Navigating the AAC-8

School System Asbestos Designated Person Training

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What is this form and why does it matter to me and my school system?
AAC-8

• 31 pages
• Available in Word format
• Theoretically easy to edit
• Billed as interactive - I’m not very adept at MS Word
AAC-8

• A current emphasis area for DEQ (but not uniformly emphasized)
• DEQ views the document as THE asbestos management plan
• If you haven't already, you're gonna have to do at least one (at some point you’ll build a new school or add on)
Schools We’ve Seen Covered

• Old schools
• Schools that still have ACM
• Schools where all ACM was removed
• New schools with no ACM
• Sometimes requested “after the fact”
AAC-8 Contents

• Facility type and details
• Owner information
• Survey information and results
• Type(s) of ACM
• Lab information
• Designated Person information
AAC-8 Contents

• Activity Plan (Response Actions, O&M)
• Resource Evaluation
• Notifications
• Record keeping
• Training
• Surveillance
• Reinspection
Pros

• Standard form - "easier for everyone"
• All information in one place
• Uniform field evaluation and enforcement
• “One ring to rule them all”
Cons

• Not as easy as advertised
• Document formatting is difficult to work within
• Some information not easily obtained/scanned/inserted
• How do you insert large format plans???
• May require inserting 25+ years of data
• Emphasis in some regions but not others
Let's look at the template
Can’t Wait! So How Do I Complete This Form?

• Start at Page 1
• Take it one page at a time
• Go to the last page, gathering information along the way
Thanks for attending!
Page 1 - Instructions & Facility Type

- See submittal instructions
- What type of facility (new, K-12)
Page 2 - Exemptions

• Exclusions?

• Not a school building

• Built after 1978 and “no possibility” of asbestos

• Built before 1979 and inspection shows no asbestos, & no asbestos added during renovation

• What?!
• Excluded facility
• Asbestos discovered later
• 180 days to comply
Page 4 - Exclusions

- Design professional signs
- or - accredited inspector signs
- See note at bottom - AMP has to be at the administrative office (what format?)
Page 5 - Section A: Facility Information

- Name, address, construction date
- Contact info - responsible official, ownership details, address
- Lessor information - many times n/a
- The big question - asbestos present?
- If so, friable, non-friable, assumed?
- If exclusion, here’s where the “no ACM” statement goes
Page 6 - Section B: Inspections Conducted

• Inspections before 12/14/87 - complete Section A & Section B, Part I
• Inspections after 12/14/87 - complete Sections A-G, Except Section B, Part I
• Insert Inspection Report after Section B
Page 7 - Section B Part I

- Inspections before 12/14/87
- Date of inspection
- Sample location diagram
- Location of sampling area
- Approximate SF or LF of suspect material sampled
- EXACT location where samples were collected
- Sample collection date
Page 8 - Section B Part I

- Analysis - copy, date, other lab reports
- Response actions/preventative measures
- Description
- Names-addresses
- Start/completion dates
- Air sample data
- Sample collection date
- Assessment data of friable materials
Accreditation data of people making assessments
• Name
• Accreditation number
• Expiration date
• Signature
• “Signature not available”? 
Inspections After 12/14/87

- Inspection/Reinspection date
- Name
- Accreditation number
- Signature
- “Signature not available”?
Sampling

- Blueprint or diagram
- Table - sample number, approximate SF/LF
- Table - sampling date, friable, non-friable, assumed
- Table - schematic
- Description of sampling procedure - “random sampling based on homogeneous material location and material access”
- Inspector’s data
• Attach copy of lab report
• Lab name, address
• Lab accreditation statement
• Analysis date
• Name and signature of person performing analysis
• Statement here - inspector’s assessment within 30 days - odd placement?
• check box for no ACM
• Another set of blanks for inspector data
Page 13 - Section C - Designated Person

- Name
- Address, phone, fax, email
- Lab accreditation statement
- Training data
- Course name, details
- Probably only one or most recent course data required
- Training must be completed within 6 months of submitting AMP to DEQ
Page 14 - Section D - Response Actions

- Attach recommendations behind Section D
- Check box for non-educational buildings
- Check box for no ACM
- Name of person making recommendations
- Signature
- Accreditation number
- Expiration
Page 15 - Section D - Response Actions

- Preventive measures/response action data
- Methods - encapsulation, removal, repair, etc.
- Location
- Reason for selecting response
- Begin/End dates
Response Actions

- Written description, drawings, etc. with response action data that does or will remain after response action
- Check box for no ACM
- Inspector data
- Designer data
Page 17 - Section E - Activity Plans

• check box for no ACM
• If ACM:
  • Reinspection plan
  • Periodic surveillance plan
• O&M
• Management planner’s recommendation for additional cleaning
• Actions taken as a results of Management planner’s recommendations
• Annual notification - many NOD’s
• newsletter, public notice, broadcast mail
• Text/email?
• Resource evaluation for reinspection, training, periodic surveillance, O&M, abatement
Page 19 - Section F - Management Plan Contributors

- List ALL who contributed
- Name, accreditation number, expiration
- Signatures - tough sometimes
- Email address - tough sometimes
Anyone seen this?

Optional

Statement may not be signed by person who prepares or reviews AMP, implements AMP
• For response actions performed after 12/14/87
• Written description of methods
• Location
• Reason for selecting response
• Name and addresses of contractors
• Accreditation for Contractor/Supervisors
• Storage/disposal site for ACM removed
Recordkeeping

- Name and signature of air sampling personnel
- Signatures may be tough to come by
- Air sampling personnel must be accredited Contractor/Supervisors
- or do they?
Page 23 - Section G - Recordkeeping

- Sample data
- Lab data
- Analysis date
- Results
- Analytical method
- Name and signature of analyst
- LELAP certificate
• At least 2 hours for custodians
• Must have the training within 60 days
• Staff who disturb 3 SF or 3 LF must have 14 hours additional training
• Training data
• Put all your training data in AAC-8 (people move around)
• Missing data is a common source of NOD
• Missing data is a common source of NOD
• Date
• Name
• Accreditation Number
• Expiration
• Changes
• Not sure accreditation is required
Page 26 - Section G - Cleaning

- Date
- Name
- Locations
- Methods
Page 27 - Section G - O&M

- Name
- Start/Completion dates
- Location
- Description
- Storage/disposal site for ACM removed
Page 28 - Section G - Maintenance Activities other than SSSD

- Name
- Start/Completion dates
- Location
- Description
- Storage/disposal site for ACM removed
Page 29 - Fiber Release Episodes

• These never happen, right?
• Date/location
• Repair method
• Preventive measures or response
• Name of person performing work
• Storage/disposal site for ACM removed
Page 30 - Designated Person

• School/agency data, address
• Designated Person contact data
• Inspections, reinspections, periodic surveillances, response actions, O&M comply
• Custodial & maintenance employees trained
• Annual notifications made
Page 31 - Designated Person

• Short term workers notified about ACM
• Warning labels posted
• Management plans available and notifications made
• Designated Person is trained
• Avoid conflict of interest
EXPENDABILITY

Kirk, Spock, McCoy, and Ensign Ricky are beaming down to the planet. Guess who's not coming back.
New Facilities - No ACM

• Easiest
  – Just a few pages
  – Need a "No ACM" letter

• File and forget - hopefully
No ACM letter or statement

• No set language
  – Letters
  – Forms

• Backup information usually easy to find in ITB or GC
No ACM letter or statement

Here’s some example language:

“To the best of our knowledge, no asbestos containing materials were specified, used, or installed in the construction of ___________________.

• Make this a requirement of design contracts?
• Examples
Example AIA GC Language
Example No ACM Letter

• “When designing X, Firm Y did not specify any asbestos containing materials in the Construction Documents or Construction Specifications. To the best of our knowledge the contractor did not install any asbestos containing materials on the project during construction.”
Example No ACM Instructions to Bidders Language

ARTICLE III

ENVIRONMENTAL CONSIDERATIONS

ARTICLE IV

AGREEMENT BETWEEN Bidders AND CONTRACTOR

ARTICLE V

AGREEMENT BETWEEN Bidders AND CONTRACTOR

ARTICLE VI

ADDITIONAL BIDDER INFORMATION

Building materials which are established as incidental costs the work under the agreement shall be

Materials shall be requested in the contract for the materials to be manufactured of DPA approved

The Owner reserves the right to require the Contractor to prepare and submit all the necessary documents.

The Contractor is required to prepare and submit all the necessary documents.
No ACM letter or statement

• Accredited inspectors can draft
  – After Contract Documents review
• What happens when Contract Documents aren't available, or designers unwilling or unable to cooperate?
• Survey!
Example - Phoenix PreK-12

• Construction completed 4/8/14
• Developed form for design team use
Example - Phoenix PreK-12

Plaquemines Parish School Board

Facility Name: New Phoenix Pre-K Through 12 School
Project Completion Date: 4-8-2014
Professional of Record: Z. Ames Yeates, AIA
Firm Address: 929 South Peters St, New Orleans, LA 70130

Contact Phone Number: (504)-522-7218
Contact Fax Number: (504)-522-5606
Contact Email: ayeates@yeatesarchitects.com

To the best of our knowledge, no asbestos containing materials were specified, used, or installed in the construction of this facility.

Signed

Z. Ames Yeates, Pre-K Through 12 School
Example - Phoenix PreK-12

• check box on page 1
• check box on page 2
• check box on page 4
• complete Parts I-IV on page 5
• insert form, statement, or letter after Section A
• complete Section C
Example - Belle Chasse Primary

- Belle Chasse Primary School
- Built early 1990’s
- No design team or contractor available
- Construction documents lost
- What do we do?
- What data do we need?
- If the facility had ACM, what data would we need?
Belle Chasse Primary Data

• Address: 539 F. Edward Hebert Blvd., Belle Chasse, LA 70037, Phone: (504) 595-6620, Fax: (504) 393-8068

• School Board: 1484 Woodland Hwy., Belle Chasse, LA 70037, Phone: (504) 595-6400, Fax: (504) 398-9990
What If?

• If the facility had ACM, what data would we need?
Demolish & Rebuild With the Same Name?
BRAIN-FREEZE

Remember: Always eat your Orion Ice Cream Flower S L O W L Y...
Complete an Abatement Project That Finalizes ACM Removal?
Class Exercise - Bootheville-Venice School

- 2013 project
- Summer completion
- Plans and specifications available
- Air monitoring report available
- Steps?
- There’s a surprise at the end
CONTINUITY

WE’RE GOING TO PRETEND THIS NEVER HAPPENED.
If ignorance is bliss, why aren’t there more happy building occupants in the world?
Critical Elements

• Get to know DEQ regional personnel
• How much emphasis on AAC-8?
• Respond to AAC-8 requests
• DEQ will work with you if you’re trying
• Embrace new technology
• PDF, email, websites
Critical Elements

• Plan for lost files from storms or other catastrophes
• School staff WILL throw it away or WON’T be able to find it at critical times
• Maintain files - use “the cloud” - I had to survey one school with no ACM because no file info, no designer to query
• Provide access
• Train staff - don’t lose the file!
• Get HR to play ball - notify for new hires
KOBAYASHI MARU

IT'S OKAY TO CHEAT, IF YOU JUST REALLY DON'T LIKE TO LOSE.
Workshop

• List the ideas you’ve learned today
• Now, on your pad, pick your top 3--and rank them 1, 2, 3
• Focus on the top 3. Master them, then move on to the others--get something done!
We enhance and protect the health, welfare, and safety of our clients, their staff, and their visitors.

- Asbestos Inspections
- Asbestos Management Plans
- Asbestos Reinspections
- Asbestos Management Plan Updates
- Asbestos Abatement Design and Consulting
- Asbestos Air Monitoring/Contractor Observation
- Asbestos Training
I don’t always play a Red Shirt on Star Trek. But when I do, I survive the whole episode.

Seriously, Jonathan Goldsmith (The Most Interesting Man in the World) played an unnamed crewman in the episode “The Corbomite Maneuver”. 
Leave a lasting legacy
Go Do Asbestos You Can!

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