Asbestos Hazard Emergency Response Act
"AHERA"

THREE-YEAR RE-INSPECTION 2018-2019

and

ASBESTOS MANAGEMENT PLAN

for the

John H. Webster Little School House
ULCS# 5591
Building # B559002-1
3400 Frankford Avenue
Philadelphia, Pennsylvania
19134

Year Built: 2001

November 2018

Conducted by:
Acer Associates, LLC
Batta Environmental Associates, Inc.
Criterion Laboratories, Inc.
G&C Environmental Services, Inc.
KEM Partners, Inc.
React Environmental Professional Services Group, Inc.
Synertech, Inc.
USA Environmental Management, Inc.
The Vertex Companies, Inc.
Westchester Environmental LLC

Management Plan Prepared by:
School District of Philadelphia
Batta Environmental Associates, Inc.
Criterion Laboratories, Inc.

This report must remain in the Main Office as mandated by the US EPA AHERA Regulations.
AHERA THREE-YEAR REINSPECTION VOLUME X

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To: All Principals

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

Date: October 1, 2018

Subject: AHERA Three (3) Year Re-Inspection X 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.

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


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 1st Management Plan for each location and from all prior inspections performed and documented in Volume # I through Volume IX (dated respectively 1992, 1995, 1998, 2001, 2004, 2007, 2010, 2013 and 2015) (if applicable) - and by this Three-Year Re-inspection of this school. The re-inspection report/Management Plan of 2018-2019 were reviewed and prepared collectively by Management Planner Megan Vala and Julie Mui, of Criterion Laboratories, Inc., Jennifer Donovan of Batta Environmental Associates, Inc. and under the direction of the District’s AHERA Manager Monique Causley.
The 2018-2019 inspection process included the addition and/or an update 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 (ACBM)s, listed in the following summary charts are categorized as Confirmed, Assumed, Non-Asbestos, and/or Non-Suspect (ACBM)s were identified in the original Management Plan, or in the Volume I through Volume IX 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 and/or gfinod@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

*Since this facility was fully renovated and/or built after December 31, 1980 all suspect friable asbestos containing building materials do not exist in 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

| Sink Undercoat Mastic | Sheetrock Ceiling | 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.
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

Floor Tile VAT 12" x 12"

* 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.
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

<table>
<thead>
<tr>
<th>Carpet</th>
<th>fiberglass ceiling tile 2' x 4'</th>
</tr>
</thead>
<tbody>
<tr>
<td>ceiling tile 2' x 4'</td>
<td>fiberglass pipe fitting insulation</td>
</tr>
<tr>
<td>ceramic tile floors</td>
<td>fiberglass pipe insulation</td>
</tr>
<tr>
<td>concrete block wall</td>
<td>wood ceiling</td>
</tr>
<tr>
<td>concrete floor</td>
<td></td>
</tr>
</tbody>
</table>

* 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.
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 materials for this location’s Auditorium

>This building does not have an Auditorium.

* 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.
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 Crawlspace 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, Crawlspace are below the basement or 1st floor and Attics are above the floor space.

**Category Rank Legend**

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;A&quot;</td>
<td>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.</td>
</tr>
<tr>
<td>&quot;B&quot;</td>
<td>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.</td>
</tr>
<tr>
<td>&quot;C&quot;</td>
<td>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.</td>
</tr>
<tr>
<td>&quot;D&quot;</td>
<td>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.</td>
</tr>
<tr>
<td>&quot;E&quot;</td>
<td>No Bulk Sample Results Available SUSPECT ACM OBSERVED. Contact OEMS immediately for additional instructions.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Attic/Crawlspace</th>
<th>Access Area</th>
<th>Floor Surface</th>
<th>Category Rank</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attic</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>No Attic</td>
</tr>
<tr>
<td>Crawlspace</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>No Crawlspace</td>
</tr>
</tbody>
</table>
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.

Pipe Chases and Pipe Shafts need to be assessed.
Section I  Report of Re-Inspection

A. Introduction
B. Three-Year Re-Inspection X Overview
C. Post-Management Plan Activities and Changes
   C.1 Sampling and Analysis
   C.2 New Floor Tile Sampling
   C.3 Abatement Activity
   C.4 Periodic Six-Month Surveillance (Damaged Materials)
Section I - A

Report of Re-inspection

Introduction

The Three-Year Re-inspection 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 2018-2019 re-inspection. The re-inspection report/Management Plan of 2018-2019 were reviewed and prepared collectively by Management Planner Megan Vala and Julie Mui, of Criterion Laboratories, Inc., Jennifer Donovan of Batta Environmental Associates, Inc. and Monique Causley, of the School District of Philadelphia.

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 US 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.

John H. Webster Little School House
Section I - B

Three-Year Re-inspection X 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 X, 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 X 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

In the event 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 (ACBM)s 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**

*In the event that 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)**

*This building is excluded from having any asbestos-containing materials via sampling data. However, our inspections may, if observed, report findings of damaged materials in order for work orders to be issued for material repairs/corrective action as necessary.*

*Damaged materials reported in this section will be forwarded to maintenance for repairs.*

<table>
<thead>
<tr>
<th>Date</th>
<th>Element</th>
<th>Floor</th>
<th>On Site Room Name</th>
<th>Material</th>
<th>Amount of Material</th>
<th>Amount of Damage</th>
</tr>
</thead>
<tbody>
<tr>
<td>4/18/2017</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>No changes in the material were observed</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>11/02/2017</td>
<td>1</td>
<td>1</td>
<td>Main Office</td>
<td>Ceiling Tile 2’ x 4’</td>
<td>336 SF</td>
<td>1 SF</td>
</tr>
<tr>
<td>11/13/2018</td>
<td>1</td>
<td>1</td>
<td>Main Office</td>
<td>Ceiling Tile 2’ x 4’</td>
<td>336 SF</td>
<td>1 SF</td>
</tr>
</tbody>
</table>
Section II  

Re-Inspection Data

A. Introduction
B. Re-Inspection Key Definitions
C. Room by Room Location Log Report
Section II - A

Re-inspection Data

Introduction

The following information documents the Three-Year Re-inspection X 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 X**

<table>
<thead>
<tr>
<th>ITEM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>ULCS#</td>
<td>Individual identification number assigned to each school within the School District of Philadelphia.</td>
</tr>
<tr>
<td>HOMOGENEOUS AREA ID#</td>
<td>Identification number assigned to each homogeneous area in a school/facility. Each section of the homogeneous area ID is significant.</td>
</tr>
<tr>
<td></td>
<td>10/01/01/01</td>
</tr>
<tr>
<td></td>
<td><strong>A B C D</strong></td>
</tr>
<tr>
<td></td>
<td><strong>A.</strong> Is the ULCS# for the school.</td>
</tr>
<tr>
<td></td>
<td><strong>B.</strong> Designates the specific building/building area within the school.</td>
</tr>
<tr>
<td></td>
<td><strong>C.</strong> Designates the floor or level within the building/building area.</td>
</tr>
<tr>
<td></td>
<td><strong>D.</strong> Designates the homogeneous material within that floor or level.</td>
</tr>
<tr>
<td></td>
<td>Note: Item D may be a number or a letter.</td>
</tr>
<tr>
<td>SYSTEM AFFECTED</td>
<td>Corresponds to the AHERA system for classifying materials.</td>
</tr>
<tr>
<td>T</td>
<td>Thermal System</td>
</tr>
<tr>
<td>S</td>
<td>Surfacing System</td>
</tr>
<tr>
<td>M</td>
<td>Miscellaneous</td>
</tr>
<tr>
<td>ITEM AFFECTED</td>
<td>Is a description of the homogeneous material.</td>
</tr>
<tr>
<td>ORIGINAL INSPECTION DATA</td>
<td>This section contains the information found in the original Management Plan (1988-1989).</td>
</tr>
<tr>
<td>AMOUNT OF MATERIAL/UNIT</td>
<td>Quantity of material, and measuring unit.</td>
</tr>
<tr>
<td></td>
<td>Units include: Square Feet (SF) Each (EA) Linear Feet (LF) Cubic Feet (CF).</td>
</tr>
</tbody>
</table>
SCHOOL DISTRICT OF PHILADELPHIA
AHERA THREE YEAR RE-INSPECTION X

RE-INSPECTION FORM KEY

<table>
<thead>
<tr>
<th>ITEM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>CND Condition</td>
<td>Corresponds to AHERA condition rating for materials.</td>
</tr>
<tr>
<td>0</td>
<td>No Damage</td>
</tr>
<tr>
<td>1</td>
<td>Damage</td>
</tr>
<tr>
<td>2</td>
<td>Significant Damage</td>
</tr>
<tr>
<td>DP Damage Potential</td>
<td>Corresponds to the AHERA material assessment system.</td>
</tr>
<tr>
<td>1</td>
<td>Potential for Damage</td>
</tr>
<tr>
<td>2</td>
<td>Potential for Significant Damage</td>
</tr>
<tr>
<td>ASMD Assumed Asbestos</td>
<td>This means that a material was not sampled for asbestos content</td>
</tr>
<tr>
<td></td>
<td>during the original Management Plan inspection.</td>
</tr>
<tr>
<td>RA Response Action</td>
<td>This corresponds to the AHERA system of response action rating for materials.</td>
</tr>
<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>
<tr>
<td>CHANGES</td>
<td>This section describes changes to the homogeneous material in the twenty-four years since the original AHERA inspection. The abbreviations are defined below.</td>
</tr>
<tr>
<td>RMVD</td>
<td>Removed</td>
</tr>
<tr>
<td>ENCL</td>
<td>Enclosed</td>
</tr>
<tr>
<td>ENCP</td>
<td>Encapsulated</td>
</tr>
<tr>
<td>DMGD</td>
<td>Damaged</td>
</tr>
<tr>
<td>SMPLD</td>
<td>Sampled</td>
</tr>
<tr>
<td>MTRL</td>
<td>Material</td>
</tr>
<tr>
<td>RPRD</td>
<td>Repaired</td>
</tr>
<tr>
<td>N/L</td>
<td>None Located</td>
</tr>
<tr>
<td>RPLCD</td>
<td>Replaced</td>
</tr>
</tbody>
</table>

John H. Webster Little School House
SCHOOL DISTRICT OF PHILADELPHIA
AHERA THREE-YEAR RE-INSPECTION X

RE-INSPECTION FORM KEY

<table>
<thead>
<tr>
<th>ITEM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td>THREE YEAR RE-INSPECTION</td>
<td>This section contains the information obtained from the Three-Year Re-inspection X. 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.</td>
</tr>
<tr>
<td>DMGD AMT Amount Damaged</td>
<td>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.</td>
</tr>
<tr>
<td>NF Newly Friable</td>
<td>This section identifies materials in the original Management Plan which have since become friable.</td>
</tr>
<tr>
<td>RA Response Action</td>
<td>This rating is based on the AHERA regulations, and is comparable to the RA rating found in the &quot;Original Inspection Data&quot; section. The following table details the response actions.</td>
</tr>
</tbody>
</table>

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

a. High Priority Response
   The homogeneous material has been scheduled for abatement or other response action.

b. Medium Priority Response
   The homogeneous material will be scheduled for abatement or other response action as soon as the high priority responses have been addressed.

c. Low Priority Response
   The homogeneous material will be scheduled for abatement or other response action as soon as the medium priority responses have been addressed.

d. On-Going Response/Operations and Maintenance
   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.

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John H. Webster Little School House
SCHOOL DISTRICT OF PHILADELPHIA
AHERA THREE-YEAR RE-INSPECTION X

RE-INSPECTION FORM KEY

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 X evaluated homogeneous areas based on the materials current condition and location, as evidenced during the inspector's site visit.
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.*
<table>
<thead>
<tr>
<th>Property</th>
<th>On-Site Room Name</th>
<th>System Affected</th>
<th>Material Description</th>
<th>HDW</th>
<th>Confirmed/Assumed/Noted</th>
<th>Amount of Change</th>
<th>SP LF</th>
<th>SP LF (STD)</th>
<th>Color required by AAI</th>
<th>Comment/Seepage/Other Notes</th>
<th>Atria/Great Room Size Practice</th>
<th>Damage Potential</th>
<th>Heavy Metals</th>
<th>Response Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classroom 1</td>
<td>Classroom 1</td>
<td>NA</td>
<td>Ceiling Block Wall</td>
<td>25%</td>
<td>Confirmed</td>
<td>24.5</td>
<td>SP LF</td>
<td>SP LF</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
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<td>24.5</td>
<td>SP LF</td>
<td>SP LF</td>
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<td>SP LF</td>
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<td>SP LF</td>
<td>SP LF</td>
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<td>SP LF</td>
<td>SP LF</td>
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<td>SP LF</td>
<td>SP LF</td>
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<tr>
<th>Site Area Name</th>
<th>System Affected</th>
<th>Material Description</th>
<th>HDM</th>
<th>Certification/Assessment/AGM</th>
<th>Amount of Material</th>
<th>SF LP EA</th>
<th>Amount of Debris</th>
<th>SF LP EA</th>
<th>Laber required by IAC</th>
<th>Comments/Description/Notes</th>
<th>Response Action(s)</th>
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<tr>
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<td>Storage Closet, across Hallway</td>
<td>NA</td>
<td>Ceiling Tile 2' x 2'</td>
<td>Non-Suspect AGM</td>
<td>70</td>
<td>BF</td>
<td>0</td>
<td>BF</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<td>NA</td>
<td>Ceiling Block Wall</td>
<td>Non-Suspect AGM</td>
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<td>BF</td>
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<td>NA</td>
<td>Plaster (TVA 0.5&quot;)</td>
<td>IAC</td>
<td>70</td>
<td>BF</td>
<td>0</td>
<td>BF</td>
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<td>Plaster (TVA 0.5&quot;)</td>
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<td>Maintenance Supply Storage from</td>
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<td>Gypsum Block Wall</td>
<td>Non-Suspect AGM</td>
<td>70</td>
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<td>Gypsum Block Wall</td>
<td>Non-Suspect AGM</td>
<td>90</td>
<td>BF</td>
<td>0</td>
<td>BF</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
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<td>Gypsum Block Wall</td>
<td>Non-Suspect AGM</td>
<td>200</td>
<td>BF</td>
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<td>Gypsum Block Wall</td>
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<td>100</td>
<td>BF</td>
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<td>BF</td>
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<td>Gypsum Block Wall</td>
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<td>BF</td>
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**Note:** The table above contains information about materials and certifications of materials present in the building, along with the required actions for each material identified during the inspection.
Section III  Certificates

A. Management Planner/Building Inspector Certificates
Section III – A

These charts indicate the name, the Course Date and Expiration Date and the corresponding Certificate Number of the Management Planner (see above) and the Building Inspector (see below) of individuals that participated in the AHERA 3 Year Annual Inspection and Management Plan process of 2018/2019.

<table>
<thead>
<tr>
<th>Management Planner</th>
<th>Date Granted</th>
<th>Expiration Date</th>
<th>Certificate Number</th>
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<tbody>
<tr>
<td>Monique Causley</td>
<td>2/6/2018</td>
<td>2/6/2019</td>
<td>745897</td>
</tr>
<tr>
<td>Jennifer Donovan</td>
<td>1/25/2019</td>
<td>1/25/2020</td>
<td>ACC-0119-7-005</td>
</tr>
<tr>
<td>Julie Mui</td>
<td>10/12/2018</td>
<td>10/12/2019</td>
<td>747215</td>
</tr>
<tr>
<td>Megan Vala</td>
<td>9/12/2017</td>
<td>9/12/2018</td>
<td>744960</td>
</tr>
<tr>
<td>Megan Vala</td>
<td>9/11/2018</td>
<td>9/11/2019</td>
<td>747079</td>
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<table>
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<tr>
<th>Building Inspector</th>
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<th>Certificate Number</th>
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<tr>
<td>Noel Abraham</td>
<td>7/27/2018</td>
<td>7/27/2019</td>
<td>94001140</td>
</tr>
<tr>
<td>Bernard Brunner</td>
<td>9/22/2017</td>
<td>9/22/2018</td>
<td>79001040</td>
</tr>
<tr>
<td>Bernard Bryson</td>
<td>9/13/2018</td>
<td>9/13/2019</td>
<td>94001497</td>
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<td>Bernard Bryson</td>
<td>2/5/2018</td>
<td>2/5/2019</td>
<td>ACC-0218-6-029</td>
</tr>
<tr>
<td>Curtis Conner</td>
<td>2/18/2019</td>
<td>2/18/2020</td>
<td>ACC-0219-6-036</td>
</tr>
<tr>
<td>William Chaykin, Jr.</td>
<td>9/19/2018</td>
<td>9/19/2019</td>
<td>402</td>
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<tr>
<td>Paul M. Davis</td>
<td>9/13/2018</td>
<td>9/13/2019</td>
<td>ACC-0918-6-008</td>
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<td>Paul M. Davis</td>
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<td>2/6/2019</td>
<td>745894</td>
</tr>
<tr>
<td>Ryan Hutsell</td>
<td>2/5/2019</td>
<td>2/5/2020</td>
<td>748067</td>
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<tr>
<td>Lawrence Jackson</td>
<td>2/18/2019</td>
<td>2/18/2020</td>
<td>ACC-0219-6-033</td>
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<tr>
<td>Mary Anne Lerro</td>
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<td>Mary Anne Lerro</td>
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<td>Kristen Masotes</td>
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<tr>
<td>Kelly Mayberry</td>
<td>12/8/2017</td>
<td>12/8/2018</td>
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<td>Kelly Mayberry</td>
<td>12/7/2018</td>
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<td>826406</td>
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<tr>
<td>Jessica Sewell</td>
<td>5/14/2018</td>
<td>5/14/2019</td>
<td>AIR05142018-10</td>
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<tr>
<td>Ananth Vinjamuri</td>
<td>11/17/2017</td>
<td>11/17/2018</td>
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<td>Ananth Vinjamuri</td>
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Certificate of Training

Asbestos Management Planner Refresher

S. J. Luther

Criteron Laboratories, Inc.

02/06/2019
Expiration Date

Number 745897
Asbestos Management Planner Refresher

Monique Cauley has successfully completed a 4-hour course entitled "Asbestos Management Planner Refresher".

Therefore,Criterion Laboratories, Inc. hereby certifies that

Monique Cauley

03/05/2020
Expiration Date
Management Planner Initial Course

Pennsylvania Asbestos

for successfully completing the prescribed course of study in

awarded to

Certificate of Completion

(856) 665-3449
7921 River Road, Penmanuk New Jersey 08110
ACCESS TRAINING SERVICES, INC.
presented by

Jennifer Donovan

Certificate Number
ACC-0119-7-005

Exam Date
1/25/19

Not Provided

Course Date
1/24-25/19

Expiration Date
1/25/20

Mark A. Schulze
Training Director

Jennifer Donovan
Approved for AHRA accreditation under ACA Title II

Exam passed on this 27th day of October 2018 - Score - 84
Including Classroom Instruction

Asbestos Management Planer Initiated

Julie Muir

Herby certifies that

Criterion Laboratories, Inc.

Certificate of Training

10/11/2018 to 10/12/2018

16 Hour Course Entitled

Certificate is conducted in English

www.criterionlabs.com
512) 244-4349 - Fax
215) 244-1000 - Phone
400 Street Road
Bensalem, PA 19020

10/21/2019
Expiration Date:
Certificate of Training

Megan Vala

has successfully completed a 4 hour course entitled

Asbestos Management Planer Refresher

on the 14th day of September 2017

Approved for AHERA Accreditation under ISCA Title II

In accordance with: ISCA 1820

Examination Date: 09/12/2018

Number 744960
Megan Vala

Asbestos Management Planer Refresher

has successfully completed a 4 hour course entitle

Criterion Laboratories, Inc

Certificate of Training

09/11/2019
Expiration Date:

Number: 747079
Asbestos Building Inspector Refresher Course

Noel Abraham

EMSL Analytical, Inc.
EMSL

Asbestos Building Inspector Refresher Course

Bernard Brunner

Certifies that

Bernard Brunner has successfully completed the course of study for the

Asbestos Building Inspector Refresher Course

EMSL ANALYTICAL, INC.

EMSL ANALYTICAL, INC.

EMSL ANALYTICAL, INC.

EMSL ANALYTICAL, INC.

www.emsl.com
Fax: (866) 786-9793
Phone: (800) 220-3773
Chatham Road, NJ 07977
200 Route 130 North
EMSL Analytical, Inc.

Sponsored by:

Expiration Date: 09/13/2019
Certified: 09/13/2018
Course Date: 09/13/2018

EMSL Certificate No. 94001497

for Accreditation under TSAC Title II
Asbestos Building Inspector Refresher Course

has successfully completed the course of study for the

Bernard Brunner, Jr.

Certifies that

EMSL Analytical, Inc.
Building Inspector Refresher Course

Pennsylvania Asbestos

Under ISCRA Title II

Certificate of Completion

Awarded to

Bernard Bryson

Exam Date
N/A

Course Date
2/5/18

Certificate Number
ACC-0218-6-029

Social Security Number
Not Provided

Mark A. Schaefer
Training Director

Examination Date
2/5/19

(856) 665-3449
7921 River Road, Pennsauken, NJ 08110
Access Training Services, Inc.
Presented by
Certificate of Completion

Bernard Bryson

Building Inspector Refresher Course

Pennsylvania Asbestos

Awarded to

ACG-0219-6-036
Certificate Number

Not Provided
Social Security Number

2/18/19
Course Date

N/A
Exam Date

2/18/20
Expiration Date

Presented by
ACCESS TRAINING SERVICES, INC.
7921 River Road, Penasquitos, NJ 08110
(850) 665-3449

under TSCA Title II

For successfully completing the prescribed course of study in

Mark R. Stilger
Training Director
This document certifies that

Curtis R. Conner

Telephone (610) 968-9602
19 Myers Lane, Malvern, Pennsylvania 19355

C&J Environmental Services, Inc.
Certificate of Completion

Building Inspector Refresher Course
Pennsylvania Asbestos

Delivered by

Access Training Services, Inc.
1221 River Road, Pennsylvania, NJ 08110

Prepared under TSCA Title II

William Chayklin, Jr.

Awarded to

(856) 665-3449

Certificate Number
ACC-0918-6-009

Social Security Number
Not Provided

Examination Date
9/13/19

Exam Date
N/A

Course Date
9/13/18
Certificate of Training

Asbestos Building Inspector Refresher

Paul M. Davis

HEREBY CERTIFIES THAT

has successfully completed a 4-hour course entitled

Certificate of Training

02/05/2020
Expiration Date
Ryan Hutsell

Certificate of Completion

for successfully completing the prescribed course of study in

Building Inspector Refresher Course

Pennsylvania Asbestos

Presented by
ACCESS TRAINING SERVICES, INC.
7921 River Road, Pennsauken, NJ 08110
(856) 663-3449

Social Security Number
Not Provided

Certificate Number
ACC-0218-6025

Course Date
2/5/18

Exam Date
N/A

Expiration Date
2/5/19

Trainig Director
Mark A. Schaffer
Certificate of Completion

awarded to
Ryan Hutsell

for successfully completing the prescribed course of study in

Building Inspector Refresher Course

Pennsylvania Asbestos

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

Social Security Number
Not Provided

Course Date
2/18/19

Certificate Number
ACC-0219-6-033

Exam Date
N/A

Expiration Date
2/18/20

Mark E. Sullivan
Training Director
Certificate of Completion

Lawrence Jackson

for successfully completing the prescribed course of study in

Pennsylvania Asbestos
Building Inspector Refresher Course

presented by
ACCESS TRAINING SERVICES, INC.
7921 River Road, Pennington, NJ 08534
under TSCA Title II
(856) 665-3449

9/3/18
Not Provided
Social Security Number

ACC-0918-6-001
Certificate Number

9/3/18
N/A
Exam Date

9/3/19
Expiration Date

Mark K. Schiesser
Training Director
Approved for AHERA Accreditation Under TSQA Title II
Exam passed on this 6th day of March 2018 - Score - 92
or this 6th day of March 2018
including classroom instruction
Asbestos Building Inspector Refresher
Mary Anne Leerto
has successfully completed a 4 hour course entitled
Heretofore Certifies That
Criterion Laboratories, Inc.
Certificate of Training
03/06/2019
Expiration Date

Number 746119
Certificate of Training

CRITERION LABORATORIES, INC.

Has successfully completed a 4-hour course entitled
Asbestos Building Inspector Refresher

Mary Anne Lerro

Exam passed on this study of March 2019, Score 88

Expiry Date:
03/05/2020

Director:
James J. Wolak, CBI, President

400 Street Road
Bensalem, PA 19020
(215) 244-1200 - Phone
(215) 244-4349 - Fax
www.criterionlabs.com

Revised 3/17/2020
Course is conducted in English
Kristen Masotes

Certificate of Completion

Building Inspector Refresher Course

for successfully completing the prescribed course of study in

Pennsylvania Asbestos

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

Social Security Number
Not Provided

Course Date
6/7/18

ACC-001846-019
Certificate Number

Exam Date
NA

Expiration Date
6/7/19

Mark K. Schiliger
Training Director
This is to certify that

Kelly Mayberry

has successfully completed the New York State Department of Health approved course entitled

Inspector Refresher

This course meets the requirements of 39 CFR Title II.

Radha Reddy
Training Director

Certificate Number: 79992

Examination Date: 12/08/2017
Examination Grade: (CC)

Expiration Date: 12/08/2018

Big Apple Occupational Safety Inc
505 Eighth Avenue, #305
New York, NY 10018
(212) 564-7666
<table>
<thead>
<tr>
<th>Course Director</th>
<th>Virginia Certificate No.</th>
<th>Cardex No.</th>
</tr>
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<tbody>
<tr>
<td>E. Ballentine</td>
<td>WARROST2014-10</td>
<td>05/14/2018</td>
</tr>
<tr>
<td>Principal Inspector</td>
<td>Exam Date</td>
<td>Course Date</td>
</tr>
<tr>
<td>David Truman</td>
<td>5/14/2019</td>
<td>05/14/2018</td>
</tr>
</tbody>
</table>

For Accreditation Under 10CA Title 12

4-Hour EPA Asbestos Inspector Refresher

The course entitled has met the attendance requirements and successfully completed.

JESSICA SEWELL

This is to certify that

AEROSOL MONITORING & ANALYSIS, INC.
Authorized Officer's Name

Gail M. Comer

Authorized Officer's Signature

[Signature]

The course was held from 11/17/17 to 11/17/17.

This document certifies that

Anantha Vithanam

has successfully completed the Commonwealth of Pennsylvania Certification that

Telephone (610) 933-3322
19 Music Lane, Malvern, Pennsylvania 19355

C&C Environmental Services, Inc.
Asbestos Building Inspector Refresh

Has successfully completed a 4-hour course entitled

Anusha K. Vimala

Hereby certifies that

Criterion Laboratories, Inc.

Certificate of Training

11/06/2019
Expiration Date:
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.

### Cross Reference Table

3 Year Reinspection Report follows this Cross Reference Table documentation.

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<tr>
<td>Asbestos Investigation Report (AIR)</td>
<td>Attachment 1 Letter Dated August 4, 2006</td>
</tr>
<tr>
<td>Training (included in the Asbestos Management Program)</td>
<td>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. 2 hour awareness training records for all Building Engineers, Custodian Assistants and maintenance personnel 40 hour worker/supervisor training records for the OEMS A-Team and various AST tradesmen.</td>
</tr>
<tr>
<td>Response Actions (monthly mailings if applicable)</td>
<td>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.</td>
</tr>
</tbody>
</table>
ASBESTOS DESIGNATED PERSON

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

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

Annual Building Inspector Refreshers 1990 to Present 4 Hours
Drexel University
Criterion Laboratories, Inc
Access Training Services, Inc.

Annual Building Management Planner Refreshers 1990 to 1994 4 Hours
Drexel University
Criterion Laboratories, Inc

Environmental Manager, School District of Philadelphia 2013 to Present 4 Hours
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
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
OFFICIAL NOTICE

PLEASE POST

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

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

Date: October 1, 2018
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
Legal Notice: Annual AHERA Notification Letter
Asbestos Report Available for Your School
2018/2019 School Year

Dear Parents/Guardians, School Staff, Temporary Workers and or Contractors:

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.

Members of the school staff, parents/guardians, temporary workers and/or contractors, are required to receive a copy of this Notification Letter.

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.

If you have any questions, feel free to contact Francine Locke, Director of the Office of Environmental Management and Services @ 215 400 5213, flocke@philasd.org. Find your school’s AHERA Report at www.philasd.org/capitalprograms/programsservices/environmental/.
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 (Crawlspaces/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.
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
Asbestos Management Program
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DEFINITIONS / ACRONYMS

ACM/PACM: Asbestos Containing Material/Potential Asbestos Containing Material

AHERA: Asbestos Hazard Emergency Response Act

AIR FORM: Asbestos Inspection Report Form

Amended Water: Water to which a surfactant (soap) has been added

AMP: Asbestos Management Program/Asbestos Management Plan

Asbestos Designate Person: Individual assigned by the district to oversee asbestos related issues.

Asbestos Regulated Area: Location that is posted as an asbestos work area in which only approved and accredited personnel are permitted to enter

AST: Asbestos Support Team involving approved and accredited school district tradespersons personnel that are school district person

A-TEAM: School District of Philadelphia asbestos workers

CIP: Capital Improvement Program

Consultant: Asbestos consulting firm hired by the District

Demolition Directive: Memorandum – August 4, 2006 from Patrick Henwood

EPA: Environmental Protection Agency

In House Personnel: School District of Philadelphia asbestos workers

LEA: Local Education Agency

O&M: Operations and Maintenance

OEMS: Office of Environmental Management and Services

OSHA: Occupational Safety and Health Administration

PEL: Permissible Exposure Limit

PSD or SDP: Philadelphia School District/School District of Philadelphia

PSIT: Philadelphia School Improvement Team

STEL: Short Term Exposure Limit
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) 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;


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
Asbestos Inspection Report  
School District of Philadelphia projects ONLY

1. Name of Building:  
Phone #

2. Name of Building Owner: School District of Philadelphia  
440 North Broad Street, Philadelphia, PA 19130  
Phone # 215-400-4750

3. Name of Licensed Investigator:  
License #  
Phone #

4. Name of Certified Lab:  
License #  
Phone #

5. Scope of Work: (include all locations)

A review of the SDP Design Drawings was performed ☐ Yes (List Information Below) ☐ No - Schedule a meeting with OEMS

Asbestos Containing Material Present? ☐ Yes (List Below) ☐ No

6. List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. You (Investigator) must label all ACM that may be left in the work area.  

<table>
<thead>
<tr>
<th>Location</th>
<th>Description</th>
<th>Type (Code 1)</th>
<th>Amount Square</th>
<th>Amount Linear</th>
<th>Condition (Code 2)</th>
<th>Action (Code 3)</th>
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Code 1  
FR1 - Friable  
NF1 - Non-Friable, Cat. 1  
NF2 - Non-Friable, Cat. 2

Code 2  
DD - Deteriorated or Delaminated  
ND - Non-Damaged

Code 3  
REM - Removal necessary prior to Demo/Reno  
NRN - No removal necessary, label ACM  
REP - Repair & Label ACM, removal not necessary

I hereby certify that the foregoing statements are true and the information contained in this report is true. This certification is made subject to the penalties set forth in 18 PA. C.S. §4904 relating to unsworn falsification to authorities. Furthermore I certify that the inspection, sampling, and labeling requirements of section X of the Asbestos Control Regulation (ACR) have been met. The building owner has been notified of the ACR requirements and given a copy of this report. If the inspection has revealed ACM which will be disturbed by the proposed work or if it has revealed ACM in bad condition, the building owner has been notified to remove or repair the ACM in accordance with the ACR prior to renovation or demolition activity.

Signature of Licensed Asbestos Investigator:  
Date:  
Signature of Building Owner:  
Date:
6. continued
List Asbestos Containing Material (ACM) located in the planned renovation/demolition area(s). Damaged ACM must be listed and then repaired or removed prior to renovation. You (Investigator) must label all ACM that may be left in the work area.

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7. List all locations inspected that do NOT have asbestos containing material present:

<table>
<thead>
<tr>
<th>Location</th>
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8. List all homogeneous materials present in this school:

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<thead>
<tr>
<th>ASBESTOS CONTAINING MATERIALS</th>
<th>NON-ASBESTOS MATERIALS</th>
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9. Caution labels affixed to all ACM?

- [ ] Yes
- [ ] No

All contractors' employees involved in the demolition or renovation activity must receive a copy or have access to this Asbestos Inspection Report.