



TITLE	POLICY NUMBER	
Asbestos Management Policy	DCS 02-05	
RESPONSIBLE AREA	EFFECTIVE DATE	REVISION
Business Operations - Business Services Administration	12/15/16	

## **I. POLICY STATEMENT**

The purpose of this policy is to establish roles, responsibilities and procedures that meet Occupational Safety and Health Act (OSHA) and Environmental Protection Agency (EPA) regulations to control the inadvertent release of asbestos or presumed asbestos fibers found in building materials within the Department of Child Safety (DCS) owned or leased facilities. These controls will protect employees working within DCS occupied facilities.

## **II. APPLICABILITY**

This policy applies to all DCS personnel who are occupationally exposed to asbestos in any aspect of their work in DCS owned or leased facilities. The safety of all clients, visitors, and contractors/vendors is also considered in this policy.

## **III. AUTHORITY**

[A.A.C. R-2-10-101 et. seq.](#)

Department of Administration, Risk Management Division

[15 USC § 2651](#)

Asbestos Hazard Emergency Response Act (AHERA)

[29 CFR 1910.1001](#)

OSHA General Industry

[29 CFR 1910.134](#)

OSHA Respiratory Protection

[29 CFR 1926.1101](#)

OSHA Construction

[40 CFR 763 Subpart G](#)

Asbestos Worker Protection

#### IV. DEFINITIONS

Abatement: Procedures to control fiber release from asbestos containing materials in a building. Used as a general term for the "response action" under AHERA. There are five ways to control the release of fibers: removal, encapsulation, enclosure, repair, or manage in place.

ADOSH: Arizona Department of Occupational Safety and Health.

Asbestos: Latin meaning inextinguishable; any of several minerals (such as chrysotile, crocidolite, amosite, anthophyllite, actinolite, and tremolite) that readily separate into long flexible fibers. These fibers are both fire and chemical resistant. The Permissible Exposure Limit (PEL) = 0.1 fiber per cubic centimeter. Asbestos work has four classifications:

- Class I asbestos work means activities involving the removal of thermal system insulation and surfacing asbestos containing material (ACM) and presumed asbestos containing material (PACM);
- Class II asbestos work means activities involving the removal of ACM which is not thermal insulation or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and side shingles, and construction mastics;
- Class III asbestos work means repair and maintenance operations where ACM is likely to be disturbed;
- Class IV asbestos work means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM, and activities to clean up dust, waste, and debris result from Class I, II, and III activities.

Asbestos Containing Material (ACM): Materials identified by qualified experts through laboratory testing to contain at least 1% asbestos.

Asbestos Program Coordinator (APC): An Asbestos Hazard Emergency Response Act (AHERA) Certified Contractor/ Supervisor, Building Inspector, or Management Planner; an individual who oversees all aspects of operational maintenance associated with

possible disturbance of asbestos materials.

Asbestos material disturbance: Any sanding drilling, crushing, grinding, or chipping of building materials containing asbestos.

Emergency fiber release: An unscheduled disturbance of asbestos/presumed asbestos or suspected asbestos materials producing airborne fibers within DCS occupied facilities.

Facility: Any institutional, commercial, public, industrial, or residential structure owned or leased by DCS and occupied by DCS employees.

Friable: A material when dry may be crumbled, pulverized, or reduced to powder by hand pressure.

Homogeneous Area: Areas of the building materials which are uniform by color, texture, construction/application date, and general appearance.

Improvement Activity: Any activity involving building materials within DCS occupied buildings. These activities include painting, repairing, installing, remodeling, constructing, replacing, cleaning, and maintaining building equipment or materials.

Plenums: Spaces, usually above a ceiling or below a floor, which can serve as a receiving chamber for air that has been heated or cooled to be distributed to inhabited areas.

Presumed Asbestos Containing Material (PACM): Building materials other than steel, wood, or glass installed in buildings constructed no later than 1980.

Regulated Asbestos Containing Materials (RACM): Thermal system insulation, surfacing material, and floor tile installed in buildings.

Project Coordinator (PC): Employee of the DCS Office of Real Estate responsible for scheduling of facility improvement activity.

## **II. POLICY**

### **A. Roles and Responsibilities**

1. The Asbestos Program Coordinator (APC) shall:
  - a. be assigned within DCS Office of Real Estate;

- b. implement an Asbestos Program through development and maintenance of policy regarding asbestos activities;
- c. ensure DCS procedures comply with local, state, and federal guidelines through annual review;
- d. act as liaison for all asbestos related issues with:
  - i. Arizona Department of Administration, Risk Management;
  - ii. Arizona Division of Occupational Safety and Health;
  - iii. Arizona Department of Environmental Quality; and
  - iv. any other regulatory agency to which DCS is subject.
- e. respond to inquiries from DCS employees about proposed facility improvement activities regarding asbestos;
- f. maintain asbestos surveys and related records for DCS owned facilities;
- g. maintain asbestos exposure records for all DCS employees;
- h. review and approve scopes of work associated with asbestos assessments and/or abatements for facilities occupied and funded by DCS;
- i. require all work specification(s), bid requests, and scopes of work for the Department to require the use of non-asbestos building materials;
- j. assure that only State-approved Assessment and Abatement Contractors are used during asbestos abatement projects in DCS owned facilities;
- k. conduct “Asbestos Awareness” training for all personnel who process or negotiate facility improvement activities. Manage employee training records including recording, tracking, and notification of required renewals;

- l. inform employees of asbestos material disturbance/abatement activities, prior to commencement of work;
- m. conduct asbestos inspections every six months within state owned facilities containing friable ACM. Facilities with non-friable ACM will be inspected annually;
- n. conduct ACM functions for facility improvement activities, when requested;
- o. post signs or labels in DCS owned facilities on asbestos materials in mechanical rooms, equipment closets, and plenums to warn workers of the existing hazard. Each sign or label shall include the following:

DANGER  
CONTAINS ASBESTOS FIBERS  
AVOID CREATING DUST  
CANCER AND LUNG DISEASE HAZARD

- p. notify the DCS Office of Real Estate of all proposed building occupations, and any facility improvement activities;
  - q. develop and maintain procedures that address asbestos-related activities specific to the functions of the Department;
  - r. respond where appropriate to inquiries from employees regarding the status of ongoing or planned work related to asbestos in their facility;
  - s. present contractors/vendors with a completed *Employee Notification of Asbestos Abatement* during pre-bid meetings if a potential disturbance is likely for work performed within DCS owned facilities;
  - t. conduct and record pre and post inspections of maintenance activities and contractor/vendor operations to ensure asbestos building materials were not disturbed.
2. Project Coordinators (PCs) shall:

- a. communicate with the APC to process facility improvement activities involving suspected asbestos materials;
- b. submit accurate floor plans of all proposed projects that may disturb asbestos/presumed asbestos building materials occupied by DCS personnel to the APC;
- c. require only non-asbestos building materials to be used when conducting new construction or installing new building equipment;
- d. request facility owners give thirty (30) days' notice prior to performing work in the facility that could potentially disturb ACM/PACM;
- e. ensure compliance to procedures that address the asbestos-related activities specific to the functions of the Department;
- f. ensure personnel are trained as required prior to assigning work in areas containing asbestos building materials;
- g. ensure all suspect building materials have been accurately identified to be asbestos free prior to assigning personnel to disturb the material;
- h. ensure asbestos building materials are not disturbed without written authorization.

## B. Training

Training requirements for personnel are determined by their level of potential exposure to asbestos and their decision-making responsibilities associated with this policy on a daily basis. DCS employees shall attend required training prior to engaging in asbestos related activities and annual refreshers.

- 1. The Asbestos Program Coordinator shall attend and retain certification as:
  - a. AHERA Building Inspector;
  - b. AHERA Management Planner.

2. The Asbestos Program Coordinator shall attend the ADOSH training.
3. Supervisory personnel involved with facility maintenance and/or telecommunication installation shall attend “Asbestos Awareness” training.
4. Personnel engaging in facility or telecommunication planning, Project Coordinators, janitorial activities, and personnel involved with contracting out these functions shall attend “Asbestos Awareness” training annually.
5. Training records shall be maintained in the APC office.

## **VI. PROCEDURE**

### **A. Appropriate Personnel/Approvals**

Only trained and certified personnel shall conduct asbestos abatement activities within the Department. This applies to both department employees and contract personnel. The Arizona State Procurement Office (SPO) has a list of Assessment and Abatement Contractors approved to conduct Class I, II, III, and IV work. All abatement projects or projects that will disturb ACM or PACM conducted by DCS personnel must be approved by the APC prior to commencing work.

### **B. Facility Improvements/Modifications**

Facility improvement activities that potentially disturb suspected asbestos materials require the approval of the APC. Only personnel trained as described in Section V.B. of this policy shall coordinate facility improvement activities that involve the disturbance or possible disturbance of ACM/PACM. The facility Administration or Office shall contact the APC for assistance.

1. DCS Owned Properties – Asbestos survey inspections will be reviewed by the APC prior to any work commencing with the facility to ensure ACM or PACM is not involved.
  - a. Facility improvement activities that require the disturbance of suspected ACM/PACM shall be reviewed by the APC;
  - b. Project Coordinators shall work with the assigned APC to plan and coordinate any facility improvements or modifications;

- c. The APC will evaluate the project and offer guidance to safely proceed with the project;
  - d. DCS Deputy Directors shall be notified of asbestos abatement activities by the APC or the DCS Real Estate Manager;
  - e. Task Assessment Scopes of Work (TASOW) for assessment and abatement activities shall be developed and approved by the APC prior to bid presentation.
2. DCS Leased Properties - The APC will review proposed plans that may disturb ACM or PACM to ensure the safety of DCS personnel working in the area.
- a. Assessment and abatement activities are the responsibility of the facility owner;
  - b. DCS personnel shall not conduct facility improvement activities within leased facilities without asbestos survey inspections of the materials in the building affected by the facility improvement and the approval of the facility owner. The Project Coordinator shall follow the guidelines described in section VI.B.1.;
  - c. Contractors procured by DCS to conduct facility, equipment, or system improvements within buildings that contain suspected ACM/PACM will be notified and provided a facility owner point of contact. Contractor work will not commence without the asbestos survey inspection of the materials in the building affected by the facility improvement or equivalent and the approval of the facility owner;
  - d. DCS Deputy Directors shall be notified of asbestos abatement activities by the APC or the DCS Real Estate Manager.

C. Assessment and Abatement Contractors (Owned Facilities)

The Office of Real Estate Administrator will be notified by the APC of projects requiring the support of abatement contractors. The APC shall produce the Task Assignment Scope of Work (TASOW) for the assessment contractor and work closely with the assessment contractor and Project Coordinator to select an abatement contractor and schedule the project. The APC shall also act as the DCS



project representative for the abatement activities.

1. Assessment Contractor – Represents DCS as the asbestos abatement consultant. The assessment contractor ensures the procedures used by the abatement contractor are within OSHA/EPA regulations. All Class I, II, and III abatement activities require the presence of an Arizona State Procurement Office (SPO) approved asbestos assessment contractor.
2. Abatement Contractor – Conducts Class I, II, III, and IV asbestos abatement activities.
3. Task Assignment Scope of Work (TASOW) - As per SPO, DCS shall submit an initial TASOW which shall include, as a minimum, the following:
  - a. Project area description;
  - b. Schedule for completion;
  - c. Deliverables;
  - d. Variables and assumptions;
  - e. Acceptance criteria; and
  - f. Project objectives.
4. Contractors shall respond with a Task Assessment Offer (TAO) which will include all required information stated in the current SPO contract.
5. A Task Assignment (TA) is the formal written acceptance, with any negotiated changes, of the contractor's TAO.
6. All changes to the TA must be presented as a formal written Task Assignment Amendment (TAA) as defined in the SPO contract.

#### D. Employee Notification

Bulletins shall be posted prominently on bulletin boards in break rooms and lounges informing employees of impending asbestos abatements scheduled in

their building. Bulletins shall be posted ten (10) work days prior to the scheduled abatement activity.

E. Abatement Point of Contact (POC)

For the purpose of abatement activities, the APC will be assigned as the POC for DCS. It will be the responsibility of the APC to be available to the assessment contractors for the duration of the job. In the absence of an APC, a PC will serve in this function under the guidance and consultation of the APC.

F. Task Assessment Scope of Work Final Inspection

As described in the SPO contract, the APC or designee will perform a walk-through of the regulated area with the assessment contractor to determine if the job is sufficiently complete.

G. Forms

[Employee Notification of Asbestos Abatement \(DCS-1245A\)](#)