

**MANAGEMENT PLAN
FOR AHERA COMPLIANCE**

**Orange County Classical Academy
4100 E. Walnut Ave.
Orange, CA 92689**

Project No: OC151961

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PREFACE

To protect the health and safety of school children and teachers from asbestos hazards, President Reagan signed into law the Asbestos Hazard Emergency Response Act (AHERA) in October 1986. Under EPA'S final rule for AHERA, published in the Federal Register of October 30, 1987, Local Education Agencies (LEA's) for public and private schools, kindergarten through 12th grade, are required to identify all asbestos-containing materials (ACM) in their facilities and develop Management Plans for the abatement and monitoring of the ACM. These plans must be submitted to the State agency responsible for administering AHERA (the Office of Local Assistance for the State of California) by May 9, 1988, and implementation of the plans must be initiated by July 9, 1989. To ensure that the work is done correctly, EPA-AHERA requires that the persons performing the asbestos inspection and management planning be properly trained and accredited. Further, to ensure that the identified asbestos is maintained in a safe condition until removed, AHERA requires that the schools' custodial and maintenance staffs be trained in asbestos awareness and management and that periodic surveillance and reinspection of the ACM be undertaken. Substantial fines and criminal penalties can be levied on LEA's failure, to comply with the provisions of AHERA.

This document is the Asbestos Management Plan for Orange County Classical Academy of the Orange Unified School District of Orange County, California. It is being submitted to the California State Office of Local Assistance in compliance with AHERA. It identifies the asbestos-containing building materials (ACBM) found in its schools and presents the plans for either removing the ACBM or maintaining it in a safe condition through an operations and maintenance (O&M) program. It also contains the School's plans for reinspection, periodic surveillance, training, and notification of the employees and parents.

Patriot Environmental Laboratory Services, Inc. performed the asbestos inspection and assessment for the Orange County Classical Academy and assisted in the preparation of this Management Plan. Patriot Environmental Laboratory Services, Inc. provided these services through a contract with the Orange Unified School District, which made provisions for AHERA compliance consulting support for all of the schools in the District.

*US EPA, "Asbestos—Containing Materials in Schools," 40 CFR Part 763, effective December 14, 1987.

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1. Asbestos Inspection and Assessment Report
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EXECUTIVE SUMMARY

A thorough inspection of all facilities in the Orange County Classical Academy of the Orange Unified School District was performed to identify and assess the condition of all on-site friable and nonfriable asbestos-containing building materials (ACBM). The inspection was performed according to U.S. EPA guidelines established for AHERA. The results are reported in the "Asbestos Inspection and Assessment Report for the Orange County Classical Academy," prepared by Patriot Environmental Laboratory Services, Inc., 2021, included as an addendum to this document.

To eliminate possible future hazards that may result from deterioration of and damage to the ACBM, the School has prepared a comprehensive plan for managing all of the ACBM safely and effectively. In general, the Management Planner recommends removal of those areas of friable ACBM having the most potential for asbestos fiber release and maintenance of all of the remaining ACBM in a safe, nonhazardous condition. Included in the Management Plan are plans for operations and maintenance (O&M), periodic surveillance, reinspection, training of custodial and maintenance personnel, and notification of school employees and parents of the results of the asbestos inspection and management plans.

The specific findings and recommendations of this Management Plan are contained in Tables I through IV, located in Appendix A. The text of this document is written to provide a thorough understanding of the methodologies and rationales used in preparing this plan.

A. INTRODUCTION

1. Purpose

This Management Plan has been prepared by the Orange County Classical Academy of the Orange Unified School District in compliance with the Asbestos Hazard Emergency Response Act (AHERA). It identifies the asbestos-containing building materials (ACBM) found in its school buildings and presents the plan for managing the ACBM in such a manner as to protect the health and safety of the School's populations (i.e., students and staff). It is a working document intended for use by school authorities in the implementation and monitoring of safe and effective asbestos management actions. In addition, it is an informational document intended for use in informing the public of asbestos plans and progress in the School. As required under AHERA, the document will be updated periodically to maintain its usefulness.

2. Management Plan Methodology

The first step in the preparation of this Management Plan was the identification and assessment of all friable and nonfriable ACBM in the School's facilities. This was accomplished by a comprehensive and thorough physical inspection of all facilities in accordance with AHERA guidelines, the results of which are reported in the accompanying Inspection and Assessment Report. An AHERA-accredited inspector experienced in asbestos surveys performed the inspection of the School. The inspectors located all suspected ACBM and assessed the type of ACBM and its hazard potential based on its condition and exposure potential. The ACBM was then classified as follows:

- Damaged or significantly damaged thermal system insulation ACBM
- Damaged friable surfacing ACBM
- Significantly damaged friable surfacing ACBM
- Damaged or significantly damaged friable miscellaneous ACBM
- ACBM with potential for damage
- ACBM with potential for significant damage
- Any remaining friable ACBM or friable suspected ACBM.

Prior to the inspection, the inspector met with the School Asbestos Coordinator to (1) review AHERA requirements and prior asbestos inspection activities in the school, (2) discuss special requirements and problems that the School may have had, and (3) lay out detailed inspection plans and schedules. At the conclusion of the inspection, the inspector gave the School Asbestos Coordinator an out— briefing that summarized its findings.

Following the inspection and assessment, all data relative to the suspect ACBM were entered into a report. The survey report was checked for accuracy by the inspector, who corrected any errors and provided missing data.

After the inspection and assessment data were finalized, an accredited Management Planner reviewed and evaluated the data and made response action recommendations (e.g. removal), as required for all friable ACM found in the School. These recommendations are those that are needed to protect the health and safety of the School population. The Management Planner then collaborated with School officials to develop an appropriate schedule for the recommended response actions, giving consideration to the hazard potential and available resources. Plans were then made for maintaining, in a safe condition, all of the remaining ACM (i.e., all ACM not recommended for removal or other abatement action) - These plans consist of ACM repair, O&M, cleanup of debris, periodic surveillance, training of custodial and maintenance staffs, record keeping, etc. Also, the various resources required to carry out both the response actions and the safe maintenance program were estimated. Finally, all the results of the inspection, assessment, planning, and resource estimation were incorporated into the Management Plan. Included in the document is a plan for notifying the employees and parents of the availability of the Management Plan.

3. Local Education Agency (LEA) Representative

The LEA Representative designated for the Orange County Classical Academy is specified by the Orange Unified School District and/or the School Board and has been given this individual full authority for implementing the Asbestos Management Plan. This person has been serving as Asbestos Coordinator for the School and has supervised the AHERA inspection and the development of the Management Plan.

The specific responsibilities of the LEA Representative are to assure that:

- the Asbestos Management Plan is maintained and updated with all required information;
- activities performed as part of the Asbestos Management Plan are carried out with the EPA's rule;
- custodial and maintenance personnel are properly trained;
- workers and building occupants, or their legal guardians, are informed, at least once each school year, about the Asbestos Management Plan;
- short-term workers (i.e., utility workers) who may come in contact with ACM are informed of the locations of ACM;
- warning labels are posted in accordance with the regulation;
- an updated copy of the Asbestos Management Plan is available at the School for inspection and that notification of availability has been provided as specified in the Management Plan;
- the Asbestos Management Plan is properly implemented by a designated person and that the designate receives adequate training as specified in 40 CFR 763.84(g) (r)
- the implications of conflict of interest that may arise from interrelationships among accredited personnel performing activities under the Asbestos

Management Plan are fully considered.

4. Date of Implementation of Management Plan

The LEA Representative will begin implementing the Management Plan as soon as it is approved by the State of California or by July 9, 1989, whichever comes first.

*The LEA Representative is scheduled to take a 6-hour asbestos awareness and management course prior to the time of the implementation of this plan.

5. Organization of the Document

This Management Plan is organized as recommended by the Office of Local Assistance of the State of California in its memorandum to "All School District Superintendents, County Superintendents of Schools and Private Schools," dated February 17, 1988. The Introduction identifies the purpose of this document, describes the methodology, and identifies the designated LEA Representative. The remaining chapters include:

Inspection Results - A summary of the results of the asbestos inspection and assessment conducted in compliance with AHERA. The full report is incorporated in "Asbestos Inspection and Assessment Report for the Orange County Classical Academy," prepared by Patriot Environmental Laboratory Services, Inc., 2021, included herewith as an addendum.

Response Actions for Friable ACBM - The recommended response actions and plans for all friable ACBM found during the inspection.

Management of the Remaining ACBM - The plans for the remaining ACBM, i.e., all friable ACBM that has not been scheduled for removal or other abatement action, plus all nonfriable ACBM found.

Reinspection and Other Plans - The plans for reinspection, periodic surveillance, O&M, training, and notification of parents and employees.

Evaluation of Resources - Estimates of the financial resources required to carry out the plans, including the response actions, O&M, periodic surveillance, reinspection, and training.

Mandatory Records - An outline of the records that will be kept to monitor and track the asbestos activities and ensure that they are carried out as required under AHERA.

Glossary - A list of terms used throughout this document.

B. INSPECTION RESULTS

The results of the inspection of the Orange County Classical Academy are summarized in the attached Asbestos Inspection and Assessment report, which indicates whether friable, nonfriable, or no ACBM was found in each of the School's buildings. The ACBM that was found was assumed to be asbestos-containing based on the previous survey documentation and experience and judgment of the inspector.

The specific locations of the ACBM found within the School are provided in the attached Inspection and Assessment Report for the Orange County Classical Academy.” The Inspection and Assessment Report identifies the friable ACBM locations, and identifies the nonfriable ACBM locations.

C. RESPONSE ACTIONS FOR FRIABLE ACBM

This chapter presents the response actions that are planned for all friable ACBM found in the Orange County Classical Academy facilities.

1. Rationale for Response Recommendations

Because friable ACBM has the potential for releasing asbestos fibers, some type of response action (e.g., removal) or safe maintenance program (O&M) must be put into effect to ensure that asbestos fibers are not released and inhaled by the School occupants. In general, ACBM abatement by removal or encapsulation is costly compared to O&M programs. Thus, the latter are generally recommended if it can be assured that O&M can maintain the ACBM in safe condition and preclude human exposure to asbestos fibers. The rationale for recommending response actions is as follows:

If the potential exists for both fiber release and human exposure, then removal or encapsulation of the ACBM is recommended.

If the potential for fiber release is negligible or there is negligible chance that human exposure would result if release should occur, then an O&M program is recommended.

In terms of the type and condition of friable ACBM found in the School, the following criteria are used to make the response action recommendations.

a. Friable Surfacing Material

In general, all friable surfacing material (e.g., troweled-on or sprayed-on ceilings) of appreciable area (greater than a few square feet) is recommended for removal regardless of the condition of the material. This is because of the ever-present potential for damage and release of fibers via natural or manmade causes, i.e., earthquakes, building vibrations, water damage, and vandalism. The exception to this would be if the material were in an enclosed, unoccupied area (e.g., crawl—space) where there is no chance of asbestos fibers getting into the air breathed by the school occupants. Then, if the material was found in good condition, O&M might be recommended rather than removal.

In those cases where removal is normally recommended, the condition of the surfacing material and the exposure potential governs the urgency of removal. For example, if the condition of the material is poor and the probability is high that fibers are being released, then isolation of the area would be recommended with removal to follow as quickly as possible. On the other hand, if the surfacing material is in good shape and intact, then there would be no urgency for the response action and removal could be scheduled after higher priority projects are completed.

b. Friable Thermal Insulation

If friable thermal insulation (on pipes, boilers, etc.) is in good or repairable condition and is generally inaccessible (i.e., located in the mechanical room), then it is recommended for O&M rather than removal. However, if the insulation is subject to recurring damage, it is recommended for removal regardless of the accessibility of the area. Further, if the insulation is in an air plenum that circulates the air to occupied areas, then removal is recommended if the material has been damaged. As in the case of surfacing material, it is the extent of damage and exposure potential that determines the urgency for removal.

c. Miscellaneous Friable Materials

There are a number of other types of building materials with varying degrees of friability that contain asbestos, e.g., suspended ceiling tiles, glued—on ceiling tiles, gaskets, fittings, and joints. In general, ceiling tiles are of low friability and are not recommended for removal unless they are subject to damage or are in an air plenum. If they are of high friability, then they are treated as surfacing material and removed regardless of their condition.

Other miscellaneous friable materials include those that are generally found in unoccupied areas having limited accessibility and hazard potential. Consequently, removal of these items is generally unnecessary.

2. Response Recommendations. Preventative Measures and Plans

The recommended response actions and/or preventative measures for each area where friable ACBM is referenced within the attached Asbestos Inspection and Assessment Document as appropriate. This document lists the ACBM location and the recommended response action.

Also included for each location is a hazard rating for the ACBM location. The hazard rating is a relative measure of the hazard potential of the ACBM, and its intended use is to aid in the prioritization and scheduling of response actions. It is not used to make decisions as to which response action is appropriate; this can only be done by the Management Planner after considering all relevant factors. The rating system is based on factors that are determined from the asbestos survey. The hazard rating system methodology is described within the attached Asbestos Inspection and Assessment Document.

The recommendations and plans for friable ACBM (see the Asbestos Inspection and Assessment Document) were prepared by an AHERA-certified Management Planner whose name and accreditation are provided within Section 6 of the attached Asbestos Inspection and Assessment Document. It should be noted that although AHERA guidelines request a state of accreditation, California has not established any accreditation criteria beyond what the Federal guidelines require. Consequently, a state of accreditation is not applicable for the management planner.

3. Response Action Records

A record will be maintained of each response action completed.

4. Recommendations for Cleaning Prior to Abatement

Unless the building has been cleaned using equivalent methods within the previous 6 months, all areas of a school building where friable ACBM or damaged or significantly damaged thermal system insulation ACBM are present, shall be cleaned before the initiation of any response action, other than O&M activities or repair, according to the following procedures:

- HEPA—vacuum or steam—clean all carpets.
- HEPA-vacuum or wet—clean all other floors and all other horizontal surfaces.
- Dispose of all debris, filters, mop heads, and cloths in sealed, leak—tight containers.

5. Certification of Design and Abatement Contractors

For removal of the ACBM, the School will use only EPA-AHERA accredited and California OSHA-registered asbestos management and abatement contractors.

6. Avoidance of Conflict of Interest

To avoid conflict of interest and to comply with AHERA, the School will ensure that the firms selected for abatement design and clearance air monitoring are independent of the firms selected for abatement.

D. MANAGEMENT OF THE REMAINING ACBM

The previous section identified those locations of friable ACBM scheduled for removal. It also identified the friable ACBM locations remaining in the buildings and scheduled for inclusion in an O&M program. Also remaining in the School buildings will be those locations of nonfriable ACBM.

The O&M program must ensure the continued integrity of both the friable and nonfriable locations remaining. In general, the O&M program consists of repairing any damage, cleaning up ACM debris, and performing long-term periodic surveillance, reinspections, and reassessment.

The Asbestos Inspection and Assessment Document lists the remaining ACBM (i.e., ACBM, both friable and nonfriable, not scheduled for removal) and notes the general O&M plans for the material. The O&M program for each type of material is described in detail in the O&M Manual.

E. REINSPECTION AND OTHER PLANS

1. Reinspection Plan

Within three years of the effective date of this Management Plan, all known or assumed ACBM remaining in each school building of the Orange County Classical Academy must be reinspected by an accredited inspector. The primary purpose of the reinspection is to determine whether nonfriable material has become friable. The Asbestos Coordinator will supervise the reinspection. The reinspection will be performed in accordance with 40 CFR 763.85(b), and a record of the reinspection will be submitted to the Asbestos Coordinator within 30 days of the reinspection. The record will be included in the Management Plan as an update and will contain the following information:

- Date of the reinspection
- Changes in the condition of known or assumed ACBM
- Locations where samples were collected and analytical results
- Assessments or reassessments of friable ACBM
- Signature(s) and certification(s) of inspector(s)

2. Periodic Surveillance Plan

Within 6 months of the effective date of this Management Plan, and at least once every 6 months thereafter, a qualified person will visually inspect all identified known or assumed ACBM. Periodic surveillance involves a visual inspection to note change in condition. Periodic surveillance will be performed by the Asbestos Coordinator or any maintenance personnel who have received the asbestos O&M training. A record of the surveillance, including the date and any changes in the condition of the materials, will be maintained by the Asbestos Coordinator in this Management Plan.

3. Operations and Maintenance Program

An O&M program will be implemented by the School's maintenance and custodial staffs once they have received the required training. The O&M program is described in the O&M Manual. The O&M program includes procedures to follow for:

- Initial cleaning of areas where friable ACBM is located;
- Repair of minor damage to friable ACBM;
- Protecting building occupants during O&M activities that disturb friable ACBM; and
- Handling friable ACBM that becomes dislodged and releases fibers.

4. Training Plan

AHERA requires that the School custodians be given a 2-hour asbestos—awareness course and that maintenance personnel who come in contact with or handle ACBM be given an additional 14 hours of O&M training. Also, AHERA requests that the LEA Representative receive adequate time to perform his/her assigned duties. The plan for achieving this training is as follows:

- a. The LEA Representative and his/her backup will be given a 6—hour asbestos awareness and management course prior to the implementation of the plan. The course will include basic understanding of the health effects of asbestos, inspecting for ACBM, options for controlling ACBM, relevant regulations, and conflict—of-interest considerations.
- b. All custodians and maintenance personnel will be given the 2—hour awareness training in the spring of 1989. This training will be conducted by accredited instructors in asbestos management.
- c. Certain custodians and maintenance personnel will be designated as asbestos O&M personnel. These personnel will also be given an additional 14 hours of O&M training in the spring of 1989. This training will be conducted by accredited instructors in asbestos management.
- d. Every 2 months after the implementation of this Management Plan (scheduled for July 9, 1989), any new custodians and maintenance personnel who have been hired the previous 2 months and have not had prior training will be given the 2—hour awareness training.
- e. Every 6 months after the implementation of this Management Plan, any new custodians and maintenance personnel who are designated to handle and maintain the ACBM and who have not had prior training will be given the 14—hour O&M training.

This training plan will ensure that all custodians and maintenance personnel will receive the 2-hour asbestos-awareness training within 60 days of employment. It will also ensure that sufficient personnel will be trained in the handling of ACBM.

5. Notification of Employees, Building Occupants, and Parents

Information concerning inspections, reinspections, response actions, and post—response action activities (i.e., surveillance activities) must be provided on an annual basis to employees and building occupants (or their legal guardians). Exhibits 1-3 are samples of notification letters that will be sent for each school by the Asbestos Coordinator to these individuals. A record of the notification efforts that have been undertaken will be maintained by the Asbestos Coordinator. A notification record must be updated by the Asbestos Coordinator after each annual notification.

Exhibit 1. Sample Letter to Parents and Staff for Schools With Friable and Nonfriable ACBM

Dear Parents and Staff of the _____ -- School:

As required by the U.S. Environmental Protection Agency's (EPA) Asbestos Hazard Emergency Response Act (AHERA), a comprehensive asbestos inspection of all of our school buildings was recently completed. This inspection was conducted by EPA-accredited inspectors in accordance with guidelines established by the EPA.

Samples of suspected asbestos—containing building materials (ACBM) were taken during the inspection and were submitted to an EPA—accredited laboratory for analysis.

The inspection and assessment identified those areas of ACBM having the potential for release of asbestos fibers (i.e., friable ACBM). However, none of these areas were found in locations normally occupied by students or faculty. To eliminate any possibility of future harm, the administration has scheduled removal of those areas with the most potential for exposure to the school's occupants. The remaining areas will be repaired as required to maintain them in a nonhazardous condition.

In addition to the friable ACBM, locations of nonhazardous (non-friable) ACBM were also identified. The school has instituted a periodic surveillance and maintenance program to ensure that this ACBM does not become hazardous.

A copy of the school's Asbestos Management Plan, including the Inspection and Assessment Report, is in the school office. This document is available for your use.

If you have any questions or concerns, please do not hesitate to contact me. -

Sincerely,

Exhibit 2. Sample Letter to Parents and Staff for Schools With No ACBM Found

Dear Parents and Staff of _____ School:

As required by the U.S. Environmental Protection Agency's (EPA) Asbestos Hazard Emergency Response Act (AHERA), a comprehensive asbestos inspection of all of our school buildings was recently completed. This inspection was conducted by EPA-accredited inspectors in accordance with guidelines established by the EPA.

Samples of suspected asbestos-containing building materials (ACBM) were taken during the inspection and were submitted to an EPA—accredited laboratory for analysis. However, this inspection found no instances of ACBM in the school.

A copy of the school's Asbestos Management Plan, including the Inspection and Assessment Report, is in the school office. This document is available for your use.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Exhibit 3. Sample Letter to Parents and Staff for Schools With Nonfriable ACBM Only

Dear Parents and Staff of the _____ School:

As required by the U.S. Environmental Protection Agency's (EPA) Asbestos Hazard Emergency Response Act (AHERA), a comprehensive asbestos inspection of all of our school buildings was recently completed. This inspection was conducted by EPA-accredited inspectors in accordance with guidelines established by the EPA.

Samples of suspected asbestos—containing building materials (ACBM) were taken during the inspection and were submitted to an EPA—accredited laboratory for analysis.

The inspection found no instances of ACBM having the potential for release of asbestos fibers (i.e., friable ACBM). Only non— hazardous (nonfriable) ACBM was found.

The School has set up a periodic surveillance and maintenance program to ensure that this ACBM does not become hazardous.

A copy of the school's Asbestos Management Plan, including the Inspection and Assessment Report, is in the school office. This document is available for your use.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

F. MANDATORY RECORDS

The U.S. EPA's final rule for AHERA requires that certain records be maintained in the administrative offices of the LEA as part of the Asbestos Management Plan. The Asbestos Coordinator will maintain all of the records listed below. A sample of each schedule (1 through 8) is provided at the end of this section.

1. Response Action Record -

List all of the response actions taken by the School. Start and completion dates will be recorded by the Asbestos Coordinator as they occur. The details of each response action should also be recorded in either Schedule 6 or 7, depending on the magnitude (minor or major) of the activity.

2. Periodic Surveillance and Reinspection

The Asbestos Coordinator will record the completion of periodic surveillance and reinspection in Schedule 2 (see 40 CFR 763.92(b)).

3. Public Notification Record

The required notifications of employees, occupants, and parents as to the School's asbestos activities must be recorded.

4. Training Record

Records of all persons receiving asbestos— awareness training and O&M training (see 40 CFR 763.92(a)).

5. Cleaning Record

Each time an asbestos cleaning activity is performed, the Asbestos Coordinator will record all appropriate information in (see 40 CFR 763.91(c)).

6. Operations and Maintenance Record

Each time that small-scale O&M activities involving ACM in the School are performed, the Asbestos Coordinator will record in Schedule 6 the name of each person performing the activity, the start and completion dates of the activity, the locations where such activity occurred, a description of the activity, including preventive measures used, and, if the ACM is removed, the name and location of the storage or disposal site of the ACM (see 40 CFR 763.91(d)).

7. Major Asbestos Activity Record

Each time a major asbestos O&M activity is performed, the Asbestos Coordinator will record in the name and signature, state of accreditation, and, if applicable, the accreditation number of each person performing the activity, the locations where such activity occurred, a description of the activity, including preventive measures used, and, if ACM is removed, the name and location of storage or disposal site of the ACM (see 40 CFR 763.91(e)).

8. Fiber Release Episode Record

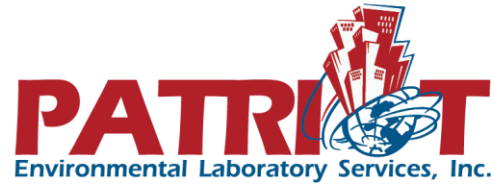
For each asbestos fiber release episode, the Asbestos Coordinator will record the date and location of the episode, the method of repair, preventive measures or response action taken, the name of each individual performing the work, and the name and location of storage or disposal site of any ACM removed (see 40 CFR 763.91(f)).

G. GLOSSARY

Abatement	Procedures to control fiber release from asbestos—containing building materials; these include removal, encapsulation, enclosure, and repair.
Asbestos	A group of naturally occurring minerals that separate into fibers. There are six commercially used asbestos minerals: Chrysotile, Amosite, Crocidolite, Anthophyllite, Tremolite, and Actinolite.
Asbestos—Containing Building Material (ACBM)	Surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school building.
Asbestos—Containing Material (ACM)	Any material that contains more than 1% asbestos by weight.
Asbestos Coordinator	The person at school level who (AC) serves as a focal point or liaison for asbestos activities.
Asbestos Hazard Emergency	An act passed by Congress and Response Act (AHERA) and signed by the President in October 1986, which requires the EPA to promulgate regulations requiring inspection for ACM, development of asbestos management plans, and response actions with respect to friable ACM in the Nation's schools. EPA published the final rule 40 CFR 763 in the Federal Register of October 30, 1987.
Asbestos Management	A plan submitted by the School Plan and required by AHERA, detailing the steps taken by the School to control potential asbestos hazards.
Asbestos Management	A program instituted by the Program School to comply with AHERA and to administer long-term control and surveillance of all ACM materials in the School.

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Asbestos Program	The person appointed by the Manager (APM) School to direct and oversee all asbestos-related activities.
Design Specifications	Documents produced by architect and Contractors and engineering firms detailing abatement procedures.
Encapsulation	The treatment of ACM with a penetrating or surface sealant in order to minimize the potential for asbestos fiber release.
Friable Asbestos- Containing Material	Any ACM that when dry may be crumbled, pulverized, or reduced to powder by hand pressure.
Homogeneous Sampling	An area of surfacing material, Area thermal system insulation material, or miscellaneous material that is uniform in color and texture.
Operations and Maintenance (O&M) Program	A program specifically designed to clean up asbestos fibers previously released, to prevent future release by minimizing ACM disturbance or damage, and to monitor the condition of the ACM.
Removal	The stripping of any ACM from surfaces or components of a facility or taking out structural components.
Surveillance	Periodic reinspection of friable and nonfriable ACM.
U.S. Environmental Protection Agency (EPA)	The Federal Agency required by AHERA to promulgate regulations concerning asbestos in schools.