DATE: May 4, 1988

TO: Asbestos Hazard Emergency Response Act (AHERA) Clients

FROM: James E Sharp, President

RE: Adjusted Asbestos Inspection Schedule

This is an update on HMS, Inc.'s schedule to inspect your school facilities for asbestos in compliance with the Environmental Protection Agency's Asbestos Hazard Emergency Response Act (AHERA). As you know there have been several interpretations of the rules which have caused delays. Since both the EPA and the Office of Local Assistance regulate how the inspections are to be conducted and how the management plans are to be submitted, we have maintained constant communications with both agencies. I think they have their act together now.

Another factor which has caused delay is the add-ons we have experienced in over half of the districts we have inspected. The AHERA regulation says that all buildings owned, leased, or otherwise used as school buildings shall be inspected. This includes district offices, maintenance buildings, bus garages, dormitories, nightwatchmen's homes (if owned by the school), outdoor education facilities, etc. If you own buildings that are abandoned or leased out to others, you do not have to inspect them unless you use them for storage or if any maintenance or custodial personnel provide services there. Of course, if you plan to reoccupy a site, you must inspect it thirty days prior to reoccupancy. Please carefully evaluate your sites so we can accurately anticipate the time and personnel necessary to keep our schedules.

Many of you have already sent in your SP-1A's or similar drawings. We use these to evaluate the time and personnel necessary to complete a districts inspections. I'm sure you are aware that many of these drawings are old and inaccurate. Usually, there have been portables added (sometimes removed), but the add-ons must be inspected. One or two additional portables have little impact, but one district had seventeen extra portables. Of greater impact is the addition of maintenance facilities, outdoor education centers, or other sites which you may not think need to be inspected. Please evaluate all the facilities within your district's uses so that we know, in advance, how to plan our time.

Below you will find a current schedule for our AHERA inspections.