

**ASBESTOS MANAGEMENT PLAN**

**FOR**

**LEICESTER PUBLIC SCHOOLS**

**LEICESTER MIDDLE SCHOOL**

Prepared By:



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**Management Planner:**

A handwritten signature in black ink, appearing to read "Edward Kolodziej".

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**Edward Kolodziej  
License #AP073070**

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## 1.0 INTRODUCTION

### 1.01. TYPES AND USES OF ASBESTOS

Asbestos is a naturally occurring fibrous mineral. It differs from other minerals in its crystal development. The crystal formation of asbestos is in the form of long thin fibers. Three of the most common types are chrysotile, amosite, and crocidolite. The three least common types of asbestos are tremolite, actinolite and anthophyllite. Unlike most minerals, asbestos breaks up into fine, light fibers invisible to the naked eye.

Asbestos became a popular commercial product to manufacturers and builders in the early 1900's to the 1970's. Asbestos is durable, fire retardant, resists corrosion, and insulates well. It is estimated that 3,000 different types of commercial products contain some amount of asbestos. The use of asbestos ranges from paper products and brake linings to floor tiles and insulation. Some uses of asbestos are as follows:

Acoustical Plaster	Electrical Panel Partitions
Asphalt Floor Tile	Breaching Insulation
Blown-in Insulation	Roofing Felt
Ceiling Tiles and Lay-in Panels	Chalkboards
Cement Pipes	Elevator Brake Shoes
Cement Siding	Boiler Insulation
Cement Wallboard	HVAC Duct Insulation
Construction Mastics (floor tile, carpet, ceiling tile, etc.)	Heating and Electrical Ducts
Decorative Plaster	Electrical Cloth
Elevator Equipment Panels	Spackling Compounds
Fire Blankets	Joint Compounds
Fire Curtains	Vinyl Wall Coverings
Fireproofing Materials	Base Flashing
Flooring Backing	Pipe Insulation (corrugated air-cell, block, etc.)
High Temperature Gaskets	Caulking/Putties
Laboratory Gloves	Wallboard
Laboratory Hoods/Table Tops	Adhesives
Packing Materials (for wall/floor penetrations)	Fire Doors
Spray-Applied Insulation	Roofing Shingles
Taping Compounds (thermal)	Thermal Paper Products
Textured Paints/Coatings	Electric Wiring Insulation
Vinyl Floor Tile	Ductwork Flexible Fabric Connections

## 1.02 FRIABLE VS. NONFRIABLE ACBM

Intact and undisturbed asbestos-containing material (ACM) does not pose a health risk. Asbestos becomes a problem when due to damage, disturbance, or deterioration over time, the material releases fibers into the air.

Friable ACBM will release fibers into the air more readily than nonfriable ACBM. Therefore, the AHERA Rule differentiates between friable and nonfriable ACBM. The regulations define friable ACBM as material that may be crumbled, pulverized, or reduced to powder by hand pressure when dry. Friable ACBM also includes previously nonfriable material when it becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure. *Undamaged non-friable ACBM should be treated as friable if any action performed on the material will make them friable.*

## 1.03 ASBESTOS HEALTH RISKS

Exposure to asbestos may result in asbestosis (a disease characterized by lung scarring, which reduces the lungs' ability to function), lung cancer, mesothelioma (always-fatal cancer arising in the chest or abdominal cavity), and other diseases. Asbestos-related diseases are often dose-response related (the greater the exposure to airborne fibers, the greater the risk of developing an illness) and have a latency period (typically 15 to 30 years).

Risks associated with low-level, non-occupational exposure (e.g., a building occupant who is not actually disturbing the asbestos) are not well established. The National Institute for Occupational Safety and Health (NIOSH) has determined, however, that there is no established safe level of exposure.

Asbestos pose little risk if it is well maintained. EPA only requires asbestos removal to prevent significant public exposure to airborne asbestos fibers during building demolition or renovation activities.

## 1.04 AHERA (Asbestos Hazard Emergency Response Act) Background

AHERA was enacted in 1986. The regulation requires LEAs (Local Education Agency) to identify the location of asbestos-containing materials, to develop Management Plans to manage properly these materials, and to take appropriate actions to control the release of asbestos fibers in their buildings. In addition to the original inspection, the regulation requires that LEAs conduct both 6-month periodic and 3-year annual re-inspections to reassess the condition of the asbestos-containing materials. Other requirements include providing asbestos awareness training to school staff, designating and training an individual (the Designated Person) to ensure that the LEA's AHERA requirements, including an Operations and Maintenance Plan (O&M), are implemented properly for each school

## 2.0 MANAGEMENT PLAN OBJECTIVES

- A. The **principal objective** of the asbestos management plan is to protect the health and safety of the building occupants in facilities that have asbestos-containing building materials (ACBM). The management plan provides this protection by establishing procedures and guidelines to:
1. Identify asbestos-containing building materials within the educational facility.
  2. Maintain ACBM in good condition
  3. Ensure proper cleanup of asbestos fibers if released
  4. Prevent release of asbestos fibers
  5. Monitor the condition of the identified ACBM
  6. Inform parents, guardians, staff, vendors and contractors of the locations of ACBM
  7. Ensure properly trained and licensed personnel conduct asbestos related activities utilizing proper procedures
  8. Document and retain records of all asbestos related activities
  9. Comply with government regulations concerning asbestos

## 3.0 LEA (Local Education Agency) and Designated Person's Responsibilities

### 3.01 LEA'S RESPONSIBILITY

Broadly stated, AHERA requires that each Local Education Agency (LEA) perform inspections to identify asbestos-containing materials in each of the public and private elementary and secondary schools under its authority; develop, implement and update asbestos management plans; take appropriate response actions; safely maintain asbestos-containing building materials (ACBM); and comply with AHERA's recordkeeping requirements.

The LEA's responsibility under the AHERA regulations is as follows:

- 1) Appoint a "designated person" to ensure proper implementation of the AHERA requirements.
- 2) Ensure that the designated person receives adequate training to perform duties assigned.

AHERA requires that the Designated Person be *adequately* trained to carry out his or her responsibilities. Due to the differing needs of school districts based on the size of the district and the amount and condition of the ACBM, AHERA does not list a specific training course or specific number of hours of training for the Designated Person. Further, AHERA does not require the Designated Person to be accredited. Specifically, the regulations note the training must include the following topics:

- health effects of asbestos;

- detection, identification and assessment of asbestos-containing building materials (ACBM);
- options for controlling asbestos-containing building materials; and
- asbestos management programs.
- relevant Federal and State regulations concerning asbestos, including AHERA and its implementing regulations and the regulations of the Occupational Safety and Health Administration, the U.S. Department of Transportation, and the U.S. Environmental Protection Agency

The LEA is overall responsible for assigning and training the designated person and ensuring the duties and responsibility of the designated person are performed.

### 3.02 DESIGNATED PERSON'S RESPONSIBILITIES

**The AHERA Designated Person Information (Name, address, telephone number, and training documentation) is located in Section 1.**

#### *ASBESTOS MANAGEMENT RESPONSIBILITIES*

EPA requires public school districts and private non-profit schools to 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 asbestos-containing building materials (ACBM) in the school buildings and compliance with the federal asbestos regulations.

The Designated Person's Duties and Responsibilities for managing the ACBM in the school are as follows:

- Ensure that the activities of any persons who perform inspections, reinspections, and periodic surveillance, develop and update management plans, develop and implement response actions, and conduct operations and maintenance activities are in compliance with all of the AHERA requirements.
- Ensure that all custodial and maintenance workers are properly trained.
- Ensure that workers and building occupants or their legal guardians are notified at least annually about activities relating to ACBM.
- Ensure that short-term workers who may come in contact with asbestos in a school are provided the locations of ACBM and suspected ACBM assumed to be ACBM.
- Ensure that warning labels are properly posted.
- Ensure that management plans are available for inspection.
- Consider whether any conflict of interest may arise among personnel undertaking activities related to the ACBM in a school or schools.

## ASBESTOS RECORDKEEPING RESPONSIBILITIES

As an asbestos program manager, the Designated Person must see to it that the following records are kept in the management plan:

- General information, such as the list of the names and addresses of all school buildings, whether the school building contains ACBM or suspected ACBM
- AHERA Designated Person information
- Inspection and reinspection reports, including assessments and recommendations and sampling results
- Description of the operations and maintenance program, including documentation on operations and maintenance activities
- Response action, fiber release episode and preventive measure documentation, including air clearance sampling, accreditation certificates of persons designing and conducting the activities, etc.
- Updated information on the locations of ACBM
- Information on future activities, such as a plan for reinspections, operations and maintenance (O&M) activities, periodic surveillance inspections, etc.
- Copies and information on required notifications
- Six-month periodic surveillance reports
- Documentation on the training for maintenance and custodial staff

### **4.0 INITIAL INSPECTION**

A. An AHERA inspection must be conducted by an accredited and state licensed asbestos inspector or management planner. This involves visually inspecting buildings for friable and nonfriable ACBM, sampling such materials unless they are assumed to be ACBM, and having samples analyzed in accordance with AHERA regulations. Once the inspection is complete the inspector must submit the results to the LEA in an inspection report. There are two elements to an AHERA inspection: identification and physical assessment.

***B. The Initial Inspection Report shall be located in Section 15 of the Management Plan.***

### **4.01 IDENTIFICATION OF ACBM**

A. The initial inspection to identify all the ACBM in a building begins with locating and listing all "homogeneous areas" of material that are suspected to contain asbestos. A "homogeneous area" is an area of surfacing material, thermal system insulation, or miscellaneous material that is uniform in color and texture. Suspected ACBM in a



homogeneous area or functional space must then be treated as ACBM unless samples are taken and the sample analyses show the material to be non-asbestos.

- B. All material suspected to be ACBM must be assumed to be ACBM unless the homogeneous area is **sampled**, and the analysis of the samples shows them to be non-asbestos. Adequate number of samples must be taken or the area will be considered to be ACBM regardless of the results of the analyses.
- C. The results of an AHERA inspection and the assessment must be documented in an **inspection report**. This report will be used by the management planner to make written recommendations on appropriate response actions.

#### 4.02 PHYSICAL ASSESSMENT OF ACBM

- A. Once the inspector has identified all of the ACBM in a building, he or she must perform a physical assessment of all TSI and friable material. Under § 763.88 of the AHERA Rule, the physical assessment of ACBM involves classifying the material into one of the following seven Physical Assessment Categories:

1. Damaged or significantly damaged thermal system insulation (TSI) ACBM
2. Damaged friable surfacing ACBM
3. Significantly damaged friable surfacing ACBM
4. Damaged or significantly damaged friable miscellaneous ACBM
5. ACBM with potential for damage
6. ACBM with potential for significant damage
7. Any remaining friable ACBM or friable suspected ACBM

The physical assessment may include the following considerations:

- Location and amount of the material
- Condition of the material, specifying:
  - Type of damage or significant damage
  - Severity of damage
  - Extent or spread of damage
- Whether the material is accessible
- Material's potential for disturbance
- Known or suspected causes of damage or significant damage
- Preventive measures that might eliminate the reasonable likelihood of undamaged ACBM from becoming significantly damaged

## 5.0 AHERA REINSPECTION AND RECOMMENDED RESPONSE ACTIONS

- A. At least once every three (3) years after the management plan is in effect the LEA will conduct a reinspection of all friable and non-friable known or assumed ACBM in each school building.
- B. Reinspection will be made by an accredited and licensed inspector and for each area of a school building the inspector will:
  - 1) Visually reinspect and reassess the condition of all friable known or assumed ACBM.
  - 2) Visually inspect material that was previously considered nonfriable and touch the material to determine whether it has become friable since the last inspection or reinspection.
  - 3) Identify any homogeneous areas in which material has become friable since the last inspection or reinspection.
  - 4) Bulk samples may be collected and submitted for analysis for any homogeneous area of newly friable material that is already assumed to be ACBM.
  - 5) Perform a physical assessment, in accordance with § 763.88 of the AHERA Rule, of the condition of the newly friable material in areas where samples are collected and of newly friable materials in areas assumed to be ACBM.
  - 6) Reassess the condition of friable known or assumed ACBM previously identified.
- C. As part of the three (3) year Reinspection a licensed Asbestos Management Planner will recommended response actions based on the inspectors results.
- D. The current three year reinspection report shall be in the Asbestos Management Plan binder located at the schools and central office. Subsequent three year reinspections shall be stored at the school' facilities office and available upon request. *The current three year reinspection shall be located in Section 4 of the Asbestos Management Plan.*

## 6.0 PERIODIC SURVEILLANCE

- A. At least once every six months after a management plan is in effect, the LEA must conduct periodic surveillance in each building that contains ACBM or is assumed to contain ACBM. The surveillance does not have to be conducted by an accredited person, but it should be conducted either by the LEA designated person (if he or she is trained) or by someone who is appropriately trained on asbestos (such as a maintenance person).
- B. Periodic surveillance involves a visual inspection of all areas that are identified in the management plan as ACBM or assumed ACBM. In evaluating each homogeneous area, the person conducting the surveillance must visually inspect all areas identified in the management plan as ACBM or suspected ACBM and record whether there are any changes in the condition of the material (including if there are no changes). The date of the surveillance, the name of the person conducting the surveillance, and any change in condition of the ACBM or assumed ACBM must be documented and included in the management plan within a reasonable amount of time, such as 30 days from the periodic surveillance.

- C. Periodic surveillance shall utilize the forms provided in this section and will be maintained in the section of the management plan.
- D. The current periodic surveillance report shall be in the Asbestos Management Plan binder located at the schools and central office. Subsequent periodic surveillances shall be stored at the school's central office and available upon request. *The current Periodic Surveillance report shall be located in Section 5 of the Asbestos Management Plan.*

## 7.0 ANNUAL NOTIFICATION LETTER

- A. The Designated Person is responsible for annually informing parents, guardians and employees of the availability of the asbestos management plan. This notification is to be documented and maintained in the AHERA Management Plan.
- B. The notification letter is located on the Leicester Schools website:  
[https://cdn5ss13.sharpschool.com/UserFiles/Servers/Server\\_340945/Image/AHERA%20Annual%20Notification.pdf](https://cdn5ss13.sharpschool.com/UserFiles/Servers/Server_340945/Image/AHERA%20Annual%20Notification.pdf)
- C. *A copy of the annual notification shall be maintained in Section 7 of the AHERA Management Plan.*

## 8.0 NOTIFICATION TO SHORT-TERM WORKERS AND CONTRACTORS

- A. The Designated Person is responsible for notifying short-term workers and contractors who come in contact with asbestos of:
  - a. Locations of identified or suspected ACBM
  - b. The availability of the AHERA Management Plan
- B. Contractors working in the facility shall sign-in an *entry log* notifying them of the presence of asbestos-containing materials in the school and availability of the AHERA Management Plan.
- C. *A copy of the log entries shall be maintained in Section 8 of the AHERA Management Plan*

## 9.0 EDUCATION AND TRAINING

### A. Custodians and Maintenance Personnel

Asbestos awareness training will be conducted for all custodians and maintenance personnel who may conduct tasks where ACBM may be contacted or accidentally disturbed. Other persons who should be provided with the opportunity to participate in awareness training include the facility asbestos coordinator and any of the Facility employees and contractors. The training should include at a minimum the following areas of emphasis:

- Background information on asbestos
- Health effects of asbestos
- Locations of ACM at the Facility
- Recognition of ACM damage and deterioration
- Review of the O&M Program for the Facility
- Proper response to fiber release

Custodial and Maintenance workers shall receive two- (2) hour asbestos hazard awareness training within sixty (60) days of hire and receive an annual refresher course.

Asbestos Awareness training course records shall be kept in Appendix B of the AHERA Management Plan.

**B. Construction and Repair Contractors**

If the facility asbestos coordinator determines that construction or repair work will be performed in an area where an ACM is known to exist, the contractor must have the proper level of training. The contractor must have the following training, which is dependent upon asbestos work activity:

<b>Activity</b>	<b>Initial Training</b>	<b>Annual Refresher</b>
Contract Custodial Work	Asbestos Awareness	Asbestos Awareness
Repair & Maintenance	16 HR OSHA – Class III	OSHA – Class III Refresher Course
Asbestos Abatement	40 Hr. EPA Supervisor Course 32 Hr. EPA Worker Course  <i>Supervisor requires to be on-site during project and both must be licensed by the state.</i>	8 Hr. Supervisor 8 Hr. Worker
Project Monitor	40 Hr. Project Monitor Course	8 Hr. Project Monitor
Asbestos Site Inspector	24 Hr. Site Inspector	4 Hr. Inspector
Asbestos Management Planner	16 Hr. Management Planner  <i>MP must be an accredited site inspector prior to taken the course</i>	8 Hr. MP Ref
Asbestos Designer	24 Hr. Project Designer	8 Hr. Design Ref.

The Designated Person shall verify the credentials and training records of any construction and repair contractor performing work at this facility. The training records shall be included with the asbestos abatement documentation

**10.0 ASBESTOS OPERATIONS AND MAINTENANCE PLAN**

**10.01 INTRODUCTION**

**A. Leicester Public Schools Policy is not to have in-house employees and service contractors conduct activities that will disturb materials containing asbestos.** However, there are housekeeping and maintenance activities during which maintenance and custodial staff may come into contact with ACBM. These work activities are to be carried out according to procedures described in this Asbestos O&M Program and include the following activities:

- A. Stripping of asbestos-containing floor tiles.
- B. Burnishing and dry buffing of asbestos-containing floor tiles.
- C. Initial/Additional cleaning where friable or damaged ACBM is present.
- D. Sealing of worn or cracked floor tiles

## 10.02 CUSTODIAL ACTIVITIES

### A. Stripping of Asbestos-Containing Floor Tile

1. Sanding of asbestos or presumed asbestos-containing floor tile is prohibited
2. Floor is to be kept adequately wet during the stripping operation
3. After stripping and before application of the new wax, the floor should be thoroughly cleaned, while wet
4. Machines cannot run at speeds greater than 300 rpm during stripping operations
5. Machine must be equipped with low abrasion pads

### B. Burnishing and Dry Buffing of Asbestos-Containing Floor Tile

1. Sanding of asbestos-containing or presumed asbestos-containing floor tile is prohibited
2. Activity can only be performed if there is a sufficient wax finish so that the pad cannot contact the asbestos-containing material.

### C. Initial Cleaning

1. Unless the building has been cleaned using equivalent methods within the previous six months, all areas of the schools listed where friable ACBM or damaged or significantly damaged thermal system insulation ACM, or friable suspected ACBM assumed to be ACM are present shall be cleaned at least once after the completion of the inspection required by 763.85(a) and before the initiation of any response action, other than Operations and Maintenance activities or repair, according to the following procedures:
  - a) HEPA vacuum or steam clean all carpets;
  - b) HEPA vacuum or wet clean all other floors and all horizontal surfaces;
  - c) Dispose of all debris, filters, mop heads, and cloths in sealed, leak tight containers as Asbestos-Contaminated Waste Material (ACWM)
2. The "Cleaning Record Form" is to be completed and maintained in Section 10.

### Additional Cleaning

1. The floor areas where asbestos-containing ceiling tiles are present shall be wet cleaned (spot mopped) once a week.
2. Every two months objects under the asbestos ceiling tiles (shelves, book, desks, blinds, etc.) shall be wet cleaned and/or HEPA vacuumed.
3. Areas underneath exposed asbestos pipe insulation or damaged pipe insulation shall be wet cleaned and/or HEPA vacuumed until the insulation is covered, encapsulated, repaired or removed.
4. Dispose of all debris, filters, mop heads, and cloths in sealed, leak tight containers as ACWM.

### D. Sealing of worn or cracked floor tiles

1. Follow all procedure in Procedures in 1.01 A and 1.01 B
2. Remove any loose pieces of floor tile
3. Apply sufficient wax layers to cover the worn or cracked areas

## **E. Warning Labels**

1. The Local Education Agency shall post signs or attach a warning label immediately adjacent to any friable and non-friable ACBM and suspected ACBM assumed to be ACM located in routine maintenance areas (such as boiler rooms, janitor closets, etc.) at each school building.

This will include:

- a) Friable ACBM that was enclosed, encapsulated or repaired.
- b) ACBM for which no response action was carried out.

All signs or labels shall be prominently displayed in readily visible locations and shall remain posted until the ACBM is removed.

The warning label shall read, in print which is readily visible because of large size or bright color, as follows:

**DANGER**  
**Contains Asbestos Fibers**  
**Avoid Creating Dust**  
**Cancer and Lung**  
**Disease Hazard**

## **F. Prohibited Activities**

1. Maintenance staff employees WILL NOT:
  - a) Drill, saw, sand or otherwise mechanically disturb asbestos containing materials, friable or non-friable.
  - b) Damage asbestos-containing materials while moving furniture, equipment or other objects.
  - c) Damage asbestos containing material while performing maintenance and custodial work.
  - d) Store or locate items and equipment on or near asbestos-containing material.
  - e) Clean or wipe floors, ceilings, moldings or other surfaces where asbestos may be present in a dry state or by sweeping with a dry rag, brush or broom.
  - e) Use unapproved vacuums for asbestos containing material and dust.
  - f) Attach, tape or anchor items onto sheetrock walls containing asbestos joint compound.
  - g) Remove or shake clean HVAC system filters dry or without control measures to minimize fiber release.

## **G. Inspections**

1. Inspections shall be performed once every 6-months and once every three years by a State of MA licensed asbestos inspector to observe the condition of asbestos-containing materials known or assumed within the building.

### 10.03 ASBESTOS ABATEMENT ACTIVITIES

#### A. Asbestos Response Actions

1. A State of Massachusetts Licensed Asbestos Abatement Contractor
2. MADEP and MADLS notification (10 business days)
3. Design Specification developed by a State of Massachusetts Licensed Asbestos Project Designer
4. Final Air Clearance performed by a State of Massachusetts Licensed Project Monitor
5. Recordkeeping
  - a) All asbestos abatement records shall be maintained at the Leicester Town Hall located at 3 Washburn Square, Leicester MA 01524.

### 11.0 ASBESTOS EMERGENCY RESPONSE ACTIONS

The following procedures will be followed when asbestos is accidentally disturbed or unexpectedly encountered during school activities, routine maintenance, renovation or demolition work.

#### 11.01 GENERAL

- A. Activities shall stop and the affected area immediately isolated with the required asbestos OSHA warning signs barrier tape.
- B. The responsible area Maintenance Supervisor or other person designated for this purpose will be immediately notified.
- C. The Asbestos Designated Person or the designated asbestos consultant will be notified immediately. The Designated Person will determine if air samples are needed to document air quality conditions. The HVAC system will be modified where possible when and where necessary.
- D. *Any asbestos abatement activities performed while school is in session would require immediate notification and approval from the MA DLS.*

#### 11.02 MINOR FIBER RELEASE EPISODE (< 3 SQUARE OR LINEAR FEET OF ACM)

- A. If the Designated Person recognizes only a minor problem, corrective measures will be performed under the Designated Person's directions to allow for safe resumption of work. Modification of the HVAC system may be required.
- B. Many actions are available if a temporary disturbance has created minor debris. HEPA vacuuming and wet cleaning are necessary cleanup procedures. The Designated Person will make the O&M program required arrangements for the asbestos contractor to carry out these actions.
- C. If an unexpected asbestos containing material is discovered during renovation:
  1. Avoidance can be practiced where work flow is modified to avoid any contact or disturbance of the material.
  2. Enclosure, encapsulation or repair are always options to control a minor amount of asbestos containing material.

3. Documentation of all actions is necessary.
  - a) The "Minor Fiber Release Episode Form" to be completed and maintained in Section 11.

### **11.03 MAJOR FIBER RELEASE EPISODE (> THAN 3 SQUARE OR LINEAR FEET OF ACM)**

- A. If the Designated Person feels a significant problem (i.e. asbestos debris on floor, potential fiber release in the air) has been created by the disturbed asbestos, all personnel will leave the area, the HVAC system will be modified. The area will then be secured from unauthorized entry and warning signs posted.
- B. The Designated Person will review the asbestos survey report for information.
- C. Designated Asbestos Consultant will be called in immediately if specification and abatement actions are required. (A response action in a school involving greater than 3 square or 3 linear feet of asbestos requires a design specification)
- D. The Designated Person will arrange for actions to restore safe conditions before further work continues.
- E. If the Designated Person recognizes that asbestos abatement will be required for any amount of asbestos, the coordinator will confirm that notifications have been made to the State of MA.
- F. The Designated Person will document all actions that were taken to correct the situation. The "Abatement Action Form" shall be completed and maintained in Appendix C.

### **11.04 EMERGENCY CALL-IN NUMBERS**

#### **SCHOOL CONTACTS**

Principal:

Designated Person: Dan Ayala  
508-892-7040 x 9004

#### **ABATEMENT CONTRACTOR**

#### **ENVIRONMENTAL CONSULTANT**

ATLAS Technical Consultants LLC  
73 William Franks Drive  
West Springfield, MA 01089  
(413) 781-0070,



## 12.0 EVALUATION OF RESOURCES

Cost associated with implementing and maintaining the AHERA Asbestos Management Plan are as follows, but not limited to:

- Training
  - ✓ Custodial (2-Hr. Asbestos Awareness)
    - In-House
    - Contractor\Consultant
  - ✓ 16-Hr Associated Project Worker (OSHA Class III)
  - ✓ Designated Person Training
  - ✓ Refresher Training
    - In-House
    - Contractor\Consultant
- Equipment & Supplies
  - ✓ HEPA Vacuum
  - ✓ Asbestos Waste Disposal Bags
  - ✓ Polyethylene Sheeting
  - ✓ Respirators & HEPA Cartridges
  - ✓ Dust Tape, Spray Adhesive, etc.
  - ✓ Glovebags
  - ✓ Disposable Suits
  - ✓ Water Spray Bottles
  - ✓ Signs, Labels and Barrier Tape
  - ✓ Personal Monitoring Equipment & Lab Analysis
- Asbestos Waste Storage & Disposal
- 3 – Year Reinspections
- Periodic Surveillances
- Asbestos Bulk Sampling
- Initial Cleaning Activities
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- Associated Project Work Activities (OSHA Class III)
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  - ✓ Consultant
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      - Final Air Clearance Testing
- Asbestos Hazard Assessments for Fiber Release Episodes
  - ✓ Air Sampling Analysis
  - ✓ Bulk Sampling Analysis
  - ✓ Dust Sampling Analysis
- Replacement cost of ACBM that was removed
- Recordkeeping

# ATLAS

## CERTIFICATE OF ACHIEVEMENT

*This certifies that*

**Daniel Ayala**

*has successfully completed an*

AHERA Designated Person Training Course

*conducted by*

ATC Group Services LLC dba ATLAS Technical  
73 William Franks Drive  
West Springfield, MA 01089  
(413) 781-0070

*Thomas Dion*

Principal Instructor: Thomas Dion

July 7, 2022

Date of Course

Not Applicable

Expiration Date

*Gregory J. Morsch*

Regional Training Director: Gregory Morsch

8DP-0369

Certificate Number

July 7, 2022

Examination Date

## DESIGNATED PERSON STATEMENT

I certify that as the person designated per 40 CFR 763.84(g) to ensure that the duties of the LEA as described in Section 3 of the AHERA Management Plan are conducted. As the designated person I received adequate training and understand the duties and recordkeeping requirements to maintain the AHERA Management Plan.

Date: 7/8/2022

Designated Person Name: (Print) Daniel Ayala

Designated Person Name: (Signature) Daniel Ayala

Address: 3 Washburn Sq.

Leicester, MA, 01524

Telephone: 508-892-7040

Training Course(s): Designated Person Course



THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF LABOR STANDARDS

Michael Flanagan  
Director

**Asbestos Inspector**

**CRAIG A CONNETT, JR**

Eff. Date 11/22/21

Exp. Date 11/22/22

AI900707

Member of C.O.N.E.S.

BOSR BOS

**22**



THE COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT  
DEPARTMENT OF LABOR STANDARDS

Michael Flanagan  
Director

**Asbestos Project Monitor**

**CRAIG A CONNETT, JR**

Eff. Date 11/22/21

Exp. Date 11/22/22

AM900557

Member of C.O.N.E.S.

BOSR BOS

**22**





# CERTIFICATE OF ACHIEVEMENT

*This certifies that*

**Craig Connett**

*has successfully completed the*  
**4 Hour Asbestos Site Inspector Refresher Training**  
**Asbestos Accreditation Under TSCA Title II**  
**40 CFR Part 763 and**  
**MA Department of Labor Standards 454 CMR 28.00**



Training held via a Live Webinar

Score: 92%

*conducted by:*  
ATC Group Services LLC dba ATLAS Technical  
73 William Franks Drive  
West Springfield, MA 01089  
(413) 781-0070

*Gregory Morsch*

Principal Instructor: Gregory Morsch

September 23, 2021  
Date of Course

September 23, 2022  
Expiration Date

*Gregory Morsch*

Regional Training Director: Gregory Morsch

SIAR-6955

Certificate Number

September 23, 2021

Examination Date

Asbestos Designer

EDWARD T. KOLODZIEJ

Eff. Date 09/28/21

Exp. Date 09/28/22

AD074321

Member of C.O.N.E.S.

BOSR BOS

22



Asbestos Project Monitor

EDWARD T. KOLODZIEJ

Eff. Date 09/28/21

Exp. Date 09/28/22

AM001903

Member of C.O.N.E.S.

BOSR BOS

22



Asbestos Management Planner

EDWARD T. KOLODZIEJ

Eff. Date 09/28/21

Exp. Date 09/28/22

AP073070

Member of C.O.N.E.S.

BOSR BOS

22



Asbestos Inspector

EDWARD T. KOLODZIEJ

Eff. Date 09/28/21

Exp. Date 09/28/22

AI073072

Member of C.O.N.E.S.

BOSR BOS

22





# CERTIFICATE OF ACHIEVEMENT

*This certifies that*

**Edward Kolodziej**

*has successfully completed the*  
**8 Hour Asbestos Site Inspector/Management Planner Refresher Training**  
**Asbestos Accreditation Under TSCA Title II**  
**40 CFR Part 763 and**  
**MA Department of Labor Standards 454 CMR 28.00**



*conducted by:*

*ATC Group Services LLC dba ATLAS Technical*  
*73 William Franks Drive*  
*West Springfield, MA 01089*  
*(415) 781-0070*

*Gregory Morsch*

Principal Instructor: Gregory Morsch

January 13, 2022

Date of Course

January 13, 2023

Expiration Date

*Gregory Morsch*

Regional Training Director: Gregory Morsch

MPAR-3433

Certificate Number

January 13, 2022

Examination Date



# CERTIFICATE OF ACHIEVEMENT

*This certifies that*

**Edward Kolodziej**

*has successfully completed the*  
**4 Hour Asbestos Site Inspector Refresher Training**  
**Asbestos Accreditation Under TSCA Title II**  
**40 CFR Part 763 and**  
**MA Department of Labor Standards 454 CMR 28.00**



*conducted by:*  
ATC Group Services LLC dba ATLAS Technical  
73 William Franks Drive  
West Springfield, MA 01089  
(413) 781-0070

*Gregory Morsch*

Regional Training Director: Gregory Morsch

SLAR-7057

Certificate Number

January 13, 2022

Examination Date

*Gregory Morsch*

Principal Instructor: Gregory Morsch

January 13, 2022

Date of Course

January 13, 2023

Expiration Date



Material Description/EPA Category	Location(s) of ACBM Homogeneous Area	Quantity	Friable	Assessment Category	Assumed/ Sampled	Amount, Location, Type of Damage	Recommendation	Schedule Begin/ Complete	Special Cleaning
Joint Compound associated with sheetrock walls Miscellaneous	Main office area, Mail room, Guidance, Book storage 1, Book storage 2, Principal's office, Vault, Storage 7, Bath 7, Assistant principal, Offices 1 - 3, Nurse's and associated bathrooms, Library, Library conference room, Library server room, Supply storage, Room 20 prep, Room 2 prep, Room 8 prep, Room 10 prep, Room 25 closet, Shared classroom walls in rooms 2 - 11, 19, 20, 24 - 31	400 SF	Y	4	2% Chrysotile (28684-21A)	3 SF damage in cafeteria by school store	Repair with spackle by trained personnel	5/4/2022 - 9/1/2022	Yes - Wet clean under damaged area
9"x 9" Brown floor tile with white and dark brown striations Miscellaneous	Main office area, Mail room, Guidance, Book storage 1, Book storage 2, Teacher's room, Music room & office, Storage rooms 1-3 and hall behind auditorium, Kitchen office, Band storage, Room 2 prep, Room 20 prep, Rooms 2, 6, 7, 8, 9, 10, 11, 20, 24, 26, 28, 30 and under carpet in Team chair, Principal's office, Assistant principal's office, Library, Library conference room, Library server room	11,800 SF	N	6	Assumed	Damaged in following rooms: Main Office, 2, 6, 7, 8, 9, 16, Music Office, Music Storage, 26 & 28	Maintain flooring with a sufficient wax coating. Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Associated mastic Miscellaneous			N	6	Assumed				
9"x 9" Tan floor tile with white and brown streaks Miscellaneous	Rear half of room 10, patches in Teacher's room, Room 26 & Room 24	400 SF	N	6	Assumed	Room 24 - 1 chipped tile	Maintain flooring with a sufficient wax coating. Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Associated mastic Miscellaneous			N	7	Assumed				

ASHERA Assessment category: 1 = Damaged or significantly damaged TSI ACBM, 2 = Damaged friable surfacing ACBM, 3 = Significantly damaged friable surfacing ACBM, 4 = Damaged or significantly damaged friable miscellaneous ACBM, 5 = ACBM with potential for damage, 6 = ACBM with potential for significant damage, 7 = All other ACM

Material Description/EPA Category	Location(s) of ACBM Homogeneous Area	Quantity	Friable	Assessment Category	Assumed/Sampled	Amount, Location, Type of Damage	Recommendation	Schedule Begin/Complete	Special Cleaning
9"x9" Maroon floor tile with orange and white streaks Miscellaneous	Cafeteria storage, Quiet room in Art, patches in Room 8	240 SF	N	6	Assumed	Cafeteria Storage - 1 chipped tile	Maintain flooring with a sufficient wax coating.	5/4/2022 - 5/4/2025	N
			N	7	Assumed		Perform standard asbestos floor care. Maintain according to O&M plan.		
12"x12" Orange mottled floor tile Miscellaneous	Room 4, Room 4 prep, Room 23, Art room, Hall 1, Hall 6, Hall 7	4,800 SF	N	6	Assumed	Good condition	Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
			N	7	Assumed				
12"x12" Off white floor tile with gray, white, and cream mottles Miscellaneous	Rooms 5, 12, 14, 15, 19, 21, 27, 28, 29, 31, 32, 33, 36, Nurse, Office area (offices 1, 2, 3 & hall)	14,800 SF	N	6	Assumed	Rm 14 - 1 chipped tile Hall 1 - 3 chipped tiles	Maintain flooring with a sufficient wax coating. Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
			N	6	Assumed				
12"x12" Light green floor tile with gold mottle Miscellaneous	Room 13, Room 25 & Stand/seating area in Gym	2,400 SF	N	6	Assumed	Rm. 25 - 5 chipped by hatch	Maintain flooring with a sufficient wax coating. Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
			N	6	Assumed				
12"x12" Dark gray mottled floor tile Miscellaneous	Hall 3, Hall 4	1,600 SF	N	6	Assumed	Good condition	Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
			N	7	Assumed				

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Material Description/EPA Category	Location(s) of ACM Homogeneous Area	Quantity	Friable	Assessment Category	Assumed/ Sampled	Amount, Location, Type of Damage	Recommendation	Schedule Begin/ Complete	Special Cleaning
12" Blue floor tile with black, white & gray mottles	Hall 2, Hall 5	1,800 SF	N	6	Assumed	Hall 5 - 3 nicked tiles	Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				7	Assumed				
Associated mastic	Breezeway 1, Cafeteria	4,000 SF	N	6	Assumed	Cafeteria - 3 chipped, 19 nicked	Maintain flooring with a sufficient wax coating. Perform standard asbestos floor care. Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				6	Assumed				
Associated mastic	Gym	3,800 SF	N	7	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				7	Assumed				
4' x 1' Wire re-enforced windows (Glaze)	Lights above rooms associated with concrete panels), Security (4' x 4' window)	1,070 SF	N	7	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				6	Assumed				
Lab tabletops	Room 10	170 SF	N	6	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous	Rooms 2-15, 19-33 and 36	2,300 SF	N	7	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Blackboards				6	Assumed				
Miscellaneous	Room 4	5 SF	N	6	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Soap stone sink	Art (4), Room 20 and Room 29	42 SF	N	5	2% Chrysoile (28684-15)	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				6	Assumed				
Black sink under coating	Mauve: Boy's 1 & Boy's 2; Gray: Slop sink 1 & Slop sink 2; Blue: Girl's 1 & Girl's 2	800 SF	N	6	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				7	Assumed				
2" Ceramic floor tile grout	Mauve: Boy's 1 & Boy's 2; Gray: Slop sink 1 & Slop sink 2; Blue: Girl's 1 & Girl's 2	800 SF	N	6	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				7	Assumed				
2" Ceramic floor tile adhesive	Mauve: Boy's 1 & Boy's 2; Gray: Slop sink 1 & Slop sink 2; Blue: Girl's 1 & Girl's 2	800 SF	N	6	Assumed	Good condition	Maintain according to O&M plan.	5/4/2022 - 5/4/2025	N
Miscellaneous				7	Assumed				

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Material Description/EPA Category	Location(s) of ACBM Homogeneous Area	Quantity	Friable	Assessment Category	Assumed/Sampled	Amount, Location, Type of Damage	Recommendation	Schedule Begin/Complete	Special Cleaning
1" Ceramic floor tile grout Miscellaneous	Bathrooms in Nurse's office, Wash room, Storage 7, Bath 7, Bath 1, Bath 2, Bath 3, Bath 5, Bath 6, Storage 4, Storage 5, Storage 6, Showers and bathrooms in boy's and girl's locker rooms	2,100 SF	N	4	Assumed	Boy's Locker Room - 1 SF damage	Recommend sampling. Repair damaged area Maintain according to O&M Plan	5/4/2022 - 5/4/2023	Yes - wet clean damaged area
1" Ceramic floor tile adhesive Miscellaneous			N	7	Assumed				
1"x3" Ceramic wall tile grout Miscellaneous	Cafeteria (5' up walls), Storage room (wall shared with tech ed.), Hall 3 (walls shared with tank room, boiler room, entry area & music area), Hall 4, Hall 5 (walls shared with locker room), Auditorium (5' up walls), Room 36 (wall shared with Art), Room 33 (wall shared with 31), Room 32 (wall shared with 30), Room 13 (wall shared with 11), Room 12 (wall shared with 10)	2,000 SF	N	4	Assumed	Storage Room - No Access Hall 3 - 1 SF damage by Gym Cafeteria - 2 chipped	Recommend sampling. Repair damaged areas. Maintain according to O&M plan	5/4/2022 - 5/4/2023	Yes - wet clean under damage area
1"x3" Ceramic wall tile adhesive Miscellaneous			N	7	Assumed				
Hard packed fittings associated with 2" to 2 1/2" fiberglass lines Thermal System Insulation	Boiler room (4), Hall 3 (6), Hall 4 (12), Teacher's room (16), Tech Ed. (18), 30 (2), 25 (6), 19 (8), Girl's 1 (2), Library (6), Principal (4), AHU rooms (36)	120 Each	Y	5	10% Chrysotile (28684-89)	Good condition	Maintain according to O&M plan	5/4/2022 - 5/4/2025	N
Hard packed fittings associated with 6" fiberglass lines Thermal System Insulation	Boiler Room	27 Each	Y	N/A	8% Chrysotile (28684-90)	No Access	-----	-----	-----
3"-4" Pipe insulation (mag) associated with domestic water Thermal System Insulation	Boiler Room & Tank Room	80 LF	Y	5	Assumed	Boiler Room - No Access Tank Room - Intact	Maintain according to O&M plan	5/4/2022 - 5/4/2025	N
Air cell insulation & hard packed fittings associated with domestic hot water Thermal System Insulation	Bath 1 (10), Hall 3 (30), Storage 3 (5), Bath 1 (10), Hall 6 (40), 31 (4), 25 (24), Rooms 24 - 28 (180), 6 - 10 (180) 8/10 Prep rooms (40), Supply (136), Hall 1 (40), Rooms 2 - 8 (280), Front office area/Hall 7/Room 20 (320)	1,300 LF	Y	6	40% Chrysotile (28684-94)	Exposed Ends	Seal with fiberglass rewettable cloth Maintain according to O&M plan	5/4/2022 - 5/4/2024	Yes - wet clean under exposed ends

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Date(s) of Inspection: 5/4/2022  
 Inspector ID Number: AI900695

School System: Leicester Public School Building: Leicester Middle School

Material Description/EPA Category	Location(s) of ACBM Homogeneous Area	Quantity	Friable	Assessment Category	Assumed/ Sampled	Amount, Location, Type of Damage	Recommendation	Schedule Begin/ Complete	Special Cleaning
Paper wrap insulation associated with domestic cold water Thermal System Insulation	Hall 3	10 LF	Y	1	10% Chrysotile (28684-95)	Debris observed above ceiling in Hall 3	Restrict access to area above ceiling to properly trained personnel. Clean top of ceiling tiles & repair damaged insulation Maintain according to O&M plan	5/4/2022 - 5/4/2023	N
Breaching Insulation Thermal System Insulation	Boiler Room	770 SF	Y	N/A	Assumed	No Access	-----	-----	-----
Generator muffler exhaust Thermal System Insulation	Boiler Room	12 SF	Y	5	Assumed	Good condition	Maintain according to O&M plan	5/4/2022 - 5/4/2025	N
Fiberglass duct keepers Miscellaneous HVAC dampers Miscellaneous	AHU rooms AHU rooms	10 SF 8 LF	Y N	5 6	Assumed Chrysotile (28684-93)	Good condition	Maintain according to O&M plan	5/4/2022 - 5/4/2025	N
Cleaver Brooks boiler units Thermal System Insulation	Boiler Room	2 Each	N	N/A	Assumed	No Access	-----	-----	-----
Oil fired boiler assembly Thermal System Insulation	Boiler Room	2 Each	N	N/A	Assumed	No Access	-----	-----	-----

Cost Estimates: Removal: N/A Encapsulation: N/A Repair: \$5,000 Enclosure: N/A O&M: \$2,500.00

Inspector name: Craig Connett  
 Inspector Signature:   
 Accreditation # / State: AI900707 / Massachusetts  
 Expiration date: November 22, 2022

Management planner name: Edward Kolodziej  
 Management planner signature:   
 Accreditation # / State: AP073070 / Massachusetts  
 Expiration date: September 28, 2022

ASHERA Assessment category: 1 = Damaged or significantly damaged TSI ACBM, 2 = Damaged friable surfacing ACBM, 3 = Significantly damaged friable surfacing ACBM, 4 = Damaged or significantly damaged friable miscellaneous ACBM, 5 = ACBM with potential for damage, 6 = ACBM with potential for significant damage, 7 = All other ACM