

## **Administrative Procedures for Environmental Management** (Attachment for Policy No. 708)

### **Purpose**

The purpose of the following administrative procedures is to formalize the steps that the Office of Environmental Management and Services (“OEMS”) will take to proactively and effectively manage environmental programs throughout the District. The following procedures will outline OEMS’s management of administering:

- The District’s asbestos management program,
- The design and monitoring of environmental abatement and remediation projects,
- Lead based paint inspections and remediation projects,
- Lead in water testing,
- The District’s regulated waste program,
- The District’s indoor air quality assessments,
- The District’s storage tank inventory,
- Environmental site assessments, and
- The District’s sustainability management program.

### **Definitions**

**Asbestos Containing Material (“ACM”):** A material that contains more than 1 percent (1%) asbestos by weight.

**Imminent Hazard (“IH”):** A known or suspected asbestos containing material that is damaged, to where debris is visible, located in a teacher/student occupied space, and there is a risk of spread.

### **Procedures**

#### **Asbestos Hazard Emergency Response Act of 1976 (“AHERA”) Inspections**

OEMS is responsible for managing the federally mandated AHERA Program for the District. The AHERA Program consists of, at a minimum, regularly scheduled six-month surveillance inspections and three-year comprehensive inspections of all District facilities. AHERA also requires the retention of documentation for AHERA training records, AHERA Management Plans for every school, and annual notifications.

OEMS contracts with Pennsylvania and City of Philadelphia licensed Building Inspectors to inspect schools for asbestos-containing building materials and prepares and updates management plans that make recommendations for the reduction of asbestos hazards.

In accordance with AHERA, the District takes the following actions:

1. Perform inspections for asbestos-containing material;
2. Develop, maintain, and update asbestos management plans;

3. Provide yearly notifications regarding the availability of each school's asbestos management plan and any asbestos abatement actions taken or planned in the school;
4. Designate a contact person to ensure the responsibilities of the local education agency are properly implemented;
5. Perform periodic surveillance of known or suspected asbestos-containing building materials; and
6. Other actions necessary to conform to AHERA regulations.

### Asbestos Monitoring and Abatement

OEMS is responsible for managing the District's Asbestos Containing Materials ("ACM") through the AHERA program. OEMS provides oversight in the recognition, assessment, management, and prevention of asbestos-related concerns throughout the District.

In the event damage is identified, the ABI will consult with OEMS as appropriate to determine the response action, in accordance with AHERA.

In the event an Imminent Hazard ("IH") is identified during an inspection, access to the area will remain restricted for students and staff until response actions are completed and the area passes an air sampling test. When an IH is identified, OEMS will send the principal and the Office of Family and Community Engagement ("FACE") a letter, to be shared with the school community, identifying the location of the IH and stating that access to the area has been restricted until the response action has been completed. OEMS will send the principal and FACE a second letter indicating the completion of the response action.

In accordance with Policy 704 and the associated procedures, the Building Engineer ("BE") or Principal should enter a work order for damage to suspected or known ACM, including a picture if possible, and contact the Facility Area Coordinator ("FAC"). The FAC will coordinate with the OEMS AHERA Manager to schedule an assessment, as necessary. BEs and Principals are encouraged to review their school's Management Plan to determine if damaged material is a known ACM.

All BEs and FACs participate in a 2-hour Asbestos Awareness training from a certified provider.

Maintenance of each school's Management Plan is the responsibility of the school's principal. They must be maintained in the main office.

### Lead Paint Management

OEMS is responsible for compliance with City of Philadelphia's lead paint legislation. In doing so, OEMS will arrange for the inspection, and, if necessary, stabilization, of lead paint every four years, as required by law. OEMS will also handle communications regarding lead paint, sending to FACE, as necessary.

All paint repairs are completed in accordance with applicable law, including Environmental Protection Agency and City of Philadelphia standards and regulations.

BEs and FACs receive training regarding identification and handling of potential lead-containing materials.

### Water Quality Management — Lead Testing

OEMS will coordinate water testing and management efforts on at least a five-year recurrent basis in conformity with applicable law, including the Philadelphia Code. Testing includes collecting samples from every drinking water outlet and submission of that sample to a laboratory for analysis. In the event a sample contains lead presence above 10 parts per billion, the outlet is shut off prior to the following school day and a corrective action plan is implemented within 30 days of receiving the sample results. Corrective actions may include the removal or repair of an outlet, installing a filter, or replacing the outlet with a hydration station.

OEMS will communicate as outlined in the [Safe Water Testing Program](#).<sup>1</sup>

### Regulated Material Management

OEMS shall be responsible for the management of regulated materials including creating management plans for the handling, storage, and disposal of those materials.

### Indoor Air Quality (“IAQ”) Program

OEMS is responsible for the creation of an IAQ program including the anticipation, recognition, tracking, and investigation of IAQ conditions that may impact the health and performance of students and teachers.

When a BE or principal identifies a suspected IAQ concern, they create a work order in the District’s Work Order Management Database and contact their FAC. OEMS schedules an IAQ inspection and recommends appropriate action, after necessary assessment, which could include interoffice collaboration.

### Environmental Site Assessments Storage Tank (“ST”) inventory

When requested by other District offices in conjunction with the transfer or improvement of property, OEMS provides Environmental Site Assessments, geotechnical and geo-environmental services including soil, groundwater, and ST assessment and remediation services through the support of professional consulting firms.

OEMS manages the ST inventory of all regulated and non-regulated STs within the District’s inventory according to Pennsylvania Department of Environmental Protection regulations. OEMS also monitors any regulatory compliance associated with any releases on an ad hoc basis.

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<sup>1</sup> The Safe Water Testing Program can be found at <https://www.philasd.org/capitalprograms/programsservices/environmental/water-testing/>

### Capital Project Coordination

Prior to the project bid, the OEMS Environmental Compliance Manager coordinates with the Office of Capital Programs' ("OCP") Design and Construction team to identify potential environmental issues which may be encountered and can be incorporated into the scope of construction projects, where appropriate, through project environmental specifications. During the course of the project, the OEMS Environmental Compliance Manager and Environmental Response Manager will coordinate with the On-site OCP Construction Project Managers and Building Construction Inspectors, or other relevant Capital Project personnel, to provide support regarding the implementation of the environmental specifications.

### Sustainability Management Program

OEMS facilitates the sustainability goal to provide each student in Philadelphia with a green, healthy, high-performance school that promotes teaching and learning and equips future leaders and decision makers with the knowledge and skills needed for a changing world. The work involves collaborative projects with outside funding and organizations.

### Environmental Advisory Council ("EAC")

OEMS created the EAC in order to engage representatives from across the city in the conversation about its progress and plans to address environmental conditions in District schools. OEMS will provide the EAC with quarterly updates, listen to members' feedback for consideration, and respond to questions that they may have so they can be informed advocates of this work in their communities. The EAC meets quarterly. Minutes from the meetings are available on the [EAC webpage](#).<sup>2</sup>

### Communicating with OEMS

OEMS is committed to continuous improvement regarding communication of environmental concerns, including the identification of new programs or resources that may potentially support communication efforts. Contact OEMS at [environmental@philasd.org](mailto:environmental@philasd.org) with any questions or concerns.

OEMS will copy FACE on all communications intended for students and guardians to promote equitable access to information.

### Maintenance Schedule

These administrative procedures will be reviewed upon policy renewal, or in the case of a triggering event.

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<sup>2</sup> The EAC webpage is available at <https://www.philasd.org/capitalprograms/programsservices/environmental/environmental-advisory-council/#:~:text=The%20School%20District%20of%20Philadelphia%27s,environmental%20hazards%20in%20our%20schools>.

**Related Information:**

[Environmental Safety Improvement Plan](#)

[Policy 704](#) - Maintenance

[Policy 705](#) - Workplace and Construction Project Safety

[Policy 300](#) - Employee Code of Ethics

[Administrative Procedures for Policy 300](#) - Employee Code of Ethics