

# SCHOOL DISTRICT OF PHILADELPHIA



## Asbestos Hazard Emergency Response Act “AHERA”

### THREE-YEAR RE-INSPECTION 2015-2016 and ASBESTOS MANAGEMENT PLAN for the

**James R. Ludlow Community Annex**

**ULCS# 5341  
Building # B534101-1  
1402 North 6<sup>th</sup> Street  
Philadelphia, Pennsylvania  
19122**

January 2016

*Conducted By:*

Accredited Environmental Technologies, Incorporated  
Batta Environmental Associates, Incorporated  
Criterion Laboratories, Incorporated  
Environmental Testing Consultants, LLC  
G & C Environmental Services, Incorporated  
KEM Partners, Incorporated  
Synertech, Inc.  
TTI Environmental, Inc.  
USA Environmental Management, Inc.  
The Vertex Companies, Inc.

*Management Plan Prepared By:*

Criterion Labs, Inc and Synertech Inc.

*This report must remain in the Main Office as mandated by the US EPA AHERA Regulations.*

# **AHERA THREE-YEAR REINSPECTION VOLUME IX**

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SCHOOL DISTRICT OF PHILADELPHIA  
EDUCATIONAL CENTER  
440 NORTH BROAD STREET  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT AND SERVICES

PHONE (215)-400-4750

January 2016

TO: All Principals  
All Building Administrators

FROM: Fran Burns  
Chief Operating Officer

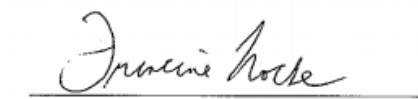
Francine Locke, M.S., Director  
Office of Environmental Management and Services

SUBJECT: AHERA Three (3) Year Re-inspection IX report

In order to comply with the provisions of the Asbestos Hazard Emergency Response Act (AHERA) the attached report is submitted to you. The law requires that this report be kept in the Main/Principal's office. It cannot be removed from these locations. *If the school (program) is relocated to a different building, these environmental documents are to be safely retained for the next school/building occupants.* All asbestos reports must be available to the public and Federal EPA upon request.



Fran Burns  
Chief Operation Officer



Francine Locke, M.S., Director  
Office of Environmental Management  
and Services

## **Executive Summary**

This Asbestos Hazard Emergency Response Act (AHERA) Three-Year Re-inspection “Volume # IX” Management Plan at this location, has been completed and the report of re-inspection submitted to the School District of Philadelphia. The re-inspections in all School District of Philadelphia buildings of 2015-2016 were conducted and completed between October 5<sup>th</sup>, 2015 through March 30<sup>th</sup>, 2016 as a joint project by Accredited Environmental Technologies, Inc., Batta Environmental Associates, Inc., Criterion Laboratories, Inc., Environmental Testing Consultants, LLC, G & C Environmental Services, Inc., KEM Partners, Inc., Synertech, Inc., TTI Environmental, Inc., USA Environmental Management, Inc. and The Vertex Companies, Inc.

In general, the School District of Philadelphia Office of Environmental Management and Services conducts Environmental Impact Evaluations and provides Asbestos Inspection Reports prior to any renovation, demolition and/or maintenance activities. The AHERA report must be reviewed prior to any renovation, demolition and/or maintenance activities in order to avoid the unknowing disturbance to Asbestos Containing Building Materials identified within this location. In addition, prior to work activities above all drop ceilings this report should be reviewed to avoid potential disturbances to Asbestos Containing Materials. Refer to Section IV of the Cross Reference Table, for additional Asbestos Management Program information. Contact the Office of Environmental Management and Services to have an Environmental Impact Evaluation conducted prior to any renovation, demolition and/or maintenance activities within this facility.

The information contained in this report was obtained from the original Asbestos Management Plan for the school, from update reports on changes and activities since the completion of the 1<sup>st</sup> Management Plan for each location and from all prior inspections performed and documented in Volume # I through Volume VIII (dated respectively 1992, 1995, 1998, 2001, 2004, 2007, 2010 or 2013) (if applicable) - and by this Three-Year Re-inspection of this school. The re-inspection report/Management Plan of 2015-2016 were reviewed and prepared collectively by Management Planner Megan Vala, Mary Anne Lerro of Criterion Laboratories, Inc. and/or Monique Causley, of Synertech Inc.

The 2015-2016 inspection process included the addition of a comprehensive Room by Room Inventory of all Thermal (T), Surfacing (S) and Miscellaneous (M) Materials specific to each room of this facility. Inspections of each room's thermal, ceilings, walls, floors and miscellaneous items regardless of Asbestos Content are categorized on the Room by Room Location Log Report for this location. Rooms or areas of the facility that were not accessible at the time of the inspection are marked with an "X". The Room by Room Location Log Report is found in Section II C of this Management Plan.

All Presumed or Suspect Asbestos Containing Building Materials (ACBMs), listed in the following summary charts are categorized as Confirmed, Assumed, Non-Asbestos, and/or Non-Suspect (ACBMs) were identified in the original Management Plan, or in the Volume I through Volume VIII AHERA Three-Year Re-inspection reports, and were re-inspected as part of this project.

As mandated by the U S EPA AHERA regulations, periodic Six-Month inspections and Three-Year Re-inspections of this location will be performed and the Inspection Data in this report will be updated accordingly.

Please feel free to contact the School District of Philadelphia's Office of Environmental Management and Services (OEMS) regarding any comments, questions, or concerns regarding this report or any Environmental related topic. OEMS staff can be reached at (215) 400 4750, via fax at (215) 400 4751 or via e-mail at [flocke@philasd.org](mailto:flocke@philasd.org) and/or [gfunod@philasd.org](mailto:gfunod@philasd.org).

Additional information can be found on our website. Here is the link to the OEMS website.  
<http://webgui.phila.k12.pa.us/offices/e/environmental>

## **I. Summary list of Confirmed Asbestos Containing Building Materials within this facility**

These charts are to be used for a quick reference\* in order to avoid the unknowing disturbance of Asbestos Containing Materials during any and all Operations, Maintenance, Renovation, and/or Demolition activities at this location. *These materials have been sampled and Laboratory Analysis has CONFIRMED the presence of Asbestos. Contact OEMS prior to the disturbance of any of the following materials.*

### **Confirmed Asbestos Containing Building Materials for this location**

*As Confirmed Materials are located, data will be listed here.*

*\* Always refer to the Room by Room Logs for each specific material classification as the material classification findings may be different in various rooms throughout this facility.*

*\*\* Some Materials may have multiple classifications (Confirmed, Assumed, NAD and Non Suspect) within this facility.*

## II. Summary list of Assumed Asbestos Containing Building Materials within this facility

These charts are to be used for a quick reference\* in order to avoid the unknowing disturbance of Asbestos Containing Materials during any and all Operations, Maintenance, Renovation, and/or Demolition activities at this location. These materials have not been sampled and should not be disturbed until verification of Asbestos Content. Contact OEMS for assessment and sampling prior to the disturbance of these materials.

### Assumed Asbestos Containing Building Materials for this location

Blackboard Glue Dots	Pipe Fitting Insulation	Sink Undercoat Mastic
Floor Tile VAT 12" x 12"	Sheetrock Wall	

*\* Always refer to the Room by Room Logs for each specific material classification as the material classification findings may be different in various rooms throughout this facility.*

*\*\* Some Materials may have multiple classifications (Confirmed, Assumed, NAD and Non Suspect) within this facility.*

### III. Summary list of Non-Asbestos Containing Building Materials within this facility

These charts are to be used for a quick reference\* in order to avoid the unknowing disturbance of Asbestos Containing Materials during any and all Operations, Maintenance, Renovation, and/or Demolition activities at this location. *These materials have been sampled and Laboratory Analysis has indicated NO Asbestos present or NO ASBESTOS DETECTED (NAD).*

#### Non- Asbestos Containing Building Materials for this location

Plaster Ceiling		
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\* *Always refer to the Room by Room Logs for each specific material classification as the material classification findings may be different in various rooms throughout this facility.*

\*\* *Some Materials may have multiple classifications (Confirmed, Assumed, NAD and Non Suspect) within this facility.*



#### IV. Summary list of Non-Suspect Asbestos Containing Building Materials within this facility

These charts are to be used for a quick reference\* in order to avoid the unknowing disturbance of Asbestos Containing Materials during any and all Operations, Maintenance, Renovation, and/or Demolition activities at this location. These materials are not typically known to contain Asbestos.

##### Non-Suspect Asbestos Containing Building Materials for this location

Carpet	Cement Floor	Fiberglass Pipe Fitting Insulation
Ceiling Tile 2' x 2'	Ceramic Tile Floors	Fiberglass Pipe Insulation
Ceiling Tile 2' x 4'	Concrete Block Wall	Metal Roof Decking

*\* Always refer to the Room by Room Logs for each specific material classification as the material classification findings may be different in various rooms throughout this facility.*

*\*\* Some Materials may have multiple classifications (Confirmed, Assumed, NAD and Non Suspect) within this facility.*

## **V. Summary list of Auditorium DATA for this location**

These charts are to be used for a quick reference of the Auditorium DATA within this facility. Sampling of the Auditorium Ceilings throughout the District is more difficult because of the various ceiling heights. As sampling occurs this information is updated on a case by case basis for each specific location and facility.

**This is a list of known sampling information for this locations Auditorium**

*No Auditorium exists in this location.*

*\* Always refer to the Room by Room Logs for each specific material classification as the material classification findings may be different in various rooms throughout this facility.*

*\*\* Some Materials may have multiple classifications (Confirmed, Assumed, NAD and Non Suspect) within this facility.*

## VI. Summary list of Attic and/or Crawlspace DATA for this location

These charts are to be used for a quick reference regarding the Attics and/or Crawlspaces inspection DATA within this facility. Contact OEMS prior to entering any attic or crawlspace within this facility and refer to the below chart and legend for Category Rank determination. The Data relative to these spaces is updated as conditions change regarding Abatement or Renovation activity on a case by case basis for each specific location and facility. In general, Crawlspaces are below the basement or 1<sup>st</sup> floor and Attics are above the floor space.

### *Category Rank Legend*

"A" - No Asbestos Containing Materials - Sample Results indicate NO ACM on pipes, fittings, elbows, or equipment located within this functional space, and NO VISIBLE DEBRIS or DAMAGE observed at time of this inspection.
"B" - Asbestos Containing Materials Exist - Sample Results indicate ACM on pipes, fittings, elbows, or equipment located within this functional space, HOWEVER, NO VISIBLE DEBRIS or DAMAGE observed at time of this inspection.
"C" - Asbestos Containing Materials Exist - Sample Results indicate ACM on pipes, fittings, elbows, or equipment located within this functional space, and LOCALIZED VISIBLE DEBRIS or DAMAGE observed at time of this inspection.
"D" - Asbestos Containing Materials Exist - Sample Results indicate ACM on pipes, fittings, elbows, or equipment located within this functional space and DISTRIBUTED VISIBLE DEBRIS or SIGNIFICANT DAMAGE observed at time of this inspection.
"E" - No Bulk Sample Results Available SUSPECT ACM OBSERVED. Contact OEMS immediately for additional instructions.

Attic/Crawlspace	Access Area	Floor Surface	Category Rank	Comments
Attic	N/A	N/A	N/A	None
Crawl Space	N/A	N/A	N/A	None

## VII. Summary list of Pipe Chase/Pipe Shaft DATA for this location

These charts are to be used for a quick reference regarding the information known about the Pipe Chases and/or Pipe Shafts inspection DATA within this facility. Contact OEMS prior to performing renovation activities any Pipe Chase and/or Pipe Shaft within this facility and refer to the below chart and legend for Asbestos Content of various materials identified within each space. The Data relative to these spaces is updated as conditions change regarding Inspection, Abatement and/or Renovation activity on a case by case basis for each specific location and facility. In general, Pipe Chases are horizontal spaces and Pipe Shafts are vertical spaces.

<i>Element</i>	<i>Floor</i>	<i>On Site Room Name</i>	<i>Material</i>	<i>Confirmed Assumed NAD Non Suspect</i>	<i>Amount of Material</i>	<i>Amount of Damage</i>	<i>Color</i>	<i>Comments</i>
N/A	N/A	Pipe Chase	N/A	N/A	N/A	N/A	N/A	None
N/A	N/A	Pipe Shaft	N/A	N/A	N/A	N/A	N/A	None

## **Section I      Report of Re-inspection**

A. Introduction

B. Three-Year Re-inspection IX Overview

C. Post-Management Plan Activities and Changes

## **Section I - A**

### **Report of Re-inspection**

#### **Introduction**

The Three-Year Re-inspection IX was performed to fulfill the requirements of 40 CFR Part 763 - the Asbestos Hazard Emergency Response Act (AHERA). As required by AHERA, each Local Education Agency (LEA) must re-inspect all known confirmed or assumed Asbestos Containing Building Material (ACBM) located in the LEA's facilities. This re-inspection is intended to update the original Asbestos Management Plan for the LEA's facilities.

Multiple Building Inspectors of several firms performed the 2015/2016 re-inspection. The re-inspection report/Management Plan of 2015-2016 were reviewed and prepared collectively by Management Planner Megan Vala, Mary Anne Lerro of Criterion Laboratories, Inc. and Monique Causley, of Synertech Inc.

All of the certificates can be found in Section III.

During the re-inspection of each School District of Philadelphia facility, all of the Management Plans for that facility were reviewed. Information from the conclusions section of that report is included in this report. Additionally, information on activities such as abatements, cleanings, sampling and inspections, which have taken place since the completion of the original Management Plan, were reviewed during the re-inspection. Information on those activities is included in this report.

As mandated by the U S EPA AHERA regulations, all future periodic Six-Month inspections and Three-Year Re-inspections of this location will be performed and the Inspection Data in this report will be updated accordingly.

## Section I - B

### **Three-Year Re-inspection IX Overview**

Each homogeneous area of Asbestos Containing Building Material (ACBM) listed in the original Management Plan or in the 1992, 1995, 1998, 2001, etc., Three-Year Re-inspection reports were inspected for the AHERA Three-Year Re-inspection Volume IX, and the information for that material verified. Any changes to a homogeneous area listed in the updates to the Management Plans were verified. Any area of suspected ACBM found in the course of the re-inspection, and not listed in the Management Plan or updates, were either assumed to contain asbestos or sampled and analyzed to determine their asbestos content. Any such new areas either assumed to contain asbestos or determined through analysis to contain asbestos were included in the report of the Three-Year Re-inspection. The results of the AHERA Three-Year Re-inspection IX are tabulated in the Room by Room log reports located in *Section II-C* of this report.

As previously noted, all future periodic Six-Month inspections and Three-Year Re-inspections of this location will be performed and the Inspection Data in this report will be updated accordingly.

## Section I – C.1

### **Post Management Plan Activities/Changes**

Information on activities affecting Asbestos Containing Building Materials (ACBMs) at this location is contained in updates to the Management Plan. These updates are kept on file by the School District of Philadelphia and were reviewed for this project. Updates to the Management Plan include the following: *Sampling and Analysis, New Tile Installation, Abatement Activity and Periodic Six-Month Surveillance Data.*

#### **Sampling and Analysis**

*As Sampling occurs, data will be listed here.*



## **Section I – C.2**

Information on the installation of new floor tiles/renovation activities affecting Asbestos Containing Building Materials (ACBMs) at this location is contained in updates to the Management Plan. These updates are kept on file by the School District of Philadelphia and were reviewed for this project. Updates to the Management Plan include the following:

### **New Floor Tile Sampling**

*In the event that new tile is installed, the material must be tested prior to installation.*

## Section I – C.3

Information on the Asbestos Abatement and renovation activities affecting Asbestos Containing Building Materials (ACBMs) at this location is contained in updates to the Management Plan. These updates are kept on file by the School District of Philadelphia and were reviewed for this project. Updates to the Management Plan include the following:

### **Abatement Activity**

*As Abatement occurs, data will be listed here.*

## Section I – C.4

Information on the AHERA inspection that noted damage to various Building Materials at this location is contained in updates to the Management Plan. These updates are kept on file by the School District of Philadelphia and were reviewed for this project. Work orders are created for Corrective Action responses and tracked for completion. Updates to the Management Plan include the following:

### **Periodic (Six-Month) Surveillance (Damaged Materials)**

<i>Date</i>	<i>Element</i>	<i>Floor</i>	<i>On Site Room Name</i>	<i>Material</i>	<i>Amount of Material</i>	<i>Amount of Damage</i>
1/14/2016	1	1	Electrical Room 103	Pipe Fitting Insulation	4 EA	1 EA

## **Section II      Re-inspection Data**

- A. Introduction
- B. Re-inspection Key Definitions
- C. Room by Room Asbestos Location Log

## **Section II - A**

### **Re-inspection Data**

#### Introduction

The following information documents the Three-Year Re-inspection IX of the subject school/facility. The Homogeneous Area Reports were produced using the building inspector's field data on the facility. The key to the Homogeneous Area Report is outlined in the following pages of this report.

**Section II - B**  
**(page 1 of 4)**

**SCHOOL DISTRICT OF PHILADELPHIA**  
**AHERA THREE YEAR RE-INSPECTION IX**

<b>ITEM</b>	<b>DEFINITION</b>
<b>ULCS#</b>	Individual identification number assigned to each school within the School District of Philadelphia.
<b>HOMOGENEOUS AREA ID#</b>	Identification number assigned to each homogeneous area in a school/facility. Each section of the homogeneous area ID is significant.  1010/01/01/01 <b>A B C D</b>  <b>A.</b> Is the ULCS# for the school. <b>B.</b> Designates the specific building/building area within the school. <b>C.</b> Designates the floor or level within the building/building area. <b>D.</b> Designates the homogeneous material within that floor or level. Note: Item D may be a number or a letter.
<b>SYSTEM AFFECTED</b>	Corresponds to the AHERA system for classifying materials.  <b>T</b> : Thermal System <b>S</b> : Surfacing System <b>M</b> : Miscellaneous
<b>ITEM AFFECTED</b>	Is a description of the homogeneous material.
<b>ORIGINAL INSPECTION DATA</b>	This section contains the information found in the original Management Plan (1988-1989).
<b>AMOUNT OF MATERIAL/ UNIT</b>	Quantity of material, and measuring unit. Units include: Square Feet (SF) Each (EA) Linear Feet (LF) Cubic Feet (CF).

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE YEAR RE-INSPECTION IX**

**RE-INSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>
<b>CND Condition</b>	Corresponds to AHERA condition rating for materials.  <b>0</b> : No Damage <b>1</b> : Damage <b>2</b> : Significant Damage
<b>DP Damage Potential</b>	Corresponds to the AHERA material assessment system.  <b>1</b> : Potential for Damage <b>2</b> : Potential for Significant Damage
<b>ASMD Assumed Asbestos</b>	This means that a material was not sampled for asbestos content during the original Management Plan inspection.
<b>RA Response Action</b>	This corresponds to the AHERA system of response action rating for materials.  <b>1</b> : Establish O&M Program <b>2</b> : Repair and Establish O&M Program <b>3</b> : Enclose <b>4</b> : Encapsulate <b>5</b> : Remove <b>6</b> : Partial Removal and Establish O&M Program
<b>CHANGES</b>	This section describes changes to the homogeneous material in the twenty-four years since the original AHERA inspection. The abbreviations are defined below.  <b>RMVD</b> : Removed <b>ENCL</b> : Enclosed <b>ENCP</b> : Encapsulated <b>DMGD</b> : Damaged <b>SMPLD</b> : Sampled <b>MTRL</b> : Material <b>RPRD</b> : Repaired <b>N/L</b> : None Located <b>RPLCD</b> : Replaced

**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE-YEAR RE-INSPECTION IX**

**RE-INSPECTION FORM KEY**

<b>ITEM</b>	<b>DEFINITION</b>												
<b>THREE YEAR RE-INSPECTION</b>	<p>This section contains the information obtained from the Three-Year Re-inspection IX. With three exceptions, the information categories are identical in format and meaning to those found in the original inspection data section. The three exceptions are defined below.</p>												
<b>DMGD AMT Amount Damaged</b>	<p>This section gives the quantity of damaged material in a homogeneous area. The quantity is shown in the same format as the amount of material/unit section.</p>												
<b>NF Newly Friable</b>	<p>This section identifies materials in the original Management Plan which have since become friable.</p>												
<b>RA Response Action</b>	<p>This rating is based on the AHERA regulations, and is comparable to the RA rating found in the "Original Inspection Data" section. The following table details the response actions.</p> <table><tr><td>1.</td><td>Establish O&amp;M Program</td></tr><tr><td>2.</td><td>Repair and Establish O&amp;M Program</td></tr><tr><td>3.</td><td>Enclose</td></tr><tr><td>4.</td><td>Encapsulate</td></tr><tr><td>5.</td><td>Remove</td></tr><tr><td>6.</td><td>Partial Removal and Establish O&amp;M Program</td></tr></table> <p>a.   <b>High Priority Response</b> The homogeneous material has been scheduled for abatement or other response action.</p> <p>b.   <b>Medium Priority Response</b> The homogeneous material will be scheduled for abatement or other response action as soon as the high priority responses have been addressed.</p> <p>c.   <b>Low Priority Response</b> The homogeneous material will be scheduled for abatement or other response action as soon as the medium priority responses have been addressed.</p> <p>d.   <b>On-Going Response/Operations and Maintenance</b> The homogeneous material does not require abatement or other response action at present, and should be included in the facility's on-going operations and maintenance program.</p>	1.	Establish O&M Program	2.	Repair and Establish O&M Program	3.	Enclose	4.	Encapsulate	5.	Remove	6.	Partial Removal and Establish O&M Program
1.	Establish O&M Program												
2.	Repair and Establish O&M Program												
3.	Enclose												
4.	Encapsulate												
5.	Remove												
6.	Partial Removal and Establish O&M Program												



**SCHOOL DISTRICT OF PHILADELPHIA  
AHERA THREE-YEAR RE-INSPECTION IX**

**RE-INSPECTION FORM KEY**

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The information presented in the changes section has been compiled from a variety of sources, including the Re-inspection and the following:

- \* Quality Control/Quality Assurance Reports of asbestos abatement projects, prepared by consultants to the School District.
- \* Permit and Notification Forms for asbestos abatement projects.
- \* Periodic Surveillance Forms
- \* Operations and Maintenance activities performed by School District personnel.
- \* Verbal information from School District personnel.
- \* Reports of sampling and analysis of suspected materials by both School District personnel and outside consultants.

**ROOM BY  
ROOM  
LOCATION LOG  
REPORT**

This section gives information, including damage amount and location, for a specific homogeneous material on a room-by-room basis and follows the Re-inspection form.

*NOTE:* The disparate nature of the above sources of information prohibits the verification of much information within the scope of the AHERA Three-Year Re-inspection . Discrepancies and omissions may exist in this information, and therefore is included on an "as is" basis. The inspectors for the Three-Year Re-inspection IX evaluated homogeneous areas based on the materials current condition and location, as evidenced during the inspector's site visit.

## Section II - C

### Room by Room Location Log Report

These charts are to be used for a quick reference\* in order to avoid the unknowing disturbance of Asbestos Containing Materials during any and all Operations, Maintenance, Renovation, and/or Demolition activities at this location.

*NOTE:*

*Contact OEMS prior to the disturbance of any of the materials that are listed as **Confirmed and/or Assumed**.*

*The quantities listed for (NAD) non-asbestos containing materials and/or Non-Suspect Materials are only estimated and were not measured for the purpose of this report. Field verification of quantities for renovation purposes would be necessary.*

# 5341 James Ludlow Community Annex - 2015-2016 AHERA Three-Year Report.xls

		School District of Philadelphia James R. Ludlow Community Annex 1402 N 6th Street Philadelphia, PA 19122 ULCS# 5341	AHERA Three-Year Reinspection 2015-2016 Room by Room Location Log Report									Reinspection Date: 1/8/2016 Building Inspector: Kelly Mayberry Number: 045814 Management Planner: Mary Anne Lerro Number: 742327				
E / e m e n t	F l o o r	On Site Room Name	System Affected	Material Description	HID#	Confirmed, Assumed, NAD, Non Suspect ACM	Amount of Material	(SF/LF/E A)	Amount of Damage	(SF/LF/E A)	Color required for VAT	Comments/Description/Notes	Attic/Crawlspace Ranking	Damage Potential (DP)	Newly Friable (NF)	Response Action (RA)
1	1	Former Head Start Hallway	N/A	Ceiling Tile 2' x 4'		Non Suspect ACM	732	SF	0	SF				N/A	N/A	N/A
1	1	Former Head Start Hallway	N/A	Concrete Block Wall		Non Suspect ACM	1098	SF	0	SF				N/A	N/A	N/A
1	1	Former Head Start Hallway	N/A	Ceramic Tile Floors		Non Suspect ACM	732	SF	0	SF				N/A	N/A	N/A
1	1	Former Head Start Hallway	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	144	SF	0	SF	Tan	Older tan tile. Unclear if this is tile referred to in management plan as there is new tan tile as well. Possible sampling event. Please contact Monique.		1	No	1/D
1	1	Exterior Doors adjacent to Former Head Start Classroom	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	620	SF	0	SF				N/A	N/A	N/A
1	1	Exterior Doors adjacent to Former Head Start Classroom	N/A	Concrete Block Wall		Non Suspect ACM	918	SF	0	SF				N/A	N/A	N/A
1	1	Exterior Doors adjacent to Former Head Start Classroom	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	310	SF	0	SF	Tan	Newer tan tile. Unclear if this is the brown FT that is NAD. Possible sampling event. Please contact Monique.		1	No	1/D
1	1	Exterior Doors adjacent to Former Head Start Classroom	N/A	Carpet		Non Suspect ACM	310	SF	0	SF				N/A	N/A	N/A
1	1	Exterior Doors adjacent to Former Head Start Classroom	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	2	LF	1	LF		what kind of damage?		N/A	N/A	N/A
1	1	Exterior Doors adjacent to Former Head Start Classroom	N/A	Ceiling Tile 2' x 4'		Non Suspect ACM	228	SF	0	SF				N/A	N/A	N/A
1	1	Exterior Doors adjacent to Former Head Start Classroom	N/A	Concrete Block Wall		Non Suspect ACM	558	SF	0	SF				N/A	N/A	N/A
1	1	Exterior Doors adjacent to Former Head Start Classroom	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	228	SF	0	SF	Tan	Older tan tile. Unclear if this is tile referred to in management plan as there is new tan tile as well. Possible sampling event. Please contact Monique.		1	No	1/D
1	1	Classroom 117 / Room 2	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	651	SF	0	SF				N/A	N/A	N/A
1	1	Classroom 117 / Room 2	N/A	Concrete Block Wall		Non Suspect ACM	918	SF	12	SF		Efflorescence.		N/A	N/A	N/A
1	1	Classroom 117 / Room 2	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	217	SF	0	SF	Tan	Newer tan tile. Unclear if this is the brown FT that is NAD. Possible sampling event. Please contact Monique		1	No	1/D
1	1	Classroom 117 / Room 2	N/A	Carpet		Non Suspect ACM	434	SF	0	SF				N/A	N/A	N/A
1	1	Large Classroom behind Student Restrooms	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	1734	SF	0	SF				N/A	N/A	N/A
1	1	Large Classroom behind Student Restrooms	N/A	Concrete Block Wall		Non Suspect ACM	1530	SF	0	SF				N/A	N/A	N/A
1	1	Large Classroom behind Student Restrooms	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	1734	SF	0	SF	Tan	Older tan tile. Unclear if this is tile referred to in management plan as there is new tan tile as well. Possible sampling event. Please contact Monique.		1	No	1/D
1	1	Large Classroom behind Student Restrooms	N/A	Carpet		Non Suspect ACM	400	SF	0	SF				N/A	N/A	N/A
1	1	Large Classroom behind Student Restrooms	M	Blackboard Glue Dots	5341/01/01/BATTA/KM/2600	Assumed	72	SF	0	SF				1	No	1/D
1	1	Large Classroom behind Student Restrooms	M	Sink Undercoat Mastic	5341/01/01/BATTA/KM/2602	Assumed	40	SF	0	SF				1	No	1/D
1	1	Large Classroom Closet	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	1734	SF	0	SF				N/A	N/A	N/A
1	1	Large Classroom Closet	N/A	Concrete Block Wall		Non Suspect ACM	1530	SF	0	SF				N/A	N/A	N/A
1	1	Large Classroom Closet	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	1734	SF	0	SF	Tan	Older tan tile. Unclear if this is tile referred to in management plan as there is new tan tile as well.		1	No	1/D
1	1	Large Classroom Closet adjacent Hall	X	X		X	X	X	X	X	X	No Access		X	X	X
1	1	Meeting Room 131	N/A	Plaster Ceiling	5341/01/01/BATTA/KM/1902	NAD	402	SF	0	SF		Meeting Room sampled NAD in Hard Coat Plaster survey March 1991		N/A	N/A	N/A
1	1	Meeting Room 131	N/A	Concrete Block Wall		Non Suspect ACM	738	SF	0	SF				N/A	N/A	N/A
1	1	Meeting Room 131	M	Floor Tile VAT 12" x 12"	5341/01/01/AA	Assumed	402	SF	0	SF	Tan	Older tan tile. Unclear if this is tile referred to in management plan as there is new tan tile as well. Possible sampling event. Please contact Monique.		1	No	1/D
1	1	Meeting Room 131	M	Blackboard Glue Dots	5341/01/01/BATTA/KM/2600	Assumed	100	SF	0	SF				1	No	1/D
1	1	Boy's Restroom	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	84	SF	0	SF				N/A	N/A	N/A
1	1	Boy's Restroom	N/A	Concrete Block Wall		Non Suspect ACM	342	SF	0	SF				N/A	N/A	N/A
1	1	Boy's Restroom	N/A	Ceramic Tile Floors		Non Suspect ACM	84	SF	0	SF				N/A	N/A	N/A
1	1	Former Kitchen	N/A	Ceiling Tile 2' x 4'		Non Suspect ACM	100	SF	0	SF				N/A	N/A	N/A
1	1	Former Kitchen	N/A	Concrete Block Wall		Non Suspect ACM	180	SF	0	SF				N/A	N/A	N/A
1	1	Former Kitchen	N/A	Ceramic Tile Floors		Non Suspect ACM	100	SF	0	SF				N/A	N/A	N/A
1	1	Former Kitchen	M	Sheetrock Wall	5341/01/01/BATTA/KM/2100	Assumed	180	SF	0	SF				1	No	1/D
1	1	Girl's Restroom	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	108	SF	0	SF				N/A	N/A	N/A
1	1	Girl's Restroom	N/A	Concrete Block Wall		Non Suspect ACM	378	SF	0	SF				N/A	N/A	N/A
1	1	Girl's Restroom	N/A	Ceramic Tile Floors		Non Suspect ACM	108	SF	0	SF				N/A	N/A	N/A
1	1	Staff Restroom 129	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	50	SF	0	SF				N/A	N/A	N/A

# 5341 James Ludlow Community Annex - 2015-2016 AHERA Three-Year Report.xls

		School District of Philadelphia James R. Ludlow Community Annex 1402 N 6th Street Philadelphia, PA 19122 ULCS# 5341		AHERA Three-Year Reinspection 2015-2016 Room by Room Location Log Report							Reinspection Date: 1/8/2016 Building Inspector: Kelly Mayberry Number: 045814 Management Planner: Mary Anne Lerro Number: 742327					
E	F	On Site Room Name	System Affected	Material Description	HID#	Confirmed, Assumed, NAD, Non Suspect ACM	Amount of Material	(SF/LF/EA)	Amount of Damage	(SF/LF/EA)	Color required for VAT	Comments/Description/Notes	Attic/Crawlspace Ranking	Damage Potential (DP)	Newly Friable (NF)	Response Action (RA)
1	1	Staff Restroom 129	N/A	Concrete Block Wall		Non Suspect ACM	270	SF	0	SF				N/A	N/A	N/A
1	1	Staff Restroom 129	N/A	Ceramic Tile Floors		Non Suspect ACM	50	SF	0	SF				N/A	N/A	N/A
1	1	Main Entrance	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	544	SF	0	SF				N/A	N/A	N/A
1	1	Main Entrance	N/A	Concrete Block Wall		Non Suspect ACM	882	SF	0	SF				N/A	N/A	N/A
1	1	Main Entrance	N/A	Ceramic Tile Floors		Non Suspect ACM	544	SF	0	SF				N/A	N/A	N/A
1	1	Custodial Closet	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	72	SF	0	SF				N/A	N/A	N/A
1	1	Custodial Closet	N/A	Concrete Block Wall		Non Suspect ACM	324	SF	0	SF				N/A	N/A	N/A
1	1	Custodial Closet	N/A	Cement Floor		Non Suspect ACM	72	SF	0	SF				N/A	N/A	N/A
1	1	Custodial Closet	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	30	LF	0	LF				N/A	N/A	N/A
1	1	Custodial Closet	N/A	Fiberglass Pipe Fitting Insulation		Non Suspect ACM	5	EA	0	EA				N/A	N/A	N/A
1	1	Mechanical Room 110	N/A	Plaster Ceiling	5341/01/01/BATTA/KM/1902	NAD	182	SF	0	SF				N/A	N/A	N/A
1	1	Mechanical Room 110	N/A	Concrete Block Wall		Non Suspect ACM	486	SF	0	SF				N/A	N/A	N/A
1	1	Mechanical Room 110	N/A	Cement Floor		Non Suspect ACM	182	SF	0	SF				N/A	N/A	N/A
1	1	Mechanical Room 110	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	80	LF	0	LF				N/A	N/A	N/A
1	1	Mechanical Room 110	N/A	Fiberglass Pipe Fitting Insulation		Non Suspect ACM	25	EA	0	EA				N/A	N/A	N/A
1	1	Hallway between Locker Rooms and Gym	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	336	SF	0	SF				N/A	N/A	N/A
1	1	Hallway between Locker Rooms and Gym	N/A	Concrete Block Wall		Non Suspect ACM	756	SF	0	SF				N/A	N/A	N/A
1	1	Hallway between Locker Rooms and Gym	N/A	Ceramic Tile Floors		Non Suspect ACM	336	SF	0	SF				N/A	N/A	N/A
1	1	Boy's Locker Room	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	672	SF	0	SF				N/A	N/A	N/A
1	1	Boy's Locker Room	N/A	Concrete Block Wall		Non Suspect ACM	936	SF	0	SF				N/A	N/A	N/A
1	1	Boy's Locker Room	N/A	Ceramic Tile Floors		Non Suspect ACM	672	SF	0	SF				N/A	N/A	N/A
1	1	Boy's Locker Room	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	4	LF	0	LF				N/A	N/A	N/A
1	1	Girl's Locker Room	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	672	SF	0	SF				N/A	N/A	N/A
1	1	Girl's Locker Room	N/A	Concrete Block Wall		Non Suspect ACM	936	SF	0	SF				N/A	N/A	N/A
1	1	Girl's Locker Room	N/A	Ceramic Tile Floors		Non Suspect ACM	672	SF	0	SF				N/A	N/A	N/A
1	1	Gymnasium	N/A	Metal Roof Decking		Non Suspect ACM	5264	SF	0	SF				N/A	N/A	N/A
1	1	Gymnasium	N/A	Concrete Block Wall		Non Suspect ACM	6000	SF	0	SF				N/A	N/A	N/A
1	1	Gymnasium	N/A	Cement Floor		Non Suspect ACM	5264	SF	0	SF				N/A	N/A	N/A
1	1	Gymnasium	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	15	LF	0	LF				N/A	N/A	N/A
1	1	Gym Closet on Boy's Locker Side	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	60	SF	0	SF				N/A	N/A	N/A
1	1	Gym Closet on Boy's Locker Side	N/A	Concrete Block Wall		Non Suspect ACM	306	SF	0	SF				N/A	N/A	N/A
1	1	Gym Closet on Boy's Locker Side	N/A	Cement Floor		Non Suspect ACM	60	SF	0	SF				N/A	N/A	N/A
1	1	Gym Closet on Boy's Locker Side	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	22	LF	0	LF				N/A	N/A	N/A
1	1	Gym Closet on Boy's Locker Side	N/A	Fiberglass Pipe Fitting Insulation		Non Suspect ACM	1	EA	0	EA				N/A	N/A	N/A
1	1	Gym Closet on Boy's Locker Side	T	Pipe Fitting Insulation	5341/01/01/BATTA/KM/1120	Assumed	1	EA	0	EA				1	No	1/D
1	1	Gym Office	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	72	SF	0	SF				N/A	N/A	N/A
1	1	Gym Office	N/A	Concrete Block Wall		Non Suspect ACM	324	SF	0	SF				N/A	N/A	N/A
1	1	Gym Office	N/A	Ceramic Tile Floors		Non Suspect ACM	72	SF	0	SF				N/A	N/A	N/A
1	1	Gym Office Shower/Locker Room	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	64	SF	0	SF				N/A	N/A	N/A
1	1	Gym Office Shower/Locker Room	N/A	Concrete Block Wall		Non Suspect ACM	288	SF	0	SF				N/A	N/A	N/A
1	1	Gym Office Shower/Locker Room	N/A	Ceramic Tile Floors		Non Suspect ACM	64	SF	0	SF				N/A	N/A	N/A
1	1	Gym Closet on Girl's Locker Side	N/A	Ceiling Tile 2' x 2'		Non Suspect ACM	60	SF	0	SF		No access		N/A	N/A	N/A
1	1	Gym Closet on Girl's Locker Side	N/A	Concrete Block Wall		Non Suspect ACM	306	SF	0	SF		No access		N/A	N/A	N/A
1	1	Gym Closet on Girl's Locker Side	N/A	Cement Floor		Non Suspect ACM	60	SF	0	SF		No access		N/A	N/A	N/A
1	1	Electrical Room 103	N/A	Plaster Ceiling	5341/01/01/BATTA/KM/1902	NAD	136	SF	4	SF		Water damage.		N/A	N/A	N/A
1	1	Electrical Room 103	N/A	Concrete Block Wall		Non Suspect ACM	450	SF	0	SF				N/A	N/A	N/A
1	1	Electrical Room 103	N/A	Cement Floor		Non Suspect ACM	136	SF	0	SF				N/A	N/A	N/A
1	1	Electrical Room 103	N/A	Fiberglass Pipe Insulation		Non Suspect ACM	20	LF	0	LF				N/A	N/A	N/A
1	1	Electrical Room 103	N/A	Fiberglass Pipe Fitting Insulation		Non Suspect ACM	4	EA	0	EA				N/A	N/A	N/A
1	1	Electrical Room 103	T	Pipe Fitting Insulation	5341/01/01/BATTA/KM/1120	Assumed	4	EA	1	EA		incidental DDC. Crumbled edges.		1	Yes	2/C
1	A	Attic	X	X		X	X	X	X	X	X	No Attic	None	X	X	X
1	C	Crawlspace	X	X		X	X	X	X	X	X	No Crawlspace	None	X	X	X

## **Section III    Certificates**

### **A. Management Planner/Building Inspector Certificates**

## Section III – A

### Management Planner/Building Inspector Certificates

These charts indicate the Name, Course Date, Expiration Date and Corresponding Certificate Number of the Management Planner and Building Inspector of individuals that participated in the AHERA 3 Year Inspection and Management Plan process of 2015/2016.

Management Planner	Date Granted	Expiration Date	Certificate Number
Monique Causley	2/15/2015	2/16/2016	ACC-0215-8-010
Monique Causley	2/16/2016	2/17/2017	ACC-0216-8-001
Megan Vala	5/22/2015	6/22/2016	740728
Mary Anne Lerro	4/5/2016	4/5/2017	742327

Building Inspector	Date Granted	Expiration Date	Certificate Number
Scott Magee	8/15/2015	8/15/2016	70016699C
William Garrity	8/15/2015	8/15/2016	70016699A
Bernard Brunner	10/2/2015	8/2/2016	45397
Mary Anne Lerro	3/3/2015	3/3/2016	740092
Mary Anne Lerro	4/5/2016	4/5/2017	742322
James Madden	12/11/2014	12/11/2015	ACC-1214-6-010
James Madden	12/3/2015	12/3/2016	ACC-1215-6-018
Troy Ray	3/15/2015	3/19/2016	ACC-0355-6-011
Ananth Vinjamuri	9/29/2015	9/29/2016	374
Shelton Williams	9/29/2015	9/29/2016	375
Paul Davis	2/12/2015	2/12/2016	ACC-0215-6-015
Paul Davis	2/2/2016	2/2/2017	741836
Bernard Bryson	2/16/2015	2/16/2016	ACC-0125-6-031
Bernard Bryson	2/15/2016	2/15/2017	ACC-0216-6-005
Alexander Roman	9/18/2015	9/18/2016	EHSBIR-150619-008
Norm Harrison	9/2/2015	9/2/2016	ACC-0915-6-011
Kelly Mayberry	2/20/2015	2/20/2016	EHSBIR-150220-005
Kelly Mayberry	2/18/2016	2/18/2017	EHSBIR-160218-006
Andrew Hine	5/6/2015	5/6/2016	AI05042015-3
Maryellen Leotta	2/12/2015	2/12/2016	ACC-0215-6-024

# Certificate of Completion

*awarded to*

**Monique Causley**

*for successfully completing the prescribed course of study in*

## Pennsylvania Asbestos Management Planner Refresher Course

under TSCA Title II

*presented by*

ACCESS TRAINING SERVICES, INC.  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

2/16/15

*Course Date*

N/A

*Exam Date*

2/16/16

*Expiration Date*

Not Provided

*Social Security Number*

ACC-0215-8-010

*Certificate Number*

Mark K. Schlüger  
*Training Director*

# Certificate of Completion

*awarded to*

**Monique Causley**

*for successfully completing the prescribed course of study in*

## Pennsylvania Asbestos Management Planner Refresher Course

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

**2/15/16**

*Course Date*

**N/A**

*Exam Date*

**2/15/17**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-0216-8-001**

*Certificate Number*

**Mark K. Schlüger**  
*Training Director*



# *Certificate of Training*

## CRITERION LABORATORIES, INC.

HEREBY CERTIFIES THAT

Megan Vala

HAS SUCCESSFULLY COMPLETED A 16 HOUR COURSE ENTITLED

Asbestos Management Planner Initial

INCLUDING CLASSROOM INSTRUCTION

05/21/2015 to 05/22/2015

Exam passed on this 22nd day of May 2015 - Score - 94

Approved for AHERA Accreditation Under TSCA Title II

3370 Progress Drive, Suite J  
Bensalem, PA 19020  
(215) 244-1300 - Phone  
(215) 244-4349 - Fax  
www.criterionlabs.com

*Course is conducted in English*

DIRECTOR:



*James A. Welts, CIH, President*

# *Certificate of Training*

CRITERION LABORATORIES, INC.

HEREBY CERTIFIES THAT

Mary Anne Lerro

HAS SUCCESSFULLY COMPLETED A 4 HOUR COURSE ENTITLED

Asbestos Management Planner Refresher

INCLUDING CLASSROOM INSTRUCTION

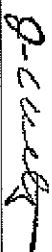
on this 5th day of April 2016

Approved for AHERA Accreditation Under TSCA Title II

3370 Progress Drive, Suite J  
Bensalem, PA 19020  
(215) 244-1300 - Phone  
(215) 244-4349 - Fax  
www.criterionlabs.com

*Course is conducted in English*

DIRECTOR:



*James A. Welts, CIH, President*

# EMSL ANALYTICAL, INC.

Certifies that

Scott Magee

has successfully completed the course of study for the

## Asbestos Building Inspector Refresher Course

for Accreditation under TSCA Title II

EMSL Certificate No. 70016699C

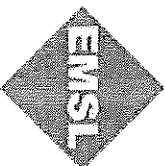
### Approved by:

PA Dept. of Labor and Industry  
Accreditation # 137

Course Date: 8/15/2015  
Granted: 8/15/2015  
Expiration Date: 8/15/2016

### Sponsored by:

EMSL Analytical, Inc.  
200 Route 130 North  
Cinnaminson, NJ 08077  
Phone: (800) 220-3675  
Fax: (856) 786-5973  
[www.emsl.com](http://www.emsl.com)



*Michael P. Menz*

Michael P. Menz, CIH  
Training Director

Environmental, Mold, Bacteria, IAQ, Asbestos, Lead, Forensic and Materials Testing Since 1981

# EMSL ANALYTICAL, INC.

Certifies that

William Garrity

has successfully completed the course of study for the

## Asbestos Building Inspector Refresher Course

for Accreditation under TSCA Title II

EMSL Certificate No. 70016699A

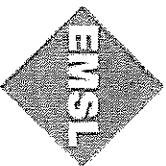
### Approved by:

PA Dept. of Labor and Industry  
Accreditation # 137

Course Date: 8/15/2015  
Granted: 8/15/2015  
Expiration Date: 8/15/2016

### Sponsored by:

EMSL Analytical, Inc.  
200 Route 130 North  
Cinnaminson, NJ 08077  
Phone: (800) 220-3675  
Fax: (856) 786-5973  
[www.emsl.com](http://www.emsl.com)



*Michael P. Menz*

Michael P. Menz, CIH  
Training Director

Environmental, Mold, Bacteria, IAQ, Asbestos, Lead, Forensic and Materials Testing Since 1981

45397

# *National Asbestos & Environmental Training Institute*

## CERTIFICATE OF COMPLETION

AHERA/EPA Accredited Per 40 CFR Part 763  
Asbestos Accreditation under TSCA Title II

*This is to certify that*

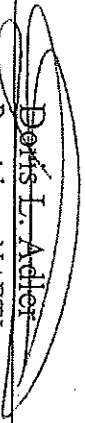
***Bernard Brunner, Jr.***

*Successfully completed the course entitled*

**1/2-Day New York State/EPA/AHERA Asbestos Building Inspector Annual Refresher on  
October 2, 2015**

*Examination Passed October 2, 2015*

*Expiration Date on October 2, 2016*

  
*Doris L. Adler*  
*President, NAEETI*

Per 10 NYCRR Part 73.2 (L) (1), DOH 2832 Certificate of Completion of Asbestos  
Safety Training is the only official record of training for N.Y.S. students.

Language: English

ABIH 1/2 CM POINT

3321 Doris Avenue, Building B, Ocean, NJ 07712

Phone (732) 531-5571

Fax (732) 531-5956

[www.naeti.com](http://www.naeti.com)

Number 740092

Expiration Date:  
03/03/2016

# *Certificate of Training*

CRITERION LABORATORIES, INC.

HEREBY CERTIFIES THAT

Mary Anne Lerro

HAS SUCCESSFULLY COMPLETED A 4 HOUR COURSE ENTITLED

Asbestos Building Inspector Refresher

on this 3rd day of March 2015

Exam passed on this 3rd day of March 2015 - Score - 84

Approved for AHERA Accreditation Under TSCA Title II

3370 Progress Drive, Suite J  
Bensalem, PA 19020  
(215) 244-1300 - Phone  
(215) 244-4349 - Fax  
[www.criterionlabs.com](http://www.criterionlabs.com)

Course is conducted in English

DIRECTOR:

*James A. Weltz*  
James A. Weltz, CIH, President



# *Certificate of Training*

## CRITERION LABORATORIES, INC.

HEREBY CERTIFIES THAT

Mary Anne Lerro

HAS SUCCESSFULLY COMPLETED A 4 HOUR COURSE ENTITLED

Asbestos Building Inspector Refresher

INCLUDING CLASSROOM INSTRUCTION

on this 5th day of April 2016

Exam passed on this 5th day of April 2016 - Score - 88

Approved for AHERA Accreditation Under TSCA Title II

3370 Progress Drive, Suite J  
Bensalem, PA 19020  
(215) 244-1300 - Phone  
(215) 244-4349 - Fax  
www.criterionlabs.com

Course is conducted in English

DIRECTOR:



James A. Welts, CIH, President

# Certificate of Completion

**James Madden**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*  
**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

**12/11/14**

*Course Date*

**N/A**

*Exam Date*

**12/11/15**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-1214-6-010**

*Certificate Number*

**Mark K. Schlüger**  
*Training Director*



# Certificate of Completion

**James Madden**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

**12/3/15**

*Course Date*

**N/A**

*Exam Date*

**12/3/16**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-1215-6-018**

*Certificate Number*

**Mark K. Schlüger**  
*Training Director*

# Certificate of Completion

**Troy A. Ray**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449**

**3/19/15**

*Course Date*

**N/A**

*Exam Date*

**3/19/16**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-0355-6-011**

*Certificate Number*

**Mark K. Schlager**  
*Training Director*

# CERTIFICATE NO 374

G&C Environmental Services, Inc. (#294)

2 Street Road, Newtown Square, Pennsylvania 19073

Telephone: (610) 993-9202 Facsimile: (610) 993-9232

Email: Training@gcenviro.com

www.GCenviro.com

This document certifies that Ananth K. Vinjamuri has successfully completed this

State of New York Department of Health Approved AHERA BUILDING INSPECTOR

REFRESHER COURSE, completed as required for asbestos accreditation under the Toxic

Substances Control Act, Title II. This course was held from 09/29/2015 to 09/29/2015.

The examination date was 09/29/2015. This certificate expires one year from the date of

successful completion of the examination 09/29/2016.

*The official record of successful training completion is the New York State Department of Health certificate of asbestos safety training completion (DPH 2832).*

Gail M. Conner

Training Director

Gail M. Conner

# CERTIFICATE NO 375

G&C Environmental Services, Inc. (#294)  
2 Street Road, Newtown Square, Pennsylvania 19073  
Telephone: (610) 993-9202 Facsimile: (610) 993-9232  
Email: Training@gcenviro.com  
www.GCenviro.com

This document certifies that Shelton Williams has successfully completed this  
State of New York Department of Health Approved AHERA BUILDING INSPECTOR

REFRESHER COURSE, completed as required for asbestos accreditation under the Toxic

Substances Control Act, Title II. This course was held from 09/29/2015 to 09/29/2015.

The examination date was 09/29/2015. This certificate expires one year from the date of  
successful completion of the examination 09/29/2016.

*The official record of successful training completion is the New York State Department of  
Health certificate of asbestos safety training completion (DPH 2832).*

Gail M. Conner  
Training Director

Gail M. Conner

# Certificate of Completion

**Paul M. Davis**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

**2/12/15**

*Course Date*

**N/A**

*Exam Date*

**2/12/16**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-0215-6-015**

*Certificate Number*

**Mark K. Schlüger**  
*Training Director*

# *Certificate of Training*

**CRITERION LABORATORIES, INC.**

HEREBY CERTIFIES THAT

**Paul M. Davis**

HAS SUCCESSFULLY COMPLETED A 4 HOUR COURSE ENTITLED

**Asbestos Building Inspector Refresher**

INCLUDING CLASSROOM INSTRUCTION

on this 2nd day of February 2016

Exam passed on this 2nd day of February 2016 - Score - 92

Approved for AHERA Accreditation Under TSCA Title II

3370 Progress Drive, Suite J  
Bensalem, PA 19020  
(215) 244-1300 - Phone  
(215) 244-4349 - Fax  
www.criterionlabs.com

*Course is conducted in English*

DIRECTOR:

*James A. Welch*

James A. Welch, CIH, President



# Certificate of Completion

**Bernard J. Bryson**

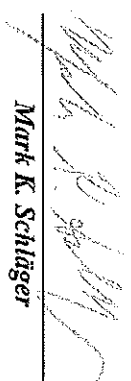
*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

<b>2/16/15</b>	<b>N/A</b>	<b>2/16/16</b>
<i>Course Date</i>	<i>Exam Date</i>	<i>Expiration Date</i>
<b>Not Provided</b>	<b>ACC-0125-6-031</b>	
<i>Social Security Number</i>	<i>Certificate Number</i>	<b>Mark K. Schlager</b> <i>Training Director</i>

# Certificate of Completion

**Bernard J. Bryson**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

**2/15/16**

*Course Date*

**N/A**

*Exam Date*

**2/15/17**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-0216-6-005**

*Certificate Number*

**Mark K. Schlager**  
*Training Director*



**EHS TRAINING INSTITUTE, INC.**  
A Division of BATTI, Inc.

# **Certificate of Completion**

## **AHERA Building Inspector**

**(Refresher)**

**Awarded To:**

**Alexander Roman**

SS#:XXX-XX-1743  
Who has completed this 4-hour course and examination,  
EPA Approved under TSCA Title II  
AHERA / ASHARA Rule  
40 CFR Part 763.

**EHS TRAINING INSTITUTE, INC.**

A Division of BATTI, Inc.

*Delaware Industrial Park • 6 Garfield Way*

*Newark, DE 19713-5817*

*(302) 737-3376 • Fax (302) 737-5764*

**Course Date: September 18, 2015**

**Date of Expiration: September 18, 201**

**Certification Number : EHSBIR 150619-008**

  
Todd K. Zeisloff, Instructor

  
Neeraj K. Batta, President

# Certificate of Completion

**Norman Harrison**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.  
7921 River Road, Pennsauken, NJ 08109  
(856) 665-3449**

**9/2/15**

*Course Date*

**N/A**

*Exam Date*

**9/2/16**


*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-0915-6-011**

*Certificate Number*

  
**Mark K. Schlager**  
*Training Director*

**EHS TRAINING INSTITUTE, INC.**  
A Division of BATTI, Inc.

# **Certificate of Completion**

## **AHERA Building Inspector**

**(Refresher)**

**Awarded To:**

**Kelly Mayberry**

SS#:XXX-XX-1551

Who has completed this 4-hour course and examination,

EPA Approved under TSCA Title II

AHERA / ASHARA Rule

40 CFR Part 763.

**EHS TRAINING INSTITUTE, INC.**

A Division of BATTI, Inc.

*Delaware Industrial Park • 6 Garfield Way*

*Newark, DE 19713-5817*

*(302) 737-3376 • Fax (302) 737-5764*

**Course Date: February 20, 2015**

**Date of Expiration: February 20, 2016**

**Certification Number : EHSBIR 150220-005**

  
**Todd K. Zeislott, Instructor**

  
**Neeraj K. Batta, President**

**EHS TRAINING INSTITUTE, INC.**

A Division of BATA, Inc.

# **Certificate of Completion**

## **AHERA Building Inspector**

**(Refresher)**

**Awarded To:**

***Kelly Mayberry***

SS#:XXX-XX-1551

Who has completed this 4-hour course and examination,

EPA Approved under TSCA Title II

AHERA / ASHARA Rule

40 CFR Part 763.

**EHS TRAINING INSTITUTE, INC.**

A Division of BATA, Inc.

*Delaware Industrial Park • 6 Garfield Way*

*Newark, DE 19713-5817*

*(302) 737-3376 • Fax (302) 737-5764*

**Course Date: February 18, 2016**

**Date of Expiration: February 18, 2017**

**Certification Number : EHSBIR 160218-006**

**Todd K. Zeisloff, Instructor**

**Neeraj K. Batta, President**

# AEROSOL MONITORING & ANALYSIS, INC.

*This is to certify that*  
**ANDREW HINE**

*has met the attendance requirements and successfully completed*

*the course entitled*

**3-DAY EPA AHERA INSPECTOR**

*For Accreditation Under TSCA Title II*

05/04/2015 to 05/06/2015

**Course Date**

05/06/2015

**Exam Date**

5/6/2016

**Expiration Date**

STEVE SIERACKI

**Principal Instructor**

*Steve Sieracki*

A105042015-3

**Certification No.**

E. Rush Barnett

**Course Director**

*E. Rush Barnett*

1331 Ashton Road

P.O.Box 646

Hanover, MD 21076

P: 410-684-3327

F: 410-684-3724

[www.amatraining.com](http://www.amatraining.com)

# Certificate of Completion

**Maryellen Leotta**

*for successfully completing the prescribed course of study in*

## **Pennsylvania Asbestos Building Inspector Refresher Course**

under TSCA Title II

*presented by*

**ACCESS TRAINING SERVICES, INC.**  
7921 River Road, Pennsauken, NJ 08110  
(856) 665-3449

**2/12/15**

*Course Date*

**N/A**

*Exam Date*

**2/12/16**

*Expiration Date*

**Not Provided**

*Social Security Number*

**ACC-0215-6-024**

*Certificate Number*

**Mark K. Schlager**  
*Training Director*

**Section IV**

**Cross Reference Table**

# Asbestos Hazard Emergency Response Act (AHERA) Environmental Compliance Audit Cross Reference Table

In response to the AHERA Environmental Compliance Audit a Cross Reference Table has been prepared for inclusion into the Environmental Management Plan. The purpose of this Cross Reference Table is to link the following documents to the AHERA Management Plan.

<b>Cross Reference Table</b>	
3 Year Reinspection Report follows this Cross Reference Table documentation.	
<b>Subject Matter</b>	<b>Location of Required Documents</b>
Designated Person	Pages 1 - 3
Annual Notification	Pages 4 - 5
6 Month Periodic Surveillance Outline of Events	Page 6
3 Year Re-inspections Outline of Events	Page 7
Asbestos Management Program (operations and maintenance)	Pages 8 - 19
Asbestos Investigation Report (AIR)	Attachment 1 Letter Dated August 4, 2006
Training (included in the Asbestos Management Program)	<p>The original records are centralized at the School District's Environmental Library. Copies are maintained on staff and are required to be maintained in the latest Reinspection Report.</p> <p>2 hour awareness training records for all Building Engineers, Custodian Assistants and maintenance personnel</p> <p>40 hour worker/supervisor training records for the OEMS A-Team and various AST tradesmen.</p>
Response Actions (monthly mailings if applicable)	The original documents are on file at the School District's Environmental Library.
	Copies of the original are mailed to the Schools Main Office for retention with the Management Plan documentation. These documents are typically kept separate from the management plan in an update binder due to the potential volume of response action reports.



## **SCHOOL DISTRICT OF PHILADELPHIA**

### **ASBESTOS DESIGNATED PERSON**

**Gerald F Junod**  
**Office of Capital Programs**  
**Environmental Management & Services**  
**440 N Broad Street, 3<sup>rd</sup> Floor**  
**Philadelphia, PA 19130**  
**Telephone: 215 400 6738**  
**Fax: 215 400 4751**

<b>Drexel University- Asbestos Building Inspector Course</b>	<b>January 9-11, 1989 24 Hours</b>
<b>Drexel University- Asbestos Management Planner Course</b>	<b>January 12-13, 1989 16 Hours</b>
<b>Criterion Laboratories, Inc. - Asbestos Management Planner Course</b>	<b>October 11-12, 2012 16 Hours</b>

<b><u>Annual Building Inspector Refreshers</u></b> <b>4 Hours</b> <b>Drexel University</b> <b>Criterion Laboratories, Inc</b> <b>Access Training Services, Inc.</b>	<b>1990 to Present</b>
---	------------------------

<b><u>Annual Building Management Planner Refreshers</u></b> <b>4 Hours</b> <b>Drexel University</b> <b>Criterion Laboratories, Inc</b> <b>4 Hours</b>	<b>1990 to 1994</b>    <b>2013 to Present</b>
---	---

#### **Environmental Manager, School District of Philadelphia**

**Manages the design and implementation of asbestos and lead projects for the Capital Improvement Program and other District Departments including Facilities & Operations and Information Technology. Ensures that asbestos abatement and lead remediation projects are expertly designed and executed in accordance with industry best management practice standards and regulations.**

#### **Manager, City of Philadelphia Asbestos Control Program**

**Served as the Asbestos Control Program Manager for the City of Philadelphia, Department of Public Health, Air Management Services, Asbestos Control Unit from August 1, 2003 through October 23, 2006.**

#### **Mid Atlantic Regional Environmental Consortium (MAREC)**

**Former member with attendance and participation commitments of all quarterly EPA Region III and yearly National Asbestos Regulatory Conferences sponsored by the EPA and the National Conference of State Legislators respectively as a representative for the City of Philadelphia Department of Public Health Air Management Services from 1994 through 2006.**

#### **Philadelphia Environmental Task Force**

**Former member of the Philadelphia Environmental Task force as a representative and point of contact for the City of Philadelphia Department of Public Health Air Management Services Asbestos Control Unit from 2002 through 2006.**

**Asbestos Instructor**

Worked as the primary instructor for the initial and annual Asbestos Project Inspector training and licensing program as mandated by City of Philadelphia Department of Public Health Asbestos Control Regulations from August 1994 through October 2006.

Worked as a lead instructor with an Environmental Consulting Firm and approved by the US EPA for the initial and annual refresher training courses for various asbestos occupational disciplines such as the Building Inspector, Management Planner and Worker/Supervisor from 1991 through 1994.

I certify that the general, local agency responsibilities as stipulated in Section 763.84 will be met.



Gerald F. Junod

Asbestos Designated Person

Environmental Manager

Office of Environmental Management and Services

## **SCHOOL DISTRICT OF PHILADELPHIA**

### **Accreditation Information Statement**

**All persons who inspect for Asbestos Containing Building Materials (ACBM) and who will design or carry out response actions with respect to assumed and confirmed ACBM, will be accredited by an EPA approved course and/or a State Contractors Accreditation Program under Sections 206 (c) and 206 (b) of Title II of the ACT.**



**Gerald F. Junod  
Asbestos Designated Person  
Environmental Manager  
Office of Environmental Management and Services**

SCHOOL DISTRICT OF PHILADELPHIA  
OFFICE OF CAPITAL PROGRAMS  
440 NORTH BROAD STREET, SUITE 373  
PHILADELPHIA, PENNSYLVANIA 19130

OFFICE OF ENVIRONMENTAL MANAGEMENT AND SERVICES

PHONE (215)-400-4750

September 2015

TO: Principals  
Building Administrators/Occupants  
Parents/Guardians

FROM: Fran Burns  
Chief Operating Officer

Francine Locke, M.S., Director  
Office of Environmental Management and Services

SUBJECT: Annual EPA Notification Letter


Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 C.F.R. 763.84 (c)(d) of public access to environmental records, this letter is to acknowledge the availability of your facility's Asbestos Hazard Emergency Response Act (AHERA) Management Plan.

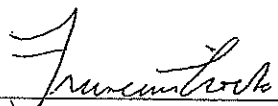
Each member of the school staff, parents/guardians, temporary workers and/or contractors, are required to receive a copy of the Notification Letter. At the direction of the Principal, a copy is to be posted on the bulletin boards and an appropriate amount of copies are to be generated for distribution.

Note: The AHERA Three-Year Reinspection reports, in colored binders; White with Pink, Tan, Black, Red, Dark Blue, Green, Yellow and White, are Federal EPA mandated inspection documents. The School District of Philadelphia is subject to severe monetary penalties if the reports and associated paperwork are not available to the EPA and the public upon request.

It is incumbent on designated school personnel to gather and retain this data as it is delivered, in one location for future review. Acceptable locations include the Principal's Office or Main Office for the primary data. The Building Engineer should maintain any secondary or duplicate copies.

If you have any questions, please call 215-400-4750. Thank you for your cooperation.

  
\_\_\_\_\_  
Fran Burns  
Chief Operating Officer

  
\_\_\_\_\_  
Francine Locke, M.S., Director  
Office of Environmental Management  
and Services

c: Danielle Floyd

AHERA-4  
8/21/15



**School District of Philadelphia**  
**OFFICIAL NOTICE**

**PLEASE POST**

September 2015

TO: Principals  
Building Administrators  
Building Engineers  
Building Occupants  
Parents/Guardians

FROM: Fran Burns  
Chief Operating Officer

Francine Locke, M.S., Director  
Office of Environmental Management and Services

SUBJECT: Annual Notification Letter: Asbestos Hazard Emergency Response Act

The Federal Register published on October 30, 1987, Subpart E, in Schools: Final Rule and Notice, 763.84 (c)(d) states that each local education agency shall ensure that workers and building occupants or guardians are to be informed at least once each school year about inspections, response actions and post-response action activities including re-inspections and periodic surveillance activities. The School District as the Local Education Agency (LEA), retains such reports that are available for public inspection in the Office of the Principal or Building Administrator.

The Principal or Building Administrator is required to do the following with this notification:

- 1) Post in a Public Place or Main Office
- 2) Inform Building Occupants
- 3) Send a copy of this notification to Parents or Guardians
- 4) Insert a copy into the latest AHERA Three-Year Reinspection report (white/pink binder) in your office or facility.

A handwritten signature of Fran Burns in black ink, positioned above a horizontal line.

Fran Burns  
Chief Operating Officer

A handwritten signature of Francine Locke in black ink, positioned above a horizontal line.

Francine Locke, M.S., Director  
Office of Environmental Management  
and Services

c: Danielle Floyd

AHERA-4a  
8/21/15

SCHOOL DISTRICT OF PHILADELPHIA  
Education Center  
440 North Broad Street  
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services

215-400-4750

AHERA  
Six Month Surveillance  
Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.92(b), the following procedure is to be implemented. At least once every six (6) months after a Management Plan is in effect, each Local Education Agency (LEA) shall conduct a periodic surveillance in each building that it owns or leases that contains Asbestos Containing Building Materials (ACBM) or is assumed to contain ACBM.
- The first Bi-Annual Inspection starts in the Spring (March, April, May) and again in the Fall (October, November, December) of each year. The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspace/Attics) and rooms in the facility. There is no action required of the Principal.
- The Building Inspector shall visually inspect all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials.
- The Building Inspector shall make a copy of the inspection document and insert into the front of the latest Management Plan (AHERA Three Year Reinspection report). The original document is returned to the LEA's Environmental Library and filed.

SCHOOL DISTRICT OF PHILADELPHIA  
Education Center  
440 North Broad Street  
Philadelphia, Pennsylvania 19130

Office of Environmental Management and Services

215-400-4750

AHERA  
Three Year Reinspection  
Outline of Events

- Pursuant to the Federal Environmental Protection Agency (EPA) mandate, as required by 40 CFR 763.85(b) the following procedure is to be implemented. At least once every three (3) years after a Management Plan is in effect, each Local Education Agency (LEA) shall conduct a reinspection of each building that it owns or leases that contains Asbestos Containing Building Material's (ACBM's) or is assumed to contain ACBM.
- Subsequent Three Year Re-inspections (2009, 2012, 2015, etc) shall start in the Fall (October, November, December, January). The Building Engineer/Assistant should assist the Building Inspector with appropriate access to all areas including (Crawlspaces/Attics) and rooms in the facility. There is no action required of the Principal.
- An accredited Building Inspector shall visually inspect and touch to determine friability, all areas that are identified in the Management Plan as ACBM or assumed ACBM. The date of the surveillance is recorded, the inspectors name and any changes in the conditions of the materials. The Building Inspectors state of accreditation and license number is required.
- After the inspection, the Building Inspector shall make a copy of the inspection documents and insert into the front of the latest Management Plan (AHERA Three Year Reinspection report). The original document is returned to the LEA's Environmental Library and filed.
- The Building Inspector shall return the reinspection data to the Management Planner to be assessed and determine appropriate response actions and a report issued (AHERA Three Year Reinspection report). One copy of the report is delivered to the schools Principal to be permanently retained with all previous environmental data. Another copy is retained in the LEA's Environmental Library.



**School District of Philadelphia**  
Office of Environmental Management & Services  
440 North Broad Street  
Philadelphia, PA 19130  
(215) 400-4750

**School District of Philadelphia  
Asbestos Management Program**



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## **DEFINITIONS / ACRONYMS**

<b>ACM/PACM:</b>	<b>Asbestos Containing Material/Potential Asbestos Containing Material</b>
<b>AHERA:</b>	<b>Asbestos Hazard Emergency Response Act</b>
<b>AIR FORM:</b>	<b>Asbestos Inspection Report Form</b>
<b>Amended Water:</b>	<b>Water to which a surfactant (soap) has been added</b>
<b>AMP:</b>	<b>Asbestos Management Program/Asbestos Management Plan</b>
<b>Asbestos Designate Person:</b>	<b>Individual assigned by the district to oversee asbestos related issues.</b>
<b>Asbestos Regulated Area:</b>	<b>Location that is posted as an asbestos work area in which only approved and accredited personnel are permitted to enter</b>
<b>AST:</b>	<b>Asbestos Support Team involving approved and accredited school district tradespersons personnel that are school district person</b>
<b>A-TEAM:</b>	<b>School District of Philadelphia asbestos workers</b>
<b>CIP:</b>	<b>Capital Improvement Program</b>
<b>Consultant:</b>	<b>Asbestos consulting firm hired by the District</b>
<b>Demolition Directive:</b>	<b>Memorandum – August 4, 2006 from Patrick Henwood</b>
<b>EPA:</b>	<b>Environmental Protection Agency</b>
<b>In House Personnel:</b>	<b>School District of Philadelphia asbestos workers</b>
<b>LEA:</b>	<b>Local Education Agency</b>
<b>O&amp;M:</b>	<b>Operations and Maintenance</b>
<b>OEMS:</b>	<b>Office of Environmental Management and Services</b>
<b>OSHA:</b>	<b>Occupational Safety and Health Administration</b>
<b>PEL:</b>	<b>Permissible Exposure Limit</b>
<b>PSD or SDP:</b>	<b>Philadelphia School District/School District of Philadelphia</b>
<b>PSIT:</b>	<b>Philadelphia School Improvement Team</b>
<b>STEL:</b>	<b>Short Term Exposure Limit</b>

## **1. Introduction**

The School District of Philadelphia, Asbestos Policy Statement:

“The School District of Philadelphia is dedicated to providing a safe and healthful work environment for its employees, students, faculty, contractors and visitors. In recognition of the potential health problems associated with asbestos, the School District of Philadelphia is committed to a comprehensive asbestos control program. This program is implemented and maintained through the School District of Philadelphia's Office of Environmental Management and Services (OEMS).”

OEMS has the responsibility of establishing procedures for asbestos abatement, asbestos inspection, air monitoring, renovation and demolition activities within all School District of Philadelphia owned or leased facilities.

These procedures are developed to ensure that:

- (1) People are not exposed to significant levels of asbestos fibers
- (2) Asbestos waste is handled and disposed of properly
- (3) Members of the School District of Philadelphia community have access to the Office of Environmental Management and Services for information, assistance, guidance, and interpretation regarding asbestos related matters.
- (4) Members of the School District of Philadelphia community have access to the Asbestos Management Plans as required and outlined in the US EPA AHERA regulations including annual written notification to all parents.
- (5) Compliance with all applicable Federal, State and Local Asbestos Regulations

Requirements outlined in this manual are mandatory in nature where the word “SHALL” is used and are advisory in nature where the word “SHOULD” is used.

## **2. Summary of Asbestos Management Program**

The School District of Philadelphia's Asbestos Management Program was established to meet the requirements of Federal, State, and Local Regulations.

These regulations include, but are not limited to:

- US Environmental Protection Agency Asbestos Hazard Emergency Response Act (US EPA AHERA) and National Emissions Standard for Hazardous Air Pollutants subpart M, Part 61 (NESHAP);
- US Department of Labor, Occupational Safety and Health Administration (OSHA) General Industry Standard (29 CFR 1910.1001) and the OSHA Asbestos Standard for the Construction Industry (29 CFR 1926.1101);
- The Commonwealth of Pennsylvania, Department of Labor and Industry, Asbestos Occupations, Accreditation and Certification Act;
- The City of Philadelphia, Department of Public Health, Asbestos Control Regulations.

### **3. Asbestos Management Program Execution**

#### **a) General Execution**

The Office of Environmental Management and Services (OEMS) develops, implements and manages safety and health programs for the School District of Philadelphia faculty, staff and students and assists with ensuring that all contractors comply with Federal, State and Local Environmental Regulations. The OEMS provides the oversight of School District of Philadelphia employees (Asbestos A-Team), environmental consultants, and asbestos abatement contractors for all projects within the School District of Philadelphia concerning Asbestos Containing Materials.

The control of safety and health hazards at the School District of Philadelphia is primarily through the implementation of engineering, work practice and administrative controls. Personal Protective Equipment (PPE) is used to supplement these controls or whenever the controls are not feasible or are in the process of being implemented. PPE is also recommended whenever exposures to chemical, physical or biological agents can be prevented or reduced by its use.

This written program establishes the procedures necessary to:

- 1) meet established standards and federal regulations for occupational exposure to asbestos fibers;
- 2) meet the requirements of the City of Philadelphia Asbestos Control Regulations which encompasses the disturbance and/or abatement of asbestos containing building materials;
- 3) provide the necessary health and safety protection to the School District of Philadelphia staff, faculty, students, contractors and visitors.

This program is strengthened by input and cooperation with the Philadelphia Federation of Teachers (PFT), Health and Welfare Fund.

### **4. Summary of Program Execution**

#### **a) Asbestos Management Program Execution**

The Asbestos Management Program is administered by the Office of Environmental Management and Services (OEMS). OEMS provides the following services primarily through professional consultants:

- (1) exposure monitoring services;
- (2) building inspection/surveys (bulk sampling) for the identification of asbestos containing materials;
- (3) asbestos project design services;
- (4) asbestos abatement project and air monitoring services;
- (5) emergency response to fiber release episodes;
- (6) education/information;
- (7) medical monitoring;
- (8) training for School District of Philadelphia personnel

### **5. Responsibilities**

#### **a) Office of Environmental Management and Services**

OEMS is responsible for performing the following functions:

- (1) Developing and administering of the Asbestos Management Program.
- (2) Providing asbestos-related services to all School District of Philadelphia departments.
- (3) Conducting required training of the Asbestos Management Program and working jointly with departments to schedule training.
- (4) Identifying and posting areas where labeling/signage are required.
- (5) Medical Monitoring of OEMS "A-TEAM" and other departments "AST" Asbestos Program staff.

- (6) Certification and training as required for OEMS "A-TEAM" and other departments "AST" Asbestos program staff.
- (7) Record keeping as outlined in Section 3.5 and all records as by required by US EPA AHERA regulations.

**b) Asbestos Worker/Supervisor - "A-TEAM"**

- (1) OEMS shall ensure that all "A-TEAM" workers/supervisors adhere to the following requirements:
  - a) Attend an initial Worker/Supervisor Asbestos Course;
  - b) Maintain the annual re-certification per EPA AHERA requirements and Commonwealth of Pennsylvania Asbestos Occupations, Accreditation and Certifications Act;
  - c) Undergo an annual Asbestos Medical Evaluation;
  - d) Undergo an annual Respirator Medical Clearance;
  - e) Undergo an annual Respirator Fit Testing.

**c) Asbestos Designated Person**

The Asbestos Designated Person is responsible for:

- (1) Assuring the health and safety of employees, students and visitors in the School District of Philadelphia facilities under his/her control.
- (2) Being kept informed of all areas under his or her jurisdiction where potential asbestos exposures exist and initiating protection programs that adhere to the Asbestos Management Program requirements of this manual.
- (3) Assuring that Asbestos Management Program requirements are adhered to by principal investigators, project managers, supervisors, or division heads, and School District of Philadelphia personnel under their supervision.
- (4) Ensuring that all employees within the Asbestos Management Program comply with (OSHA 1910.1001 (j) (7) (iv)) and the US EPA AHERA regulations by attending the required training.
- (5) Ensure the posting of:
  - a) Warning labels/signage
  - b) Commonwealth of Pennsylvania Asbestos Abatement and Demolition/Renovation Notification form
  - c) Asbestos Inspection Reports (AIR) form (where required)
  - d) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

**d) Supervisor or Project Manager (Capital, Maintenance and Facilities)**

Each person in charge of a project, maintenance/repair, renovation/demolition, or other activity from the Departments of Capital, Maintenance, and/or Facilities, where asbestos containing material may be present is responsible for:

Identifying, with the assistance of OEMS, asbestos containing building materials prior to any disturbance of these materials. Various Federal (EPA and OSHA) and Local (City of Philadelphia Asbestos Control Regulations) require Asbestos Inspections prior to renovation/demolition activities. This shall be accomplished by always following the Asbestos Management Program Procedures as follows:

- (1) Ensure that the requirements of the Asbestos Management Program Procedures are followed by all personnel, trades, and contractors who are involved with the project;

- (2) Review of the required Asbestos Inspection Report (AIR) form (Attachment 1) and AHERA Management Plan documents prior to activities that may disturb any Asbestos Containing Materials;
- (3) Perform all project related duties as outlined in the Project Management Responsibilities;
- (4) Keep the department chairperson or director informed on any actions proposed or taken regarding the Asbestos Management Plan;
- (5) Ensuring that Construction Projects follow the Demolition Directive procedure outlined in the August 4, 2006 letter.

**e) Employee – Capital**

School District of Philadelphia Capital employees and/or consultants shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of the projects they are performing or managing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit (a.k.a PSIT Service Request Form) and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode upon discovery of visible damage to asbestos containing materials.
- (3) Ensuring that Construction Projects follow the Demolition Directive procedures as outlined in the August 4, 2006 letter.

The types of projects represented as part of the Capital Improvement Program are as follows:

- (1) Complete Renovation of an existing building that addresses all facility component concerns and educational program needs;
- (2) Major Renovation of an existing building addressing significant facility component and educational improvements;
- (3) Addition to an existing building (either as an attachment or stand-alone structure) to accommodate needed program space;
- (4) Conversion of an existing facility to accommodate a change in educational program;
- (5) Facility Component Improvement of specific facility needs (i.e. electrical or HVAC system upgrades, ADA improvements, life safety improvements, exterior renovations, etc.)

**f) Employee – Maintenance**

School District of Philadelphia Maintenance employees shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work order permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed.
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) All employees involved in maintenance activities shall attend required Asbestos Awareness training program within 60 days of employment.

**g) Employee – Facilities & Custodial**

School District of Philadelphia Facilities and Custodial employees shall:

- (1) Ensure that no suspect or asbestos containing building materials are disturbed in the course of their duties or work they are performing. This shall be accomplished by notifying their supervisor and OEMS by issuance of a work permit and verifying that the materials which may be disturbed are non-asbestos containing. If this information is not available or verification has not been made, these materials should not be disturbed;
- (2) Immediately notify OEMS and their supervisor in the event of a potential fiber release episode or upon discovery of visible damage to asbestos containing materials.
- (3) All employees involved in Facilities and Custodial activities shall attend require Asbestos Awareness training program within 60 days of employment.

## **6. Requirements**

### **a) Employee Exposure Monitoring**

When information indicates that an employee's exposure to asbestos fibers may equal or exceed an 8-hour time-weighted average of 0.1 f/cc \* (per OSHA 1910.1001 & 1926.1101), OEMS shall develop and implement an asbestos exposure monitoring program. The sampling strategy shall be designed to identify employees by work task (job classification) that is exposed to asbestos fibers that exceed an 8-hour time-weighted average of 0.1 f/cc.

### **b) Employee Notification**

OEMS shall notify in writing, each employee exposed to asbestos fibers at or above an 8-hour time weighted average of 0.1 f/cc.

### **c) Observation and Monitoring**

OEMS shall provide employees or their representatives with an opportunity to observe any exposure measurements conducted.

### **d) Training Program**

OEMS shall institute a training program which meets the requirements of AHERA for all employees who perform maintenance operations in a facility/school which contains asbestos containing materials or presumed asbestos containing materials and 1910.1001 (j), and the Commonwealth of Pennsylvania Department of Labor and Industry and the City of Philadelphia Asbestos Control Regulations. The affected departments shall ensure employee participation in this program. The OEMS "A-TEAM" and other departments "AST" Asbestos Program staff training shall be conducted annually for each employee as required by all Federal, State and Local for each asbestos discipline.

All Asbestos Awareness training as required by AHERA shall be performed within 60 days of employment and shall include:

- Health effects of asbestos
- Locations of ACM and PACM in the building/facility
- Recognition of CM and PACM damage and deterioration
- Requirements of the OSHA 1910.1001 standard relating to maintenance
- Proper response to fiber release episodes
- Procedure to be followed to isolate areas affected by fiber release

### **e) Access to Information**

OEMS shall make available to affected employees or their representative's copies of the Occupational Safety and Health Administration (OSHA) General Industry Standard Part 1910.1001 and the department shall post a copy in the workplace.

### **f) Record Keeping**

OEMS shall maintain an accurate record of all employee exposure measurements. OEMS and/or the School District of Philadelphia Human Resources Department shall maintain records of employee medical monitoring program. OEMS shall maintain all employee training records. All records shall be provided upon request to employees, former employees, representatives designated by the individual employee.

## **7. AHERA OPERATIONS AND MAINTENANCE PLAN**

### **a) CONTROLS**

#### **i. Work Order System**

Minimizing disruption of ACM/PACM during maintenance and renovation activities is the primary goal and task encountered by OEMS. Operations and maintenance employees and contractors should be warned to avoid conducting any maintenance work which may disturb ACM/PACM. Initiating a work order system, where all work orders or requests are channeled through the Office of Environmental Management and Services (OEMS), will be the method used to control and minimize disruption of ACM/PACM.

Any work performed by in-house personnel or contractors that could or will impact ACM/PACM shall be coordinated by OEMS. A completed Asbestos Inspection Report Form (Attachment 1) shall be issued to in-house personnel and/or all contractors whose work could impact ACM/PACM. This form should accompany each contract issued to an outside contractor and posted on the jobsite.

All work order requests for maintenance and renovation activities in areas where ACM/PACM is suspected or known to be present are to be submitted to OEMS prior to proceeding with work. OEMS is responsible for reviewing asbestos survey records for information about the presence of ACM/PACM in the area where the work is to be performed. OEMS should physically inspect the area to ensure existing records reflect actual conditions. If no asbestos is present, a work order is not necessary and the planned actions can proceed. If ACM/PACM is found to be present in the area, OEMS will sign the work order application and obtain an approved and accredited asbestos contractor or assign OEMS "A-TEAM" to abate the ACM/PACM.

#### **ii. Regulated Areas**

The owner will identify and regulate all areas where airborne concentrations of ACM/PACM exceed the Permissible Exposure Limit (PEL)\* (Per OSHA determined to be 0.1 f/cc) and/or short term exposure limit (STEL) (Per OSHA determined to be 0.1 f/cc), or there is reasonable possibility that the (PEL) and/or (STEL) may be exceeded. All ACM/PACM removal activities involving thermal system insulation ACM/PACM (Class I), surfacing ACM/PACM (Class I), and miscellaneous ACM/PACM such as floor tile, roofing, and siding mastic, etc. (Class II), and repair and maintenance operations where thermal system insulation and surfacing ACM/PACM is likely to be disturbed (Class III) will be performed in accordance with federal, state, and local regulations. All asbestos abatement work and activities will be designed and managed as asbestos regulated areas. These areas will be demarcated and labeled.

#### **iii. Warning Signs**

Warning signs shall be displayed at all approaches to each asbestos regulated area. The asbestos abatement contractor will provide OSHA warning signs in all regulated areas during removal, repair, and other maintenance activities. OEMS will provide AIRs to all contractors who must inform all employees and supervisors working in locations contiguous to asbestos regulated areas of the potential hazards and work practices required.

#### **iv. Warning Labels**

Warning labels and/or signage shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers. Generally, the asbestos abatement contractor or OEMS A-Team personnel will provide all warning labels for ACM/PACM containment.



## **8. O & M RESPONSE ACTIONS**

The Asbestos Management Program general O&M procedures are outlined in this section. Additional requirements specific to asbestos abatement activities are included in the Project Design documents for all Asbestos Abatement Work. Regular cleaning, inspection, and reporting of ACM/PACM deterioration or other problems must be diligently practiced by all employees including custodial and maintenance personnel.

### **a) Facility Maintenance Isolation of Area Responsibilities**

Maintenance personnel are often required to work in areas where ACM/PACM may potentially be disturbed. Most maintenance activities are conducted by in-house staff, outside contractors, or a combination.

Emergency fiber release episodes, such as pipe fitting or valve breaks, emergency boiler work, or mechanical equipment repair will be responded to by OEMS A-Team personnel or asbestos abatement contractor personnel. The owner's maintenance staff will: (1) isolate the emergency fiber release area; (2) post warning signs to prevent unauthorized access, and (3) notify their supervisor and OEMS. OEMS will ensure that the fiber release area remains isolated and is properly cleaned by and approved and accredited abatement contractor or by OEMS A-TEAM personnel.

### **b) Unlikely Contact with ACM/PACM**

Maintenance activities or repairs which can be performed without contacting or disturbing the ACM/PACM require little more than normal care and good workmanship. For example, valves which are either uncovered or covered with non-asbestos insulation can be packed or repaired without disturbing asbestos insulation on nearby pipes. The major precaution is to ensure that maintenance and custodial personnel are familiar with procedures such as isolating the area, posting warning signs, and notifying OEMS in the event of any accidental ACM/PACM disturbance.

### **c) Accidental Disturbance of ACM/PACM**

Maintenance and facilities personnel shall notify OEMS any time a fiber release is suspected. If friable ACM/PACM becomes airborne in the building,

### **d) Planned Disturbance of ACM/PACM**

Maintenance activities that may impact ACM/PACM include access to a valve, flange, duct, or related system component.

Where asbestos-containing insulation must be removed to maintain or repair the thermal system, the ACM/PACM will imminently be disturbed. ACM/PACM removal work shall be conducted by OEMS A-Team personnel or an approved and accredited asbestos abatement contractor.

If friable ACM/PACM becomes airborne in the building, maintenance and facilities personnel shall secure the area and contact OEMS. OEMS shall respond accordingly.

**e) Miscellaneous ACM/PACM**

Miscellaneous types of ACM/PACM may include vinyl asbestos floor tiles, mastics/adhesives and woven vibration dampers. Disturbance of these materials should be avoided. Routine maintenance activities involving these materials should not pose a problem if handled properly. Questions on the proper removal and disposal of miscellaneous ACM/PACM should be directed to OEMS. OEMS will contact an approved and accredited asbestos abatement contractor or utilize OEMS A-TEAM personnel to assist with miscellaneous ACM/PACM clean-up activities.

**f) Vinyl Asbestos Floor Tile**

Asbestos-containing floor tiles in good condition are considered non-friable unless they are crushed, drilled, sawed, sanded or disturbed by any activity that breaks up the material. Routine maintenance of these materials should employ the use of non-abrasive buffers and wet cleaning technique. Broken or loose floor tiles should be removed and disposed of as asbestos waste by OEMS. Remaining debris should be vacuumed with a HEPA vacuum and the area wet mopped using amended water.

**g) Mastics/Adhesives**

Mastics and adhesives containing asbestos in good condition are considered non-friable and do not pose a potential health concern unless crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**h) Woven Vibration Dampers**

Woven vibration dampers in good condition are considered non-friable and do not pose a potential health concern unless cut, crushed, drilled, sawed, sanded, or otherwise abraded. Questions on the proper removal should be directed to OEMS.

**i) Other Work Practices**

Any special work not included in this section should be addressed to OEMS for review prior to the initiation of work that may involve the disturbance of ACM/PACM.

**j) Fiber Release Episodes**

Facilities and maintenance staff should report to OEMS the presence of asbestos debris, water or physical damage to ACM/PACM, or any other evidence of possible fiber release. OEMS should have the OEMS A-Team personnel or an approved and accredited abatement contractor respond to the site to clean up debris and make repairs as soon as possible. OEMS will also contact a consultant to conduct air monitoring and prepare a report and submit at project completion to OEMS for each episode. OEMS will forward the reports for each site location AHERA Management Plan accordingly.

## 9. REFERENCES and RESOURCES

Applicable regulations for asbestos projects impacted by renovation, demolition, and maintenance activities.

- **Philadelphia Air Management Services – Asbestos Control Unit**  
<http://www.phila.gov/health/units/ams/Asbestos/asbestos.html>
- **Pennsylvania Asbestos Occupations, Accreditation and Certification Act**  
<http://www.dli.state.pa.us/landi/cwp/view.asp?a=185&q=56262&landiNav=>
- **United States Environmental Protection Agency Asbestos Home Page**  
<http://www.epa.gov/asbestos/>
- **Occupational Safety and Health Administration (OSHA) Asbestos Home**  
<http://www.osha.gov/SLTC/asbestos>