

Administrative Procedure

Category:	Procedure:	
Business Management	Asbestos Safety	
Descriptor Code:	Issued Date:	Revised Date:
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The Maintenance Department is to be notified immediately whenever it is suspected that asbestos-containing materials have been disturbed.

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RESPONSIBILITY FOR ABATEMENT/REMOVAL FROM SCHOOLS

The removal of asbestos from school buildings will be accomplished by either accredited employees of the school system or an authorized, licensed, accredited asbestos abatement contractor. The choice will be based upon the site and complexity of the project(s), the time available to accomplish the work, the number of projects to be completed, and the cost of the two options. Regardless of who actually accomplishes the work, the responsibility for insuring that the work is done properly rests with the LEA designee.

MAINTENANCE OF RECORDS AND PLANS

The Supervisor of Maintenance and Operations shall be the person in charge of keeping all Management Plans, changes, updates, six-month inspections, etc. on file in the Central Office. It shall be the responsibility of the principal/building administrator to see that all Management Plans are on file in the individual building and all staff are aware of current updates. All changes, updates, etc. shall adhere to all Federal, State and local regulations. After completion of the Management Plans and the Ground Level C audit, the following procedures shall be followed to ensure that Management Plans are kept current.

- 1. A copy of the six-month inspection (which will be conducted by Knox County personnel) shall be completed and recorded on a five-part form. The distribution of this form shall be as follows:
 - a. The original shall be placed in the school building Management Plan at the time the inspection is conducted.
 - b. One copy shall go to the LEA designee for filing the appropriate Management Plan.
 - c. One copy shall go to the Administrative Assistant to the Superintendent for filing in the official appropriate Management Plan in the Central Office.
 - d. One copy shall go to the Maintenance Department for filing in the appropriate Management Plan at the Maintenance office.
 - e. One copy shall go to the system's asbestos consultant for filing in the appropriate Management Plan at the consultant's office.

POSTING OF ASBESTOS WARNING LABELS

By the time of the completion of the first six-month inspection following the distribution of the completed updated Management Plan for the LEA designated person shall make sure that warning labels are attached immediately adjacent to any friable and non-friable Asbestos Containing Building Materials (ACBM) in routine maintenance areas (such as boiler rooms) of each school building. Such material includes friable ABCM that was responded to by means other than removal (for example, by encapsulation) and ABCM for which no response action was carried out. Classrooms, libraries and cafeterias are a few examples of rooms that are not considered routine maintenance areas. All labels must be displayed prominently in readily visible

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locations and remain posted until the ACBM that is labeled is removed. Warning labels must be made readily visible with large letters or bright color and shall read as follows:

CAUTION! ASBESTOS. HAZARDOUS! DO NOT DISTURB WITHOUT PROPER TRAINING AND EOUIPMENT

For further information please call the Maintenance Department at 594-3633.

The LEA designee or his representative shall determine the placement of labels and shall insure that these labels are placed in the appropriate place(s) within each building.

FIBER RELEASE EPISODES

Every effort will be made to prevent the release of any asbestos fibers in Knox County Schools. If, despite these precautions, any uncontrolled or unintentional episodes, as defined below, should occur, the below delineated procedures will be followed. These definitions and procedures are taken from the current AHERA 40 CFR 763 document.

Fiber Release Episode - Any uncontrolled or unintentional disturbance of asbestos-containing building material resulting in visible emission:

- A. Minor fiber release episode: The local education agency shall ensure that the procedures described below are followed in the event of a minor fiber release episode (i.e., the falling or dislodging of 3 square or linear feet or less of friable ACBM):
 - 1. Thoroughly saturate the debris using wet methods.
 - 2. Clean the area per specifications.
 - 3. Place the asbestos debris in a sealed, leak-tight container.
 - 4. Repair the area of damaged ACM with materials such as asbestos-free spackling, plaster, cement or an encapsulant or immediately have the appropriate response action implemented as required by 763.90.
- B. Major fiber release episode: The local education agency shall ensure that the procedures described below are followed in the event of a major fiber release episode (i.e., the falling or dislodging of more than 3 square or linear feet of friable ACBM):
 - 1. Restrict entry into the area and post signs to prevent entry into the area by persons other than those necessary to perform the response action.
 - 2. Shut off or temporarily modify the air-handling system to prevent the distribution of fibers to other areas in the building.
 - 3. The response action for any major fiber release episode must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions.

FIBER RELEASE EPISODE RESPONSE

If a principal/building administrator has reason(s) to believe that a minor or major fiber release episode has occurred or is imminent, the principal/building administrator shall:

- 1. Remove all persons from the affected area
- 2. Close off the affected area (modify HVAC system)
- 3. Notify the LEA Designee
- 4. Take appropriate response action

After the above has been completed and it has been confirmed that a fiber release episode has occurred or is imminent, the appropriate individual/individuals shall notify parents and all building occupants of the 8 9 14

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actual or imminent fiber release episode. If a major fiber release episode has been confirmed, air monitoring will be instituted immediately. Item one shall be completed. Item two shall be at the option of the principal/building administrator.

- 1. Send information on the release home by the students, as soon as possible, following the fiber release episode. If it is anticipated that minor fiber release episodes will persist for a period of time, a single notice will be sufficient provided the nature and estimated duration of the event is described.
- 2. Notify the Public Affairs Department after notification to the Superintendent or his designee. A copy of such notification and name of person/persons contacted shall be placed in the Management Plan. If a fiber release episode has indeed occurred, the respondent shall complete the five-part Fiber Release Episode report immediately on site. The original shall be placed in the school/facility Management Plan at the time of the episode. The remaining four copies shall be sent by the LEA Designee for distribution and filing in the appropriate Management Plan copies. The episode shall be documented on the "Contractor and Maintenance Sign-In Sheet."

PLANNED REMOVAL ACTIVITIES

Primary Removal Activity – These activities cannot be completed within a twelve-hour period of time or have been determined to be performed only on extended weekends, school vacations or summer vacation. Secondary Removal Activity – These activities can be completed within twelve hours and may be performed on nights and weekends. No removal activities shall occur during normal school hours. If removal activities are undertaken outside normal school hours in an occupied building, it will only be in a portion of the building which does not share air space with any occupied or adjacent portion of the building. The Knox County Board of Education will comply with all local, State and Federal regulations during removal activities. However, in order to prevent possible inadvertent exposure to any individual during a planned removal activity while a portion of the building is occupied, the following general procedures will be performed:

- a) All adjacent accesses shall be secured while maintaining existing Fire Code regulations (i.e., Refer to Figure One – Between "C" and "B") (i.e., doors locked and/or sealed).
- b) A barrier shall be constructed to isolate and seal the work area (i.e., Refer to Figure One "A").
- c) Signage and/or barrier tape as appropriate shall be posted on work area boundary accesses (i.e., Refer to Figure One - "A" area) and on all adjacent area boundary accesses such as doorways and hallways (i.e., Refer to Figure One - "B" area).
- d) All work areas shall be maintained under HEPA filtered diminished pressure during the removal activity. It may be necessary to cancel extracurricular activities if they cannot be conducted in strict adherence with these procedures.

NOTIFICATIONS

If a planned primary removal activity is anticipated, a ten-day certified notification shall be sent by the LEA Designee, to the Principal or Building Administrator, the Superintendent, the School Board Members, and all designated persons required by law.

If a non-asbestos related emergency (such as boiler or piping malfunction or roof leakage) has occurred which has not caused a fiber release episode, but correcting the problem could create a fiber release episode, the notification will be the same as for a fiber release episode response.

If a planned secondary removal activity is anticipated, the notification will be the same as for a fiber release episode response.

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PROCEDURES TO PREVENT INADVERTENT RELEASE OF ASBESTOS DURING REPAIR OR CONSTRUCTION/RENOVATION WORK

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The following procedures will be followed to prevent the inadvertent release of asbestos during repair or renovation work:

All architects, engineers or others designated to prepare plans and specifications for repair, renovation or

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Work Done by Contractors

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construction will be required to verify that no asbestos will be disturbed by the work to be undertaken. Written acknowledgments that they are liable for any expenses which may be incurred as the result of improper handling of asbestos resulting from professional negligence, errors or omissions in their designing, specifying or planning of the work must be signed and provided as part of their contract. Technical assistance 13 in the identification of potential asbestos hazards is available from the LEA designee. All contract documents 14 for bids to do renovations, installations, or other construction related work processed through the Knox 15 County BOE Purchasing Department will contain a requirement that no asbestos be disturbed by the work 16 and that material furnished be free of all asbestos. All contractor employees working on such projects will 17

be instructed on the location of asbestos prior to beginning their work and the bid specifications will require acknowledgment of liability for any expenses incurred as a result of negligence, errors or omissions in work

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Work Done by Volunteers All work done by volunteer groups in school buildings, such as PTA's, booster clubs, etc. will be approved

in writing by the principal or principal/building administrator prior to commencement of any activity. Prior to approving any work, the building administrator or a designated assistant, (i.e., assistant principal, etc.) will verify by a review of the on-site Management Plan that the work can be done with no disturbance of asbestos. If a determination cannot be made from such a review, the assistance of the LEA designee person should be requested.

by the contractor's employees. Technical assistance is available through the LEA designee.

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Work Done by the Maintenance Department

All work done by the maintenance department will only be done as the result of a maintenance work request from the principal/building administrator (or designated assistant) who will verify prior to requesting the work that no asbestos will be disturbed in its accomplishment. If a review of the Management Plan is not sufficient to make such a verification, assistance must be requested from the LEA designee. No work order will be issued to a maintenance shop unless it has been checked that no asbestos will be encountered in the proposed work. All school employees shall prevent any work being done which has not been cleared as nonasbestos containing by the principal or building administrator. To facilitate this, all maintenance employees entering the building to complete work orders will be required to sign in and out at the school principal's office. Building occupants may challenge any worker doing work in the building to verify that the worker has checked the Management Plan and understands that no ACM will be disturbed.

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Work Involving Known or Suspected Asbestos

In the event of a routine work request involving asbestos, the written work request should be routed to the LEA designee prior to delivery to the Maintenance Department. In the case of an emergency, notify the Maintenance Department and telephone the LEA designee (e.g., a severe water leak where it cannot be positively verified that correction will not disturb asbestos), for guidance. In the case where potential for asbestos exposure exists, contact the LEA designee for guidance (e.g., Nine by Nine floor tile are loose and may break) and assistance.

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Sign-In and Acknowledgment

As noted above, all persons entering a school facility for maintenance, renovation, construction, etc., will sign in and out at the school office. The "Contractor and Maintenance Sign-In" sheet will include information as to the presence of asbestos in the building and will refer to the asbestos Management Plan for the building. Signing in will constitute acknowledgment of being informed of the asbestos status of the building and the responsibility not to disturb asbestos. This requirement will apply to all persons (including, but not limited to, school system employees, contractors, subcontractors, etc.). Contractor personnel on new construction not requiring entry into the existing facilities who are working in a defined enclosed area which is separate from the existing school building need not sign in.

Education and Training

All maintenance and custodial employees will be trained in the hazards of asbestos and precautions to be taken when working around it. All employees will have a visible identification badge which indicates their work location. The level of training they have received will be documented in their training records and indicated on their identification badges. This will allow a ready and easy check by school personnel that no one without proper training is involved in any work in an asbestos environment.