

COUNTY OF VENTURA	2012 EMPLOYEE HEALTH & SAFETY MANUAL	GENERAL
Originating Agency: GSA	Last Issued Revised	Policy No. 1 G
Policy: GSA	8/6/2012	ASBESTOS OPERATIONS AND MAINTENANCE PROGRAM
Forms: N/A		VANGUARD BUILDING

1.0 INTRODUCTION

The General Service Agency (GSA) maintains an Asbestos Operations and Maintenance Program. The purpose of the Asbestos Operations and Maintenance Program is to safely and effectively manage asbestos-containing materials (ACM) in County buildings so as to minimize human exposure to asbestos fibers. This is accomplished by:

1. Maintaining in-place ACM in good condition by preventing its disturbance or damage
2. Monitoring the condition of in-place ACM
3. Ensuring proper abatement of ACM in poor condition or cleanup of asbestos fibers previously released
4. Restricting access to areas with ACM in poor condition until proper abatement work can be done.

In accordance with the Asbestos Operations and Maintenance Program (O & M Program), items 3 and 4 are to be handled by Risk Management, Health, Safety and Loss Prevention (HSLP) through consultants and abatement contractors. Items 1 and 2 on the other hand, must be implemented through specific work practices and procedures by trained personnel during building cleaning, maintenance, renovation, and general activities that may involve ACM.

This document provides basic guidance on how to effectively achieve the objectives of items 1 and 2. It elaborates general O&M work practices and procedures as they apply to custodial staff, maintenance staff (trades, communications, etc.), and professional staff (project engineers, program managers, contract administrators, etc.). It also provides general procedures to use in reporting ACM-related problems.

This program is given with the following understanding. First, employees are to contact their immediate supervisor before executing any of the procedures noted herein. Secondly, the program presented herein is general and basic, and there may be more specific O&M procedures for the area where work is being contemplated. Again, employees should seek immediate supervisor's advice about such matters.

2.0 REPORTING PROBLEMS

It is important to realize that *intact, undisturbed asbestos-containing materials (ACM) do not pose any unusual health risk; they do become hazardous when damaged, disturbed, or deteriorated thereby releasing fibers into building air.* It is thus critical that everyone working in County buildings:

1. Report any evidence of disturbance or damage of known or suspect ACM to their immediate supervisor, who in turn should contact HSLP for corrective actions
2. Report any dust or debris that might have come from known or suspect ACM to their immediate supervisor for appropriate action
3. Report *any* on-going activity that presents a potential for ACM damage to their immediate supervisor, who should then either (a) set in-place special procedures to lessen the potential for damage, or (b) contact HSLP for evaluation.

In keeping with this policy, *under no circumstance* should the person making the report or the responsible supervisor take any action to abate, cleanup, or effect any change in the situations being reported. Rather, the supervisor should report a problem to appropriate GSA management. To request a material evaluation for asbestos, contact Risk Management, at 654-2166.

3.0 MAINTENANCE

3.1. OVERVIEW

This section presents general maintenance practices for communication (computer and telephone) and maintenance (trades and crafts) personnel working in County ACM-buildings.

3.2 GENERAL WORK PRACTICES

ACM promptly releases fibers when certain mechanical processes are done on it. Drilling, cutting, abrading, sanding, breaking, sawing, or otherwise abusing ACM is the concern here. Since such work is routinely done during maintenance work, there are three general rules for maintenance staff: 1. confirm work area is ACM-free, 2. report to Risk Management any damage to building materials and 3. don't do any work on known or suspected ACM. For example:

1. **SUSPENDED CEILINGS.** Don't go above suspended ceilings unless area is known to be safe. Tops of suspended ceilings may have debris coming from ACM in the area.
2. **CRAWLSPACES AND ATTICS.** Don't go into crawlspaces or attics unless area is known to be safe. These spaces may be contaminated with asbestos fibers coming from ACM in the area.
3. **REPAIR, REMOVAL AND RENOVATION.** Don't repair, remove or renovate thermal insulation (on pipes, boilers, ducts, etc.), surfacing materials (sprayed-on or toweled-on finishes, fire-proofing, etc.) or other materials (floor tiles, cement pipes/panels, ceiling tiles, wallboard, etc.) without checking for ACM.
4. **WATER PIPES.** Don't repair or replace pipes without ensuring both the insulation, if any, and the pipe itself is not ACM.

5. ELECTRICAL AND TELEPHONE WIRES. Don't remove or repair wiring without ensuring that the insulation/covering is not ACM.
6. LIGHT BULB AND FIXTURES. Don't replace light bulbs or fixtures without ensuring removal of these items won't cause damage or exposure to ACM. ACM ceiling materials and possible ACM above ceilings is the problem here.
7. HVAC FILTERS. Do mist HVAC system filters with water from spray bottles before removing. Discard filter by sealing in a trash bag and putting in trash. This is to minimize the amount of dust created from handling the filter.

4.0 CUSTODIAL

4.1 OVERVIEW

The custodial practices of wet cleaning, vacuuming, and floor covering maintenance are addressed here. *Unless the building or work area is known to be asbestos-free, these procedures should be followed.* Improper cleaning can damage ACM, thus releasing airborne asbestos fibers. Similar results may occur if the ACM is accidentally damaged. Cleaning around ACM should always be performed cautiously. And if damage to a specific building material is encountered, and if it is known or suspected ACM, notify the supervisor before cleaning in the area.

4.2 HARD SURFACE CLEANING

Follow the procedures below when hand-cleaning hard surfaces (e.g., walls and desks) in ACM bearing areas (this is also a good ideal in non-ACM areas).

1. When using dry rags or paper towels, do:
 - a. Immerse rag/towel in pail filled with water and soap, wring out the excess water, and then fold it in quarters.
 - b. Wipe surface once (one pass per quarter), refold to a fresh quarter, and carry on until all quarters have been used.
 - c. Don't place dirty rag back into the pail (if a used rag/towel comes in contact with the water, empty and refill)
 - d. Dispose of rag/towel in plastic bags
2. Steps b. through d. apply for pre-packaged wet cleaning cloths.
3. Don't use tools to scrape debris which is adhered to the surface being cleaned.

4.3 VACUUMING

Don't use common vacuums or other dry cleaning methods in ACM buildings. Regardless of the flooring type (e.g., tile, carpet, etc.), dry sweeping or vacuuming with a common vacuum will force dust back into the air. To make sure the dust particles that have settled to the floor are not re-suspended into the air, clean the surface with a vacuum cleaner equipped with a High Efficiency Particulate Air (HEPA) filter. In fact, do:

1. Regularly clean all carpets and non-carpeted flooring using HEPA-vacuums.
2. Vacuum non-floor surfaces using attachments made for HEPA-vacuums.
3. Remove and dispose of the vacuum bag when it is about three-quarters full (when removing the bag, spray water from a bottle directly onto the bag so as to suppress

the dust created by the bag removal and disposal; dispose of the bag in trash by first putting it in a plastic trash bag)

4.4 FLOOR COVERINGS

Tiles and sheets are the two basic types of floor coverings that may contain asbestos. While today's products are asbestos-free, it was common in the past to add asbestos fibers into these products to provide durability and adaptability. The fibers in these floorings are not free, but rather are firmly encased or locked into the product during the manufacturing process. Normal wear of these products does not present an asbestos exposure hazard provided the flooring is not drilled, sanded, or otherwise physically abused. Nevertheless, special cleaning methods are required when working with ACM flooring coverings.

Detailed herein are work procedures for the two types of floor coverings. Unless positive (e.g., by laboratory test) that the flooring is asbestos-free, assume it to be ACM and treat it as prescribed here.

1. CLEANING, STRIPPING, AND BUFFING PROCEDURES

- a. Don't dry sweep floors, rather use HEPA-vacuums or wet mops.
- b. Strip ACM flooring as infrequently as possible. But when stripping, follow these basic rules:
 - i. Keep the floor wet during the stripping operations; don't dry strip.
 - ii. Fit machine with least abrasive pad available and run it at a slow speed of 190 revolutions per minute (if the pad picks up the floor color, it's too abrasive and needs changing to one less abrasive)
 - iii. Stop Stripping floors when the old wax or finish coat is removed (over stripping can damage the floor and cause asbestos fiber release)
 - iv. After stripping and before application of the new surface clean the floor thoroughly by wet means.
- c. Don't use a floor buffing machine on unwaxed or unfinished ACM floors.

2. DAMAGED OR WORN SHEET FLOORING.

Sheet vinyl flooring and linoleum often have ACM paper backing. The surface layer, which is not typically ACM, protects the ACM backing under normal conditions. Since the flooring is soft, however, it will eventually wear through, exposing the ACM backing. Notify HSLP of any sheet flooring which has been worn so the surface pattern no longer shows, or if it is cut, torn, or has curled at the edges of the backing.

3. DAMAGED OR LOOSE FLOOR TILES.

Minor wear, such as at the exposed edges of the floor tile or near doorways, is not of concern. If tiles are loose, broken into loose pieces, pulverized, or worn through to the adhesive notify your supervisor for appropriate action.

5.0 PROFESSIONAL STAFF

5.1 OVERVIEW

Professional staff should develop and implement asbestos control procedures necessary for their normal scope of work. Such procedures should utilize HSLP support. Minimum objectives for such procedures are set forth below. They list recommended practices for project managers and engineers that will minimize the risk of human exposure to asbestos fibers. They will also ensure that projects comply with GSA policy and all applicable state, county and federal regulations.

5.2 CONSTRUCTION WORK ON EXISTING BUILDINGS

1. ACM SURVEYS

An ACM survey should be done as needed prior to the start of any construction project (repairs, demolitions, seismic upgrades, etc.). Surveys are organized and directed by project managers in consultation with Risk Management. In general, when work is going to involve ACM disturbance, its abatement (removal, encapsulation, etc.) will be required before work starts. And since vendors do all surveys (and abatements), project managers should budget accordingly as part of project planning.

2. WORK DONE BY COUNTY EMPLOYEES

- a. No employee shall work with or cause disturbance of ACM in any way that might cause fiber release. All work with such expectation must be coordinated with an asbestos abatement contractor with consultation of Risk Management HSLP.
- b. Before starting any projects involving building materials, the employee should be given information about the status of ACM in the project's work area.
- c. Any employee who encounters building damage which does or could involve ACM should secure the area and report to the immediate supervisor.

3. WORK DONE BY NON-ACM COUNTY CONTRACTORS

- a. Unless contracted to do so, contractors are not to work with any known or suspect ACM.
- b. Notify contractors of the results of ACM surveys. Point out that ACM survey are not 100% accurate, and that suspect material may be found in previously inaccessible areas (e.g. inside walls)
- c. Include contract language which states that contractor is responsible for notifying GSA of *any* suspect material found during project. Language should also specify that the contractor is to stop all work in the area where the suspect material is found pending evaluation by the GSA.

4. WORK DONE BY ACM CONTRACTORS.

County initiated work involving ACM is accomplished through a DOSH Certified Asbestos Abatement Contract with Risk Management HSLP's oversight.

APPENDIX

ASBESTOS OPERATIONS AND MAINTENANCE PLAN (ACM O&M PLAN)

1.0 ROUTINE WORK PRACTICES – Non-Friable ACM Identified in Survey

- 1.1. Non-friable ACM flooring (mastic only) is to be cleaned in accordance with GSA ACM O&M Plan as detailed in the Custodial practices for floor covering maintenance. Fiber release from non-friable material is extremely low unless these materials are broken, drilled, sanded or otherwise disturbed. No special personal protective equipment is required for this work. Refer to the survey summary for floor locations with ACM mastic. **(Table 1)**
- 1.2. The non-friable ACM roof repair mastic and roof cap sheet is to be encapsulated with a single-ply roof. All routine maintenance on encapsulated roof shall be done in accordance with the General Work Practices detailed in the GSA ACM O&M Plan.

2.0 MONITORING IN-PLACE NON-FRIABLE ACM

Maintenance and Custodial personnel will routinely survey in- place non-friable ACM as encountered to note and document any changes in the condition of materials. Circumstances in which ACM or its covering is damaged, deteriorate, or delaminated shall be reported to supervisor for appropriate response action.

REFERENCE:

General Services Asbestos Operations and Maintenance Plan
Criterion Environmental, Inc., Pre-Renovation Asbestos and PCB's Survey, Vanguard Building, June 20, 2008 CEI Client ID# VTA-1220-AsbPCB

June 20, 2008
 1400 Vanguard St.
 Oxnard, CA 93033

Location	Material	Comments
Roof	Vent Penetration Mastic	Non-Friable
Roof	Repair Mastic	Non-Friable
Roof	Cap Sheets	Non-Friable
Entry Overhang	Flashing Mastic	Non-Friable
ALL LOCATIONS	Off-White & Blue 12x12" Tile - No Asbestos Detected	
First Floor- West Electric Room	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
First Floor- West Janitors Closet	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- Roof Access Stairwell	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- West Janitor Closet	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- West Server Room	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- Southwest Kitchen	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor-Closets in Southwest Cubical Area	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor-East Janitor Closet	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- East Electric Room	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- East Maintenance Shop	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
Second Floor- Northeast File Room, Closet	Black Mastic(Beneath off-White 12x12"Floor tile)	Non-Friable
First Floor-Northwest Kitchen	Black Mastic(Beneath Blue 12x12" Floor Tile)	Non-Friable
First Floor- Southeast Cubical Area, Kitchen	Black Mastic(Beneath Blue 12x12" Floor Tile)	Non-Friable
First Floor- East Maintenance Shop	Black Mastic(Beneath Blue 12x12" Floor Tile)	Non-Friable
First Floor- East Electric Room	Black Mastic(Beneath Blue 12x12" Floor Tile)	Non-Friable
Second Floor- North Break Room	Black Mastic(Beneath Blue 12x12" Floor Tile)	Non-Friable
Second Floor Probation-Southeast Storage Closets	Black Mastic(Beneath Blue 12x12" Floor Tile)	Non-Friable