing O&M repair activities. Medical evaluations and respirator fit testing are provided before an employee is issued a respirator. Information on MPS respirator protection and medical evaluation policies is located in the Respiratory Protection Safety Management Plan. This management plan is maintained in the EH&S Division office.

Part 7: Emergency Response

As long as asbestos-containing materials remain in a building, fiber release episodes can occur and specific emergency procedures must be implemented. AHERA defines a fiber release episode as “any uncontrolled or unintentional disturbance of ACM resulting in visible emissions.” Examples of fiber release episodes include: a roof leak that results in a delamination of surfacing ACM, thermal systems insulation falling off a pipe or building occupants cutting or poking into asbestos pipe insulation. All asbestos fiber releases are dangerous and pose a health risk to building occupants and must be addressed immediately by trained personnel. **The building engineer must report all fiber release episodes to EH&S at (612) 668-0310.**

Asbestos fiber release episodes are divided into two groups requiring specialized cleaning and precautions called emergency response actions. Procedures for both are as follows. **ONLY designated EHS staff can clean minor releases.**

- **Minor Fiber Release Episode:** A minor fiber release is defined as “the falling or dislodging of 3 square or 3 linear feet or less of friable ACM.” In the event of a minor fiber release, the building engineer must implement the following procedures:
 1. Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas of the building.
 2. Restrict access to the area (if feasible) until the asbestos debris is cleaned up. If the area cannot be locked off, the asbestos debris must be covered with plastic to prevent further disturbance until cleanup can be accomplished.
 3. Notify EH&S at **(612) 668-0310**. EH&S will provide assistance and direction as necessary.
 4. Utilize appropriate personal protective equipment (e.g. respirator, protective clothing).
 5. All debris and contaminated cleaning materials such as mop heads and rags should be sealed in airtight bags and secured in a safe location. Dust pans or shovels must be rinsed off thoroughly.
 6. The damaged area must be repaired with an appropriate non asbestos-containing material.
 7. The source of the release should be evaluated to determine if further response actions are necessary.

- **Major Fiber Release Episode:** A major fiber release is defined as “the falling or dislodging of more than 3 square or 3 linear feet of friable ACBM.” In the event of a major fiber release, the building engineer must implement the following procedures.
 1. Restrict entry into the area and post signs to prevent entry into the area by persons other than that necessary to perform the response action.
 2. Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas in the building.
 3. Immediately notify EH&S at **(612) 668-0310**. EH&S will provide assistance and direction as necessary. An accredited asbestos project designer must design the response action for any major fiber release episode.

Emergency Numbers:

Lee Setter	Cell: 612-719-7742
Bill Wood	Cell: 612-454-8951
Jason Karpe	Cell: 612-806-1394

In the event of a major fiber release episode, EH&S immediately obtains the services of licensed industrial hygiene consulting firms and licensed asbestos abatement contractors to perform emergency clean-up and response action procedures. The most appropriate response action is determined based upon the situation. All response actions are performed as outlined in the MPS Asbestos Abatement Project Specification (**Appendix F**) and the MPS Specification for Industrial Hygiene Consulting Services (**Appendix G**).

Part 8: Response Actions and the Asbestos Abatement Program

According to AHERA, there are five response actions identified to manage asbestos containing materials. The five response actions include: removal, encapsulation, enclosure, repair, and operations & maintenance (O&M). The best response action to be implemented is determined based on the hazard assessment and scheduled renovation and demolition activities. At a minimum, all assumed or confirmed ACM is managed under an O&M program. The procedures for the O&M program are identified in **Part 5** of this management plan. The O&M program identifies the procedures to manage ACM in place until it is scheduled for removal prior to renovation or demolition. Licensed asbestos abatement contractors perform required response actions that exceed O&M. Response actions exceeding O&M are managed under the MPS Asbestos Abatement Program.

Response Actions and the Asbestos Abatement Program

The asbestos abatement program is managed by Lee Setter, and includes asbestos removal, encapsulation, enclosure, repair and maintenance projects. Most of the response actions performed under the abatement program are removal projects. The primary reason for the removal is to facilitate renovation or demolition activities.

MPS contracts with licensed asbestos abatement contractors and licensed industrial hygiene consulting firms to perform response actions including emergency response to major fiber release episodes. The listing of contractors and consultants approved to perform asbestos response actions for MPS is located in **Appendix H** of this management plan. MPS performs all response actions in accordance with state and federal regulations and incorporates more stringent procedures by means of the MPS Asbestos Abatement Project Specification (**Appendix F**) and the MPS Specification for Industrial Hygiene Consulting Services (**Appendix G**).

Whenever feasible projects are scheduled after school hours and over school breaks. If projects are performed during school periods, activities are communicated with school staff and parents. Information, including an overview booklet of the asbestos abatement program, can be distributed. The overview booklet is located in **Appendix C** of this management plan. If you have questions concerning the asbestos abatement program, Lee Setter can be contacted at **612-668-0308**.

Part 9: Employee Training

Training of trades people, custodians and outside contractors working in MPS buildings is an important component of an effective O&M program. Plant Maintenance and Operations employees who work in a building that has ACBM will receive awareness training of at least two hours. Per [OSHA 1910.1001\(j\)\(7\)](#) annual refresher will be provided online and notification will be sent to each employee. Plant Maintenance and Operations employees shall be trained within 60 days after commencement of employment. Training will include but is not limited to:

- Information regarding asbestos and its various uses and forms.
- Information on the health effects associated with exposure.
- Information on the location of ACBM identified in each school building that they work in.
- Recognition of damage, deterioration and delamination of ACBM.
- The name and telephone number of the person designated to carry out the District's regulatory responsibilities and the location and availability of the asbestos management plan.

MPS only requires trades people with 14hr O and M training (plus the additional 2 hour awareness) to perform activities that will result in the disturbance of ACBM. All other employees have been instructed during the 2 hour Awareness training to stop work and contact EHS to verify materials before impacting them or if deterioration is occurring on a PACBM.

When the additional 14 hours of training is provided, it will include but is not limited to:

- Descriptions of the proper methods of handling ACBM.
- Regulatory overview of AHERA and OSHA requirements.
- Hands on training in the use of respiratory protection, other personal protective equipment and good work practices.
- O&M procedures including cleaning methods, small scale, short duration activities, and fiber release episodes, minor and major.

Outside contractors working in District buildings that contain ACBM are required to sign the Contractor Information Record (**Appendix I**). The Contractor Information Record must be reviewed and signed by each individual working as a contractor. This document informs the individual about the location of ACBM and that they must not disturb it. The executed Contractor Information Records are maintained by the construction project managers and EH&S.

Part 10: Recordkeeping

Recordkeeping responsibilities for asbestos compliance are performed by EH&S. Recordkeeping documents are maintained indefinitely in this management plan and in each building specific management plan. The type and location of records retained are itemized as follows:

- Building Specific Asbestos Management Plans are maintained in the main office area for the facility and in the EH&S office. The building specific management plans contain all updated information as identified in **Section 1** of this management plan.
- Record of the annual asbestos notice is maintained in the EH&S office and the MPS Communications office.
- Record of each six-month periodic surveillance inspection and its findings are maintained in the building specific management plans.
- Record of each three-year reinspection and its findings are maintained in the building specific management plan.
- Record of operation and maintenance activities including initial cleaning and additional cleaning are maintained in the building specific management plan.

- Worker protection records including medical surveillance, respiratory protection and fit testing are maintained as part of the MPS Respiratory Protection Safety Management Plan. Also, respirator protection program participants are to maintain their own records.
- Records of emergency response to fiber release episodes are maintained in the building specific management plan. Records are to include the date and location of the episode, method of repair, preventative measure or response action taken, identification of the persons performing the work and disposal information for ACBM removed.
- Records for all response actions and preventative measures are maintained in the building specific management plan. Records are to include, but are not limited to, a project design, location and description of work, procedures, start and completion dates, contractor accreditation, disposal records and air monitoring data including laboratory accreditation. Specific information on response action documentation is located in the MPS Asbestos Abatement Project Specification (**Appendix F**) and the MPS Specification for Industrial Hygiene Consulting Services (**Appendix H**). As a result of the magnitude of documents produced under the Asbestos Abatement Program, not all documents are maintained in the building specific management plan at the school site. Information is referenced in the school's copy and is available upon request.
- Records for two-hour and fourteen-hour asbestos awareness training are maintained in the EH&S office. Records are to include the name of the person receiving training, the instructor, time and date of the training and a description of the training provided.
- Contractor Information Records are maintained by the construction project managers and in the EH&S office.