



February 18, 2022

Chester Upland School District
232 W. 9th Street
Chester, PA 19013

RE: AHERA Management Plan Review

Site Name: Toby Farm Elementary

Address: 201 Bridgewater Road, Brookhaven, PA 19015

Project #: 20220009

Dear Mr. Galante:

Acer Associates, LLC (ACER) has completed a review of the above-referenced school's AHERA Management Plan. This letter has been prepared to summarize the findings of our review and outline what actions need to be taken in order for the schools to be in compliance with the Asbestos Hazard Emergency Response Act (AHERA) of 1986 requirements per 40 CFR Part 763.

AHERA DOCUMENTS

AHERA requires all public and nonpublic elementary and secondary schools (K-12) to complete an initial inspection for asbestos containing building materials. These schools are required to develop, maintain, and update asbestos management plans and keep a copy on-site. These plans are required to document the location of the asbestos, the recommended asbestos response actions, and any action taken to repair and remove the material. According to the Chester Upland School District, the school's original AHERA Management Plan documents were reportedly destroyed. The roof collapsed in the building where the AHERA files were stored and the files were lost during the associated clean up. The only AHERA document provided by the Chester Upland School District for this school was an AHERA 3-Year Reinspection Report dated October of 2020 prepared by Environmental Control Systems, Inc.

PRESUMED ASBESTOS CONTAINING BUILDING MATERIALS (PACBMs)

ACER completed a review of the October 2020 AHERA 3-Year Reinspection Report. The report included no bulk sampling data. All building materials identified by Environmental Control Systems, Inc. were presumed asbestos containing materials (PACMs). On February 2, 2022, ACER performed a site inspection to confirm the findings of the 3-Year Reinspection Report. The table on the next page summarizes the PACBMs identified in the October 2020 3-Year Reinspection Report and additional PACBMs identified by ACER.



3-Year Reinspection Report	ACER Site Inspection Additional Materials
Blackboard Mastic	12"x12" Floor Tile & Mastic (Various Colors)
Pipe Fittings	2'x4' Ceiling Tile (Multiple Types)
9" X 9" Floor Tile & Mastic (Various Colors)	2'x2' Ceiling Tiles
Boiler Breaching	Drywall
	Joint Compound
	Electrical Panels
	Cove Base Mastic
	Plaster Ceilings and Walls
	Seam Caulk (Fan unit)
	Boiler Insulation
	Incinerator Door Caulk
	Incinerator Brick & Mortar
	Pipe Insulation
	Carpet Mastic
	Mortar Associated With CMU
	Mortar Associated With Brick
Fire Doors	

AHERA requires warning labels be placed immediately adjacent to any friable and non-friable asbestos containing building materials (ACBMs) and PACBMs located in routine maintenance areas. No warning labels were observed during ACER's inspection.

LOCAL EDUCATION AGENCY (LEA)

The Environmental Protection Agency (EPA) requires the Local Education Agency (LEA) appoint an asbestos management coordinator called the "AHERA Designated Person". This person is responsible for a number of asbestos-related activities, including the implementation of the plan for managing ACBMs in the school and compliance with the federal asbestos regulations. No documentation was provided regarding the identification of the AHERA Designated Person for this school.

YEARLY NOTIFICATION

Parents, teachers, and school employees or their representatives have the right to inspect the school's asbestos management plan. Schools are required to notify parent-teacher organizations (such as PTAs) once a year about the availability of the school's asbestos management plan and asbestos-related activity taking place within the school. The school must make the plan available for inspection within five (5) working days of it being requested. No documentation of yearly notifications was provided.



AWARENESS TRAINING

AHERA requires every member of the maintenance and custodial staff who works in a school containing ACBMs receive at least two (2) hours of awareness training. A record of the aforementioned training is required to be included in the management plan under 40 CFR 763.93(h) and 763.94(c) of the EPA Asbestos-Containing Materials in Schools regulation, 40 CFR Part 763 Subpart E. No documentation of awareness training for the maintenance and custodial staff was provided.

CONCLUSIONS & RECOMMENDATIONS

Based on ACER's review of the school's AHERA documents and site inspection, the following conclusions and recommendations have been developed:

- The school's original Building Inspection Report, Management Plan, 3-Year Reinspections, and 6-Month Periodic Surveillances were lost as a result of a roof collapsing to the building where the files were stored. A replacement Building Inspection Report and Management Plan need to be prepared as soon as possible.
- The additional PACBMs identified during ACER's February 2, 2022 site inspection will need to be included in the replacement Management Plan.
- Warning labels need to be placed immediately adjacent to any friable and non-friable asbestos containing building materials (ACBMs) and PACBMs located in routine maintenance areas of the school
- The AHERA Designated Person will need to be identified in the Management Plan.
- Yearly notifications regarding the school's AHERA Management Plan need to be completed. Upon request, ACER can provide sample language for the notification. The school district may want to consider either including this notification in their handbook and/or posting it on their webpage. This eliminates the potential oversight of sending out the notification in a separate correspondence on a yearly basis.
- Every member of the maintenance and custodial staff needs to receive at least two (2) hours of awareness training. Copies of their training certificates will need to be kept as part of the AHERA Management Plan.
- Upon completion of the replacement Building Inspection Report and Management Plan, 6-Month Periodic Surveillances and 3-Year Reinspections need to be completed every six (6) months and three (3) years as required.



ACER ASSOCIATES, LLC

Upon your review of ACER's conclusions and recommendations, please contact us with any questions.

Sincerely,

Acer Associates, LLC

A handwritten signature in black ink that reads "Matthew J. DePalma". The signature is written in a cursive style with a large, prominent "M".

Matthew J. DePalma

Vice President