



"Each Student demonstrates Strength of Character and is College or Career Ready"

September 18, 2017

To: All School Principals

From: Mrs. Cheryl Canty-Aaron

Safety & Environmental Manager

RE: THREE-YEAR ASBESTOS MANAGEMENT PLAN/INSPECTION UPDATE FOR 2017 – 2020

The Asbestos Hazard Emergency Response Act (AHERA) requires that asbestos inspections be performed every three years. This notice and the attached report satisfies the requirements, per the AHERA. Further, it mandates that parents, teachers, custodians, maintenance workers and all other school district employees be made aware of this document and the location/availability of the **"Asbestos Inspection and Management Plan"**, for their school. It must be kept in the main office of each school, for review upon request by parents and/or school district employees.

Please find attached, the current AHERA Management Plan for your school/facility. It has been updated to include exclusion statements that state that "new construction or building alterations/additions" provided after 1988, were constructed using asbestos-free building materials - per EPA Section CFR 763.99. **If any additional building alterations/additions occur in the future, please advise me, so that the appropriate documentation can be obtained for your binder.**

So that your binder remains current, please print a copy of this letter and the attached report. Insert them into the front of your AHERA Plan.

If you have any questions regarding the Management Plan for your school, please feel free to contact me at (478) 779-3523.

Thank you for your assistance and cooperation in this matter.

**Georgia Department of Education
 AHERA Management Plan
 Cover Sheet**

Bibb County School District
 LEA (Name of School System)

Riley Elementary School
 Name of School

484 Mulberry Street
 Address

Bibb County
 Name of County

Macon
 City

31210
 Zip Code

Type of Submittal

Reinspection of existing school building to update Management Plan. Due every three years. 40CFR763.85(b)

New Building or occupied as a school building after October 12, 1988 40CFR763.99(a)(7)

Building leased or acquired for use as a school after October 12, 1988. 40CFR763.85(a)(2)

List of Documents Attached

- Form 0073-BH Reinspection
- Form 0073-CD Response Action
- Dated copy of notification

List of Documents Attached

- New management plan for building
- Exclusion statement
- Dated copy of notification

List of Documents Attached

- New management plan for building
- Form 0073-BH Reinspection
- Form 0073-CD Response Action
- Dated copy of notification

No ACBM. School buildings with no ACBM as documented in an approved 1988 Management Plan which has been updated to record one of the below conditions may be excluded from reinspection. The annual notification must note that no alterations or additions have occurred, or that the management plan has been updated to cover the alterations or additions according to 763.99

No ACBM in the 1988 plan and no alteration or additions containing ACBM (attach certification by inspector or design professional).

All 1988 suspected ACBM removed and cleared in accordance with 763.90(1). Any replacement material must be covered by an exclusion in compliance with 763.99.

All 1988 Suspected ACBM proved to be non-ACBM through bulk sampling and analysis according to 763.86 and 87.

For new buildings more than one year old, the annual notification must note that no alterations or additions have occurred, or that the management plan has been updated to cover the alterations or additions according to 763.99.

The exclusion statement must be signed by a Georgia registered Architect who was responsible for the construction of the building or,

by a Georgia registered professional Engineer who was responsible for the construction of the building or,

by an inspector who is accredited under a course which has EPA and Georgia approval for AHERA inspector training

For initial inspection, leave the 1988 column and the response actions line on form 0073-BH blank. All school buildings in this category must be inspected by an accredited inspector and have a management plan in compliance with 40CFR763.93 unless the building qualifies for an exclusion under 763.99.

It is not necessary to submit the full management plan to the State, only revisions to the management plan, response actions and forms listed above and this cover sheet

All other buildings which required a 1988 Management Plan and which are still in use as a school building must be reinspected by an accredited inspector every three years and have a Management Plan in accordance with 40 CFR763.93. It is not necessary to submit the full management plan to the State, only revisions to the management plan, response actions and forms listed above and this cover sheet

Management plans for new buildings shall comply with all requirements under AHREA and the forms listed above and this cover sheet. Submit a copy of the above forms and this cover sheet to the state. It is not necessary to submit copies to the EPA.

The LEA shall maintain in its administrative office a complete, updated copy of the management plan for each school under its administrative control or direction. Each school shall maintain in its administrative office a complete, updated copy of the management plan for that school. The plan shall be available for inspection to workers before any work begins in any area of a school. The plan shall also be available for inspection to representatives of the EPA, the state, the public (including parents), teachers and other school personnel and their representatives within five working days after receiving a request for inspection. The notification to parents and employees regarding the availability and location of the plan must be reissued annually and is required whether or not ACBM is present. 40CFR763.93(g)(2)(3)(4)

40CFR763.84 General local education agency responsibilities.

Each local education agency shall:

- (a) Ensure that the activities of any persons who perform inspections, re-inspections, and periodic surveillance, develop and update management plans, and develop response and implement actions, including operations and maintenance, are carried out in accordance with subpart E of this part.
- (b) Ensure that all custodial and maintenance employees are properly trained as required by this subpart E and other applicable Federal and/or State regulations (e.g., the Occupational Safety and Health Administration asbestos standard for construction, the EPA worker protection rule, or applicable State regulations).
- (c) Ensure that workers and building occupants, or their legal guardians, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic reinspection and surveillance activities that are planned or in progress.
- (d) Ensure that short-term workers (e.g., telephone repair workers, utility workers, or exterminators) who may come in contact with asbestos in a school are provided information regarding the locations of ACBM and suspected ACBM assumed to be ACM.
- (e) Ensure that warning labels are posted in accordance with § 763.95.
- (f) Ensure that management plans are available for inspection and notification of such availability has been provided as specified in the management plan under § 763.93(g).
- (g) (1) Designate a person to ensure that requirements under this section are properly implemented.
 (2) Ensure that the designated person receives adequate training to perform duties assigned under this section. Such training shall provide, as necessary, basic knowledge of:
 - (i) Health effects of asbestos.
 - (ii) Detection, identification, and assessment of ACM.
 - (iii) Options for controlling ACBM.
 - (iv) Asbestos management programs.
 - (v) Relevant Federal and State regulations concerning asbestos, including those in this subpart E and those of the Occupational Safety and Health Administration, U.S. Department of Labor, the U.S. Department of Transportation and the U.S. Environmental Protection Agency.
- (h) Consider whether any conflict of interest may arise from the interrelationship among accredited personnel and whether that should influence the selection of accredited personnel to perform activities under this subpart.

Signature

LEA AHERA Designated Person

Cheryl Canty-Aaron
 Print or Type Name

Date: 28-Aug-17

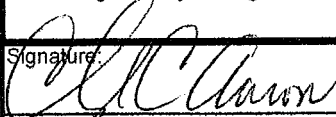
Phone: 478-779-3523

Signature

LEA Superintendent/Owner

Dr. Curtis L. Jones, Jr.
 Print or Type Name

Date: 28-Aug-17

Georgia Department of Education AHERA Reinspection Form.		List of Buildings, Inventory of Homogeneous Areas of Suspected ACBM, Assessment and Reassessment of Materials.		Functional Space All Floors Corridors, Restrooms, Storage, Classes, Kitchen, Cafeteria, Mech. Rm.											
LEA: Bibb County School District School: Riley Elementary School Bldg(s): Buildings 2010, 2020, 2030, 2040 Addr: 3522 Greenbriar Rd., Macon, Ga. 31204		Amount 25,567 sq. ft. 303 # 335 LF		Homogeneous Area Floor Tile Abated in Cafeteria - 2000; Other areas were encapsulated in 2003. Cementitious Fittings Abated Block-type TSI (Pipes above ceiling, Duct, Flue, Tank, Boiler) Abated											
Inspector's Name: Cheryl Canty-Aaron		40CFR763.763(b) Assessment Categories (1) Damaged or significantly damaged thermal system insulation ACM. (2) Damaged friable surfacing ACM. (3) Significantly damaged friable surfacing ACM. (4) Damaged or significantly damaged friable misc ACM. (5) ACBM with potential for damage. (6) ACBM with potential for significant damage. (7) Any remaining friable ACBM or friable suspected ACBM. (8) All other nonfriable ACBM													
Signature: 		8/28/2017													
Accrediting Agency: TEI		Accred. # 16171				1989	Now	1989	Now	1989	Now	1989	Now	1989	Now
Check One	1	TSI						X		X					
	2	Surfacing													
Check One	3	Miscellaneous	X	X											
	4	Assumed ACBM													
Check One	5	Sampled/Tested	X	X	X					X					
	6	Non-ACBM													
Check One	7	ACBM	X	X	X					X					
	8	Nonfriable	X	X											
Check One	9	Friable								X					
	Response Action Implemented Since 1988*			e	c-1	b-3				b-3					
Check One	10	No Damage	X	X	X										
	11	Damaged								X					
Damage d Type Check If Applicable	12	Deterioration								X					
	13	Physical								X					
	14	Water								X					
	15	Other													
	If Extent Check If Applicable	16	Under 10%												
17		Over 10%													
18		Local													
Accessibility Check One	19	Distributed								X					
	20	Low		X	X					X					
Potential for Disturbance Check One	21	Medium													
	22	High	X												
Potential for Disturbance Check One	23	Low	X	X	X					X					
	24	Medium													
Mark # 1,2,3,4,5,6,7,8, N/A or leave blank. See instruction.	25	High													
	26	Assessment Category	8	5	1					1					

Instructions

Purpose: To record the findings of the required triennial reinspection of all friable and nonfriable known or assumed ACBM in school buildings according to 40CFR763.85(b) and 40CFR763.93(e)(3), to include the inventory of homogenous areas of suspected ACBM according to 40CFR763.85(a)(4)(VI)(B) and 763.93(e)(II) and the assessment of materials according to 40CFR763.88(b) and 763.93(e)(V) of the EPA Asbestos-Containing Material in Schools; Final Rule and Notice.

Preparation: Review the school's management plan and note the conditions recorded for each homogeneous area of known or assumed ACBM under the 1988 column. Reinspect each previously recorded homogeneous area and note its present condition under the Now column. Fill in the appropriate number for the assessment category from 40CFR763.88(b) on line 26. Note that assessment categories (1), (5) and (6) include nonfriable TSI. All other assessment category numbers apply only to friable material. (Also see 40CFR763.90(b)(e) and (f). EPA now recommends that all known or assumed ACBM, friable or not, be included under an O & M program. *To include this ACBM on the reinspection form, use an additional category number (8) for all other nonfriable ACBM. If the material is non-ACBM, line 26 may be marked N/A (not applicable) or left blank. Fill in the 1988 scheduled response action and the implemented response action using the legend from the alternate DE Form 0073-CD. If the response action was removal and the replacement material is suspected ACBM, record it as a new homogeneous area. Record any other new areas of suspected ACBM.

If more than one building is to be listed, list the name or number of the first building on the first line under homogeneous areas, then list that building's homogeneous areas under the building name or number. After listing all homogeneous areas of that building, list the next building, then list it's homogeneous areas, etc. If the addresses of the buildings are different, list each building's address with its name or number.

List each homogeneous areas of suspected ACBM. If it is sampled, fill in the amount of square feet, linear feet or number of fittings. If not sampled, the amount column may be left blank or marked N/A. Fill in the functional space for each homogeneous area.

** Green Book, Managing Asbestos in Place, EPA 20T-2005, July 1990.

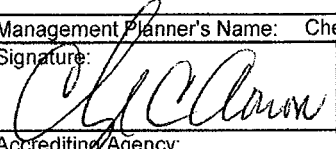
Example:

	Amount	Functional Space
Building number 320 (fill in address here if different from main building)		
Floor Tile	N/A	All Classrooms
Pipe Insulation	65 LF	Main Boiler Room
2x4 Ceiling Panels	8650 SF	All Classrooms and Corridors
Insulation on Pipe Fittings	22	Main Boiler Room

Use additional pages as necessary to include all data required by 40CFR763E. If any further difficulty is encountered in filling out this form, please do not hesitate to call the Georgia Department of Education Facilities Section for further explanation.

Distribution: Attach to AHERA Management Plan cover sheet and mail to:

Georgia Department of Education
 Facilities Services Section
 1670 Twin Towers East
 Capitol Square
 Atlanta, Georgia 30334
 Telephone: (404) 656-2454
 Fax (404) 651-6867

Georgia Department of Education HERA Reinspect Form		Response Actions Recommended and Preventive Measures and Response Actions Scheduled.		Functional Space	All Floors	Corridors, Restrooms,	Kitchen, Cafeteria, Mech.					
LEA: Bibb County School District School: Riley Elementary School				Complete	Schedule							
Blg(s): Buildings 2010, 2020, 2030, 2040 Addr: 3522 Greenbriar Rd., Macon, Ga. 31204												
Management Planner's Name: Cheryl Canty-Aaron Signature: 				Start								
Accrediting Agency: Accred.# 16171												
40CFR763.763(b) Assessment Categories (1) Damaged or significantly damaged thermal system insulation ACM. (2) Damaged friable surfacing ACM. (3) Significantly damaged friable surfacing ACM. (4) Damaged or significantly damaged		friable misc ACM. (5) ACBM with potential for damage. (6) ACBM with potential for significant damage. (7) Any remaining friable ACBM or friable suspected ACBM. (8) All other nonfriable ACBM		Homogeneous Area	Floor Tile	Abated in Cafeteria - 2000; Other areas were encapsulated in 2003.	Cementitious Fittings	Abated	Block-type TSI (Pipes above ceiling, Duct, Flue, Tank, Boiler)	Abated		
Fill in Number from Alternate DE Form 0073-BH	Assessment Category	5										
Fill in Letter from 40CFR763.90	Recommended Response Action	c-1										
Fill in Letter and Number Selected	LEA Selected Response Action	c-1										
The management planner shall recommend appropriate response actions which are consistent with the assessment. The LEA may select from the recommendations that action which is the least burdensome method. The response actions selected shall be sufficient to protect human health and the environment. The LEA shall schedule the selected response actions for implementation in a timely manner.												

40CFR763.90 Response Actions

- (b) If damaged or significantly damaged thermal system insulation ACM is present in a building, the local education agency shall:
 - (1) At least repair the damaged area.
 - (2) Remove the damaged material if it is not feasible, due to technological factors, to repair the damage.
 - (3) Maintain all thermal system insulation ACM and its covering in an intact state and undamaged condition.
- (c) If damaged friable surfacing ACM or damaged friable miscellaneous ACM is present in a building, the local education agency shall select from among the following response actions:
 - (1) encapsulation,
 - (2) enclosure,
 - (3) removal, or
 - (4) repair the damaged material.
- (d) If significantly damaged friable surfacing ACM or significantly damaged friable miscellaneous ACM is present in a building the local education agency shall:
 - (1) Immediately isolate the functional space and restrict access, unless isolation is not necessary to protect human health and the environment.
 - (2) Remove the material in the functional space or, depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment.
 - (3) enclosure or,
 - (4) encapsulate.

- (e) If any friable surfacing ACM, thermal system insulation ACM, or friable miscellaneous ACM that has potential for damage is present in a building, the local education agency shall at least implement an operations and maintenance (O&M) program, as described under 763.91.
- (f) If any friable surfacing ACM, thermal system insulation ACM, or friable miscellaneous ACM that has potential for significant damage is present in a building, the local education agency shall:
 - (1) Implement an O&M program, as described under 763.91.
 - (2) Institute preventive measures appropriate to eliminate the reasonable likelihood that the ACM or its covering will become significantly damaged, deteriorated or delaminated.
 - (3) Remove the material as soon as possible if appropriate preventive measures cannot be effectively implemented, or unless other response actions are determined to protect human health and the environment. Immediately isolate the area and restrict access if necessary to avoid an imminent and substantial endangerment to human health or the environment.

Instructions

Purpose: To record response actions recommended by the management planner as required by 40CFR63.88(d) and 763.(e)(5) and to record preventive measures and response actions selected by the LEA as required by 40CFR763.90(a). To record the scheduled dates for beginning and completing each preventive measure and response action as required by 40CFR763.93(e)(6) of the EPA asbestos- containing materials in schools: Final Rule Notice.

Preparation: Include on this form all homogeneous areas of suspected ACBM that were assumed to be ACBM or that were sampled and tested and proved to be ACBM. It is noted that no space is provided on this form to record the LEA's reason for selecting the response action or preventive measure as required by 763.93(e)(6) except that the reason will be obvious if the selection is consistent with the recommendation and the recommendation is consistent with the assessment. Use additional pages as necessary to include all data required by 40CFR763E.

*EPA now recommends that all known or assumed ACBM, friable or not, included in an O&M program. See the "Green Book," Managing Asbestos in Place, EPA 20T-2003, July 1990.

Example:

LEA Selected Response Action	Recommended Response Action	Assessment Category	Homogeneous Area	Schedule		Functional Space
				Start	Complete	
Building A (fill in address here if different from main building)						
e	e	5	Floor Tile	#####	#####	Lunch Room
b 2	b	1	Pipe Fittings	1/6/1992	#####	Boiler Room
e	e	7	Ceiling Tile	#####	#####	All Classrooms
f 3	f 3	6	Pipe Insulation	#####	#####	Kitchen

Note that any friable or known or assumed friable ACBM or any nonfriable known or assumed ACBM that become friable as a result of activities performed in the building, must be included in an O&M Program (response action e). Preventive measures should be considered for any ACBM that has potential for disturbance. All ACBM should be monitored under periodic surveillance.

If any difficulty is encountered in filling out this form, please do not hesitate to call the Facilities Services Section.

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Georgia Department of Education
 Facilities Services Section
 1670 Twin Towers East
 Capitol Square
 Atlanta, Georgia 30334
 Telephone (404) 656-2454

Fax (404) 651-6867

Alternate DE Form 0073-CD February 1991 (reinspection)

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