

## Guidance for Consultants: Top 5 Management Planner Violations

Schools are required to use certified Asbestos Inspectors and Management Planners to conduct their 3-year AHERA reinspections for asbestos-containing materials (ACM). A summary of common violations is provided to assist consultants comply with AHERA requirements.

- **Detailed Recommendations:** Failing to provide a detailed description of the preventive measure or response action that is recommended. Simply stating “repair or remove as needed” does not satisfy AHERA. The consultant must indicate the specific locations that need abatement, how much material is affected, and the preferred method.
- **Schedule:** Failing to include a schedule for beginning and completing each preventive measure or response action. Simply stating “as needed,” “as soon as possible,” or “before next reinspection” does not satisfy the AHERA requirement.
- **Additional Cleaning:** Failing to recommend if additional cleaning is needed when friable ACM is present. Simply stating “continuous HEPA vacuuming” does not satisfy AHERA. The consultant should specify how often, when and where to perform the cleaning.
- **Cost Estimate:** Failing to provide a cost estimate for recommended response actions, including Operations and Maintenance (O&M) activities. This should be a comprehensive presentation of all estimated costs, including design fees, air sampling and laboratory costs. Estimates should also include costs for training, periodic surveillance and reinspection if the response action recommendation is to manage ACM under the O&M program.
- **Hazard Assessment:** Confusing the hazard assessment with the physical assessment. During an inspection, the Inspector evaluates the condition of ACM, which is called a physical assessment. The Management Planner combines the condition of the material with the material’s potential to be disturbed by physical contact, vibration or air movement. The Planner will rank the priority for abatement based on the materials with highest risk of exposure to building occupants. The Management Plan should report both the physical assessment (ranked 1-7) and the hazard assessment, so the school can understand which materials are the priorities for removal or repair. This should be accompanied by the estimate of resources necessary to complete the recommended response action, and a schedule for completing the response action.