



SAFETY DIRECTIVE

Title: **Asbestos**
Issuing Department: Town Manager's Safety Office
Effective Date: September 01, 2014
Approved: Gilbert Davidson, Town Manager
Type of Action: New

1.0 PURPOSE

The purpose of this directive is to ensure Town employees understand the hazards of asbestos exposure and handling procedures.

2.0 DEPARTMENTS AFFECTED

This directive applies to all departments and employees of the Town of Marana who have the potential of exposure to asbestos.

3.0 REFERENCES

- 3.1 OSHA Standard 29 CFR 1910.1001 – Asbestos
- 3.2 OSHA Standard 29 CFR 1910.1200 - Hazard Communication
- 3.3 OSHA Standard 29 CFR 1926.1101 -- Safety & Health Regulations for Construction - Asbestos
- 3.4 OSHA Standard 29 CFR 1910.134 -- Respiratory Protection
- 3.5 40 CFR 61 Subpart M: National Emission Standard for Asbestos
- 3.6 Pima County Department of Environmental Quality Asbestos Program

4.0 DEFINITIONS

Asbestos: A set of six naturally occurring silicate minerals exploited commercially for their desirable physical properties. These minerals include: chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, and actinolite asbestos. Asbestos is a naturally occurring fibrous mineral that is used in the production of many products. Asbestos is commonly found in insulation, fireproofing, and for material strengthening. Applications range from building materials, fire proofing (including fire-rated doors) and tile flooring. Asbestos is common in facilities built prior to 1972 and is still common in specific building

materials installed prior to 1990. Asbestos is known to cause serious adverse health effects to humans including asbestosis, mesothelioma, and lung cancer. Asbestos is regulated by the Occupational Safety and Health Administration (OSHA), and the Environmental Protection Agency (EPA) under the Clean Air Act and the Toxic Substances Control Act (40 CFR 61 Subpart M).

- 4.1 Asbestos-containing material (ACM): Any material containing more than 1% asbestos.
- 4.2 Authorized Person: Any person authorized by the employer and required by work duties to be present in regulated areas.
- 4.3 Certified Industrial Hygienist (CIH): One certified in the practice of industrial hygiene by the American Board of Industrial Hygiene.
- 4.4 Controlling Entity: The Town department or division that occupies a Town-owned facility and is responsible for hiring a subcontractor to perform building maintenance, repair/remodel, demolition, project management or asbestos mitigation. The Controlling Entity is the ultimate responsible party in an asbestos-related citation event.
- 4.5 Competent Person (CP): One who is capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate those hazards.
- 4.6 Disturbance: Activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM. Disturbance includes cutting away small amounts of ACM and PACM, no greater than the amount which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of ACM or PACM so disturbed exceed that which can be contained in one glove bag or waste bag which shall not exceed 60 inches in length and width.
- 4.7 Friable asbestos material: Any material containing more than 1% asbestos as determined by testing, that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.
- 4.8 Non-friable asbestos-containing material: Any material containing more than 1% asbestos as determined by testing that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable ACM is defined in two categories:
 - 4.8.1 Category I non-friable asbestos-containing material (ACM): Asbestos-containing packing, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos;
 - 4.8.2 Category II non-friable ACM: Any material, excluding Category I non-friable ACM, containing more than 1% asbestos.
- 4.9 Presumed Asbestos Containing Material (PACM): Thermal System Insulation (TSI) and surfacing material found in buildings constructed earlier than 1980.
- 4.10 Project Manager: The individual designated and/or contracted by the Town department (Controlling Entity) to oversee/manage building remodeling, renovation or building equipment/component replacement and has knowledge to identify suspect asbestos

containing materials. This individual shall require (when necessary) asbestos identification and sampling, and when resulting in a positive test, shall oversee/manage asbestos encapsulation or demolition and disposal, according to applicable regulations, into the project scope.

- 4.11 Qualified Personnel (QP): Employees authorized by training and title who possess certification in inspection, identification, sampling, mitigation, removal and disposal of asbestos or ACM under conditions specified by OSHA and the EPA.
- 4.12 Regulated asbestos-containing material (RACM): consists of the following:
 - 4.12.1 Friable asbestos material;
 - 4.12.2 Category I non-friable ACM that has become friable;
 - 4.12.3 Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading;
 - 4.12.4 Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.
- 4.13 Regulated area: An area established by the employer to demarcate areas where Class I, II, and III asbestos work is conducted, and any adjoining area where debris and waste from such asbestos work accumulate; and a work area within which airborne concentrations of asbestos exceed or there is a reasonable possibility they may exceed the permissible exposure limit.
- 4.14 Release: Any event (planned or an emergency), that releases or has the potential to release ACM or PACM;
 - 4.14.1 Planned: Remodel, renovation, maintenance or demolition
 - 4.14.2 Emergency: Fire, explosion, flood, facility damage
- 4.15 Removal: All operations where ACM and/or PACM are taken out or stripped from structures or substrates, and include demolition operations.
- 4.16 Renovation: The modifying of any existing structure, or portion thereof.
- 4.17 Repair: Overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates.
- 4.18 Subcontractor/Contractor: A licensed asbestos contractor or the Facilities & Asset Maintenance Division (FAM) designated and contracted by the department (Controlling Entity) to perform asbestos identification and sampling, and when resulting in a positive test, having the necessary qualifications/certifications to perform asbestos encapsulation, and/or abatement (demolition) activities and disposal in accordance with applicable regulation, prior to the performance of work. The Subcontractor/Contractor may be a contributing party in an asbestos-related citation event.
- 4.19 Supervisor: An employee with the authority to hire, transfer, suspend, lay-off, recall, promote, discharge, assign, reward, or discipline other employees, or to responsibly direct

them, or to adjust their grievances, or effectively to recommend such action, so long as this authority requires the use of independent judgment.

5.0 POLICIES AND PROCEDURES

5.1 Education and Training

5.1.1 Town Manager's Safety Office shall convey Awareness Training for all employees during the new hire process. This training shall include:

5.1.1.1 Health effects of asbestos exposure.

5.1.1.2 Employee response to an emergency release of ACM or PACM in Town facilities.

5.1.2 Town Manager's Safety Office shall conduct training for affected personnel (Supervisory and Management) on the policies and procedures listed in this directive, including:

5.1.2.1 Locations of Asbestos-Containing Materials (ACM) and Presumed Asbestos-Containing Materials (PACM) in Town facilities

5.1.2.2 Recognition of ACM and PACM damage and deterioration.

5.1.2.3 Response to an emergency release of ACM or PACM in Town facilities.

5.1.2.4 Procedures for qualifying the presence of ACM or PACM prior to repair, remodel (renovation) or demolition (removal) of Town facilities.

5.1.3 Town Manager's Safety Office shall coordinate training for Qualified Personnel on an annual basis.

5.2 Renovation, Remodel or Demolition (Planned Event)

5.2.1 Departments, as the Controlling Entity, shall consult with the department repository record and/or with Buildings Safety, building file on the presence of ACM at the site where work is to be performed. If a test and result record cannot be found, departments shall ensure that prior to any renovation, remodel or demolition of existing Town facilities that a determination of the presence or absence of asbestos or ACM is considered and addressed. Suspect material shall not be presumed negative by year of installation and shall be tested and cleared prior to commencement of any work. When asbestos or ACM material is identified and confirmed by testing, only qualified personnel or a Certified Asbestos Abatement Contractor shall encapsulate or remove asbestos/ACM.

5.2.2 Departments with facilities (buildings or structures) under management of the Facilities & Asset Maintenance Division (FAM) shall contact FAM prior to performing repair, renovations or demolition work.

5.2.3 For work assigned to FAM, the presence of ACM shall be evaluated by FAM supervision which may be delegated to the FAM Competent Person and the presence of asbestos or ACM shall be ruled out prior to any work being performed. If an ACM hazard is encountered, all inspection documents shall be archived by FAM in the work order archive file.

- 5.2.4 In cases where the department, as the Controlling Entity elects to hire a Contractor to perform building renovation, remodeling, or conduct demolition work in substitution of the FAM staff, the department shall ensure the presence of asbestos or ACM shall be ruled out prior to any work being performed. The results of ACM testing shall be documented and delivered to Development Services Department for the building archive records file.
- 5.2.5 Departments, as the Controlling Entity with facilities (buildings or vertical structures) owned by the Town, but managed by a building management company, shall notify FAM prior to performing repair, renovations, or demolition work.
- 5.2.6 Facilities & Asset Maintenance may be able to assist departments by reviewing any previous building records on file for ACM testing. In all cases where work will be performed, the presence of ACM shall be ruled out by the building management company or by a qualified contractor. The department choosing to perform work shall (on the department's behalf) send sample collection and testing result documentation to FAM for building records archive file.
- 5.2.7 The Development Services Department shall evaluate projects (building additions, renovations, and demolitions) for the presence of ACM prior to authorizing any work to be performed and documented for file. All ACM sampling and testing documentation/ reports shall be sent to FAM for the building records archive file.
- 5.2.8 All ACM sampling and testing shall be performed in accordance with Sections 5.3 and 5.4 of this directive.

5.3 Sampling

- 5.3.1 The Facilities & Asset Maintenance Division shall have a Competent Person qualified by title and training to evaluate the presence of ACM in Town facilities, based upon factors related to age of the building or structure and experience with construction materials. The Competent Person may also be qualified to obtain ACM samples for testing by the on-call Town Industrial Hygienist and/or contracted laboratory certified to perform testing on suspect ACM.
- 5.3.2 The Development Services Department (DSD) shall have Qualified Personnel authorized by training and title to obtain suspect ACM samples for testing by the on-call/Town Industrial Hygienist or contracted laboratory certified to perform testing on suspect ACM.
- 5.3.3 Departments, as the Controlling Entity with Town-owned facilities under management of a building management company, or departments, as the Controlling Entity that elect to have repair, remodel or demolition work performed by a subcontractor shall ensure that ACM sampling is performed by a licensed Asbestos Contractor and testing is performed by an Industrial Hygienist or laboratory certified to perform testing on suspected ACM.
- 5.3.4 Any sampling performed shall be performed in full compliance with all OSHA, federal, state, and local regulations. Person(s) collecting ACM samples shall do so wearing Personal Protective Equipment and shall not expose any Town staff or member of the public to ACM while obtaining samples.

5.3.5 Samples shall be obtained and placed in sealed envelopes or similar to prevent employee exposure. Documentation of the sampling sites in the form of specific site identification, material description, measurements and/or photographs shall be documented for building record archive file. Chain-of-custody forms shall be utilized when submitting samples for ACM testing to the Industrial Hygienist and/or the contract laboratory certified to perform testing on suspected ACM.

5.4 Testing

5.4.1 The Facilities & Asset Maintenance Division shall retain (in direct consultation with Town Manager's Safety Office) an Industrial Hygienist and/or a contract laboratory certified in the testing of suspect ACM material to perform ACM testing on Town-managed facilities on behalf of Facilities & Asset Maintenance Division (FAM) and projects under the control and management of the DSD.

5.4.2 Departments, as the Controlling Entity, with Town-owned facilities under the management of a building management company shall be responsible for hiring a licensed asbestos contractor for sampling and an independent Industrial Hygienist or a laboratory certified in testing for ACM, or shall contract with the building management company for those professional services to ensure ACM testing is performed prior to commencement of any work.

5.4.3 The results from any and all testing performed on Town facilities, including negative results for ACM, shall be forwarded to the Development Services Department for inclusion in the building records archive file.

5.4.4 A negative ACM test shall mean work may proceed, providing notification of work to be performed has been made to FAM and any building or demolition permits required to perform work have been secured by the department.

5.4.5 A positive ACM test shall require an evaluation of abatement strategies that include removal of ACM prior to demolition, containment barriers for remodel/renovation or encapsulation and posting of notice to prevent ACM disturbance. The results of the evaluation shall be included with testing documentation and results submitted to Development Services Department for the building records archive file.

5.5 Documentation

5.5.1 Development Services Department shall serve as the central repository of all testing records performed on all Town-owned facilities regarding asbestos or suspected ACM. Abatement strategies for ACM, when performed, shall be included in the building record archives file.

5.5.2 Departments shall retain a copy of all laboratory PACM testing and results for their file. A copy shall be sent to Development Services Department for the building record archives file.

5.6 Asbestos Program. Facilities & Asset Maintenance Division shall maintain the Town Asbestos Program limited to Town-owned facilities under management and control of FAM. The Asbestos Program shall include the following procedures for the Competent Person, Qualified Personnel and employees involved in asbestos Abatement:

5.6.1 Respiratory Protection

5.6.2 Hazard Communication

5.6.3 Occupational Health Examinations

5.7 Prohibited Work Practices. Departments, except those with employees trained or certified in asbestos abatement and excepting specific work practices (wet-method pipe cutting) are prohibited from performing work (disturbing) or directing employees to perform work where asbestos is known to be present or where there is a potential for asbestos to be present, including:

5.7.1 Sanding, cutting, hammering, or drilling through asbestos-containing flooring, wall, fire door, and acoustical ceiling materials.

5.7.2 Removal of carpet, floor tile, or carpet/floor tile mastic (glue) and removal of affixed acoustical ceiling tile, sprayed on ceiling material or removing suspended ceiling tiles.

5.7.3 Disturbance of pipe and other mechanical or thermal systems insulation.

5.7.4 Dry-sweeping mechanical rooms or areas that may contain asbestos materials.

5.7.5 Dry-buffing or dry-stripping asbestos-containing flooring materials, (unless this work is performed under wet stripping methods using low abrasion pads at speeds below 300 rpm).

5.8 Abatement

5.8.1 For asbestos abatement work performed by FAM, the Competent Person shall ensure work is performed as delineated in the Facilities & Asset Maintenance Division procedures for asbestos.

5.8.2 For asbestos abatement work performed by a department, as the Controlling Entity utilizing a building management company or licensed Asbestos Contractor, the department shall ensure the Competent Person for the site is performing abatement according to OSHA Standard 1910.1001 and/or 1926.1101.

5.8.3 The Competent Person (CP) for any asbestos abatement shall conduct job site safety inspections, personal air monitoring, and safety meetings. In addition, the CP shall maintain daily employee logs, waste disposal records, and Safety Data Sheets (SDS) for all products brought to the site. All records and documentation shall be kept on site until completion of the abatement. After termination of the abatement, documents shall then be held for file for the length of time stipulated by applicable regulations. The Town reserves the right to review and/or request copies of any documentation associated with abatement performed on Town facilities by a contract vendor.

5.8.4 The Competent Person for any asbestos abatement shall ensure that packaging, labeling, and disposing of all ACM waste, whether performed by Town staff or contractors, is performed in accordance with Department of Transportation (DOT), Environmental Protection Agency (EPA), Arizona Department of Environmental Quality (ADEQ) and Pima County Department of Environmental Quality (PDEQ) requirements.

5.9 Asbestos Contractor

- 5.9.1 Town of Marana may contract for the services of outside consultants and contractors for significant asbestos removal and emergency abatement work. These firms shall be licensed as an Asbestos Contractor by the state of Arizona.
 - 5.9.2 The Asbestos Contractor shall ensure compliance with all PDEQ asbestos regulations, and complete all PDEQ forms for abatement projects, small-scale incidental maintenance blanket projects, large-scale blanket projects, and emergency projects within the timeframes required by the agency.
 - 5.9.3 In special conditions the Asbestos Contract may advise the Town on how to get waivers from regulatory agencies, if required, when emergency abatements are performed or when requesting to deviate from required practices specified in the regulations or from work practices specified in the original notification.
 - 5.9.4 The Asbestos Contractor must obtain waivers from PDEQ for emergency abatements or any other situation that requires it and must notify PDEQ of revisions to the notification, such as the need to change project start dates, duration, etc., and must ensure that the notification is accurate and valid throughout the abatement project.
 - 5.9.5 The Asbestos Contractor shall provide the Town (Facilities & Asset Maintenance Division and Development Services Department) with a complete documentation report that includes the original waste disposal and documentation form, notification, air clearance results, if applicable, and a copy of the invoice.
- 5.10 Asbestos Consultants
- 5.10.1 Any consultant hired by the department, as the Controlling Entity, the building management company, or the Facilities & Asset Maintenance Division to review suspect or confirmed ACM shall be licensed or certified in the state of Arizona.
 - 5.10.2 A certified Asbestos Management Planner may be contracted to develop asbestos removal specifications or project designs for large-scale or other projects.
 - 5.10.3 A certified Asbestos Monitor/Industrial Hygienist shall be on site to conduct final air clearance sampling when required after an abatement project and will provide the controlling entity with the original, complete report, including project log and results from the certified laboratory.
- 5.11 Emergency Release
- 5.11.1 An Emergency Release shall be declared when an unexpected or unplanned incident occurs that causes damage to a facility resulting in the release of ACM or PACM and potential employee exposure, such as:
 - 5.11.1.1 Fire
 - 5.11.1.2 Explosion
 - 5.11.1.3 Water Leak or Water Intrusion (Flood)
 - 5.11.1.4 Accident or Storm Damage
 - 5.11.2 An Asbestos Contractor or Contract Industrial Hygienist will be immediately contacted in the event of an Emergency Release.

- 5.11.3 For buildings under Facilities & Asset Maintenance Division control, FAM shall be responsible for shutting down or isolating the HVAC system to prevent asbestos fibers from contaminating adjacent areas. The mechanisms contributing to the fiber release (air-handling systems, machinery, etc.) shall be secured by means of a lock-out tag-out system to minimize further fiber release, and, if possible, shut off the steam or water lines, if the emergency involves a leak.
 - 5.11.4 For buildings under management contract, the department, as the Controlling Entity shall contact the building management contractor to shut down or isolate the building HVAC system.
 - 5.11.5 The department, as the Controlling Entity shall prevent unauthorized people from entering the asbestos emergency area.
- 5.12 Asbestos Cement Pipe (ACP)
- 5.12.1 Affected Departments:
 - 5.12.1.1 Marana Utilities
 - 5.12.1.2 Parks and Recreation
 - 5.12.1.3 Public Works Department
 - 5.12.1.4 Development Services Department
 - 5.12.2 When responding to an emergency water main break on ACP, removal of damaged ACP shall require the employees to follow established and written department policy on Asbestos Cement Pipe and contact the department's Competent Person. At a minimum, department procedure shall direct employees to:
 - 5.12.2.1 Wet all ACP pieces thoroughly and recover the ACP while wearing gloves.
 - 5.12.2.2 Encapsulate (paint) the broken edges of the ACP and immediately place the piping in a 6–millimeter plastic bag(s) approved for asbestos disposal.
 - 5.12.2.3 Execute repairs and recover any ACM pipe; trimmed, cut, snapped or otherwise prepped for splice.
 - 5.12.2.4 Remove the gloves and dispose of them with the ACP debris.
 - 5.12.2.5 Wash hands thoroughly after the plastic bag with ACP has been secured.
 - 5.12.2.6 Apply a tag to the bag with the following information:
 - 5.12.2.6.1 Location where ACP was removed
 - 5.12.2.6.2 Approximate linear feet of length
 - 5.12.2.6.3 The name and Town cell phone number of the employee who bagged the ACP
 - 5.12.2.7 Dispose of the ACP in the appropriate waste storage areas and enter information into the log book.
 - 5.12.3 If the ACP is dry, it shall be saturated with water prior to handling or disposal.
 - 5.12.4 The following asbestos removal threshold limits cannot be exceeded by Town employees when removing ACP:

5.12.4.1 260 linear feet of pipe (damaged pipe)

5.12.4.2 35 cubic feet or more of components (damaged components)

5.12.5 Should the amount to be removed exceeds these threshold limits, a notification to the Pima County Department of Environmental Quality utilizing the National Emission Standards for Hazardous Air Pollutants (NESHAP) form, must be made and the project considered an asbestos abatement project.

5.12.6 Employees shall not be involved in the ACP removal until an abatement plan is put in place and a contracted asbestos removal agency is contacted. Town employees are not authorized to remove asbestos in quantities that exceed the levels listed above.

6.0 RESPONSIBILITIES

6.1 The Safety Coordinator has overall responsibility for the Town's safety programs. The Safety Coordinator shall consult with the Town Manager regarding appropriate changes and amendments to this administrative directive.

6.2 Town Manager's Safety Office shall provide advice and counsel in determining identification and testing strategies for potential asbestos or ACM where a Competent Person does not exist for a department and where facilities are not under the direct management of the Facility Management Division.

6.3 Department Heads, managers and supervisors are responsible for ensuring that the requirements of this directive are fully implemented in their work areas.

6.4 The Department Director shall appoint a Competent Person (CP) and/or Supervisor with the necessary training and authority to ensure this policy is followed by all Supervisors, employees, and their subcontractors performing work for the department and to stop or alter unsafe work procedures that are in conflict with this directive.

6.5 Department procedures shall be followed when conducting cleaning, maintenance, and repair tasks and any other work that may potentially disturb asbestos. Failure to follow federal, state or local regulations, including direction supplied in this directive may result in citation, legal action or monetary penalty to the Controlling Entity and/or subcontractor and shall result in disciplinary action for the employee(s) found in violation.

6.6 The Competent Person shall be responsible for evaluating facilities and work practices that involve potential asbestos or ACM exposure to employee and if suspect materials are identified; contact Town Manager's Safety Office to determine and/or confirm an asbestos sampling and testing strategy has been implemented if historical asbestos assessment/testing records are not available from FAM.

6.7 If ACM testing records are not included, or do not exist in the FAM building archive file, and if suspected ACM is present, then ACM testing will be required to determine presence or absence of ACM. All testing must be performed by a licensed Qualified Person (QP) or contractor. The testing procedures and results shall be documented, with reports retained in the FAM building records archive. The Controlling Entity shall be responsible for all costs associated with the ACM testing and abatement activities.

- 6.8 Supervisors shall ensure that only qualified personnel are assigned to duties involving asbestos or ACM abatement. Supervisors shall ensure that regulated asbestos waste is disposed in accordance with state and federal regulations.
- 6.9 Supervisors shall ensure that where asbestos or ACM has been identified and posted that those employees shall not disturb or otherwise alter material associated with notice and shall perform cleanup only after consultation with the department Competent Person to determine acceptable methods.
- 6.10 Supervisors shall assume the potential for asbestos and ACM prior to assigning employee work that would involve renovation or demolition of facilities or material that may contain asbestos or ACM. Where suspect materials may be present; the supervisor shall contact the Competent Person for the department and/or Town Manager's Safety Office for assistance.
- 6.11 Employees are responsible for attending all mandatory training classes, and understanding the policies and procedures outlined in this directive, as well as all Town health and safety procedures.
- 6.12 Employees shall not disturb materials that have been identified and/or marked as containing Asbestos or ACM and where Friable Asbestos is observed, shall secure the area and contact the department Competent Person or Town Manager's Safety Office for cleanup direction. Employees shall not knowingly dispose of regulated asbestos waste.
- 6.13 The Facility Maintenance Division shall serve as the Controlling Entity for all aspects of asbestos management in their occupation of Town-owned facilities.
- 6.14 The Facility Maintenance Division, as the Controlling Entity (CE), shall be responsible for ensuring that all federal, state and local regulations regarding asbestos identification, sampling, abatement, and disposal are met by the department and/or any subcontractor.
- 6.15 The Facility Maintenance Division, as the Controlling Entity shall create and maintain a repository record of all projects involving building renovation, remodel or demolition and shall document all ACM testing, results, and disposal methods performed by the department or the sub-contractor hired to Asbestos-related work.
- 6.16 The Facility Maintenance Division, as the Controlling Entity shall neither allow nor condone work to be performed on or in facilities that are known to contain or may contain ACM by employees or unlicensed subcontractors.
- 6.17 The Facility Maintenance Division, as the Controlling Entity shall be prohibited from directing non-certified employees to perform asbestos abatement work and shall only hire a licensed and certified subcontractor to perform asbestos abatement and disposal.
- 6.18 The Facility Maintenance Division shall provide and facilitate training time for qualified personnel and awareness training for non-qualified employees.
- 6.19 Facility Maintenance Division will assist departments by maintaining records on asbestos testing for Town-owned facilities. Departments shall ensure that FAM receives a copy of any and all asbestos testing performed on Town-owned facilities and results to be included in the building file.

- 6.20 Facilities & Asset Maintenance Division (FAM) may serve as the subcontractor for the department (Controlling Entity) and when so contracted, shall be responsible for asbestos assessment and testing of suspect ACM material and shall perform abatement prior to any demolition, remodel, repair, or building system component/equipment replacement.
- 6.21 Development Services may serve as the Project Managers for the Town (Controlling Entity). When Development Services is utilized by the CE they shall be responsible for asbestos assessment and testing of all suspect ACM material and shall contract for asbestos encapsulation, and/or removal (abatement) and disposal.
- 6.22 The Community Development Department shall coordinate asbestos procedures for public housing facilities and shall ensure that all sampling, testing, abatement, and disposal is performed by licensed and certified entities and work performed is conducted by trained and authorized personnel under the guidelines set forth by Housing and Urban Development (HUD), which includes the disposition of all regulated asbestos waste.
- 6.23 The Safety Coordinator and the Safety Committee are authorized to halt any operation of the Town where there is danger of serious personal injury.

7.0 ATTACHMENTS

- 7.1 None

REVISION HISTORY

<i>REV</i>	<i>DESCRIPTION OF CHANGE</i>	<i>DATE</i>
OR	Original Release	09/01/2014

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