

Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 1

ASBESTOS MANAGEMENT

1.0 PURPOSE AND INTRODUCTION

The passage of the Asbestos Hazard Emergency Response Act (AHERA) and subsequent regulations require Pitt County Schools to inspect for the presence of asbestos and develop a management plan for all facilities.

This program contains work procedures and requirements that will be used to ensure that any activities that may disturb asbestos-containing materials are conducted in a safe manner.

Not all facilities have asbestos-containing materials. For the schools that do have asbestos-containing materials, Pitt County Schools systematically checks for any damage and removes asbestos-containing materials as necessary.

The presence of asbestos-containing materials in buildings does not in itself constitute a health hazard. If the material is not damaged or disturbed, it is not a danger to workers or other occupants.

2.0 RESPONSIBILITIES

2.1 Program Directors, Site Managers, and Principals

- a) Provide access to the Asbestos Management Plan as requested by representatives of the EPA, NCDHHS, the public, teachers, school staff, and parents.
- b) Post and/or distribute annual asbestos notifications to all staff and PTA groups.

2.2 Assistant Director of Facility Services / AHERA Designee

- a) Responsible for evaluating and revising this procedure annually or as regulations change.
- b) Conduct three-year asbestos inspections for all facilities.
- c) Manage the asbestos management plans for all facilities.
- d) Implement response actions for damaged asbestos materials.
- e) Annually notify all parents, teachers, staff, and employee organizations of the existence and availability of Pitt County Schools' asbestos management



Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 2

plans and asbestos management activities (Inspections, reinspections, response actions, removals, and periodic surveillance).

- f) Ensure all asbestos materials in routine maintenance areas are properly labeled.
- g) Conduct periodic on-site inspections of asbestos removal projects.
- h) Approve and manage jobs involving the removal or disturbance of asbestos-containing materials.
- i) Maintain records of all inspections, abatement activities, air and bulk sampling results, waste manifests, and training activities.

2.3 Environmental Specialist

Conduct 6-month periodic surveillance of all asbestos materials for all facilities.

2.4 Facility Services and Custodial Employees

- a) Notify Facility Services of the exact location if they encounter a material that is suspected to contain asbestos that they may need to work on or around.
- b) Notify Facility Services if any damage is found to asbestos-containing materials, including water damage.

3.0 TRAINING AND CERTIFICATION

- **3.1** The Assistant Director of Facility Services and the Environmental Specialist will maintain an accredited license as an Asbestos Inspector with the North Carolina Department of Health and Human Services.
- 3.2 The Assistant Director of Facility Services will maintain an accredited license as an Asbestos Management Planner with the North Carolina Department of Health and Human Services.

4.0 ASEBESTOS-CONTAINING MATERIALS

Listed below are asbestos-containing materials that could be found within our facilities (list is not all inclusive):

Pipe Insulation and Aircell Insulation	
Hard Pipe Joints and Fittings	Pipe Insulation Mastic and Tar
Floor Tile (9"X9" and 12"X12" Tile)	Floor Tile Mastic



Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 3

Linoleum and Vinyl Sheet Flooring	Ceiling Tile (12"X12")
Window Glazing	Fire-Rated Doors (Asbestos Core)
Clothe Gaskets on HVAC Ductwork	Laboratory Countertops
Chalkboards	Chalkboard Mastic
Theatre Fire Curtains	Transite Panels (ex. Fume Hood Walls)
Soffit Panels	Fascia Panels
Rope Gaskets on Boilers	Roofing Coatings
Asbestos Cement Pipe	

5.0 STEPS TO INFORM OTHERS

- 5.1 As required by 40 CFR 763.93 (G) 4, all parents, teachers, staff, and employee organizations shall be notified annually of the existence and availability of Pitt County Schools' asbestos management plans and asbestos management activities (Inspections, reinspections, response actions, removals, and periodic surveillance). This information will be communicated in the form of a letter. A copy of the letter will be posted on Pitt County Schools website. It will contain information on the availability of the management plan and the architect and/or engineer's statement of no ACBM (if applicable). A copy of this notification will be on file in each management plan. The Assistant Director of Facility Services will be responsible for all communications.
- **5.2** A complete copy of each school's management plan will be updated and maintained at the school (or on Pitt County School's website) and at Facility Services and will be available during normal business hours (7:00 am 3:30 pm), without cost or restriction, for inspection by representatives of the EPA, NCDHHS, the public, teachers, school staff, and parents.
- **5.3** Management Plans for newly constructed and leased facilities will be developed as soon as all applicable documents are received from the architect and contractors involved.

6.0 INSPECTIONS

- **6.1** Every three years Pitt County Schools conducts a reinspection of all facilities to assess the condition of identified and any newly discovered asbestos.
 - **6.1.1** This information is kept in the asbestos management plan. In addition, copies of all management plans are located at Facility Services.
- **6.2** Prior to the demolition of a building or structure, a NESHAP inspection shall be conducted.



Program Name: Asbestos Management		
Origination Date: 12/06/11	Revision Date: 02/19/24	
Author: Mike Whitford	Revision No.: 03	Page 4

- **6.3** If an employee encounters a material that is suspected to contain asbestos that they may need to work around or on, it is their responsibility to notify Facility Services of the exact location.
 - **6.3.1** Facility Services will consult the management plan for the facility, inspect, and/or sample (if deemed necessary) the material to determine the presence or absence of asbestos. When in doubt as to the nature of the material, it is treated as if it does contain asbestos.

7.0 SIGNAGE

All asbestos materials located in routine maintenance areas shall be properly labeled.

8.0 ASBESTOS AWARENESS

- **8.1** Do not drill holes in asbestos-containing materials.
- **8.2** Do not hang plants or pictures on structures covered with asbestos-containing materials.
- **8.3** Do not sand asbestos-containing floor tile
- **8.4** Do not break, dry scrape, or pry up adhered areas of floor tile or asbestoscontaining mastic.
- **8.5** Do not damage asbestos-containing materials while moving furniture or other objects.
- **8.6** Do not install curtains, drapes, or dividers in such a way that they damage asbestos-containing materials.
- **8.7** Do not use an ordinary vacuum to clean up asbestos-containing debris.
- **8.8** Do not remove ceiling tiles below areas that have asbestos-containing materials such as asbestos-containing pipe insulation above.

8.9 Working Around Asbestos-Containing Materials

8.9.1 In buildings with asbestos-containing surfacing material, many routine maintenance activities can be conducted without contacting the asbestos. For example, changing light bulbs in a fixture on a ceiling with asbestos-containing acoustical plaster or ceiling tiles can usually



Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 5

be performed without disturbing the asbestos. In these situations, few precautions other than normal care are needed.

8.9.2 In buildings with asbestos-containing thermal system insulation, maintenance activities or repairs that can be performed without contacting or disturbing the asbestos require little more than normal care and good workmanship. For example, valves that are either uncovered or covered with non-asbestos insulation probably can be repaired without disturbing asbestos material on nearby pipes.

9.0 ASBESTOS REMOVALS

9.1 General

- 9.1.1 An accredited asbestos abatement contractor will conduct all Operations & Maintenance work (O&M), asbestos removal activities, and cleanup, no matter how small, in Pitt County Schools facilities.
- **9.1.2** An accredited asbestos project designer will develop a project design for the removal of 3 or more square feet of surfacing material or 3 linear feet or more of thermal system insulation. This is considered a large-scale disturbance of asbestos.
- **9.1.3** An accredited supervising air monitor will develop an air monitor design for all regulated asbestos removals.
- **9.1.4** An accredited air monitor will conduct all air monitoring requirements, including collecting TEM samples on regulated asbestos removals and collecting PCM samples on select nonregulated asbestos removals.
- **9.1.5** All asbestos removal work shall be performed in full compliance with all applicable EPA, OSHA, and DOT regulations, NIOSH recommendations, and all other applicable Federal, State and Local government regulations.
- **9.1.6** The asbestos removal contractor will secure the necessary permits for asbestos removal.
- **9.1.7** The contractor shall use industry-accepted asbestos removal procedures. Dry sweeping shall be prohibited in the work area.
- **9.1.8** Any visual debris shall be removed by HEPA vacuuming and/or wetwiping.



Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 6

- 9.1.9 All critical barriers and negative air machines will be left in place until the project has been given final approval by the project air monitor. Failure of air clearance sampling shall result in the reexecution of fine cleaning activities by the contractor until satisfactory air sampling is achieved.
- 9.1.10 The asbestos removal contractor will be responsible for any asbestos fiber contamination of adjoining areas and/or properties that occur as a result of asbestos removal activities. All equipment and/or materials within these areas and/or properties shall be totally decontaminated or disposed of and replaced by the contractor with equipment and/or materials of equal or better quality at the contractor's expense.
- **9.1.11** Transite ceiling tiles are unlikely to release measurable airborne fiber concentrations when handled as a unit that is, removed as a whole tile by lifting out of the grid without breaking, sanding, drilling, or otherwise physically damaging the transite tile.

9.2 Licenses

- **9.2.1** All asbestos removal workers must be licensed asbestos abatement workers.
- **9.2.2** There must be a licensed asbestos removal supervisor on the job site during all work hours throughout the asbestos removal related work activities.

9.3 Asbestos Removal Preparations

- **9.3.1** Asbestos removals should be scheduled after normal working hours (nights or weekends), if possible, or access to the work area should be controlled: doors should be locked from the inside and signs posted to prevent unauthorized persons from entering the work area.
- **9.3.2** All penetrations of the floor, walls, and ceilings including ducts, vents, and doors shall be sealed with fire retardant polyethylene and duct tape to prevent any possible airborne asbestos from escaping into the area outside the work area.
- 9.3.3 At the beginning of each workday, all polyethylene barriers shall be checked to ensure that they are still intact. Needed corrections/reparations shall be made before prior to resuming asbestos removal activities.



Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 7

- **9.3.4** Any items not being removed from the work area (i.e., permanently attached furniture, water fountains, etc.) shall be sealed with fire retardant polyethylene and duct tape to prevent contamination.
- **9.3.5** HVAC systems will be turned off during the time asbestos removal activities are occurring to prevent the distribution of fibers from the work site to other areas in the building.
- **9.3.6** Asbestos removal contractors shall cover the HVAC duct grills (return and supply) inside the work area with polyethylene and seal with duct tape prior to beginning work.
- **9.3.7** The contractor shall post asbestos danger signs or barricade tape at all entrances to the work area.

9.4 Negative Air Pressure Systems

- 9.4.1 When required, a ventilation system shall be installed by the contractor to create a negative pressure within the enclosure with respect to the area outside the enclosure. This system must be equipped with HEPA filters. Exhaust equipment and systems shall comply with ANSI Z9.2-79 and be used according to manufacturer's recommendations.
- **9.4.2** Negative air exhaust shall not be vented into the building.
- **9.4.3** If during the removal process negative pressure is not maintained in the work area, all removal operations shall be immediately suspended.

9.5 Personal Protective Equipment (PPE)

- **9.5.1** All asbestos removal workers shall wear an approved respirator, disposable coveralls, gloves, and footwear to enter asbestos removal work areas.
- **9.5.2** Eating, drinking, smoking, and chewing of gum or tobacco shall not be permitted in asbestos removal work areas.

9.6 Asbestos Waste Materials

9.6.1 All asbestos waste shall be packaged and disposed of in accordance with all applicable local, state, and federal regulations and ordinances. Asbestos shall be disposed of at an approved landfill.



Program Name: Asbestos Management		
Origination Date: 12/06/11 Revision Date: 02/19/24		
Author: Mike Whitford	Revision No.: 03	Page 8

9.6.2 Waste bags shall be properly sealed immediately after filling. The contractor shall ensure asbestos labels are affixed to all asbestos waste material.

9.7 Post Job Submittals

Asbestos removal contractors shall submit the following documentation to Pitt County Schools within 30 days of the completion of an asbestos removal project.

- A. Permit Copy
- B. Waste Shipment Records
- C. Employee Accreditations & Pictures
- D. Employee Training Agency

10.0 DEFINITIONS

AHERA - Asbestos Hazard Emergency Response Act

<u>Amosite</u> – Brown asbestos. An asbestiform mineral of the amphibole group. It is the second most commonly used form of asbestos in the U.S.

<u>Asbestos</u> – A general name given to a number of naturally occurring hydrated mineral silicates that possess a unique crystalline structure, are incombustible in air, and are separable into fibers.

<u>Asbestos-Containing Material</u> – Any material or product that contains more than 1% asbestos.

<u>Chrysotile</u> – White asbestos. The only asbestiform mineral of the serpentine group. It is the most common form of asbestos used in buildings.

<u>Encapsulation</u> – The use of an agent to seal the surface or penetrate the bulk of an asbestos-containing building material.

<u>Friable</u> – Asbestos material that when dry may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously nonfriable material after such previously nonfriable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to power by hand pressure. Friable materials are more likely to release fibers when disturbed.

<u>HEPA</u> – High-Efficiency Particulate Air filtering system

<u>Homogeneous Area</u> – An area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.



Program Name: Asbestos Management		
Origination Date: 12/06/11	Revision Date: 02/19/24	
Author: Mike Whitford	Revision No.: 03	Page 9

Mastic - Adhesive

<u>Miscellaneous Material</u> – Interior building material on structural components, structural members, or fixtures, such as floor tile, ceiling tile, shingles, wall panels, and adhesives.

<u>Nonfriable</u> – Asbestos material that when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

<u>PCM</u> – Phase Contract Microscopy. A method of analyzing air samples for asbestos fibers. PCM is not as precise as TEM.

<u>PLM</u> – Polarized Light Microscopy. A method of analyzing bulk samples for asbestos in which the sample is illuminated with polarized light and viewed under a light microscope.

<u>Surfacing Material</u> – Asbestos material that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other material on surfaces for acoustical, fireproofing, or other purposes.

<u>TEM</u> – Transmission Electron Microscopy. A method of analyzing air samples for asbestos fibers using a transmission electron microscope.

<u>TSI</u> – Thermal System Insulation. Asbestos material that is applied to pipes, fittings, boilers, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes. TSI can be found as aircell insulation or hard-mudded fittings and joints.

<u>VCT</u> – Vinyl Composition Tile.

11.0 REFERENCE DOCUMENTS

- **11.1** Environmental Protection Agency. **Protection of Environment:** *61* Subpart M, National Emission Standard for Asbestos. Washington, DC: U.S. Government Printing Office.
- **11.2** Environmental Protection Agency. **Protection of Environment:** *40 CFR 763 Subpart E, Asbestos-Containing Materials in Schools.* Washington, DC: U.S. Government Printing Office.
- 11.3 North Carolina Administrative Code. Title 10A Health and Human Services, Chapter 41 Epidemiology Health, Subchapter C –



Program Name: Asbestos Management		
Origination Date: 12/06/11	Revision Date: 02/19/24	
Author: Mike Whitford	Revision No.: 03	Page 10

Occupational Health: Section .0600, Asbestos Hazard Management Program.

- 11.4 North Carolina Occupational Safety and Health Administration.

 Occupational Safety and Health Standards for General Industry: 29

 CFR 1910.1001, Asbestos. Raleigh, NC: N.C. Department of Labor.
- 11.5 North Carolina Occupational Safety and Health Administration.

 Occupational Safety and Health Standards for General Industry: 29

 CFR 1926.1101, Asbestos. Raleigh, NC: N.C. Department of Labor.