DATE:          Friday, June 10, 2022
FROM:         Gene Sides, Manager
              Office of Major Construction
SUBJECT:   Asbestos in Schools – Formal Notification
REFERENCE:   U.S. Environmental Protection Agency Regulations 40 CFR, Part 763 –
              Asbestos Containing Materials in Schools, Final Rule and Notice (Federal
              Register Volume 52, No. 210, Friday, October 30, 1987)

The Environmental Protection Agency issued a final rule under Section 203 of Title II of the
Toxic Substances Control Act (TSCA), 15 U.S.C. 2643, and effective December 14, 1987, to
require all educational agencies to identify Asbestos Containing Materials in their school
buildings and take the appropriate actions to control release of Asbestos Fibers. The local
educational agencies are required to describe their activities in management plans which must be
made available to all concerned persons and submitted to State Governors. This final rule
requires that local educational agencies use specially trained and certified persons to conduct
inspections for asbestos, develop management plans, and design or conduct major actions to
control asbestos.

The Division of Facilities and Real Estate Management, Memphis City Schools, has developed a
plan for each school facility that shows where Asbestos Containing Materials or suspected
Asbestos Containing Materials are to be found therein. This plan is available in the main office at
each of our schools or facilities.

Therefore, any short-term worker/vendor/contractor installing services/equipment or making
repairs in any facility of Shelby County Schools will be responsible for determining whether or
not their work will be in an area with Asbestos Containing Materials, it will be imperative that
Shelby County Schools, Division of Facilities and Real Estate Management, Office of Facilities
Support, be advised and approve performance of such work before it is started.
ATTACHMENT “A”

MEMO, Friday, June 10, 2022

FROM:

TO: Contractors/Vendors Accomplishing Maintenance/Repairs or Installing Equipment in Shelby County Schools Facilities

SUBJECT: Asbestos in Schools – Formal Notification

The aforementioned regulations are extremely important. Violations of Title I of TSCA by persons other than local education agencies can result in civil penalties to you of up to $25,000.00 per day. In addition, criminal penalties may be assessed to individuals who knowingly and willfully commit such violations.

Prior to completing any work in any Shelby County School Facility, you must complete Attachment A Form No. I (Certification of Receipt of Asbestos Notification), and return it to the Office of Procurement Services.

If your work will require the penetration of Asbestos Containing Material or the disturbance of Asbestos Containing Material in any school facility, please complete Attachment A Form No. II (Request of Approval to Disturb Asbestos) and forward it immediately to the Office of Procurement Services. Do not proceed until you have been contacted by the Asbestos Designated Person for Shelby County Schools.

Attachment A Forms:

I. Certification of Receipt of Asbestos Notification
II. Request for Approval to Disturb Asbestos
ATTACHMENT “A” FORM I

Certification of Receipt of Asbestos Notification

In accordance with the requirements of Environmental Protection Agency Regulations, Shelby County Schools has notified my company of the location of the Asbestos Information Folders/Asbestos Management Plans in each of Shelby County Schools Facilities in which I may be required to work. I understand that specially trained and certified persons are required to conduct inspections for asbestos, develop management plans, and design or conduct any action that might result in the disturbance of asbestos. All personnel in my firm who may be required to do work in Shelby County Schools have been instructed as to the possible locations of the asbestos containing materials in school buildings and of the location of the Asbestos Information Folders/Management Plans. No worker who has not received the proper and required training will disturb or remove any asbestos from and Shelby County Schools facility (this certification will be completed and forwarded to Shelby County Schools).

VENOR COMPANY NAME:

________________________________________
Authorized signature (Must be an Officer of the Company)

________________________________________
DATE
ATTACHMENT “A” FORM II

Request for Approval to Disturb Asbestos

If your work will require the penetration of asbestos containing material or disturb any asbestos containing material in a school facility, please complete the information below and send it to the Office of Procurement Services. You will be advised on the approval to do said work and of any precautions necessary. After your request is reviewed, you will receive a written approval to proceed.

<table>
<thead>
<tr>
<th>Brief description of work to be performed</th>
</tr>
</thead>
<tbody>
<tr>
<td>School/Facility Name:</td>
</tr>
<tr>
<td>Address of School/Facility:</td>
</tr>
<tr>
<td>Specific Areas or Room Numbers:</td>
</tr>
</tbody>
</table>

Complete Description of Work Required and Asbestos to be disturbed:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

Qualified Personnel (Included Name(s) and Training Received):

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

VENDER COMPANY NAME

______________________________

AUTHORIZED SIGNATURE

______________________________

DATE

ATTACHMENT “A” FORM II