

ROCKAWAY BOROUGH SCHOOL DISTRICT

Asbestos O&M Program

Introduction

This is the Rockaway Borough School District's Asbestos Operations and Maintenance plan (O&M). This plan has been developed for use by District employees and contractors as a guide for completing service, cleaning and maintenance tasks which involve contact with or disturbance of asbestos containing building materials (ACBM). This document does not serve as a substitute for training required by local, state, or federal laws for asbestos workers or persons who work in buildings with asbestos. This document is designed for use as a supplement to the reader's current asbestos training, and to local, state, and federal standards for the maintenance, repair, and removal of asbestos from buildings by qualified personnel.

Due to the presence of asbestos/'suspect' asbestos in various District buildings, this plan includes a number of elements which are designed to protect District employees, students, tenants, contractors, and other building occupants from exposure to asbestos in the course of day to day activities. The main purpose of this plan is to provide specific protocol for maintaining ACBM in District buildings in good condition and prevent disturbance.

When small scale disturbance is necessary, or has occurred unintentionally, this plan will provide specific protocol for performing the cleanup or removal of ACBM in a way that will reduce or eliminate the risk of release of airborne asbestos fibers into the building and surrounding area. This plan does not address large scale abatement of asbestos, but deals specifically with day to day operations only.

The key elements which are included in this plan are:

- 1) Definitions
- 2) Notification program to inform workers, tenants, and building occupants where ACBM is located, and how and why to avoid disturbance.
- 3) Surveillance program to assess and document the condition of ACBM in buildings, and to trigger response actions when necessary.
- 4) Work permit/control system to prevent unauthorized disturbance of asbestos during scheduled maintenance and remodeling activities.

- 5) Specific work practices to be followed when working with ACBM which will reduce/eliminate the risk of disturbing asbestos, or which will control the release of fibers during intentional small scale disturbance activities.
- 6) Record keeping system to document the presence of asbestos, ongoing O&M activities, and abatement activities in buildings on the District campus.
- 7) Training program to ensure that district employees are properly trained and informed in the hazards of asbestos, local laws, and district policy on the disturbance, handling, and removal of asbestos.
- 8) District protocols and procedures for requesting asbestos surveys, work authorizations, and asbestos abatement.
- 9) Consequences of failing to comply with this Asbestos O&M plan and the District Safety Policy.
- 10) Links
- 11) Attachments

Definitions

Abatement – The removal of asbestos containing building materials (ACBM) from a building using a specific set of work practices designed to protect workers and building occupants from exposure to asbestos fibers. Special training, materials, tools, protective measures, and engineering controls may be necessary.

AHERA – Acronym for the *Asbestos Hazard Emergency Response Act* – 40 CFR 763, Subpart E. This regulation governs the identification and management of Asbestos in K-12 schools. The AHERA requirements are currently the most stringent asbestos regulations in place, and are generally viewed as the state of the art and often adopted for non-AHERA facilities.

Asbestos – A group of naturally occurring magnesium silicate minerals which have a fibrous nature. Due to desirable physical properties, this mineral was used in a number of commercial and industrial applications including architectural finishes and insulation products. Asbestos fibers have known adverse health effects when inhaled.

Asbestos containing material (ACM) – A material or product which contains greater than 1% asbestos.

Asbestos containing building material (ACBM) - Asbestos containing material, including surfacing, thermal system insulation, and miscellaneous materials which are installed on the interior of a building and certain exterior components.

Asbestos Program Manager (APM) – The person responsible for administering the District Operations & Maintenance plan.

Disturbance – Any activity which crumbles, pulverizes, or otherwise disrupts the matrix of ACM, 'Suspect' ACM or Presumed ACM (PACM); or which generates visible debris or dust from the material; or which renders that material friable. Disturbance also includes activities which only impact small quantities of asbestos.

Fiber – A particulate form of Asbestos which is 5 micrometers or longer, with a length to-width ratio of at 3 to 1 or greater.

Friable – A condition referring to the ability of a material to be crumbled, pulverized, or reduced to powder by hand pressure; or a material which has previously been crumbled, pulverized, or reduced to a powder by any means. This is a specific regulatory term. State agencies have expanded this definition to include broken floor tile and transite etc.

Intact – ACM which has not deteriorated or been damaged. The matrix of an intact material remains undisturbed and the fibers remain bound within the matrix.

Miscellaneous ACM – Any ACM with the exception of surfacing materials, and Thermal System Insulation. Examples include mastics, floor coverings, and roofing materials.

Operations and Maintenance (O&M) Program or Plan.

- 1) A program of work practices used to maintain ACBM in good condition, ensure prompt and proper cleanup of asbestos debris, and prevent ongoing release by controlling the disturbance of ACBM.
- 2) Work; Small scale, short duration asbestos removal which is performed in the course of day-to-day operations.

OSHA Class I asbestos work is work involving the removal of ACM or PACM Surfacing materials and TSI.

OSHA Class II asbestos work is work involving the removal of ACM which is not Surfacing or TSI.

OSHA Class III asbestos work is work involving the repair and maintenance of building systems which may involve the disturbance of ACM or PACM.

OSHA Class IV asbestos work is work which may put employees in contact with ACM or PACM materials, but where no disturbance is to occur.

NOB - Nonfriable Organically Bound materials. Materials where the composition of the material binds the fibers in an organic matrix. Examples include floor tile, cove base, mastics caulking and roofing etc. As the accurate analysis of NOB materials can be difficult by the standard PLM method, NJ DOH requires TEM confirmation of all 'negative' NOB materials.

Presumed ACM (PACM) – Thermal system insulation or surfacing material installed in buildings constructed before 1981. This material is considered to contain asbestos until the designation has been rebutted by analytical methods described in 29 CFR 1926.1101 (k)(5).

Removal – Any operation where ACM or PACM is taken out or stripped from structures or substrates.

Surfacing ACM – Any ACM which is applied as a surface treatment. Examples include spray-applied fireproofing and acoustical ceiling textures.

Thermal System Insulation (TSI) ACM – Any ACM which is applied to pipes, boilers, boiler tanks, ducts, or other systems to prevent heat loss or gain. Examples include pipe insulation, duct wrap, and boiler tank insulation.

Notification

Building Occupants:

In boiler rooms, mechanical spaces, plenums, and other areas which contain ACBM and which are not areas of public access, warning signs alerting occupants to the presence of asbestos will be placed on the entry to that space. In addition, warning labels may be placed directly on friable ACBM materials including TSI Pipe insulation, boiler tank insulation, and duct seam tape. Materials which have a coarse texture that prevents the adhesion of labels will have labels affixed directly adjacent to the material at access points or in areas where disturbance is most likely. In this case the signage will include a description of the material which the signage refers to.

In-house workers and maintenance staff:

Cleaning and maintenance staff shall be briefed on the presence of asbestos in their area of responsibility. Notification may be accomplished through physical labeling of the ACBM where appropriate, verbal notification by the Asbestos Program Manager (APM) on a case by case basis, or through the Districts asbestos awareness training program.

Contractors and Vendors:

Prior to the start of any work, contractors arriving on campus will be alerted in writing, and verbally or by a chaperoned site walk, of the presence of any ACBM in the work area.

Written notification will consist of form, titled "Contractor Notification and Confirmation for Asbestos Containing Building Materials". (Attachment A Forms) which shall be independently issued to the contractor prior to the start of work. Contractors will be required to read, sign, and this form prior to the start of the project. Copies of the form shall be retained with the project documents, and with records for that building which are maintained in the office of the Asbestos Program Coordinator. Small projects and repairs for which bids are not submitted are not exempt from these notification requirements.

The office of the APM can issue a site specific form along with the work authorization permit for a specific project if it is requested. Information regarding the history, use, location, and management of asbestos on the District campus, or a site specific form may be accessed by contacting the office of the APM by telephone.

Surveillance

Thorough asbestos inspections of District buildings were performed and completed in 1989. Subsequent re-inspections are to be performed every three years by a Certified Asbestos Building Inspector as required by AHERA.

In order to keep the Asbestos Management Plan up to date, a program of Periodic Surveillance is to be maintained. All accessible spaces with known or assumed asbestos are to be visually inspected twice a year, or as often as determined to be necessary to adequately track any changes in the condition of the building material. Scheduling flexibility is allowed in areas where access or use prevents an adequate inspection.

Periodic Surveillance. The inspections for a building should be performed by individuals who are familiar with that building. Ideally, the same person should perform each surveillance in order to increase the likelihood of noticing any changes in the condition of ACBM over time.

A copy of the re-inspection and Periodic Surveillance reports will be retained with records for that building which are maintained in the office of the Asbestos Program Manager.

In addition to the normal inspection schedule, District employees are encouraged to notify the office of the APM whenever they suspect a change in condition of a known, assumed, or suspected ACBM. District employees such as maintenance and custodial personnel are intimately familiar with the buildings in which they work, and they form the first line of defense for reporting accidental damage and unauthorized disturbance of ACBM in the building. The active participation of the District and maintenance personnel is the most important factor in successfully executing the District O&M plan.

Any changes in the status of ACM at a building are recorded as addendums to the original inspection report for a building. Changes in condition may be caused by authorized abatement activities, deterioration due to age or damage, or ongoing testing of building materials at the building.

It is the goal for new construction on the District campus to be certified by the contractor or architect to be free of asbestos. However, since asbestos and asbestos containing products continue to be imported and used even some new materials should be considered to be 'suspect'.

Work Controls

The District maintains an informal Asbestos Survey Request and Work Authorization permit system for the purpose of preventing accidental or unauthorized disturbance of ACBM on the District Campus. Asbestos Survey Request must be discussed prior to the start of any work on the District campus which involves the disturbance of any building materials.

Examples of work which involves disturbance of building materials include:

- 2) Removing and replacing floor coverings.
- 3) Hanging or removing built-in shelves, patching holes from removal of same.
- 4) Removing walls or installing new doors into walls.
- 4) Any activities that involve drilling, cutting, sanding, scraping, crushing or pulverizing any existing building components as part of the work.

Examples of work which do not involve disturbance of building materials include:

- 1) Replacing light bulbs
- 2) Painting walls which do not involve sanding or scraping as part of the prep work.
- 3) Moving furniture which is not built-in.
- 4) Any activities which do not involve drilling, cutting, sanding, scraping, crushing, pulverizing, or removing any existing building components as part of the work.

Work which does not involve the disturbance of building materials may proceed without the submittal and completion of the Asbestos Survey Request. In cases where there is a question whether the work activity will result in disturbance of building materials, the worker, supervisor, or requesting party shall contact the APM for clarification and guidance.

An Asbestos Survey Request may be made verbally by calling the APM (Tony) at (201)-538-4519.

Once an Asbestos Survey Request is discussed, the APM may perform a site visit, check existing records for the building. A Work Authorization Permit may be issued which details any special measures which may need to be followed to prevent disturbance of

ACBM, and provide worker and building occupant protection during the course of the work activities.

Once the Work Authorization Permit is issued, the work may commence as usual unless special protective measures or asbestos abatement activities are required. If special work practices are required the District may hire a qualified consultant to solicit estimates and schedule an independent contractor to perform the asbestos removal.

Because the process of collecting estimates, selecting, and scheduling an additional contractor takes time, and because asbestos removal often requires analytical clearance of the work area upon completion, extra time should be budgeted for jobs in which asbestos removal is anticipated.

Work Practices

Initiation of asbestos related work on the District campus shall begin with the completion of an Asbestos Survey Request. Following completion of the survey, and issuance of a Work Authorization Permit which requires special work practices for asbestos disturbance, the requesting party should be prepared to work with the APM to schedule trained personnel to perform the work. Oversight services will typically be provided by the APM or independent consultant for such tasks. Proceeding with any disturbance of ACBM without informing the APM of the schedule is strictly prohibited. The APM has the authority and responsibility for managing asbestos waste generated during the course of work, ensuring that safe work practices are employed, and maintaining up-to-date records of O&M activities which disturb asbestos.

Special work practices for O&M work are compiled on a material by material basis in the **National Institute of Building Sciences (NIBS) Guidance Manual for Asbestos Operations & Maintenance Work Practices**. All O&M work on the District campus shall be performed by NJ licensed abatement workers and follow State and Federal regulations

If the quantity of ACBM to be disturbed exceeds 3 square feet, or 3 linear feet (for Thermal System Insulation), the project does not fall within the scope of O&M work and abatement of the materials must be performed by currently trained and properly certified asbestos workers. In these cases, the APM will collect estimates from qualified, asbestos abatement contractors currently licensed by the state of New Jersey for the work. Copies of the estimates will be turned over to the requesting party for review.

Bids/estimates for abatement contractors will be solicited and processed in accordance District regulations.

All abatement work performed on the District campus shall be in accordance with all applicable Federal, State, and Local Regulations. Prior to performing any work on the District Campus, contractors must meet District Insurance and Indemnification Guidelines. Asbestos abatement contractors will be required to submit the following:

- a) An initial exposure assessment, or negative exposure assessment for the work to be performed, including analytical test results for air samples showing effectiveness of the work practices employed on prior jobs with similar scope of work. Initial exposure assessments shall be validated through personnel sampling at the time of the abatement project, and the results of the sampling shall be submitted with the project close-out documents.
- b) Proof of notification of work to the appropriate Federal, State, and Local agencies, as specified in 40 CFR 61.145.
- c) MSDS forms for any hazardous chemicals which the contractor will use on campus.
- d) Appropriate training documentation for any asbestos workers and supervisors.
- e) Close out documents including record of the work performed; date of work, waste manifests, and records of shipment and receipt of waste at the disposal site.

Once a representative of the District has selected a contractor, the APM shall be notified of the choice. At this point the requesting party may either issue a Purchase Order for the work based on the estimate, or request that the APM have a Purchase Order generated. Following receipt of the Purchase Order, the APM will act as liaison between the requesting party and the contractor for the purpose of scheduling the work.

Asbestos abatement contractors may also be used for small scale O&M work in cases where trained district employees are not available, or where other factors such as convenience or disposal issues make the use of a contractor more expedient or cost effective than use of District personnel. In these cases, the protocol outlined above for asbestos abatement should be followed.

OSHA Categories of Work for Asbestos

OSHA has defined specific categories for various types of asbestos work. These categories are used in part to determine the level of training, personal protective equipment, and engineering controls necessary to safely and successfully perform asbestos related work.

Class I asbestos work is work involving the removal of ACM or PACM Surfacing materials and TSI. Class I asbestos work may only be performed by certified asbestos workers using strict engineering controls. The District does not maintain a team of workers trained to the level required to perform Class I asbestos work, and this work is always performed by a private contractor.

Class II asbestos work is work involving the removal of ACM which is not Surfacing or TSI. Examples of Class II asbestos work include the removal of flooring materials, roofing and siding materials, wall systems, and other asbestos materials which are not classified as Surfacing or TSI. Class II asbestos work may only be performed by certified asbestos workers using accepted protocol and engineering controls. District employees are not trained to the level required to perform Class II asbestos work and this work is always performed by a private contractor.

Class III asbestos work is work involving the repair and maintenance of building systems which may involve the disturbance of ACM or PACM. Class III asbestos work includes the repair or disturbance of TSI, Surfacing, and all other ACM materials which may be included in a building, but is limited in scope. Class III asbestos work is always performed by a private contractor.

Class IV asbestos work is work which may put employees in contact with ACM or PACM materials, but where no disturbance occurs. Class IV asbestos work may include custodial and maintenance tasks. Class IV asbestos work may be performed by workers who have received asbestos awareness training. All newly hired District Maintenance and Custodial workers are required to attend an initial Asbestos Awareness training session, and the NJ DOH requires a two hour Asbestos Awareness training refresher course on an annual basis.

Record-keeping

The buildings on the District Campus have been surveyed for asbestos. Copies of the asbestos surveys are housed in both the School and Board offices. These documents contain the location, quantity, and a physical description of all known and assumed ACM in the buildings. Any additional sampling conducted in the course of ongoing asbestos inspections is located with the initial survey for each building.

New buildings, or buildings which have been remodeled since the completion of the campus wide survey are either certified to be free of asbestos by the Architect or are operated under the assumption that ALL 'suspect' building materials contain asbestos. Documentation of the status of new buildings and the results of any ongoing asbestos testing in these buildings are housed in the Management Plans.

Written or computer records of all Asbestos Survey Requests, and resulting Work Authorization Permits, are housed in the office of the APM.

Records of asbestos abatement and Operation and Maintenance activities are housed in the Asbestos Management Plan. Records of abatement include the date and location of abatement, name of the contractor or District worker, scope of work, and information regarding the transport and disposal of any waste that is generated.

Training

Two Hour Awareness Training

Custodial and maintenance personnel employed directly by the District, or who work for a company which provides services under contract are required to receive a minimum of two hours of initial asbestos awareness training. This awareness training will be maintained with a two hours refresher training. The training shall include information on the historical uses of asbestos, health effects, District policies, and site specific information, or how to obtain site specific information.

The two hour awareness training is mandatory for custodial and maintenance personnel who work in buildings with asbestos, and who may come in contact with ACBM during the normal course of activities, but who will not disturb ACBM. This training does not qualify trainees to perform intentional disturbance or removal of ACBM on the District campus.

16 Hour O&M Worker Training

District employees who will perform disturbance and small scale removal of ACBM as a part of their duties shall receive a total of 16 hours of training targeted towards O&M workers. The training will be maintained with an annual 2 hour refresher course. In addition to the material contained in the 2 hour asbestos training, the 16 hour training shall include specific information on work practices, regulatory compliance, respiratory protection, and safety issues.

The 16 hour training is mandatory for personnel who perform small scale, short duration disturbance of ACBM as a part of their duties. This training does not qualify trainees to perform large scale abatement of building materials or removal of asbestos for purposes other than normal Operations & Maintenance activities.

Asbestos Abatement Worker Training:

Because the District does not allow employees to perform asbestos abatement above the level of O&M work (small scale, short duration), there is no need for asbestos abatement worker training. Work of this level shall be performed exclusively by qualified asbestos abatement contractors who employ trained asbestos workers. The APM shall confirm that the workers employed by any abatement contractor have received this level of training before abatement work on the campus begins.

Specific Protocols:

The District has developed and implemented specific policies for various activities which may impact ACBM, or for which the involvement of the Asbestos Program is required to meet statutory requirements. These policies should serve as a starting point for any activity which may disturb ACBM in District buildings. Adherence to these policies is required by the District, and failure to adhere to the policies may be met with disciplinary measures.

General Procedure for Reporting Unsafe Conditions

In accordance with District policy, any District employee who witnesses what he/she believes to be unsafe or unauthorized disturbance of ACBM, observes asbestos or suspected asbestos debris, or is aware of damaged ACBM which creates an unsafe condition in any District building should immediately contact the office of the APM at 201-538-4519. The employee should provide the location and nature of the activities or unsafe conditions so that the APM can take appropriate action.

Custodial Staff

Custodial staff members make up the first line of defense against asbestos hazards in District buildings. The participation of custodial staff in the District O&M program is the single most important factor in the success of the program. Although custodial workers are not authorized to disturb asbestos, they are intimately familiar with the building or area in which they work.

Custodial workers shall make note of any changes in the condition of ACBM over time and report any damage or deterioration to the department supervisor, or office of the APM. In addition, any improper or unauthorized disturbance of ACBM which Custodial Staff members observe should be reported to the office of the APM.

Custodial workers should not attempt to clean up any debris which is suspected to contain asbestos. Any debris should be immediately reported to the office of the APM so that immediate appropriate cleaning may be performed and the potential for future debris generation may be assessed and mitigated, if warranted. If special cleaning procedures are deemed to be necessary for a specific area in order to alleviate a known asbestos exposure hazard, the APM may opt to design and implement special cleaning procedures for that area. In that case, the APM will provide proper training and equipment to the custodial staff so that the special cleaning procedures can be safely implemented.

Trades, Maintenance Staff, and Supervisors

As with custodial staff members, maintenance workers develop an intimate knowledge of buildings for which they are responsible. Maintenance workers shall make note of changes in the condition of ACBM and report any deterioration, damage, unauthorized or improper disturbance of ACBM which they witness.

Maintenance workers routinely perform work which has the potential to disturb ACBM. Prior to the start of any work which causes disturbance to any building material, maintenance workers must obtain a work authorization permit from the office of the APM. The asbestos survey/work permit system is in place to prevent accidental disturbance of ACBM and to provide up-to-date records of the location and quantity of asbestos materials, and of asbestos disturbance on the District campus.

To request an asbestos survey and work authorization permit, a worker, or supervisor must contact the office of the APM by telephone or in person. The requesting party will need to furnish the following information.

- 1) Name and contact information of requesting party.
- 2) Building name and number, and location of work.
- 3) Description and scope of work to be performed.
- 2) Description of materials which may be disturbed.
- 3) Anticipated start date of work to be performed.
- 4) Work Order number or Project number.

Following the submittal of the asbestos survey request, the APM will issue a work authorization permit which indicates how the work may proceed. If no ACBM will be impacted by the work, then the work may proceed as usual with no special controls. If it is determined that ACBM is present and will be disturbed by the proposed work, then the work shall be conducted by trained O&M asbestos worker or an asbestos contractor, using work procedures approved by the APM.

O&M Asbestos Workers

All O&M work shall be performed by licensed abatement contractors.

Depending on the nature, frequency, and duration of work to be performed, the office of the APM, may require air sampling to be conducted during the work.

Clearance sampling shall be required upon completion of all O&M work.

Contractors and Consultants

Contractors and who work on the District campus must submit proof of asbestos training appropriate to the level of exposure/disturbance involved in the scheduled work. Copies of the appropriate training documents shall be submitted to the office of the APM for review prior to the start of work.

Any work involving contact with ACBM without disturbance requires two hour asbestos awareness training.

Any work involving the collection of samples of ACBM requires EPA approved training to the level of an AHERA certified Building Inspector.

Any work involving the small scale disturbance or repair of asbestos or abatement of larger quantities of ACBM, requires EPA approved training to the level of AHERA certified Asbestos Worker, and a supervisor trained to the level of an AHERA certified Contractor/Supervisor.

Contractors performing asbestos abatement, removal, or repair must furnish the following documents prior to the start of work on the District Campus.

- a) An initial exposure assessment, or negative exposure assessment for the work to be performed, including analytical test results for air samples showing effectiveness of the work practices employed on prior jobs with similar scope of work. Initial exposure assessments shall be validated through personnel sampling at the time of the abatement project, and the results of the sampling shall be submitted with the project close-out documents
- b) Proof of notification of work to the all appropriate Federal, State & Local agencies as appropriate
- c) MSDS forms for any hazardous chemicals which the contractor will use on campus.
- d) Appropriate training documentation for any asbestos workers and supervisors.
- e) Close out documents including record of the work performed; date of work, waste manifests, and records of shipment and receipt of waste at the disposal site.

Contractors performing asbestos abatement, removal, or repair shall conform to the All applicable Federal, State and Local regulations.

Consequences of non-compliance:

Compliance with this Asbestos O&M plan is mandatory. Due to the history of litigation and government regulation related to asbestos, compliance with this plan is the only way to meet the District goals of protecting employees and building occupants from potential exposure to asbestos; meeting local, state, and federal regulatory requirements for the management of asbestos in buildings; and protecting employees and the District as a whole from legal, financial, and tort liability which would arise from the improper handling of ACBM.

District employees who intentionally violate the provisions of this O&M plan may be subject to the disciplinary measures.

POST 1989 BUILDING MATERIALS

As the EPA ban on asbestos was not put into effect the country continues to import surprising amount of asbestos for domestic use. There is also no ban on importing building materials that may contain asbestos. Therefore it should be noted that new building materials may also have asbestos and therefore would also be regulated under the AHERA regulations.

In addition, the EPA has issued a determination that the use of MSDS is not permitted to determine if a material is asbestos containing and therefore regulated.

Links:

National Institute of Building Sciences O&M Work Practices Guidance Manual
(http://www4.nau.edu/cas/SES/Asbestos_Program.htm)