

## **NWASCO SCHOOL DISTRICT #21**

### **ASBESTOS MANAGEMENT PLAN**

#### **PART I: GENERAL PROVISIONS OF THE MANAGEMENT PLAN**

##### **1.0 INTRODUCTION**

**This Asbestos Management Plan was developed in accordance with the United States Department of Labor, Occupational Safety and Health Administration's (OSHA's) Asbestos Standards [29 CFR 1910.1001, 29 CFR 1926.1101].**

**These regulations place a burden of asbestos management on the owners and operators of facilities that may contain asbestos-containing materials (ACMs), as well as employers whose employees may be expected to work near or with ACMs. As the district is both a facility owner and an employer, it has responsibilities in both aspects of the Standards. These responsibilities include identification of potential asbestos exposure hazard, notification of employees and occupants of the presence of ACM, employee awareness and operational training, recordkeeping, and management of renovations and maintenance operations.**

**In general, the management plan development process consisted of:**

- A review of available documents, such as blueprints, construction specifications.**
- A visual inspection of building areas and elements to locate suspect ACM; sampling of suspect ACM as required; and assessment of the physical condition of the ACM.**
- Assignment of required and appropriate response actions for all ACM identified.**
- Development of an Operations and Maintenance Program to institute appropriate controls for the management of ACM remaining in-place.**

**This plan is based on Inspections and ACM sampling conducted prior to July 2016 . Condition assessments and subsequent assigned response actions of ACM identified are based on the conditions at the time of the inspection.**

**This plan is divided into two parts. Part I provides general provisions of the plan; Part II is the Operations and Maintenance Program.**

##### ***2.0 PURPOSE AND POLICY***

**The objective of this Management Plan is to allow the continuation of normal building maintenance and service activities while limiting the potential exposure of building occupants, maintenance workers, and outside service personnel to airborne asbestos fibers. The program's policies and work procedures have been specifically designed to meet the needs of both the District and the community at-large.**

**This Management Plan is guided by four (4) specific policy statements:**

- 1) Asbestos-containing materials identified at the District’s facilities are to be maintained under an Operations and Maintenance program to be instituted by the Manager. Members of the District community are expected to comply with this Management Plan relative to operations that they may undertake.**
- 2) Under this Management Plan, to the extent that the objective of the Management Plan is not compromised, intact ACM will not be removed until a condition arises pursuant to Policy Statement three (3) below.**
- 3) Instances and conditions which would motivate removal of some portion of the ACM in the facility include:**
  - When it is determined that ACM will be disturbed by repair, renovation or demolition activity; or**
  - Where a response to damaged ACM is necessary, and it is determined that removal is either the only acceptable response or the most cost effective response relative to all factors considered.**
- 4) Repair is the minimally necessary response action to damaged ACM that is not removed.**

### **3.0 DEFINITIONS**

**“Accredited Inspector” means a person who has completed a course at a USEPA approved training facility in the inspection of buildings for Asbestos-Containing Materials, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).**

**“Accredited Management Planner” means a person who has completed a course at a USEPA approved training facility in the management of Asbestos-Containing Materials in buildings, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).**

**“Accredited Asbestos Abatement Project Designer” means a person who has completed a course at USEPA approved training facility in the design of asbestos abatement projects, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).**

**“ACM” means Asbestos-Containing Material.**

**“CMU” means concrete masonry unit.**

**“EPA” means the United States Environmental Protection Agency.**

**“HEPA filter” means High Efficiency Particulate Absolute filter.**

**“NIOSH” means the National Institute of Occupational Safety and Health.**

**“O & M” means Operations and Maintenance.**

**“OSHA” means the United States Department of Labor Occupational Safety and Health Administration.**

**“USEPA” means the United States Environmental Protection Agency.**

### **REGULATIONS REFERENCED IN THIS MANAGEMENT PLAN**

**OSHA Standards for Asbestos - 29 CFR 1910.1001 and 29 CFR 1910.1101.**

**OSHA Respiratory Protection Standard - 29 CFR 1910.134.**

**USEPA National Emission Standards for Hazardous Air Pollutants - 40 CFR Part 61.**

**USEPA Asbestos-Containing Materials in Schools Rule - 40 CFR 763, Subpart E.**

#### ***4.0 GENERAL SCOPE***

##### ***4.1 MANAGEMENT STRUCTURE***

###### ***4.1.1 PROGRAM MANAGEMENT***

**Program Management shall originate from the Manager, which shall be the Director of Facilities. The Manager shall delegate, as necessary, oversight and review of the Plan to appropriate personnel and consultants.**

**The Manager may delineate specific buildings with no identified ACM and conditions which preclude the potential presence of concealed suspect material to be exempt from the requirements of this Management Plan. A copy of this exemption must be included in the Management Plan.**

###### ***4.1.2 INITIAL NOTIFICATION OF DISTRICT COMMUNITY***

**Notification of the development of this Plan shall be made in writing to management representatives in different departments of the district community by the Facilities Department.**

**The Manager shall meet with these contact persons to discuss the elements of this Plan, especially relative to the “Notification of Employee or Contracted Labor” requirement following.**

#### **4.1.3 NOTIFICATION OF EMPLOYEE OR CONTRACTED LABOR**

Anytime anyone other than the District's employees are required to conduct custodial or maintenance type activities in this building (such as outside contractors, utility workers, etc.):

- they shall be notified of the location of the ACM in the building and any special precautions required, and;
- a person designated by the Manager shall be notified of their presence in the building and their intended activities.

Notification to the workers may be in the form of reading or issuing of this Management Plan, or by other written information that as a minimum includes the type and/or location of ACM in the building, and any special precautions required.

Notification to the designated person of the presence and intended activities of the outside workers shall be made by appropriate building personnel prior to the workers beginning their activities so that a determination of whether the activities will disturb ACM can be made. The designated person shall then release the workers to proceed and document the release, any specific instructions, and evidence of the worker's notification. The Manager shall maintain such documentation.

District employees who may contact ACM as part of their regular assigned duties shall participate in an awareness training program. This program can be in-house, on line or by administered by an outside source.

#### **4.1.4 EMERGENCY SITUATIONS**

In the event that emergency responses are required, a person designated by the Manager shall be contacted by telephone and may direct responses by telephone. Written documentation of the emergency and response must be completed within 24 hours of the initial telephone contact and forwarded to the Manager.

#### **4.2 OCCUPANT AWARENESS**

The Plan will be available from the Manager's on-site office during normal business hours. District employees, as appropriate, shall receive awareness training pursuant to the OSHA Standard. Re-inspection and assessment of the subject building shall be performed periodically (5 years) to review the condition of ACM being maintained in-place.

#### **4.3 LABELING OF ACM**

The location of any ACM in routine maintenance areas shall be marked with warning labels affixed immediately adjacent to, or directly upon, the ACM, as appropriate

**Labeling shall be in accordance with the OSHA Standard for General Industry, 29 CFR 1910.1001.**

## ***PART II: OPERATIONS AND MAINTENANCE PROGRAM***

### ***1.0 GENERAL SCOPE***

**The following procedures will be utilized if an O & M program is established for maintenance personnel or work performed by any contractors.**

#### ***1.1 PROGRAM MANAGEMENT***

**Program Management shall originate from the Manager, with oversight and review of work locations and procedures being performed by the person(s) designated by the Manager.**

#### ***1.2 SCOPE***

**This Plan shall apply to all spaces and building elements containing ACM and shall not apply to areas where ACM is not present.**

#### ***1.3 DEFINITIONS***

**Words, terms and abbreviations used in this Plan shall have the meanings described in the Definitions section of this Management Plan.**

#### ***1.4 ENGINEERING CONTROLS***

**Engineering controls such as, but not limited to, isolation, enclosure, local exhaust ventilation, and dust collection shall be used during response action activities. Local exhaust and dust collection systems shall utilize High Efficiency Particulate Absolute (HEPA) filters manufactured for use with asbestos particles. All hand-operated and power-operated tools which may produce or release fibers shall be equipped with local HEPA-filtered exhaust systems.**

### ***2.0 CLEANING AND MAINTENANCE PROCEDURES***

#### ***2.1 GENERAL WORK PRACTICES***

**General work practices, including but not limited to, handling of asbestos; cleaning of adjacent surfaces and materials; personal protection and hygiene; and isolation of work areas shall be in accordance with the OSHA Standards. Specific instructions and work practices shall be in accordance with the Specific Instructions and Work Practices section of this Program.**

#### ***2.2 EQUIPMENT AND SUPPLIES***

Specialized equipment and supplies, such as but not limited to, HEPA filter equipment, and respiratory and personal protection equipment shall be commercially available equipment and supplies manufactured for their intended use.

### ***2.3 SPECIFIC INSTRUCTIONS AND WORK PRACTICES - NON-FRIABLE ACM***

#### ***ROUTINE WORK PRACTICES - NON-FRIABLE ACM***

The non-friable ACM (resilient asbestos floor tiles, floor tile mastic) is to be cleaned by non-abrasive cleaning agents and methods only. Mild detergents applied by soft mops and/or rags are an acceptable practice. No special personal protective equipment is required for this work. ACM is never to be sanded, chipped, gouged, broken, or otherwise made to break down and become friable.

#### ***REMOVAL OF LOOSE OR BROKEN ACM - NON-FRIABLE ACM***

Non-friable ACM that has loosened and is to be removed shall be removed in intact sections whenever possible. Removed sections shall be stored and disposed of in accordance with Section 8.0 of this O & M program. No special personal protection equipment is required for this work.

Non-friable ACM that has been broken shall be removed by wetting the broken pieces and the surrounding area with an amended water solution and placing the broken pieces in approved disposal bags. The area from which the pieces were removed, and the surrounding areas, are then to be cleaned using a HEPA filtered vacuum. Personal protective equipment shall be as required by Section 5.0 of this O & M Program.

#### ***REMOVAL OF INTACT ACM -NON-FRIABLE ACM***

Should the need arise to remove intact non-friable ACM for renovation or other purposes; it shall be removed by methods that will not cause the ACM to break down and become friable.

Removal of more than three square feet or three linear feet of ACM shall be accomplished by a licensed asbestos abatement contractor.

### ***2.4 SPECIFIC INSTRUCTIONS AND WORK PRACTICES - FRIABLE ACM***

#### ***REPAIR OR EMERGENCY REMOVAL - FRIABLE ACM***

Repair or emergency removal shall consist of small-scale, short duration renovation and maintenance activities including:

- Removal or repair of ACM pipe insulations;
- Replacement or repair of ACM gasket, hot water tank, or duct insulation;
- Removal of less than three square feet of ACM plaster;

- Installation of electrical conduits through or near ACM;
- Cleanup of ACM fireproofing lying on top of ceiling tiles or other surfaces.

All such work shall be in strict accordance with the OSHA Standards.

### ***RENOVATION PROJECTS***

Renovation and/or demolition projects may motivate re-inspection of certain building spaces and/or invasive inspection of such spaces as enclosed bathroom cores and columns at the Manager's discretion. The owner will utilize the services of an accredited inspector to perform these invasive inspections.

### ***3.0 FIBER RELEASE EPISODE***

Major (disturbance of greater than three linear or three square feet) or minor fiber release episodes shall be handled in accordance with all applicable regulations. In addition, the following information shall be recorded by the person(s) designated by the Manager and maintained by the Manager:

- Date of episode
- Location of episode
- Method of repair
- Preventive measures or response actions taken
- Name, address, telephone number, and affiliation of each person performing the work
- If ACM is removed, the name and location of the storage or disposal site for ACM.

### ***4.0 RESPIRATORY AND PERSONAL PROTECTION***

#### ***4.1 PERSONAL PROTECTIVE CONTROLS***

No special protective equipment is required for employees of the Manager or other authorized parties who may perform work involving non-damaged, non-friable ACM.

Appropriately licensed personnel involved in work with friable or damaged non-friable ACM shall use, as a minimum, the following personal protective equipment and procedure:

- An appropriate respirator
- Disposable protective clothing
- Personal decontamination

#### ***4.2 MEDICAL EXAMS AND RESPIRATORY PROTECTION PROGRAM***

Should any of the Manager's employees be trained to complete short duration response actions, the Manager shall establish a Respirator Program pursuant to the OSHA Respiratory Protection Standard 29 CFR 1019.134.

#### ***4.3 OTHER HEALTH AND SAFETY HAZARDS***

The owner shall comply with all standards involving other health and safety hazards which may require consideration including but not limited to ladders, scaffolding, electrical equipment, and chemical solvents.

#### ***5.0 TRAINING PROGRAMS***

All employees whose work requires them perform operations, maintenance and repair activities which may disturb minor quantities of ACM shall be required to attend Operations and Maintenance Training, including specific work practices and safety procedures. Training shall be provided prior to or at the time of initial assignment. Operations and Maintenance Training shall be provided by a qualified training agency.

All employees who perform housekeeping operations in an area which contains ACM shall be provided an asbestos awareness training course, which shall at a minimum contain the following elements: health effects of asbestos, locations of ACM in the building, recognition of ACM damage and deterioration, and proper response to fiber release episodes. Each employee shall be trained at least once a year.

The following employees are required to attend the awareness-training course:

- Facilities staff

All outside contractors working in an area of a building where ACM is located will be notified of the presence of the ACM and will be required and responsible for the appropriate level of training for their employees. Contractors must be able to provide verification that their workers have been trained regarding the proper handling of ACM.

The Manager may choose to supplement its O& M capabilities at any time with qualified contracted parties.

#### ***6.0 RULES, NOTIFICATIONS, AND PERMITS***

##### ***6.1 EPA AND OSHA COMPLIANCE***

All O & M work shall be performed in compliance with all applicable Federal and State regulations. Compliance with these standards shall be overseen by the Manager.

#### ***7.0 WASTE DISPOSAL***

##### ***7.1 BAGGING AND HANDLING***

Any asbestos-containing materials which are not in use or in place on ceilings, walls, floors, or mechanical system components shall be stored in such a way so as to prevent the release of fibers.

Disposal of asbestos-containing waste shall be in strict accordance with all Solid Waste Regulations. The owner shall utilize contractor/haulers as necessary to effect this disposal.

## **7.2 LABELING**

The bags shall be labeled in accordance with applicable regulations.

## **8.0 PERIODIC INSPECTIONS**

At least every five years beginning with the implementation of this Management Plan, all areas where ACM has been identified shall be re-inspected for changes in its condition. The re-inspection shall be conducted by a person with adequate training. Results of the periodic surveillance shall be forwarded to the Manager for inclusion into this Management Plan.

### **8.1 INSPECTION CONTROL**

The Manager is responsible for maintaining records sufficient to indicate when re-inspections are required and for making the necessary arrangements for the re-inspections to be conducted by accredited inspectors.

### **8.2 MANAGEMENT PLAN UPDATES**

Should re-inspections result in changes of any kind to be made to this Management Plan, those changes may be made by an in-house inspector or an accredited management planner, or the re-inspection results may be reviewed by an accredited management planner, and evidence of that review maintained by the Manager.

### **8.3 SPECIAL INSPECTIONS**

Renovation and/or demolition projects shall motivate re-inspection of certain building spaces and/or invasive inspection of such spaces as enclosed bathroom cores and columns. The Manager shall utilize the services of an accredited inspector for all inspections.

## **9.0 ABATEMENT ACTIVITIES**

### **9.1 ABATEMENT DEFINED**

The word abatement as used in this O& M Program is a generic term that means any of several procedures to control fiber release from ACM. This includes removal, encapsulation, enclosure, and repair.

## **9.2 CHAIN OF COMMAND**

**The Manager shall consider all aspects and policies of this Management Plan when developing and executing an abatement project.**

## **9.3 USE OF LICENSED CONTRACTORS**

**Except as noted directly following; only contractors licensed in the state of Oregon to perform asbestos abatement activities shall be used.**

**As allowed by the applicable Oregon Asbestos Licenses and Permits Code. A contractor that is not an Oregon-licensed asbestos abatement contractor may undertake removal of asbestos-containing floor tile and/or floor tile mastic utilizing an “excursion method” process approved by the Oregon State Department of Health. The District may opt to arrange floor tile/mastic removals in this manner.**

## **9.4 REGULATION AND SPECIFICATION COMPLIANCE**

**All work involving the ACM shall be performed in compliance with all pertinent federal, state, and local codes and regulations. The work shall be performed in accordance with site specific specifications prepared by an accredited asbestos abatement project designer.**

**All asbestos abatement projects shall comply with the requirements of the USEPA regulation 40 CFR Part 61, Subpart M, and the United States Department of Labor Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1910.1101.**

## **9.5 PERSONAL PROTECTIVE EQUIPMENT**

**All visitors to active abatement job sites in the building shall be required to wear the necessary personal protective equipment.**

## **9.6 OCCUPANCY CONSIDERATIONS**

**All abatement work shall take place in compliance with applicable standards.**

## **9.7 QUALITY ASSURANCE**

**The quality of the abatement contractor’s work shall be primarily determined by visual inspection and air sampling in accordance with the project specifications and all regulatory requirements.**

## **9.8 POLICY DEVIATION**

**Deviation by any worker or contractor from these established policies shall be investigated and acted on accordingly. The Manager shall not tolerate any mindful deviation from these requirements.**

## **9.9 NOTIFICATIONS**

Written notice of the intent to perform asbestos abatement activities in the building shall be transmitted by the contractor to the appropriate Federal, State and local agencies. The notices shall include:

- **The Name of the Contractor**
- **The Location of the Abatement Project**
- **The Scheduled Start and Finish Dates**
- **General Procedures to be Used During the Project**
- **The Waste Disposal**

## **9.10 FIRE AND EMERGENCY NOTIFICATION**

Local fire and emergency personnel must be notified of the abatement project and of any special precautions to be used in case of emergency. Telephone numbers of the local authorities must be prominently displayed at the job site.

## **9.11 WASTE AND WATER DISPOSAL**

All required ACM and ACM-contaminated wastes shall be properly enclosed and manifested for hauling and disposal.