



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

MEMORANDUM

Circular Letter EHS #2006-33

TO: Local Education Agencies, Asbestos Consultants, Asbestos Abatement Contractors, and Local Directors of Health

FROM: Ronald Skomro, Supervising Environmental Sanitarian
Department of Public Health, Environmental Health Section
Asbestos Program

DATE: August 18, 2006

SUBJECT: Request to Perform Asbestos Abatement While School is in Session

This correspondence serves to detail requirements associated with the submission of requests by Local Education Agencies (LEAs) to perform asbestos abatement while school is in session. Subsection 19a-333-7(a) of the Regulations of Connecticut State Agencies prohibits the performance of asbestos abatement in a school building while school is in session without first obtaining the written approval of the DPH. The requirements detailed in this document supersede the requirements outlined in EHS Circular Letter #2006-22, which applied to asbestos abatement performed with a project end date prior to September 1, 2006.

The DPH recognizes two general categories of abatement based upon the extent of occupancy of the school building by students or other children. Those categories include: full occupancy, when students are attending classes during the academic school year; and partial occupancy, when students or other children are present in the school building for purposes other than attending classes during the academic school year. Partial occupancy includes such times as evening, weekend, or vacation periods when use of the school by students or other children is limited to extra curricular activities. (Note: The DPH has deemed attendance at summer school to constitute partial occupancy.)

The following documentation shall be submitted to the DPH for review associated with each request to perform asbestos abatement while school is in session:

Full Occupancy

The LEA must submit a letter from the Superintendent, School Director, or Headmaster requesting the approval of the DPH to perform asbestos abatement while school is in session. The licensed project designer for the project may prepare and submit this letter on behalf of the Superintendent, School Director, or Headmaster. The following information shall accompany this letter:

1. The name and license number of the project designer.



Phone: (860) 509-7367, Fax: (860) 509-7378
Telephone Device for the Deaf (860) 509-7191
410 Capitol Avenue - MS #_51 AIR_
P.O. Box 340308 Hartford, CT 06134
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2. A copy of the asbestos inspection report required pursuant to the provisions of the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M, as necessary, to augment the school asbestos management plan (AMP). *(Note: Asbestos abatement and/or subsequent construction activities may result in disturbance to asbestos-containing materials that are not identified within the AMP. A NESHAP inspection shall be conducted in the event that additional suspect asbestos-containing material will be subject to disturbance during abatement or construction activities.)*
3. A copy of the written project design for the project.
4. Written verification that a DPH licensed asbestos abatement contractor will perform the asbestos abatement. The name and license number of the asbestos abatement contractor shall be provided.
5. A narrative describing the intended building use by students/children during the scheduled project dates. This narrative shall include a summary of the measures that will be employed to reduce the risk for exposure to asbestos to students/children. The floor plan shall be submitted identifying the location of students/children who will occupy the school relative to the location of the asbestos abatement project.
6. Written verification that the project will be subject to monitoring by a project monitor, licensed by the DPH. The name of the project monitor and/or the name of the firm providing the monitoring service shall be provided. Additionally, the frequency and duration of the monitoring services shall be described.
7. Written verification that parent, teacher, and employee organizations associated with the school will receive written notification regarding the asbestos abatement prior to commencement of the project. Verification shall be provided that parents/guardians of children and employees associated with other organizations (e.g. day care, youth camps, etc.) that will occupy the school building during the asbestos abatement will receive a similar written notification.

The DPH will inspect each school to review site-specific conditions. Requests associated with full occupancy should be submitted to the DPH as soon as possible (preferably thirty (30) days), but not less than fourteen (14) days prior to the scheduled start date of the abatement project. Requests will be reviewed in the chronological order in which they are received. As needed, the DPH will consider special circumstances requiring emergency abatement during full occupancy.

Partial Occupancy

The LEA shall submit a letter from the Superintendent, School Director, or Headmaster requesting the approval of the DPH to perform asbestos abatement while school is in session. The licensed project designer for the project may prepare and submit this letter on behalf of the Superintendent, School Director, or Headmaster. The following information shall accompany this letter:

1. The name and license number of the project designer.
2. Written verification from the project designer that a thorough inspection of the facility has been conducted pursuant to the provisions of the asbestos NESHAP, as necessary, to augment the school AMP. A statement from the project designer must identify the date(s) of the NESHAP inspection, and the name and license number for each individual that conducted the inspection.
3. Written verification that a DPH licensed asbestos abatement contractor will perform the asbestos abatement. The name and license number of the asbestos abatement contractor shall be provided.

4. A narrative describing the nature of the abatement project, including the scheduled project start and completion dates, the type(s) and amount(s) of asbestos-containing material(s) to be abated, and the location of the abatement with the school (building(s) and room(s)).
5. A narrative describing the intended building use by students/children during the scheduled project dates. This narrative shall include a summary of the measures that will be employed to reduce the potential risk for exposure to asbestos to students/children. A floor plan shall be submitted identifying the location of students/children who will occupy the school relative to the location of the asbestos abatement project.
6. Written verification that the project will be subject to monitoring by a project monitor, licensed by the DPH. The name of the project monitor and/or the name of the firm providing the monitoring service shall be provided. Additionally, the frequency and duration of the monitoring services shall be described.
7. Written verification that parent, teacher, and employee organizations associated with the school will receive written notification regarding the asbestos abatement project prior to commencement of the project. Verification shall be provided that parents/guardians of children and employees associated with other organizations (e.g. day care, youth camps, etc.) that will occupy the school building during the asbestos abatement will receive a similar written notification.

Requests associated with partial occupancy should be submitted to the DPH as soon as possible, but not less than ten (10) days prior to the scheduled start date of the abatement project. Requests will be reviewed in the chronological order in which they are received. As needed, the DPH will consider special circumstances requiring emergency abatement during partial occupancy.

All requests to perform asbestos abatement while school is in session and all pertinent documentation shall be addressed to the following:

Ronald Skomro, Supervising Environmental Sanitarian
Department of Public Health
Environmental Health Section, Asbestos Program
410 Capitol Avenue, MS #51 AIR
P.O. Box 340308
Hartford, CT 06134-0308

The DPH requests that, for asbestos abatement that occurs when no students/children are present in the school building, the LEA provide a statement documenting this fact. This statement should accompany the prescribed asbestos abatement notification form submitted to the DPH.

Please contact the DPH Asbestos Program should you have any questions regarding this document at (860) 509-7367.

cc: Suzanne Blancaflor, DPH/EHS
Pamela Kilbey-Fox, DPH/LHAB