



THE SCHOOL DISTRICT OF PHILADELPHIA

Asbestos Hazard Emergency Response Act “AHERA”

THREE-YEAR RE-INSPECTION 2018-2019 and ASBESTOS MANAGEMENT PLAN for the

Finletter Little School House

**ULCS# 7271
Building # B727002-1
6101 North Front Street
Philadelphia, Pennsylvania
19120**

Year Built: 1997

December 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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**OFFICE OF ENVIRONMENTAL
MANAGEMENT AND SERVICES**
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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

This Asbestos Hazard Emergency Response Act (AHERA) Three-Year Re-inspection "Volume # X" 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 2018-2019 were conducted and completed between May 2018 through April 2019 as a joint project 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., and Westchester Environmental LLC.

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 (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 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 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

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

Sheetrock Ceiling	Sheetrock Wall	Sink Undercoat Mastic
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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.*

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.*

** *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	Concrete Floor	Wood Ceiling
Ceiling Tile 2' x 4'	Fiberglass Pipe Fitting Insulation	
Ceramic Tile Floors	Fiberglass Pipe Insulation	
Concrete Block Wall	Vinyl Sheeting Floor	

** 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 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.*

*** 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 1st 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.

<i>Attic/Crawlspace</i>	<i>Access Area</i>	<i>Floor Surface</i>	<i>Category Rank</i>	<i>Comments</i>
Attic	X	X	X	No Attic
Crawlspace	X	X	X	No Crawlspace

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 X 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 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 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 (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

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.

<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>
03/21/2017	1	1 st	Hallway from Classrooms K1 to A12	Sheetrock Ceiling	2934 SF	5 SF
10/18/2017	1	1 st	Hallway from Classrooms K1 to A12	Sheetrock Ceiling	2934 SF	5 SF
12/07/2018	1	1 st	Hallway from Classroom K1 to Classroom A12	Sheetrock Ceiling	2934 SF	5 SF

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

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

RE-INSPECTION FORM KEY

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

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

RE-INSPECTION FORM KEY

ITEM	DEFINITION
THREE YEAR RE-INSPECTION	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.
DMGD AMT Amount Damaged	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.
NF Newly Friable	This section identifies materials in the original Management Plan which have since become friable.
RA Response Action	<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> <ol style="list-style-type: none">1. Establish O&M Program2. Repair and Establish O&M Program3. Enclose4. Encapsulate5. Remove6. Partial Removal and Establish O&M Program <ol style="list-style-type: none">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.

**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.

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.