# **APRIL 2020**

# **Church Asbestos Program**

Handbook

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# **Introduction and Goals**

### 1.1

# Introduction

This handbook is an asbestos policy and procedure guide for managers of entities belonging to The Church of Jesus Christ of Latter-day Saints. This handbook also refers to contracts and forms to be used by asbestos consultants, asbestos contractors, and Church workers involved with asbestos.

Church entities should appoint an asbestos program manager (APM) and assistant asbestos program managers as described in section 7. Managers of Church entities should implement the procedures outlined in this handbook when anyone is working around asbestos, whether managing in place, repairing, or abating. Church employees who work around asbestos should be properly trained.

Prolonged exposure to asbestos fibers can cause debilitating diseases. The diseases most often associated with prolonged asbestos inhalation are:

- Asbestosis. This is a restrictive lung disease that reduces lung capacity. Asbestosis has been prevalent among workers who have been exposed to large doses of asbestos fibers over a long period of time. The typical latency period for asbestosis is 15 to 30 years.
- Lung Cancer. This is a cancer that forms in tissues of the lung, usually in the cells lining air passages. Like asbestosis, there is a long latency period between initial exposure and the onset of lung cancer, typically 20 to 30 years.
- Mesothelioma. This is a cancer of the chest cavity lining (mesothelium). This type of cancer spreads very rapidly and is always fatal. Mesothelioma typically occurs 30 to 40 years after initial exposure.

Other diseases are more frequent among persons with prolonged exposure to asbestos than the normal population. These include cancer of the esophagus, stomach, colon, and pancreas, and pleural plaques, thickening, and effusion. (The pleura is the delicate membrane lining associated with the lungs.)

These asbestos-related health issues have given rise to federal government regulations aimed at protecting human health and the quality of the environment, such as Occupational Safety and Health Administration (OSHA) standards. The Church must comply with these laws and regulations while managing risk and liability and controlling associated costs.

### 1.2

# Asbestos Facts

The United States Environmental Protection Agency (EPA) has offered the following facts as a "rational approach to asbestos management":

Fact 1 Although asbestos is hazardous, human risk of asbestos disease depends on exposure.

Fact 2 Prevailing asbestos levels in buildings—the levels that people face as building occupants—seem to be very low, based on available data. Accordingly, the health risk faced by building occupants also appears to be very low.

**Fact 3** Removal is often not a building owner's best course of action to reduce asbestos exposure. In fact, an improper removal can create a dangerous situation where none previously existed.

Fact 4 The EPA requires asbestos removal only in order to prevent significant public exposure to asbestos, such as during building renovation or demolition.

Fact 5 EPA recommends in-place management when asbestos is discovered.

# 1.3 Church Asbestos Program Goals

The Church will use the EPA's five facts as a basis for its asbestos program. In relation to asbestos, the Church will:

- 1. Inspect buildings for asbestos as required by regulations and establish management plans.
- 2. Update inspections prior to renovations, demolitions, or when required by applicable state and local regulations.

- 3. Manage asbestos "in place" when possible to do so without endangering health or the environment.
- 4. Remove (abate) asbestos that will be disturbed during renovations or demolition.
- 5. Remove (abate) damaged asbestos when discovered, depending on the amount of damage to the asbestos. Small-scale repairs may be made (see section 7).
- 6. Train employees who may be working near asbestos in asbestos operations and maintenance practices and asbestos regulations.

# **Asbestos Consultants**

# 2.1

# Policy

A professional asbestos consultant is an individual or organization that provides professional, technical, and consulting services related to asbestos.

Use only professional asbestos consultants who are qualified under Church Asbestos Program guidelines. Consultants prequalified by the Church Purchasing Division should be given precedence.

The Church has signed contracts with the consultants on the "Safety, Health, and Environmental Consultants" list. The contracts were negotiated by the Church Purchasing Division to protect the Church legally and ensure that the consultants have adequate insurance. The consultants have been selected as the most qualified and cost competitive, are familiar with Church operations, and will provide standardized services and reports. Fees have been negotiated by the Church Purchasing Division. These consultants have been selected as qualified industrial hygiene and environmental professionals to provide consulting on industrial hygiene (including indoor air quality), asbestos, mold, and lead-based paint. Use the Industrial Hygiene Consulting Services Statement of Work (SOW) when requesting consulting services.

Use the criteria in this section for selecting consultants only if contracted consultants are not available in your area.

It is important to seek out the best consultants initially and then work with the same approved consultants to develop a good working relationship. This will result in efficiency, lower costs, better project control, and improved work quality.

Once consultants are approved, performance and fees should be reviewed periodically. Negotiating

fair and reasonable fees is an ongoing process. Although quality and reliability are paramount considerations, the Church must also expect competitive fees from its consultants.

If contracted consultants are not used, the Church and the consultant will enter a formal consultant agreement for all asbestos consultant services (see Asbestos Consultant Agreements on page 5).

Consultants will not serve as both consultants and asbestos contractors for Church projects. Use them exclusively as consultants. No conflict of interest will exist between the consultant and any contractor prequalified to bid on an abatement project. If this conflict of interest requirement is violated, or other unethical conduct is evident, approved consultant status will be rescinded for at least one year.

# 2.2 Asbestos Consultant Role

The selection of an asbestos consultant must go beyond the traditional consultant selection process. Asbestos abatement is a highly regulated, highly visible, and highly technical process. It can create liability for those involved. Improperly identifying materials can result in excessive and unnecessary expense to the owner. Improper removal of materials containing asbestos can contaminate entire buildings and result in costly physical damage and litigation.

The asbestos abatement consultant will:

- 1. Guide each abatement project through the process of asbestos identification, assessment, options, regulations, and response actions.
- 2. Ensure that informed decisions are made for regulatory compliance.

- 3. Direct properly conceived, executed, and documented response actions.
- 4. Ensure that safety and regulatory requirements are met until response actions are completed.

### 2.3

# Asbestos Consultant Qualifications

Consultants that have signed contracts with the Church Purchasing Division do not need to go throught the qualification process. This section applies only to noncontracted consultants.

The minimum requirements for any professional consultant to perform asbestos consulting services are as follows:

- 1. Minimum of five years consulting experience in asbestos identification and assessment and in asbestos management and removal, with proven qualifications by project experience, education, and training.
- 2. The consultant firm need not be classified as an environmental engineering company. An organization with professionals such as industrial hygienists, engineers, architects, technicians, designers, and so forth would be the best candidates. Professionals who manage projects, make technical judgments and decisions, and are responsible for consulting firm actions shall be certified, licensed, or accredited as appropriate by federal, state, and local laws and have the required asbestos experience.
- 3. Consultant personnel who conduct asbestos investigations, make assessments, prepare construction documents, plan asbestos abatement management, and monitor abatements will be Asbestos Hazard Emergency Response Act (AHERA) accredited and have appropriate asbestos accreditations

- (certifications) in the applicable states and localities, with a minimum of five years related experience. The work of each consultant's personnel will be directed and approved by a Certified Industrial Hygienist (CIH).
- 4. The consultant will obtain professional liability insurance specific to asbestos-related activities with limits of the greater of: Consultant's actual coverage amounts or One Million Dollars (\$1,000,000) per claim and Two Million Dollars (\$2,000,000) in the aggregate. A certificate of insurance is required for Church projects.
- 5. The consultant will be eligible only for project work of the size and scope with which he or she has had proven experience.
- 6. The consultant will be judged qualified only after review and verification of a Statement of Qualifications document that will include but not be limited to:
  - a. Introduction to professional firm.
  - Background, organization, and financial statement of the firm.
  - c. Quality assurance program.
  - d. Asbestos consulting services.
  - e. Available internal asbestos services and capabilities.
  - f. Professional staff and their qualifications.
  - Representative asbestos clients and references.
  - h. Professional liability insurance status.
  - i. Sample project documents if requested.
- 7. The consultant will consent to a technical audit provision in his or her agreement that will allow the owner the right to verify and investigate the consultant's technical procedures regarding the consulting services for which he or she has been engaged.

Consultant reviewers will fully document the review and follow-up of their qualifications and any consultant or project visits performed as part of the prequalification process. This information may be required for higher authorities of committees responsible for final consultant approval.

The Statement of Qualifications document should be periodically updated, but no more than once a year.

### 2.4

# Asbestos Consultant Agreements

Consultants that have signed agreements with the Church Purchasing Division do not need to sign an asbestos consultant agreement. Use the Industrial Hygiene Consulting Services Statement of Work (SOW) when requesting consulting services. This section applies only to noncontracted consultants.

Formal agreements will be made for professional services with consultants. Agreements are for an asbestos survey and management plan and another for asbestos abatement.

Consultant Services Agreements are available on the Church intranet document library in the Meetinghouse Facilities Resource Library. U.S. and Canadian versions of the agreements are available.

Titles of the agreements are:

- Agreement Between Owner and Consultant, Asbestos Survey and Management Plan
- Agreement Between Owner and Consultant, Asbestos Abatement

Electronic copies are also available from the Risk Management Division.

Asbestos Survey and Management Plan
Agreement. To initiate a survey and inspection, the

church representative should provide an Agreement Between Owner and Consultant for Asbestos Survey and Management Plan to the consultant that includes the building name, address, property number, and the owner's designated representative. The scope of the survey should be defined (i.e., comprehensive survey or limited survey of specified suspect materials). Provide existing information on the building, a map and directions to the site, and a floor plan if available. The consultant should respond by providing two signed copies of the Agreement Between Owner and Consultant, Asbestos Survey and Management Plan to the owner's representative. The Church should sign the agreements and return one copy to the consultant.

Asbestos Abatement Agreement. To initiate an abatement project, the Church representative should provide an Agreement Between Owner and Consultant for Asbestos Abatement to the consultant that includes the building name, address, property number, and the owner's designated representative. The request should include a description of the scope of work that may disturb asbestoscontaining material (ACM) and a time frame for the submission of a bidding document, a proposed bid walk date, and an estimated project start date. Provide existing information on the building, a map and directions to the site, and a floor plan if available. The consultant should respond by providing two signed copies of the Agreement Between Owner and Consultant, Asbestos Abatement to the owner's representative using the sample agreement. The Church should sign the agreements and return one copy to the consultant.

# 2.5 Asbestos Management Plan

The Agreement Between Owner and Consultant, Asbestos Survey and Management Plan requires the consultant to provide the owner a management plan as part of the survey report. Following is an example of what this management plan should contain. As conditions change and portions of the asbestos in buildings are removed, additional information should be added to the management plan to reflect these changes. Under the Agreement Between Owner and Consultant for Asbestos Abatement, the consultant is required to provide an updated management plan for the building that includes a listing and drawing of all asbestos-containing materials (ACM) remaining in the building following asbestos removal. In the event there is a complete removal of all ACM, this should also be noted.

The cover of the management plan should show the status of ACM in the building according to the following definitions:

Surveyed—No Asbestos-Containing Material (ACM). The building has been surveyed by a qualified consultant who (1) used appropriate sampling techniques, (2) collected a sufficient number of samples of suspect ACM, (3) used a qualified laboratory to analyze the samples, and (4) provided a survey report with contents as specified in the *Church Asbestos Program Handbook*. Results of all sampled analyses showed no ACM to be present in the building in concentrations at or above the regulated concentration for the state where the building is located.

Surveyed—ACM. The building has been surveyed by a qualified consultant who (1) used appropriate sampling techniques, (2) collected a sufficient number of samples of suspect ACM, (3) used a qualified laboratory to analyze the samples, and (4) provided a survey report with contents as specified in the Church Asbestos Program Handbook. Results of sample analyses showed ACM to be present in the building in concentrations at or above the regulated concentration for the state where the building is located.

Surveyed—ACM (Partial Removal). The building has been surveyed by a qualified consultant who (1) used appropriate sampling techniques, (2) collected a sufficient number of samples of suspect ACM, (3) used a qualified laboratory to analyze the samples,

and (4) provided a survey report with contents as specified in the *Church Asbestos Program Handbook*. Results of sample analyses showed ACM to be present in the building in concentrations at or above the regulated concentration for the state where the building is located.

Since the date of the asbestos survey for this building, an authorized asbestos removal has been performed that removed a portion of the ACM identified in the survey. This management plan contains pertinent information on the ACM locations both prior to and following the partial removal (and air sampling results from samples collected during the removal, if required by state regulations). **Note:** This category of management plan must be updated to reflect the building's current status following each partial removal.

Surveyed—ACM (Complete Removal). The building has been surveyed by a qualified consultant who (1) used appropriate sampling techniques, (2) collected a sufficient number of samples of suspect ACM, (3) used a qualified laboratory to analyze the samples, and (4) provided a survey report with contents as specified in the *Church Asbestos Program Handbook*. Results of sample analyses showed ACM to be present in the building in concentrations at or above the regulated concentration for the state where the building is located.

Since the date of the asbestos survey for this building, an authorized asbestos removal/removals has/ have been performed that ultimately removed all of the ACM identified in the survey. This management plan contains pertinent information about ACM locations prior to the complete removal (and air sample results from samples collected during the removal/removals, if required by state regulations).

# Asbestos Management Plan

for

# (Location)

(C	hurch Property No)
	(Date)
Status:	<ul><li>☐ Surveyed—No Asbestos-Containing Material (ACM)</li><li>☐ Surveyed—ACM</li></ul>
	☐ Surveyed—ACM (Partial Removal)
	☐ Surveyed—ACM (Complete Removal)
	(Consultant)

### I. PURPOSE

Information in this document applies to Church employees and any other personnel involved in the constructions, maintenance, or remodeling of this facility. A copy of this plan should be readily available to Church employees in their work area, and other personnel may be provided the opportunity to review the plan by contacting the appropriate supervisor.

The Church's asbestos program goals are to:

- Inspect buildings for asbestos and establish management plans.
- Manage asbestos "in place" when possible to do so without endangering health or the environment.
- Remove (abate) asbestos during renovations or demolitions.
- Remove (abate) damaged asbestos when discovered.
- Train appropriate employees concerning asbestos operations and maintenance practices and asbestos regulations.

Custodial personnel and others doing maintenance and repair work in the facility should acquaint themselves with this plan. They should pay particular attention to the survey results (see Sections III, IV, and VI of this plan), the list of typical suspect asbestos materials (see Section V of this plan), and Church policies and procedures for handling ACM (see Section V of this plan).

In the future, care should be taken to ensure that no asbestos-containing construction or patching materials are used in this building.

## II. BACKGROUND

Asbestos is a naturally occurring mineral. It is distinguished from other minerals in that its crystals form into long, thin fibers. Asbestos proved well suited for many uses in the construction trades because of its unique properties—it does not burn, it is strong, it is a good insulator of heat and electricity, and it is not broken down by chemicals. However, asbestos fibers become a significant health concern when they are inhaled. Exposure to asbestos fibers has been linked to asbestosis (scarring [fibrosis] of the lung), lung cancer (malignant tumor of the bronchi covering), mesothelioma (cancer of the chest cavity lining), and other diseases of the lung and chest cavity.

The Church intends that no occupant or worker inside a Church facility should be exposed to airborne asbestos fibers at concentrations potentially hazardous to health and has initiated a program to manage potential asbestos problems in its facilities. Procedures outlined in this notification should be followed. Only qualified personnel who have been properly trained and equipped are authorized to handle or remove ACM.

This plan is based primarily on the asbestos survey completed at the facility on				
by	<i></i>	(and subsequent asbestos removals		
completed on	by	). A summary of the sur-		
vey findings, including building locations where ACM was discovered, is included. A				
copy of the entire survey report may be obtained by contacting				

## III. SPECIFIC LOCATION OF ASBESTOS-CONTAINING MATERIALS (ACM)

The following summary lists the specific locations where ACM was identified in this building. The summary also lists the type and quantity of construction materials containing the asbestos. It may also list the percentage and specific types of asbestos (chrysolite, amosite, crocidolite, anthophyllite, tremolite, actinolite, or other type as required by different state or local governments) in the material.

EXECUTIVE SUMMARY					
Following the abatement on (date), (ACM) are present in (location) as follows:					
Material	Location	Quantity	%Asbestos	Friable	Condition
ACM was identified in (location) as follows in the original survey:					
Material	Location	Quantity	%Asbestos	Friable	Condition

## IV. BULK SAMPLING RESULTS

Representative samples of accessible building materials suspected of containing asbestos were collected and forwarded to an accredited laboratory for analysis. Samples were analyzed using polarizing light microscopy methods approved by the National Institute for Occupational Safety and Health (NIOSH).

**Note:** Some states require the use of Transmission Electron Microscopy (TEM) for resinously bound fibers, such as vinyl floor tile. All materials that meet the definition of ACM under applicable state or federal regulations are identified as ACM.

### V. POLICIES AND PROCEDURES

The Church's asbestos materials policy is discussed in the *Church Asbestos Program Handbook* section 7, "Asbestos Operations and Maintenance (O&M) Program." Employees who may be working near asbestos should receive asbestos awareness training and follow the work practices in the O&M program.

The specific locations in this building where ACM has been identified are listed in section III and illustrated in section VI of this plan. While every attempt was made to conduct a thorough survey of the building, it is possible that some suspect asbestos materials may have been overlooked because they were inaccessible (under furnaces,

inside walls, attics, or crawl spaces with no apparent access points) or the consultant did not suspect them to be asbestos-containing materials.

Typical suspect materials include pipe, boiler, and tank insulation; sprayed or troweled-on ceiling and wall coatings; ceiling tiles and adhesives; asbestos-cement (Transite) panels and pipes; floor tiles and flooring adhesives; vinyl floor sheeting (linoleum); roofing tars; felts, shingles, and patching compounds; duct insulation; duct fire dampers and vibration isolators; fire door cores; electrical wiring coverings; and dry-wall joint compound.

Before you remove, cut, sand, drill, break, or otherwise disturb, damage, or work on or with ACM or suspect ACM that have not been sampled in your building, please refer to the *Church Asbestos Program Handbook* section 7, "Asbestos Operations and Maintenance (O&M) Program." If you have questions, contact your management. These same policies and precautions also apply to all personnel who may be involved in any type of construction, maintenance, or remodeling in this facility.

Should a true emergency occur, such as the falling of textured ceiling ACM or a ruptured steam or hotwater line with ACM thermal system insulation, immediately seal off the area and turn off all heating and ventilation to and from the area to prevent the spread of fibers to other parts of the building. Building custodians or other unqualified personnel should not handle, remove, or dispose of regulated amounts of ACM because of the stringent precautions required in performing these operations.

Get help resolving asbestos-related problems by contacting your management, who will be able to connect you with either Church personnel who have been trained and equipped to handle asbestos problems or consultants or contractors whom the Church has approved for this work.

### VI. ACM LOCATION PLANS

(Attach ACM location plans.)

# **Analytical Laboratory Qualifications**

# 3.1

# Policy

Laboratories used for asbestos analysis will be qualified and accredited. To ensure that no conflict of interest exists, consultants should not be affiliated with analytical laboratories that perform sample analysis.

# Laboratory Qualifications

Accurate and thorough analysis of bulk and air samples to determine asbestos content and concentration or the absence of asbestos is very important. Analytical results must be correct and defensible in court. To help ensure that the results will be as correct as possible, use only qualified laboratories for analysis. You cannot assume that all laboratories are qualified or that all analysis results are accurate and legally defensible.

Because so much cost and effort will depend on accurately assessing and responding to asbestos hazard, the laboratory results, which are the basis for determining the hazard, must be correct. The following are minimum analytical laboratory qualification requirements:

- The laboratory will be accredited under the National Institute for Standards and Technology (NIST), operated under the National Voluntary Laboratory Accreditation Program (NVLAP).
- 2. The laboratory will be accredited by the American Industrial Hygiene Association (AIHA) and where applicable by the state in which the samples are collected. Copies of accreditations should be included in surveys and final reports.
- 3. Where at least three bulk samples are analyzed for a homogeneous area, samples should be analyzed progressively until one

- of the results shows asbestos greater than the regulated amount.
- 4. When analyzing bulk samples, if the analyst detects asbestos in the sample and estimates the amount to be less than 10 percent, then:
  - Amounts greater than 1 percent should be accepted as ACM.
  - Amounts less than 1 percent should have the amount verified by point counting.
     Samples where no asbestos is detected by polarized light microscopy (PLM) do not need to be counted.
- 5. Field analysis of asbestos fiber counts for air samples is not generally allowed, but may be approved on a case-by-case basis. Field analysis may be justified, for example, because of a remote location. Field analysts should be employed by an accredited laboratory, participate in the AIHA Asbestos Analysis Testing (AAT) program, and be listed and meet the provisions of the AIHA Asbestos Analysts Registry (AAR) program.

# 3.3 Verifying Laboratory Qualifications

The consultant should, for both himself or herself and the contractor, verify the accreditation of each laboratory that will analyze samples on Church projects before any analysis begins.

Document the verification process.

The asbestos consultant will not be permitted to use an analytical laboratory that is not accredited. However, personal air sample analyses made by the contractor may only be done in a laboratory that is a satisfactory participant of the PAT program and state certified, if applicable.

# **Asbestos Abatement Contractors**

# **4.1** Policy

The Church has signed contracts with the abatement contractors on the "Safety, Health, and Environmental Consultants" list. The contracts were negotiated by the Church Purchasing Division to protect the Church legally and ensure that the contractors have adequate insurance. The contractors have been selected as the most qualified and cost competitive, are familiar with Church operations, and will provide standardized services and reports. Fees have been negotiated by the Church Purchasing Division. These contractors have been selected as qualified contractors to provide abatement, including asbestos, mold, and lead-based paint.

Thoroughly screen and prequalify prospective asbestos abatement contractors for each project only if contractors preselected by the Church Purchasing Division are not available in your area. Contractors prequalified by the Church Purchasing Division should be given precedence.

Contractors should be prequalified annually by the Facilities Management Project Management Office or an equivalent group only if contractors preselected by the Church Purchasing Division are not available in your area. Contractors will be qualified, experienced, and reputable. Bidding on asbestos abatement projects will be by invitation only. Only prequalified contractors who attend the pre-bid walk-through will be permitted to submit a bid. Multiple bids are required from contractors preselected by the Church Purchasing Division for contracts exceeding \$30,000. For exceptions, contact the Church Purchasing Division.

### 4.2

# Asbestos Abatement Contractor Qualifications

Contractors that have signed contracts with the Church Purchasing Division do not need to go through the contractor selection process. This section applies only to contractors that have not signed contracts with the Church.

The nature of asbestos abatement work and the carcinogenic nature of asbestos fibers have dictated a standard of care much higher than that of the construction industry. The asbestos removal industry has evolved from its general contracting origins to an industry more closely resembling the hazardous waste industry. Select contractors who take a scientific approach to asbestos removal, have specialized equipment and trained and certified workers, and have well-conceived and carefully managed operations.

If Church subsidiaries or affiliated businesses have trained and certified workers and can act as a contractor, some of the selection, insurance, and bonding specifications may not apply.

### **Contractor Selection Process**

- 1. The owner shall determine the nature and scope of the asbestos abatement project based on the professional survey and careful consideration.
- 2. The asbestos consultant will develop a preliminary list of several qualified contractors who have the experience and proven record for the nature and type of the project.

- 3. The consultant, in association with the Church, will select about 5 contractors (or at least 3 contractors in smaller markets) from the preliminary list for a formal screening and selection process.
- 4. Request information included in the Asbestos Contractor Qualification Checklist (see the form included in this section) from each of the final prospective contractors.
- 5. Both the Church and the asbestos consultant should evaluate the checklist responses and give a pass/fail rating.
- 6. Interview the contractors with a pass rating to review statements made in their checklists and to make a final determination of qualifications. After successful completion of the interview and final approval by the Church, invite them to bid on projects.

- 7. Once this process has been completed for a contractor, you may invite the contractor to bid repeat projects for up to a year without requalification if their performance so justifies and there is no change in company status. Requalify contractors for bidding at least annually or at shorter intervals if necessary.
  - Always disqualify a contractor from future bidding if their performance is not satisfactory. Impose a suitable waiting period (six months to a year) before requalifying the contractor to bid on projects.
- 8. Document the asbestos contractor prequalification process well, and keep it in a file on contractors. Keep information on the project contractor in the project file.

### 4.3

# Asbestos Contractor Qualification Checklist

Make a detailed response to each item listed below. Attach supplementary sheets as necessary and reference attached information to the checklist item.

(for office use only)

### ABCDEF 1. Years in business

- a. Total years in business
- b. Number of years asbestos removal has comprised more than 50 percent of business activity

## ABCDEF 2. Principals, owners, and salaried personnel

- a. Names
- b. Detailed resumes by function and relevant asbestos experience

### ABCDEF 3. Business name

a. Any business name changes? If so, why?

## ABCDEF 4. Project experience

- a. A list of projects by dollar amount
- b. References: names, addresses, and phone numbers of owners, architects, engineers, and hygienists associated with former projects (at least 20 projects)

### ABCDEF 5. Insurance for asbestos liability

- a. Carrier-A.M. Best rating
- b. Number of years carrier in business
- c. Type of company (i.e., domestic, offshore, or risk retention/risk purchasing)
- d. Type of insurance (i.e., occurrence or claims made)

### ABCDEF 6. Bonding

- a. Capacity per job
- b. Aggregate limits

### ABCDEF 7. Financial statements

a. Financial statements (if requested) that have been audited by an outside certified accounting firm for the past three years

### ABCDEF 8. Bank relationships

- a. Names of banks
- b. Number of years with banks
- c. Letters from banks indicating loan performance and credit history over the past two years
- d. Letters from banks indicating credit limits

## ABCDEF 9. Equipment list

- a. Type of equipment by manufacturer
- b. Quantity of each type
- c. Condition of equipment:
  - 1. HEPA vacuums
  - 2. Respirators
  - 3. Negative air machines
  - 4. Any other type of power unit

## ABCDEF 10. Vehicle list for project use

- a. Type of vehicles
- b. Models and makes

## ABCDEF 11. Description of warehouse and office facilities owned or rented

- a. Location of each
- b. Approximate square footage of each
- c. Functions performed by each

## ABCDEF 12. List of EPA and OSHA violations

- a. Type of project where violations occurred
- b. Types of violations
- c. Dates of violations

# **Asbestos Project Specifications**

# 5.1 Introduction

The Environmental Protection Agency (EPA) made the following statements in Asbestos NESHAP Clarification of Intent in the Federal Register on 5 October 1993:

- The presence or absence of asbestos-containingmaterials (ACM) in a facility does not trigger any requirement under the National Emission Standard for Hazardous Air Pollutants for Asbestos (Asbestos NESHAP) regarding whether or not an owner needs to remove material that will not be disturbed during renovation.
- Removal of ACM that is not stripped, removed, dislodged, cut, drilled, or similarly disturbed during a renovation is not required, even if the renovation is major in character.
- For the protection and minimization of risk, removal of ACM is not always in the building owner's best course of action to reduce asbestos exposure.
- The EPA generally recommends proper inplace management of ACM rather than removal of ACM.
- In many buildings, a well-run in-place management program should be all that is necessary to control the release of asbestos fibers. However, in-place management procedures alone are not sufficient for ACM that is significantly damaged and may not be sufficient for some types of ACM situated in highly accessible areas; in these areas, some form of full scalefull-scale abatement—repair, encapsulation, enclosure, encasement, or removal—will be necessary.
- Removal of ACM may also be appropriate when performed in conjunction with a major building

- renovation, as part of a long-term building renovation, or as part of long-term building management policies.
- Unless all safeguards are properly applied, improper asbestos removal projects can actually increase asbestos exposure. Premature removal may also cause building owners to lose the benefits of possible future improvements in asbestos removal technology.

Managers of Church entities should follow these guidelines in relation to asbestos abatement projects.

# Asbestos Project Specifications

Before performing any capital needs assessment (CNA), addition/remodel projects, or demolition projects, where regulated friable asbestos will be disturbed, the friable asbestos should be removed using the asbestos project specifications and qualified and certified consultants and contractors. **The asbestos consultant should prepare the asbestos manual** and provide other services specified in the Consultant Services Agreement – Asbestos Abatement mentioned in section 2.

The asbestos project agreements are on the Church intranet document library in the Meetinghouse Facilities Resource Library. U.S. and Canadian versions of the agreements are available.

The following documents should be included in the asbestos project manual:

- Bidding Requirements for Asbestos Abatement Project
- Contractor Bid Proposal and Asbestos Abatement Project Agreement

- Supplementary Conditions for Bid Proposal and Asbestos Abatement Project Agreement
- Division 01 Asbestos Abatement Project Agreement

Electronic copies are also available from the Risk Management Division.

# 5.3 Demolitions

EPA NESHAP regulations require that all buildings be inspected for asbestos before demolition. Managers of Church entities should have a consultant conduct an asbestos survey before a building demolition. If an asbestos survey older than three years will be used for a demolition, the consultant should review and update the report as necessary. A pre-demolition asbestos survey must be conducted even if the building is known to be asbestos-free. Friable asbestos and asbestos that may become friable during the demolition process should be abated before demolition.

For a NESHAP notification that includes abatement and demolition, the abatement contractor should make the notification. Managers of Church entities should provide information to the demolition contractor to be included in the notification. The demolition contractor should make NESHAP notifications for demolition even when no asbestos is being removed.

Some regulators and consultants have been reluctant to approve demolitions with Category I non-friable ACM left in place. They have required that all ACM, including Category I floor tile and roofing, be removed from buildings before demolition. The EPA NESHAP revision in 1990, however, allows buildings to be demolished without removing EPA Category I non-friable ACM such as floor coverings and asphalt roofing. Managers of Church entities should demolish buildings with Category I non-friable ACM in place if permission can be obtained

from applicable state and local agencies and EPA regional offices. Work with the consultant on obtaining regulatory approvals. The trend is toward states requiring all asbestos-containing material to be removed prior to demolition. This trend will likely become more the norm in coming years.

Asbestos demolition specifications can be found on the AEC Wwebpage for O&M, R&I for Meetinghouse and CES Specifications for existing Projects, Division 01: General Requirements (R&I Projects Only).

# Roofing Projects

Category I non-friable ACM includes asphalt roofing products containing greater than 1 percent asbestos. For projects involving asbestos-containing asphalt roofing, work practices should be used that have been demonstrated to prevent the ACM from becoming friable. As long as the ACM remains non-friable, most AHERA and NESHAP regulations do not apply. NESHAP inspection and notification requirements, however, may apply. Where land-fill waste disposal requirements allow, dispose of asbestos-containing asphalt roofing as construction waste.

For roofing projects where regulated friable asbestos will be disturbed, the friable asbestos should be removed using the asbestos project specifications and qualified and certified consultants and contractors. Roofing projects involving asbestos-containing asphalt roofing may be done by a qualified roofing contractor under the addition/remodel project specifications without oversight from an asbestos consultant. The asbestos management plan should be updated by a consultant after the project.

Asbestos roofing guidelines are found in the following locations in the AEC Wwebpage for O&M, R&I for Meetinghouse & CES Specifications:

- Section 07 3113 Asphalt Shingles, Article 3.3 Preparation
- Section 07 5115 Built-Up Asphalt Roofing, Article 3.2 Preparation, Paragraph A Removal of Asbestos-Containing Roofing Materials

# 5.5 Flooring Projects

When asbestos-containing flooring is removed in preparation for carpet installation, the project should comply with applicable asbestos regulations. Environmental rules on removing asbestos-containing flooring vary from state to state. Contact the state regulators or a state-certified asbestos consultant to determine applicable state or federal rules.

Resilient floor covering and mastic are considered Category I non-friable ACM by the federal EPA if they are not subject to sanding, grinding, cutting, or abrading. State environmental rules may regulate asbestos-containing flooring projects.

Removing asbestos-containing flooring materials is considered a Class II activity under the OSHA standard 29 CFR 1926.1101. This requires trained workers, a competent person, a regulated area, the use of asbestos work practices, proper disposal, notification, etc. required for Class II work. OSHA requirements for removing asbestos-containing flooring materials are further clarified in the OSHA Settlement Agreement with the Flooring Industry, 15 June 1995.

In states where removing asbestos-containing flooring is regulated by environmental quality regulations, the project should be done as an asbestos abatement project, using the asbestos project specifications and qualified and certified consultants and contractors.

The Asbestos Management Plan should be updated by a consultant after the project.

References to asbestos flooring are found in the AEC Wwebpage for O&M, R&I for Meetinghouse & CES specifications.

# New-Building, Remodeling, or Repair Certification

# 6.1 Policy

The policy of the Church is to avoid the use of all asbestos-containing materials (ACM) in the construction, remodeling, or repair of its buildings, whether owned, leased, or rented. For the purpose of this policy, ACM is defined as any material in which asbestos is detected to be more than 1 percent via polarized light microscopy (PLM) or any material that fits NESHAP's current definition of ACM, or other regulatory body (such as the state) definition if that definition is more stringent.

### 6.2

# New-Construction Certification

Asbestos use continues to decline. Chrysotile accounts for nearly all the asbestos currently used in the United States. The EPA Asbestos

Ban-and-Phase out Rule was intended to stop virtually every use of asbestos. It was struck down by the United States Court of Appeals in 1991. Although the use of asbestos has been severely restricted, it is still found in materials such as roofing felt, asbestos cement shingles, roofing putty and sealants, fire blankets, curtains, cement boards, and corrosion-resistant pipes.

There are currently no laws that require new construction to be free of ACM. Construction of new buildings and remodeling or repair projects that contain no asbestos-containing materials prevent potential asbestos-related liability in the future. It also protects the church from unnecessary future asbestos management and abatement costs.

Current Church meetinghouse specifications state the following. These should be included in your documents.

# Section 01400, Quality Requirements Article 1.2, Paragraph B.1

### A. Asbestos

- Contract Documents for this Project have been prepared in accordance with generally accepted professional architectural and engineering practices. Accordingly, no asbestos or products containing asbestos have been knowingly specified for this Project. Notify Architect immediately for instructions if:
  - Materials containing asbestos are brought to site for inclusion in the Work.
  - Asbestos materials are encountered in existing structures upon which work is being done.
- 2. At Architect's direction and with Owner's approval, a certified asbestos inspector shall collect samples and an independent testing laboratory will perform testing procedures on suspect materials.
- 3. Certify that based upon best knowledge, information, inspection, and belief no building materials containing asbestos were used in construction of Project. Submit certification on form provided by Owner.

Requiring contract architects and general contractors to certify that no asbestos-containing materials were specified or used in construction assures that buildings are asbestos free.

The Construction Material Asbestos Statement is on the Church intranet document library in the Meetinghouse Facilities Resource Library. U.S. and Canadian versions of the agreements are available. This form may be used to obtain the certification.

# Asbestos Operations and Maintenance (O&M) Program

# Quick Finder for Asbestos O&M Procedures Church Employees May Perform

(The key words are in bold type.)

SURFACES CONTAINING ASBESTOS	RESILIENT FLOORING CONTAINING ASBESTOS	MISCELLANEOUS PROCEDURES
Move a <b>ceiling tile</b> to look inside a work space (page 23)	Install new <b>carpet</b> over tile or sheet vinyl (page 29)	Use <b>duct tape</b> to clean up a small amount of asbestoscontaining material (pages 27, 29)
Attach an item to a <b>ceiling</b> containing asbestos (page 24)	Strip the floor <b>wax</b> (page 30)	Replace asbestos-containing gaskets (pages 27, 29)
Replace a light fixture <b>diffuser</b> in a ceiling containing asbestos (page 24)	Buff or <b>polish</b> the floor (page 30)	
Replace <b>light bulbs</b> in a light fixture in a ceiling containing asbestos (page 24)	Clean or <b>scrub</b> the floor (page 30)	
Clean a room where surfaces contain asbestos (page 24)		
Repair damaged <b>plaster</b> or a textured finish that contains asbestos (page 24)		

Key Word	Page	Procedure
Duct tape	27	Use duct tape to clean up a small amount of ACM.
Ceiling	23	Attach an item to a ceiling containing asbestos.
Ceiling tile	23	Move a ceiling tile to look inside a work space.
Light bulb	24	Replace light bulbs in a light fixture in a ceiling containing asbestos.
Plaster	24	Repair damaged plaster or a textured finish that contains asbestos.
Gasket	27	Replace asbestos-containing gaskets.
Floor	29	Install new carpet over tile or sheet vinyl.
	30	Strip the floor wax.
	30	Buff or polish the floor.
	30	Clean or scrub the floor.

# 7.2 Introduction

Each building should have an Asbestos Management Plan (see page 6). This plan identifies areas in a building with asbestos-containing materials (ACM). The building Asbestos Management Plan should be consulted before beginning operations and maintenance (O&M) activities that could disturb ACM. Where documented ACM or presumed ACM is present, this O&M program should be followed.

An asbestos O&M program is one that manages asbestos "in place." That is, the asbestos is not abated because its release into the air is not likely. This section outlines policies concerning "in-place" management of asbestos.

Where mechanical rooms or other spaces have thermal systems insulation (TSI) that is ACM or PACM, post a sign on the inside of the door, or where it is visible after entering the space. The sign should include the following information:

CAUTION
ASBESTOS
HAZARDOUS
DO NOT DISTURB
WITHOUT PROPER
TRAINING & EQUIPMENT

The policies contained in this section are adapted from the EPA's Managing Asbestos in Place—A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials (the green book); the National Institute of Building Sciences' Guidance Manual—Asbestos Operations and Maintenance Work Practices; and the OSHA Asbestos Standard, 29 CFR 1910.1101, published 10 August 1994. Copies of these references are available online in the electronic Code of Federal Regulations (eCFR) or from the Risk Management Division.

The principal objective of the asbestos O&M program is to minimize exposing building occupants to asbestos fibers. To accomplish this objective, the O&M program includes work practices that maintain ACM in good condition, ensure proper cleanup of asbestos fibers previously released, prevent further release of asbestos fibers, and monitor the condition of ACM.

Installed thermal system insulation (TSI) and troweled-on surfacing materials should be treated as ACM to comply with the OSHA asbestos standard. These materials are designated "presumed ACM, or PACM." Asphalt and vinyl flooring material installed during or before 1980 should be treated as PACM. These assumptions should be made unless tests of the material from the asbestos survey demonstrate that no asbestos is present in the material.

The asbestos program goals noted in section 1 of the handbook include inspecting buildings for asbestos and establishing management plans. The asbestos O&M program is used in conjunction with the management plan to manage asbestos in place. An example management plan is in Section 2 of this handbook.

Each organization would appoint an asbestos program manager (APM), who is actively involved in all asbestos-related activities. The APM may also be the safety, health, and environmental coordinator. The APM should be at the department, area office, or Church entity corporate level. The APM should be thoroughly familiar with this handbook and actively involved in all asbestos-related activities. If resources allow, the APM may receive EPA inspection/ management planner accreditation under the Asbestos Hazard Emergency Response Act (AHERA) or state-certification as a building inspector/management planner.

The APM may assign assistant asbestos program managers within his or her organization. The APM should train and supervise these assistants so they are properly qualified and may act in his or her place to supervise level A asbestos work practices. Assistant APMs may also be FM supervisors, building managers, and so on.

In general, the asbestos program manager should have the authority to supervise all asbestos-related activities in buildings, including inspections, asbestos O&M activities, and abatements. The APM will either train building workers in asbestos O&M techniques or coordinate worker training. In addition, the APM and assistant APMs should supervise the custodial and maintenance staffs, contractors, and outside service maintenance staffs, contractors, and outside service vendors in reference to all asbestos-related activities.

The success of the asbestos O&M program depends on each level's commitment to implementing it properly.

Appendices A through G of this section contain forms to assist the APM in administering the asbestos O&M program. The forms serve the following purposes:

**Appendix A: APM Checklist.** Used by the APM and assistant APMs to coordinate level A work practices.

Appendix B: Level A Worker Checklist. Used by workers engaging in level A activities that may disturb ACM. This helps workers comply with the asbestos O&M work practices.

Appendix C: Job Request for Maintenance Work. Used by workers when any maintenance work will be done that may disturb ACM identified in the Building Management Plan.

**Appendix D: Maintenance Work Authorization Form.** Used by the APM to authorize maintenance work that may disturb ACM.

Appendix E: Evaluation of Work Affecting Asbestos-Containing Materials. Used by the APM to evaluate the effectiveness of asbestos O&M work practices for maintenance work that may disturb ACM.

**Appendix F: Waste Tracking Form.** Used by workers and the APM to document the proper disposal of ACM that was disturbed by level A work practices.

**Appendix G: Work Procedures.** Explanation of how to secure a work area and use a drop cloth, which procedures are often referred to in the work practices.

# 7.3 Work Practice Groupings

This section groups work practices according to the type of ACM employees will be working around. The same four categories used by the National Institute of Building Sciences are used here. These categories are:

- 1. **Surfacing Materials.** Materials sprayed or troweled onto building surfaces, such as acoustical or fireproofing materials.
- 2. Thermal Systems Insulation (TSI). Pipe, boiler, tank, duct, and other insulation applied to components to reduce heat loss, heat gain, or condensation.
- 3. **Miscellaneous Materials.** Materials such as ceiling tile, roofing materials, and cement asbestos products that are not included in categories 1 or 2 above, excepting flooring materials.
- 4. **Resilient Flooring.** Floor tile or sheet vinyl flooring materials.

This section will address each of these four categories separately.

### 7.4

# Work Practice Levels

Three different work practice levels that correspond to the potential for asbestos fiber exposure have been established. Level A represents a low potential of exposure, level B represents a more moderate potential of exposure, and level C represents a heavier potential of exposure.

These three work practice levels are:

- 1. **Level A:** Work that may contact ACM but will not disturb it. If ACM is disturbed, it is likely that exposure to workers and building occupants will be minimal.
- 2. **Level B:** Work is likely to or intended to disturb small amounts of ACM for short periods of time. Worker protection and localized engineering controls are justified, but the disturbance is unlikely to expose building occupants or impact the building environment.
- 3. Level C: Work practice is intended to disturb small amounts of ACM in ways sufficient to justify engineering controls and protection of workers, building occupants, and the building environment.

Employees using this manual will engage only in level A work practices. If a situation requires level B or level C, contact the consultant and he or she will coordinate the hiring of a contractor.

Church maintenance and custodial workers should not clean up waste or debris containing ACM or presumed ACM (PACM) associated with construction. This work should be done by an asbestos contractor. If Church workers clean up waste or debris or engage in repair and maintenance activities where ACM is likely to be disturbed, they should comply with the OSHA construction standard for asbestos, 29 CFR 1926.1101.

**Note:** The OSHA construction standard for asbestos, 29 CFR 1926.1101, establishes four classes of asbestos work. These asbestos work classes relate to ACM disturbance associated with construction. For those who may reference the OSHA construction standard for asbestos, **class IV asbestos work** is basically the same as a level A work practice.

### 7.5

# Surfacing Materials Work Practices

Work practices for asbestos-containing surfacing materials will be presented in two parts: level A practices; and level B and C practices. Trained Church employees may perform level A work practices. Hire a contractor to perform level B or C work practices.

## **Level A Surfacing Materials Work Practices**

The following are level A work practices that trained Church employees may perform around asbestoscontaining surfacing materials.

1. Moving one non-asbestos ceiling tile below a plenum space that has exposed surfacing asbestos to make observations.

This work practice should only be used in situations where the ACM surface material is in good condition, there is no ACM dust and/or debris on top of ceiling tiles, and the ACM above the ceiling will not be disturbed when the tile is lifted. An OSHA-competent person should make a determination that lifting out a ceiling tile could not cause exposure to a worker. The determination should be reevaluated periodically.

This work practice does not include replacing one or many tiles. Those who remove hanging ceiling tiles must wear respiratory protection (see the Church Safety, Health, and Environmental Manual), clear the area of other people, and observe asbestos waste disposal procedures. Employees not trained in these procedures should not perform this work.

- Perform pre-work activities on Level A Worker Checklist (see Appendix B).
- Place ladder or scaffold in work area.
- Wet wipe the underside of the panel that was moved.

- Lift panel slightly above the grid system, and slowly slide panel to one side, leaving panel on top of an adjacent panel.
- Carefully replace ceiling panel when finished.
- 2. Attaching an item to a ceiling finished with ACM.

Surfacing material on the ceiling must be stable and highly unlikely to be disturbed.

- Perform pre-work activities on Level A Worker Checklist (see Appendix B).
- Secure the work area (see Appendix G).
- Place necessary tools, equipment, and materials in the work area.
- Put bedding adhesive on bottom of item and press against ceiling.
- Perform clean-up and tear-down steps on level A checklist to complete work.
- 3. Replacing a diffuser that is completely surrounded by the metal frame of a light fixture recessed in a ceiling finished with ACM where the diffuser can be removed without disturbing ACM.
  - Perform pre-work activities on Level A Worker Checklist (see Appendix B).
  - Secure the work area (see Appendix G).
  - Place necessary tools, equipment, and materials in the work area or on drop cloth.
  - Carefully open diffuser without touching ACM. Unhook and remove diffuser from light fixture. Do not rattle light fixture.
  - Perform clean-up and tear-down steps on level A checklist (Appendix B).

- 4. Replacing bulbs in a light fixture attached to or in a surface finished with ACM where the surface may be contacted but disturbance or ACM is unlikely.
  - a. Replacing bulbs in a recessed or pendant mount light fixture attached to an asbestoscontaining decorative texture finish or acoustical plaster ceiling.
  - b. Replace bulbs in fixtures mounted on fireproofed surface.

For both (a) and (b) above:

- Perform pre-work activities on Level A Worker Checklist (see Appendix B).
- Secure the work area (see Appendix G).
- Place necessary tools, equipment, and materials in the work area.
- Carefully replace bulbs without jarring fixture. Use duct tape to clean up any dust or debris generated.
- Perform clean-up and tear-down steps on level A checklist (see Appendix B).
- Cleaning rooms with exposed surfaces finished with ACM where there is no visible dust or debris.
  - a. Perform routine cleaning in a room where spray-applied acoustical plaster is on walls or ceilings.
  - Perform routine cleaning in a mechanical room with exposed fireproofing in good condition.

For both (a) and (b) above:

- Clean area using standard cleaning tools.
   Avoid contact with ACM that might be damaged during cleaning. Do not exhaust vacuum cleaners toward ACM.
- Do not clean up asbestos debris. If asbestos debris is found, discontinue cleaning and contact supervisor.

- 6. Repairing damaged surfacing ACM.
  - Repair small hole in acoustical plaster ceiling or wall without disturbing surrounding plaster.
  - Repair small gouged area in asbestos-containing decorative texture finish without disturbing surrounding finish.

For both (a) and (b) above:

- Perform pre-work activities on Level A Worker Checklist (see Appendix B).
- Secure the work area (see Appendix G).
- Place necessary tools, equipment, and materials in the work area.
- Repair damaged area using non-ACM caulking without disturbing ACM. Do not scrape or sand existing ceiling.
- Perform clean-up and tear-down steps on level A checklist (see Appendix B).
- 7. Accessing through an ACM finished surface.
  - a. Open access door in acoustical plaster ceiling that has been opened before. The ceiling or wall is in good condition and it is not likely that ACM debris is on the door.
    - Perform pre-work activities on Level A Worker Checklist (see Appendix B).
    - Secure the work area (see Appendix G).
    - Place drop cloth (see Appendix G).
    - Place necessary tools, equipment, and materials in the work area.
    - Unlatch door and open carefully.
    - Perform maintenance work required above or behind access door, and slowly close door until it is secured in place.
    - Complete applicable steps on level A checklist.

# Levels B and C Surfacing Materials Practices

The following situations require level B or level C work practices. For the following list, contact the consultant and he will coordinate the hiring of a contractor.

- 1. Working inside a plenum, such as a closed ceiling space, finished with ACM.
  - a. Move ceiling tiles when dust or debris from surfacing is present on top of ceiling.
  - b. Replace ceiling tiles.
  - c. Attach component to ACM-finished surface above a ceiling.
  - d. Install or replace HVAC diffuser.
  - e. Install or replace light fixture when ACM is in poor condition.
  - f. Remove small area of ACM fireproofing to attach component.
  - g. Inspect, maintain, or replace HVAC mixing box.
  - h. Open or close valves above ceiling.
  - i. Install new plenum-rated computer or telephone cables that will lie on top of ceiling.
- 2. Repairing or replacing an item in a surface finished with ACM.
  - a. Attach battery-powered smoke detector to acoustical plaster.
  - b. Attach track lighting to ACM-finished ceiling.
- 3. Replacing bulb in an ACM-contaminated light fixture.
  - Replace bulbs in recessed fixtures (includes fluorescent) where ACM surfacing material debris is visible inside fixture.
  - b. Replace bulbs in pendant mount fixture where ACM debris is present inside or on top of fixture.

- c. Replace bulbs in fixtures where ACM will be disturbed.
- d. Replace bulbs in fixtures recessed in high acoustical plaster ceiling in a public space.
- 4. Cutting or drilling a hole in a surface finished with ACM.
  - a. Install a few conduits through fireproofed metal deck.
  - b. Drill hole through decorative textured finish.
  - c. Drill hole using drill with HEPA-filtered dust collection.
  - d. Drill or cut hole for pipe or duct chase.
- 5. Repairing damaged surfacing ACM.
  - Repair gouge marks in acoustical plaster ceiling where small amount of damaged ACM is present.
  - b. Repair small area of delaminated acoustical plaster in good condition.
  - c. Install fire-rated enclosure over small area of damaged fireproofing.
  - d. Trowel on fireproofing to repair small waterdamaged area.
  - e. Repair delaminated plaster in fair condition.
- 6. Accessing through an ACM-finished surface.
  - a. Open access door in acoustical plaster ceiling where ACM may or will be disturbed.
  - b. Open access door that has surfacing material on flanges that will be disturbed when door is opened.
  - c. Open access door in acoustical plaster ceiling where ACM is in poor condition and dust or debris may be on other side of door.
- 7. Painting surfacing ACM.
  - a. Repaint asbestos-containing acoustical plaster.

- b. Paint ACM plaster finish that has never been painted.
- c. Paint ACM decorative textured finish that has never been painted.
- d. Paint asbestos-containing fireproofing.

### 7.6

# Thermal Systems Insulation (TSI) Work Practices

Thermal systems are heating, cooling, and ventilating systems, including the unit producing the heating, cooling, or ventilating, and all associated pipework and ductwork.

All work on thermal systems insulation (TSI) containing asbestos requires level B or C work practices. Therefore, no work on TSI may be performed by Church employees. If work is needed on TSI, contact the consultant, who will coordinate the hiring of a contractor.

### 7.7

# Miscellaneous ACM Work Practices

Miscellaneous ACM is any ACM that is not a surfacing material or TSI. Work practices for miscellaneous ACM will be presented in two parts: level A practices; and levels B and C practices. Trained Church employees may perform level A work practices. Hire a contractor to perform level B or C work practices.

## Level A Miscellaneous ACM Work Practices

The following are level A work practices that trained Church employees may perform near miscellaneous ACM.

- 1. Replacing or removing asbestos-containing roofing material.
  - a. Replace or remove intact less than 25 square feet of asbestos-containing built-up roofing without creating visible dust, to perform patching or repair work or to install new vents or stacks.
    - Perform pre-work activities on level A checklist (see Appendix B).
    - Secure the work area (see Appendix G).
    - Place necessary tools, equipment, and materials in work area.
    - Cut around area to be removed using hand tools.
    - Scrape up roofing, and place into disposal bags.
    - Perform applicable steps on level A checklist.
  - b. Replace or remove intact less than 25 square feet of asbestos-containing shingles without creating visible dust, to perform patching or repair work or install new vents or stacks.
    - Perform pre-work activities on level A checklist (see Appendix B).
    - Secure the work area (see Appendix G).
    - Place necessary tools, equipment, and materials in work area.
    - Slide scraper under bottom shingle, and twist scraper to break shingle seal. Remove entire shingle.
    - Place all shingles into disposal bags.
    - Perform applicable steps on level A checklist.

- 2. Cleaning up debris from a minor fiber release.
  - a. Clean up a small amount of ACM debris with a small piece of duct tape.
    - Perform pre-work activities on level A checklist (see Appendix B).
    - Cover small amount of debris with duct tape so debris adheres to tape.
    - Dispose of duct tape in disposal bag for ACM.
    - Perform applicable steps on level A checklist.
- 3. Replacing an asbestos-containing gasket.
  - a. Replace a small non-adhered gasket that can be removed intact.
    - Perform pre-work activities on level A checklist (see Appendix B).
    - Place necessary tools, equipment, and materials in work area.
    - Disassemble equipment as needed to expose entire gasket.
    - Remove gasket and place into disposal bag. Dispose of as ACM.
    - Wet wipe flange where gasket was installed.
    - Install new gasket, reassemble equipment, and perform applicable steps on level A checklist.

# Levels B and C Miscellaneous ACM Work Practices

The following situations require level B or level C work practices. For the following situations, contact the consultant, who will coordinate the hiring of a contractor.

- 1. Cleaning carpet that has some visual or analytical evidence of asbestos contamination.
- 2. Working on ceilings that contain asbestos.
  - Remove several asbestos-containing ceiling panels to perform maintenance work on or above ceiling.
  - b. Remove damaged, broken, or soiled asbestoscontaining ceiling panels alone or in conjunction with maintenance work above ceiling.
  - c. Remove ceiling tiles in any condition that are attached with adhesive.
  - d. Remove ceiling tiles in any condition that are in a spline ceiling system.
- 3. Working with asbestos-containing cement.
  - a. Remove corrugated or flat asbestos cement panels.
  - Remove louvers for asbestos cement cooling tower.
  - c. Drill holes in asbestos board to install new electrical panel.
  - d. Drill or cut holes in an asbestos cement panel to install a vent through panel using power tools.
  - e. Replace or remove asbestos cement roof shingles.
  - f. Replace or remove asbestos cement siding shingles.
  - g. Remove high-temperature resistant (HTR) asbestos cement panels.

- 4. Working with an asbestos-containing fire door.
  - a. Remove asbestos-containing fire door or door hardware in any condition.
  - Replace lockset or closer on asbestos-containing fire door. Lockset may penetrate asbestos core of door.
  - c. Cut asbestos-containing fire door to install a window.
  - d. Drill a hole for a new lockset through asbestos core of door.
- 5. Working with asbestos-containing roofing.
  - a. Replace or remove small area of asbestos-containing built-up roofing that is damaged, may become not intact, or may create visible dust during removal, or where more than 25 square feet will be removed.
  - b. Replace or remove asbestos-containing asphalt shingles that are damaged so that they have become friable, may become not intact, or create visible dust during removal, or where more than 25 square feet will be removed.
- 6. Working with asbestos-containing drywall, plaster, or drywall compound.
  - a. Install new electrical receptacle or ceiling junction box in asbestos-containing drywall or plaster using hand tools.
  - b. Drill holes to attach conduit to asbestos-containing drywall or plaster using non-powered hand tools or power drill with HEPA-exhausted collar attachment.
  - Drill holes in asbestos-containing joint compound where drywall or plaster is non-asbestos.
  - d. Remove small area of asbestos-containing drywall in good condition using hand tools.
  - Replace damaged section of asbestos-containing drywall or drywall adhered to studs using hand tools or power tools with HEPA vacuum dust collection attachments.

- 7. Working with asbestos-containing duct work.
  - a. Remove flexible duct connector with duct work.
  - b. Remove flexible duct connector.
  - c. Remove asbestos-containing ductwork taping cloth with duct section.
  - d. Remove small amount of ductwork taping cloth in good condition to install new duct attached to existing ducts.
  - e. Replace damaged section of ductwork.
  - f. Remove asbestos-containing paper-type duct wrap in poor condition.
- 8. Cleaning up debris from a fiber release.
  - a. Clean up debris and dust on surfaces after surfacing ACM has fallen from ceiling, pipe insulation, or other source. The amount of ACM debris is more than can be picked up by small piece of duct tape.
- 9. Cleaning a room with asbestos-containing dust.
- 10. Replacing an asbestos-containing gasket.
  - a. Replace small valve packing.
  - b. Replace gasket between two small- or medium-size pipe flanges.
  - c. Replace large pipe flange gasket.
  - d. Replace small damaged gasket.
  - e. Replace gasket on a boiler door.
  - f. Replace well-adhered gasket.
- 11. Working with an HEPA vacuum or fan unit
  - a. Empty HEPA vacuum bag using localized engineering controls.
  - b. Change filter in HEPA fan unit.
  - c. Change filter or bag in HEPA vacuum using glovebag.
  - d. Empty bag, change filter, and clean HEPA vacuum.
  - e. Change filter in HEPA fan unit in mini-enclosure.

- 12. Removing asbestos-wrapped wiring.
  - a. Remove asbestos-wrapped wiring in good condition on stage spotlights.
  - b. Remove damaged wiring in poor condition.
  - c. Remove wiring located in underground electrical vaults.
- 13. Removing asbestos-containing caulking compound.
  - a. Reglaze several small window panes, entire window, or several windows.
  - b. Remove small amount of pliable caulking compound.
  - c. Remove small amount of dry caulking compound.

#### 7.8

# Resilient Flooring ACM Work Practices

Resilient flooring ACM is any asbestos-containing flooring material that may be easily removed. Church employees may perform level A work practices. For level B or C work practices, contact the consultant, who will coordinate the hiring of a contractor.

# Level A Resilient Flooring ACM Work Practices:

- Removing or replacing several floor tiles that are loose or can be removed with minimal or no breakage where tile or mastic is not likely to become friable.
- 2. Installing new carpet over well-adhered resilient asbestos tile or vinyl sheet flooring with ACM backing in good condition.
  - Perform pre-work activities on level A checklist (see Appendix B).
  - Place necessary tools, equipment, and materials in work area.

- Vacuum area where carpet will be installed.
- Strip wax or finish from existing floor.
- Level off any minor high spots on floor using a scraper. Do not sand or grind flooring.
- Fill any low areas using manufacturer's recommended underlayment or leveling compound.
- Install new flooring or carpet as recommended by manufacturer.
- Perform clean-up and tear-down steps on level A checklist.
- 3. Stripping floor wax or finish coat from resilient asbestos flooring that is well adhered and in good condition.
  - Perform pre-work activities on level A checklist (see Appendix B).
  - Place necessary tools, equipment, and materials in work area. Place walk-off mats where required to prevent tracking of stripping solution to other areas. Position "Caution—Wet Floor" signs.
  - After proper mixing of stripping chemical, adequately wet floor by mop, applying liberal amounts of solution. Allow chemical to soak for amount of time recommended by manufacturer. If areas become dry, reapply solution to keep floor adequately wet.
  - After wax or finish has softened, strip flooring using least abrasive pad and low speed setting (175—190 rpm maximum). Keep floor adequately wet during machine operation. Do not overstrip. Stop stripping when old wax or finish is removed. Work small areas at a time.
  - Remove dirty stripping solution with wet vacuum or "strip" mop.
  - With "rinse" mop, apply liberal amount of clean water to stripped area, and remove water with wet vacuum or mop. Repeat rinse procedures.

- If some spots of wax or finish remain, restrip those areas.
- If new flooring will be installed over stripped floor, do not apply wax or finish. When applying new wax or finish, do so according to manufacturer's recommendations.
- Perform clean-up and tear-down steps on level A checklist.
- 4. Drying or spray buffing the polish on resilient asbestos flooring to remove minor surface imperfection and restore gloss.
  - Perform pre-work activities on level A checklist (see Appendix B).
  - Place necessary tools, equipment, and materials in work area. Position "Caution—Wet Floor" signs.
  - Pick up any large, loose debris, and place into disposable bags. Use scraper and water to remove all foreign matter from the finished surface (e.g., gum, tar, or stickers).
  - Spot clean or damp mop to remove stains and spills. Mix chemical cleaner or restorer with water, and apply according to manufacturer's recommendations. If dry buffing will be performed, apply restorer chemical as required.
  - Either spray buff or dry buff the area.
  - To spray buff, spray small area with spray-buff solution and use manufacturer-recommended pad or brush at recommended rpm to buff the area. Repeat procedure until entire area is spray buffed.
  - To dry buff, use manufacturer-recommended pad or brush at recommended rpm to buff or dry burnish the area. Burnish or dry buff only on asbestos-containing flooring that has sufficient finish so that the pad cannot contact ACM.
  - Perform clean-up and tear-down steps on level A checklist.

- 5. Cleaning or scrubbing resilient asbestos flooring with adequate coats of floor polish on flooring before buffing or applying additional polish.
  - Perform pre-work activities on level A checklist (see Appendix B).
  - Place necessary tools, equipment, and materials in work area. Place walk-off mats to prevent tracking of scrubbing solution to other areas.
     Position "Caution—Wet Floor" signs.
  - Place drop cloth on adjoining floors to protect them from any spilled cleaning solution.
  - Mix scrubbing chemical with water as recommended by manufacturer, and use mop to apply liberal amount (do not flood). Allow to soak for amount of time recommended by manufacturer. Keep floor adequately wet by reapplying cleaning solution if drying occurs. Work small areas at a time.
  - Use floor-scrubbing machine (at recommended rpm) and manufacturer-recommended pads to remove embedded dirt and surface marks.
  - Remove spent scrubbing solution with wet vacuum or mop.
  - Rinse area using clean mop and clean rinse water. Remove water with wet vacuum or mop. Use damp mop to clean up any remaining water or streaks.
  - Perform clean-up and tear-down steps on level A checklist.

# Levels B and C Resilient Flooring ACM Practices.

The following situations require level B or level C work practices. For these situations, contact the consultant, who will coordinate the hiring of a contractor.

- Removing or replacing adhered, perimeter-adhered, old loose vinyl sheet flooring with ACM backing.
- 2. Removing a small amount of resilient asbestos floor covering to drill holes in sub-floor to attach object to floor or install pipe or conduit.
- 3. Replacing a small area of tiles that are sufficiently damaged that the tile or mastic may become friable during removal.
- 4. Removing a tile and mastic that may become friable during removal.
- 5. Removing several floor tiles and mastic that are sufficiently damaged that the tile or mastic will become friable during removal so that you may drill hole(s) in subfloor to attach object to floor or install a pipe or conduit.
- Installing a partition over resilient asbestos flooring that is well adhered and in good condition.
- 7. Removing carpet that is installed over resilient asbestos flooring, where mastic or a small number of tiles may be pulled up or flooring may be pulled up without separation of backing and wear layer.

## 7.9 APPENDIX A

# **APM Checklist**

# Asbestos Program Manager (APM) Checklist for Operations and Maintenance Work Practices

**Note:** This checklist is to be used for Church employees engaging In level A work practices only. If a situation requires level B or level C, a contractor will be hired to do the work.

	Receive and review Job Request for Maintenance Work form (see Appendix C).  Work to be performed:		
	Review asbestos survey data to determine if ACM is affected.		
	Complete Maintenance Work Authorization Form (see Appendix D).		
	Select work practices for all ACM to be encountered.		
	Select personal protective equipment and decontamination requirements to be used, if needed.		
	Select appropriate materials, and review potential hazards (scaffold use, etc.).		
	Schedule work when area is not in use. Use plan developed to isolate area, if necessary.		
	Notify personnel affected by work.		
	Assign workers with appropriate level of training. Verify currency of training.		
	Provide workers with copies of:		
	☐ Maintenance Work Authorization Form.		
	☐ Work practice checklist from O&M program.		
	☐ General procedures.		
	☐ Notifications.		
	☐ Work schedule.		
	As practical, review work practices during work for compliance with requirements and worker general procedures.		
	Complete evaluation of Work Affecting Asbestos-Containing Materials form (see Appendix E).		
	File all required records in proper files.		
Sim	natura		

# 7.10 APPENDIX B

# Level A Worker Checklist

# **Operations and Maintenance Work Practices**

Pre-work Activities	Dotain from supervisor of aspestos program manage		
		☐ Completed Maintenance Work Authorization Form.	
		☐ Work practice(s) to be used, including personal protective equipment options.	
		☐ Work notification, as applicable.	
		☐ Work schedule.	
		Review work practices.	
		Inspect work area for visible dust or debris. If present, stop work and notify APM.	
		Obtain recommended tools, equipment, and materials as described in the section on work practice(s) and the Maintenance Work Authorization Form.	
		☐ Move tools, equipment, and materials to work area.	
Work Practices		Perform work per steps in section on work practices.	
Clean-up and Tear-down		Return tools, equipment, and remaining materials to storage area.	
Procedures		Notify APM or supervisor that work is completed, and return documents to APM.	

# Job Request for Maintenance Work

Name:		Date:
Telephone nui	mber:	Job request no
Requested star	rting date:	Anticipated finish date:
Description of	work:	
Description of (include locati		al that might be affected, if known
Requestor nan	ne and telephone number:	
Supervisor na	me and telephone number:	
Submit this ap	oplication to:	
(The asbestos p	program manager)	
		Il maintenance work in areas where asbestos- norization must then be received before any work
	Granted (job request no	)
	With conditions*	
*C 1''	Denied	
*Conditions		

7.12 APPEND	X D			
Maintenance Work Authorization Form No				
AUTHORIZ	ATION			
Authorizatio	n is given to proceed with the following maintenance work:			
PRESENCE	OF ASBESTOS-CONTAINING MATERIALS (ACM)			
	ACM is not present in the vicinity of maintenance work.			
	ACM is present, but their disturbance is not anticipated; however, if condition change, the asbestos program manager will re-evaluate the work request befor proceeding.			
	_ ACM is present and may be disturbed.			
w in	· ICAI . C · · · · M . · · I A . D			
	ice If Asbestos-Containing Materials Are Present			
The followin	g work practices shall be employed to avoid or minimize disturbing asbestos:			
Personal Pr	otection if Asbestos-Containing Materials Are Present			
	g equipment/clothes will be used/worn during the work to protect workers (see personal protection):			
Special Pra	ctice or Equipment Required:			
Signed:	Date:			
(asbestos pro	gram manager)			

## 7.13 APPENDIX E

Evaluation of Work Affecting Asbestos-Containing Materials

THIS EVALUATION COVERS THE FOLLOWING MAINTENANCE WORK:			
Location of work (address, building, room number(s), or general description):			
Dates of work:			
Description of work:			
Work approved form number:			
Evaluation of work practices employed to n	ninimize disturbance of asbestos:		
Evaluation of work practices employed to c	contain released fibers and to clean up work area:		
Evaluation of equipment and procedures us	sed to protect workers:		
Handling or storage of ACM waste:			
	_		
Signed:	Date:		
(asbestos program manager)			

# 7.14 APPENDIX F

Waste Tracking Form

# PART 1 (TO BE COMPLETED BY WORKERS)

Maintenance authorization number:					
Work location (building):					
Room number or area:					
			PART 2 (TO BE COMPLETED BY ASBESTO Waste properly packaged and labeled: Yes  Exceptions:	No	
			Waste storage location:		
			Waste disposal location:		
			Waste shipment records received:	Date:	
			Signed:	Date:	
(asbestos program manager)					

### 7.15 APPENDIX G

# Work Procedures

### SECURING THE WORK AREA

When asbestos fibers might be released, the work area should be vacated and secured (where feasible) by scheduling, locking doors (from the inside if possible), or using other means. If this is not feasible, access to the work area should be restricted, such as by asbestos barrier tape around the perimeter of the work area. If barrier tape is used, it should be placed 5 to 10 feet outside of any polyethylene drop cloth used in the work area. Install barrier tape by taping or tying to fixed objects.

Do not block access to any emergency exits, and when asbestos fibers might be released, post OSHA-required "Danger" signs at all entrances to the work area. For such projects it might be desirable to have a physical barrier installed several feet in front of warning signs to avoid having warning signs readily visible to occupants.

A "Keep out of Construction Area" sign should be posted on physical barriers. A physical barrier would be arranged so that a person who goes past the physical barrier will then see required warning signs.

### POLYETHYLENE DROP CLOTH

Preparing the work area with a drop cloth requires that a single layer of polyethylene be spread on the floor of the work area and taped or weighted in place. The drop cloth should be a least 4 mils thick (6 mils is preferable).

Do not use more than one layer if ladders (or similar equipment) will be used, unless a hard surface, such as plywood, is laid over the drop cloth. If the floor is a soft material, such as a carpet, use caution to prevent tearing of polyethylene under equipment.

The drop cloth should cover an area large enough to catch falling debris. If work is to be performed at an elevated level, the drop cloth should be placed on the work platform or extended at ground level beyond the immediate work location to catch any debris.

**Note** that the use of a drop cloth introduces potential slip hazards in the work area. Nonslip foot coverings are recommended where drop cloths are used. Drop cloths should be thoroughly cleaned if they are moved from one spot to another.

# **Record Keeping**

### 8.1

# Importance of Record Keeping

Records can be used as evidence of events or actions. A building owner is responsible for providing a safe and healthy environment for occupants. If someone challenges whether the owner is doing this, records will be needed to show otherwise.

From a legal perspective, the owner should make records of all asbestos-associated activities, assuming that the records may eventually be needed to prove that responsible actions and reasonable care were taken, even if an assessment was done properly by competent professionals. Owners, professionals, and contractors may be required years later to prove that the removal was done competently and according to then-current procedures and practices.

# 8.2 Record Management

The Church should keep asbestos-related records for at least 50 years because of the long latency periods for asbestos-related diseases. Managers of Church entities should submit electronic files of asbestos-related records to the appropriate department records administrator. For the Meetinghouse Facilities Department, submit files to Church Headquarters at pfdsafety@ChurchofJesusChrist.org. Electronic files will be kept in the As-Built Catalog. Hard copies of asbestos-related records can be destroyed after they have been saved electronically.

Upon completion of each asbestos abatement project, the consultant should assemble an electronic file of asbestos activities. This file should include all records for all abatement projects performed in the building. If no asbestos is left in the building, this file will contain all the building documentation.

The consultant shall send the electronic file to the Church department or entity, who shall ensure that all the necessary records are included and that the file is in the proper form, consolidated, and organized.

#### 8.3

# Submitting Asbestos Files to Church Headquarters

## **SUBMITTING ASBESTOS FILES**

Submit the electronic asbestos file for each building surveyed or abated to the appropriate department records coordinator at Church headquarters upon project completion. For the Meetinghouse Facilities Department, send electronic files to pfdsafety@ ChurchofJesusChrist.org.

## **Posting Asbestos Files**

The appropriate department records coordinator will arrange for the electronic file to be posted to the As-Built Catalog.

### **Contents of Asbestos Files**

It is recommended that the contents include but not be limited to the following:

- 1. Asbestos survey reports, updated survey reports, and management plans.
- 2. For buildings that have had asbestos abatement activities:
  - a. Initial follow-up building asbestos survey reports
  - b. Reports of any local, state, or federal inspections

- c. Contract for asbestos abatement
- d. Contract for consultant services
- e. Notifications to regulatory agencies
- f. Evidence of insurance and bonds for the contractor and consultant
- g. Special reports, correspondence, and change orders
- h. Asbestos abatement project manual
- Summary of contractor respiratory protection program information, showing compliance with OSHA requirements
- j. Contractor fit test program
- k. Contractor medical statement (medical statement signed and dated by examining physician, with names of each employee examined)
- l. Job reports and personal air sample results
- m. Estimate of tonnage of asbestos waste
- n. Certificate of removal
- Transportation of asbestos waste-dump receipts, trip tickets, transportation manifests, and other documents of disposal. If possible, these should be original copies, completely filled out, signed, and dated

- p. Asbestos consultant industrial hygienist employee health and fit testing records
- q. General itemized project summary, signed and dated
- Results of background, air, and final clearance air testing with evidence of laboratory accreditations
- 3. For buildings that have had asbestos operations and maintenance programs:
  - a. Updated management plan
  - Reports of facility inspections noting asbestos-related problems
  - Asbestos operations and maintenance program checklists, job requests, authorization forms, evaluation forms, and waste tracking forms
  - d. Records of accidental asbestos releases and clean-up activities

# **Funding and Appropriations Guidelines**

### 9.1

# Funding and Appropriations

No provisions have been made, nor appear likely to be made, to establish a separate budget category exclusively for asbestos projects. Instead, asbestos projects are funded through capital needs analysis (CNA) as one-time needs. Therefore, each year when preparing the CNA facility plan, make sure to include sufficient funds to cover anticipated asbestos survey and abatement costs for the budget year. Current prioritization criteria may make it necessary to phase an asbestos abatement program over a period of several years.

#### 9.2

# Project Application Preparation

## FOR MAJOR PROJECTS

Certain projects do not require a consultant and do not need a project application AC21, but they may go forward following standard CNA project procedures.

If the asbestos-related work requires the services of a consultant or is a major project, include the asbestos-related work with other project costs on AC21 forms, following normal established procedures.

## FOR OTHER PROJECTS

For other Church departments, divisions, and entities, follow procedures established for your organization to apply for asbestos abatement.

### 9.3

# **Tracking Costs**

# TRACKING COSTS FOR PROJECTS

Identify individually any work related to asbestos as a line item in the CNA Facility Plan, with costs reflected in the project's Schedule of Values so Church headquarters can track all Church expenditures connected to the asbestos program.

## TRACKING COSTS FOR OTHER PROJECTS

For other Church departments, divisions, and entities, follow procedures established for your organization to track asbestos abatement costs for a project that includes asbestos abatement.

# **Asbestos Awareness Training**

### 10.1

# Introduction

Employees who may be working near asbestos or performing level A work practices are required by OSHA to have asbestos awareness training. OSHA also requires refresher training at least once a year. Managers and supervisors should provide training.

Training should include the health effects of asbestos, a review of asbestos management plans that identify locations of ACM or PACM in the building(s) where employees work, recognition of damaged ACM or PACM, the Church asbestos operations and maintenance program, and proper response to fiber release episodes.

A copy of the OSHA Asbestos Standard, 29 CFR 1910.1001, should be made available to employees. The most current version is available online at: https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1001.

OSHA requires that training records be maintained for one year beyond the last date of employment for each employee. Keep face-to-face training records using the *Safety Training Meeting Record* from the Church *Safety, Health, and Environmental Manual*. Online training is automatically tracked.

Asbestos hazard awareness training materials are available on the Church Learning Center site or on the Risk Management Intranet site. Those without access to these sites should contact the Risk Management Division.