

## Asbestos in Schools - Guidance for AHERA Designated Persons

### Scope

All public and private K-12 schools must assign a person responsible for overseeing the management of asbestos-containing materials in the school buildings. This responsible person is called the AHERA Designated Person. This bulletin summarizes the main duties of the Designated Person. Additional responsibilities and details are available in the EPA self-study guide at <http://www2.epa.gov/sites/production/files/2013-09/documents/e23.pdf>

### General AHERA Designated Person Requirements

The AHERA Designated Person is responsible for overseeing and ensuring that school occupants and employees are not exposed to asbestos. This means ensuring that asbestos-containing materials are maintained in good condition, and that activities which might disturb asbestos-containing materials are conducted in accordance with regulatory requirements.

#### Identify Asbestos-Containing Materials (ACM):

- Knowledge of ACM: the Designated Person must be familiar with the location, quantity and condition of ACM in the school.
- **Ensure suspect ACM is tested or assumed to be asbestos before it is disturbed.**
- Post warning labels in maintenance areas where ACM is located.

#### Keep Asbestos-Containing Materials in Good Condition

- Repair or Remove Damaged ACM: Review the school Asbestos Management Plan for consultant recommendations to repair, remove, enclose or maintain ACM in place. Implement consultant's recommendations in a timely manner.
- Implement an Operations & Maintenance (O&M) Plan to maintain ACM and prevent staff and occupant exposure.
- Conduct Periodic Surveillance of material condition every six months. Keep documentation in the Management Plan.
- Ensure a Reinspection is conducted every three years by a licensed Asbestos Inspector and Management Planner.

#### Notify School Staff, Guardians and Contractors about ACM

- Notify short-term workers (e.g., telephone repair workers, utility workers, HVAC, flooring, or exterminators) about the locations of ACM in their proposed work area, and restrictions to prevent disturbing the material.
- Provide annual written notification to all employees and guardians about the availability of the Asbestos Management Plan.
- Management Plans in each School Office: A copy of the school Management Plan must be kept in the school administrative office and the district administrative office for quick review by staff, vendors and guardians.

### **Ensure Activity which Disturbs Asbestos is Conducted by Qualified Workers**

- An Accredited Project Designer is required to design asbestos abatement projects.
- A Licensed Asbestos Contractor is required to conduct repair, removal or enclosure of ACM larger than 3 square/linear feet. Maintain worker sign-in logs and contractor documentation.
- 16-hour O&M training is required for abatement projects and protective measures smaller than 3 square/linear feet. Protective equipment and dust control equipment is also required.
- A Licensed Project Monitor is required to conduct clearance air samples. Maintain laboratory reports.

### **Ensure Custodial and Maintenance Staff are Trained**

- Custodial Staff who work in the vicinity of ACM must have 2-hour Asbestos Awareness Training.
- Maintenance and Custodial Staff who may disturb asbestos must have 16-hour O&M training and protective equipment.
- Designated Person must have AHERA Designated Person training.

### **Keep the Asbestos Management Plan Updated**

- The Management Plan must have a signed statement from the Designated Person affirming that the AHERA responsibilities have been, and will be met.
- Keep the Management Plan continuously updated with:
  - Periodic Surveillance documentation
  - O&M activity documentation
  - Fiber release episode documentation
  - Bulk sampling laboratory reports
  - Reinspection reports
  - Asbestos Abatement documentation, such as contractor records and clearance air sampling laboratory reports.
  - Training documentation for custodians, maintenance and Designated Person
  - Annual notification documentation

### **Resources for Designated Persons**

Self-Study Guide from EPA:

<http://www2.epa.gov/sites/production/files/2013-09/documents/e23.pdf>

Details about AHERA from EPA: <http://www2.epa.gov/asbestos/school-buildings#resources>

For more information about AHERA, please visit: [www.mass.gov/dols/ahera](http://www.mass.gov/dols/ahera), or contact Janet McKenna at 617-626-5673 with any questions or concerns.