



Asbestos Awareness

Student Manual

**Course # 19L10-01 (PSTN)
19610-01 (Field)
19610-02 (Partner)
19601-37 (CD-ROM)**

May 2005

EMPLOYEE RESOURCE MANAGEMENT
EMPLOYEE DEVELOPMENT

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May 2005

United States Postal Service
Employee Resource Management
Employee Development
475 L'Enfant Plaza SW
Washington, D.C. 20260-4215

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A COMMITMENT TO DIVERSITY

The Postal Service is committed to fostering and achieving a work and learning environment that respects and values a diverse **workforce**. Valuing and managing diversity in the Postal Service means that we build an inclusive environment that respects the uniqueness of every individual and encourages the contributions, experiences and perspectives of all people.

It is essential that our work and learning environments be free from discrimination and harassment on any basis.

In our classrooms, on the workroom floor, in casual conversation and in formal meetings, employees and faculty are asked to encourage an open learning environment that is supportive to everyone.

Course materials and lectures, classroom debates and casual conversation should always reflect the commitment to safety and freedom from discrimination, sexual harassment and harassment on any prohibited basis.

EAS Staff has a professional obligation to provide a safe, discrimination free and sexual harassment free learning environment. Instructors are expected to support this commitment. Class participants are asked to support the goal of zero tolerance of behavior that violates these commitments.

If you find course material that is presented in the classroom or in self-instructional format that does not follow these guidelines, please point that out to the instructor as well.

If classroom discussions do not support these principles, please point that out to the instructor as well.

Diversity is a source of strength for our organization. Diversity promotes innovation, creativity, productivity and growth, and enables a broadening of existing concepts.

The Postal Service's policy is to value the diversity of our employees, customers and suppliers; to do what is right for our employees and the communities we serve, thereby ensuring a competitive advantage in the global marketplace.

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Use of Training Materials

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Asbestos Awareness

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US Postal Service Asbestos Awareness

This manual, when used with USPS Technical Training Center Course **19L10-01 Asbestos Awareness**, will meet the OSHA requirements for a two hour "asbestos awareness" program for all custodial and maintenance personnel who "work in" a facility that contains asbestos.

Training requirements are referenced under:

- OSHA General Worker Protection Standard
29 CFR 1910.1001 (j)(6)
- OSHA Construction Standard
29 CFR 1926.1101(k)(9)(vi)
- Asbestos Hazard Emergency Response Act (AHERA)
40 CFR 763.92

Employees who, in the course of their duties, may be expected to come "in contact with" ACM's may require an additional 16 hour asbestos operation and maintenance training course.

What's covered in this manual?

When you complete this manual you'll be able to:

1. Describe the various uses and forms of asbestos.
2. List the potential health problems caused by asbestos exposure.
3. Recognize damage, deterioration and delamination of asbestos containing materials.
4. Describe the location of ACM's in your facility.
5. Identify the individual in your facility who is designated to carry out general asbestos responsibilities.

NOTE

The information required in items 4 and 5 will be specific to your building.

A short quiz at the end of the manual will test your asbestos knowledge.

Where can we find asbestos?

Asbestos became extremely popular as a building material in the late 1800s for several different reasons: it does not burn, it is a weak conductor of heat and electricity, it is extremely strong, and it withstands chemical corrosion.

Because of its unique properties, asbestos has been used in a variety of building materials, collectively known as asbestos containing building materials (ACBMs).

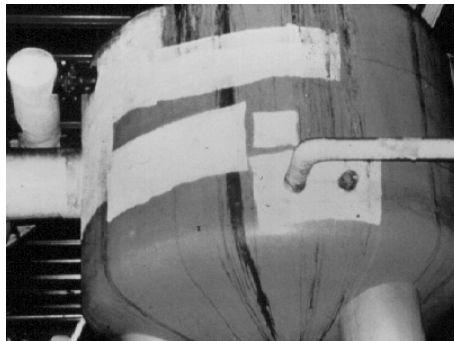
Categories of Asbestos Containing Building Materials (ACBMs)	
Category	Use
Surfacing materials	ACM sprayed or troweled on surfaces for acoustical, decorative, or fireproofing purposes (e.g., plaster, fireproofing, insulation, gasket materials)
Thermal System Insulation (TSI)	Insulation used to inhibit heat transfer on pipes, boilers, tanks, ducts, and various other elements of hot/cold water, HVAC, and other systems (e.g., pipe wrap, blanket insulation, cements)
Miscellaneous ACM	Other nonfriable materials such as floor tile, ceiling tile, roofing felt, concrete pipe, etc.

General Asbestos Locations

ACBMs are frequently found in these building systems:

HVAC systems. Asbestos-containing insulation is used to inhibit unwanted heat transfer and may be found on:

- The outside of boilers (block or board insulation).
- The breaching or flue that conveys waste gases from the combustion process.
- The inside or outside of ducts (blanket, bat, or sprayed-on insulation).



In addition, gasket material on boiler doors, rope used as filler in openings, valve packing, fire stop packing, and vibration - dampening cloth connecting sections of duct work may contain asbestos.

HVAC systems that use chilled water will typically include a cooling tower where excess heat is rejected to outdoor air. Sometimes tower baffles and filter media (fill) are constructed with ACBM. Tower structures are frequently corrugated "Transite" board.

Plumbing systems. Asbestos may be found on:

- The piping and equipment that heat and/or maintain water at a stable temperature.
- The outside of cold pipes and equipment (thermal system insulation [TSI] materials prevent heat loss from pipes and equipment and water condensation).
- Domestic water systems (insulating asbestos).

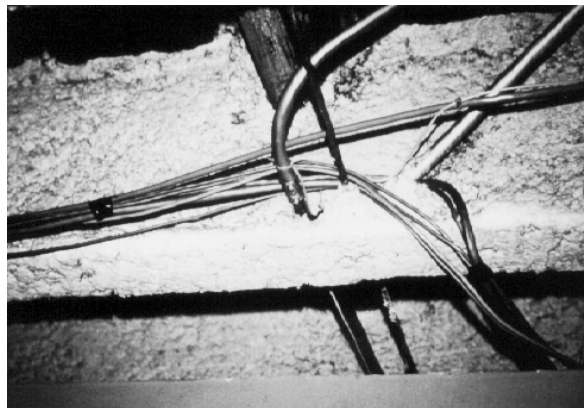


Also, asbestos cement pipe may have been used in plumbing systems, waste systems, and roof drains. Such pipe is concrete-like in appearance.

Electrical systems. Asbestos may be found in or on:

- Transite ducts for electrical cable runs.
- Partitions in electrical panels.
- Asbestos cloth used to bind bare cables.
- Insulation in lighting fixtures.

Structural systems. Building codes call for application of fireproofing material to all structural steel components. Prior to 1978, the fireproofing material of choice was sprayed-on asbestos, and it is this friable material that causes such great concern throughout the nation. Asbestos fireproofing can also be found on the underside of steel ceilings or roof decking materials.



Decorative and Finish Materials. Asbestos was mixed with plaster or applied directly to surfaces such as ceilings or the underside of concrete roof decks for fireproofing, noise abatement, and decorative purposes.



Floor tiles and planking

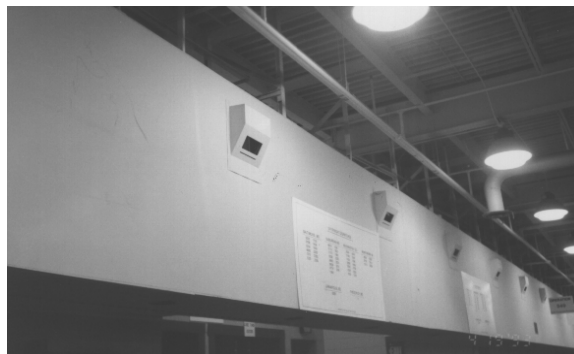
Asbestos was added to vinyl and asphalt to produce floor tile and floor planking. Flooring constitutes a major percentage of all ACM's found in USPS facilities.

To the best of our knowledge *all* 9 x 9 floor tile contains asbestos, *some* 12 x 12 tile contains asbestos (depending on the date of manufacture), *most* black asphalt floor planking contains asbestos, and much of the tile adhesive contains asbestos.



Other asbestos materials

Asbestos cement board was often used to construct inspector's look out galleries.

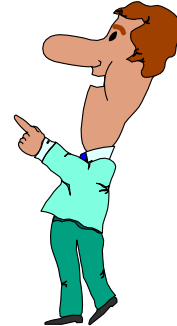


How do you know if you have asbestos in your building?

If your facility was built before 1980 there is a good chance that it contains some type of asbestos. About 85% of our buildings were constructed when ACM's were used.

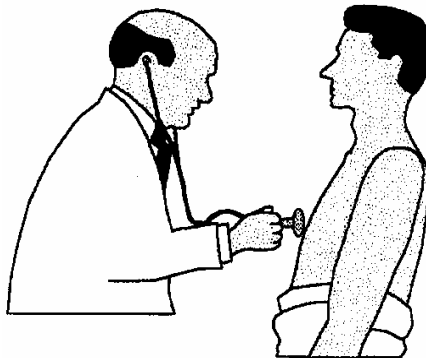
The Postal Service will inspect all owned and leased buildings for the presence of asbestos containing materials. The inspection will produce a written report which identifies the types and location of asbestos in your facility.

You must be notified of the results of this inspection and given appropriate training on how to safely work around the asbestos material in your facility without causing a hazard to yourself or others.



What health problems are linked to asbestos?

Asbestos enters the body via inhalation. Long term exposure to asbestos particles in the air can cause a build up of fibers in your lungs which can lead to serious health problems.



- Long term asbestos exposure may cause a condition known as asbestosis which is a reduced lung capacity caused by scarring of the lung tissue.
- Asbestos is generally regarded as a carcinogen. Inhalation of asbestos fibers over an extended period of time can cause lung and other types of cancer.

NOTE

An overwhelming majority of the cases of occupational asbestos diseases have been directly traced to exposure to very high concentrations of airborne fibers and the lack of any type of personal protective equipment. Smoking dramatically adds to the risk of contracting asbestos related diseases.

Intact and undisturbed asbestos materials do not pose a health risk. When asbestos containing materials are handled properly, the release of asbestos fibers into the air is prevented or minimized, and the risk of exposure is reduced.

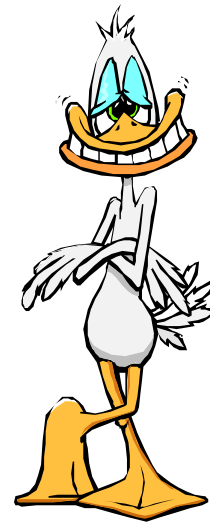
Asbestos becomes hazardous when, due to damage, disturbance (for example, by maintenance activities without proper control), or deterioration over time, fibers are released into the atmosphere.

Okay - we've got asbestos! What should we look for?

Your main concern when working in a building that contains asbestos materials is to make sure that the asbestos remains intact and undisturbed. If the microscopic asbestos fibers are not released to the air, there is very little, if any, risk of adverse health effects. At this level of asbestos awareness training (2 hour) you will not be called upon to intentionally disturb asbestos containing materials but you should always be aware of the condition of any asbestos in your workplace.

ACBM's are generally described as *friable* and non - *friable*. Friable materials are those that can be easily crumbled or reduced to powder by ordinary hand pressure. Friable asbestos generally has the highest potential for fiber release because any contact with the material will cause it to break apart. Good examples of friable asbestos include spray applied fireproofing, acoustical plaster, and badly deteriorated pipe insulation.

Non - friable materials have the asbestos contained within a solid matrix that includes other substances such as asbestos cement board siding and pipe, vinyl asbestos floor tiles (VAT), or tile or carpet mastic. Asbestos fibers can't be released to the air unless the ACM is significantly damaged or disturbed by mechanical means.



**No fibers?
No problem**

Fireproofing and other friable surfaces

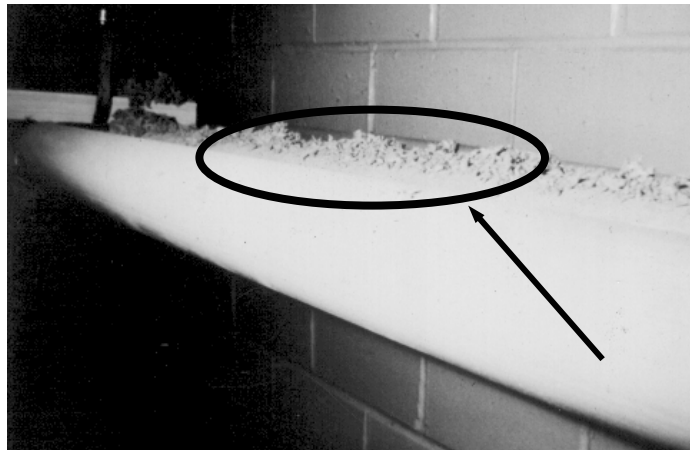
Most asbestos containing fireproofing has been removed from USPS facilities. If your inspection report indicates that your building still contains some of this material you'll want to pay special attention. Remember that asbestos fireproofing is friable and the fibers can easily be released to the air.

Mechanical damage, plumbing and roof leaks, vibration, and even high velocity air movement across the surface of the asbestos material can cause damage.

This photo shows fireproofing material which is starting to pull away from the structural steel. There's a good chance that a large chunk of asbestos will end up on the floor or on somebody's head.



Check carefully for other evidence of damage to friable materials. Piles of white fluffy material on pipes or other horizontal surfaces are a good indication that the asbestos is deteriorating.

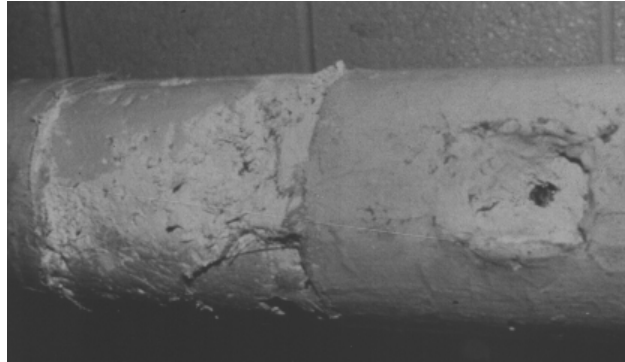


Thermal insulation

Asbestos pipe and boiler insulation is made up of solid asbestos blocks or an asbestos cement mixture that has been applied to hot or cold water piping, boilers, chillers or other mechanical equipment. The asbestos is wrapped in a metal, plastic or canvas covering and as long as the covering remains in place there is little danger of fiber release.

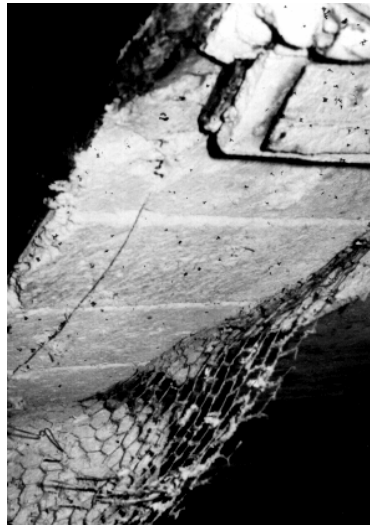
Unfortunately asbestos thermal insulation takes a tremendous beating. Mechanical damage, waterleaks, emergency repairs, and simple old age all help to destroy the covering and expose the asbestos to the air.

This photo shows typical pipe insulation damage. The canvas insulation jacket has been broken open and there is a great deal of damage to the asbestos material below.



Repairs may also contribute to the asbestos problem. In the past, maintenance personnel were often unaware of the proper procedures to deal with asbestos and simply cut insulation away to make repairs. When the repair was finished, the asbestos was left exposed to the air.

This photo shows the surface of a large boiler. Someone has peeled the jacket and insulation away to make a repair and then has just walked away, leaving a potential asbestos exposure problem.



Non-friable materials

Non-friable asbestos poses *less* of a problem to us because the fibers are not easily released into the air. Non-friable materials are regulated and certain safety precautions and work practices still must be followed.

In general non-friable ACM's are much more durable and require severe disturbance or some sort of mechanical action to cause them to release fibers. Operations such as drilling or cutting of non-friable asbestos require special training and tools.

This photo shows an asbestos cement board air duct. This material is commonly referred to by its brand name "Transite."



Floor tiles and floor planking

USPS has a major interest in proper floor care. Approximately 80% of the 250 million square feet of interior space that USPS controls may contain asbestos. Our policy clearly states that we must assume that all floor tiles and planking contains asbestos unless an authorized inspection and sampling process by accredited personnel proves otherwise.

Industries such as the various flooring and floor chemical manufacturers, as well as the manufacturers of floor care equipment, have lobbied strongly to the EPA and OSHA for rulings that would be favorable to them. OSHA 29 CFR 1910 lists the currently accepted work practices and procedures for care of asbestos containing flooring materials.

Briefly the OSHA rule allows wet *stripping* of asbestos floors by machines at speeds not in excess of 300 RPM. Only low abrasion pads are permitted during this process. Stripping pads are *not allowed*. The ruling allows for spray buffing and/or burnishing *as long as an adequate amount of floor finish is present on the floor to provide a barrier to the release of asbestos fibers*.

USPS policy clearly states that maintenance managers will ensure that employees will not engage in any activity that may disturb ACMs. This would include floor care activities which have the potential to release fibers to the environment.

We strongly recommend that you choose the low speed spray buffing method of floor care instead of the high speed burnishing process. Burnishing has a very strong potential to disturb or release asbestos fibers for reasons beyond the control of the machine operator. Uneven floor surfaces and insufficient thickness of floor finish will cause fiber release in high concentrations.

Use the following steps to safely maintain your asbestos containing flooring:

1. Wet strip the floor with a 175 RPM scrubber/buffer with a *scrubbing* pad. Use a commercial stripper product. Remove the liquid from the floor before it dries. Most states will allow you to dispose of the liquid down a sanitary sewer. Check your local laws to make sure.
2. Apply 2 - 4 coats of floor sealer to the flooring. Make sure that your stripper, sealer and wax all come from the same company. Follow manufacturer's instructions.

3. Apply 2 - 4 coats of finish over the sealer following manufacturer's recommendations.
4. Maintain the floor using a spray on product such as "Snap Back" and a low speed buffer. When refinishing becomes necessary, use a stripper to remove the wax finish only and leave the sealer intact.

Low speed stripping and buffing operations may take a bit more time but they will produce excellent results with minimal health risks.

What should happen when we find damaged or deteriorated asbestos?

Remember that at this level of "awareness" training you will not be called upon to disturb asbestos containing materials. USPS approved asbestos work practices for such operations as drilling into vinyl asbestos tile are very specific and require additional training beyond the scope of this course.

As a result of your inspection you should know where the asbestos is located in your facility. Use the following checklist to protect yourself and others from exposure to asbestos fibers:

- ✓ Note the condition of ACMs in your work area. If the condition appears to have changed notify your supervisor or the Facility Asbestos Coordinator (FAC).
- ✓ If you are performing a job which disturbs or may disturb ACM's check with your supervisor or FAC before proceeding.
- ✓ If you observe any type of immediate severe damage to large areas of asbestos materials - for example if portions of a ceiling fall in due to a roof leak or if pipe insulation falls to the floor due to a steam or water leak - restrict access to the area and immediately notify your supervisor or FAC. Do not initiate clean up operations without further instruction.

Test your knowledge of asbestos

1. Asbestos training is required under:
 - a. The Clean Air Act
 - b. National Environmental Act
 - c. Occupational Safety and Health Act
 - d. The Clean Water Act
2. Miscellaneous asbestos containing materials are usually:
 - a. Friable
 - b. Non - friable
 - c. Applied to boilers as insulation
 - d. Used as fireproofing
3. One of the most common uses for spray applied asbestos in a commercial building was:
 - a. Cooling tower fill
 - b. Electrical panel insulation
 - c. Valve packing
 - d. Fireproofing
4. Your facility was constructed in 1985. Which of the following statements apply?
 - a. It must be inspected for asbestos
 - b. It doesn't need to be inspected for asbestos because it was built after 1980
 - c. It should only be inspected if people complain to OSHA
 - d. It should only be inspected if your state requires it
5. The primary organ that asbestos affects is the:
 - a. brain
 - b. circulatory system
 - c. intestines
 - d. lungs
6. Friable asbestos is:
 - a. contained in a solid matrix of other materials
 - b. not regulated by OSHA or the EPA
 - c. easily reduced to powder by ordinary hand pressure
 - d. produced only in the *Freeabale* province of France
7. Asbestos pipe insulation can be damaged by:
 - a. Water leaks
 - b. Steam leaks
 - c. Incorrect or unauthorized repair procedures
 - d. All of the above


8. OSHA recommends that asbestos flooring materials be stripped by:
 - a. Dry stripping pads at high speeds
 - b. Dry low abrasion pads at low speeds
 - c. Wet low abrasion pads at low speeds
 - d. High speed sanders
 9. If you find that a large amount of asbestos containing ceiling plaster has fallen to the floor in an office you should:
 - a. Keep people away, notify your supervisor or FAC, and wait for further instructions
 - b. Ignore the problem and hope that nobody will notice
 - c. Begin a clean up procedure immediately
 - d. Immediately call in the HAZMAT team
 10. Who do you talk to in your facility for more information on asbestos?
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Management Instruction

Asbestos-Containing Building Materials Control Program

This instruction establishes policy and procedures for the identification and control of asbestos-containing building materials (ACBMs) and presumed asbestos-containing materials (PACMs) in postal facilities. For details on technical aspects of asbestos management, consult Handbook AS-556, *Asbestos Management Guide*.

Date	04/07/98
Effective	Immediately
Number	EL-810-98-1
Obsoletes	EL-810-94-3
Unit	Safety and Workplace Assistance
	
Yvonne D. Maguire Vice President Human Resources	

Policy

The Postal Service is committed to providing a safe and healthful work environment for all employees and building occupants. Management must implement and maintain an asbestos control program in accordance with this instruction. The preferred practice is to manage ACBMs in place when they do not pose a risk to human health.

The Postal Service is committed to compliance with all applicable federal and state environmental laws and regulations, including regulations established by the federal Occupational Safety and Health Administration (OSHA).

To ensure that these compliance goals are met, the Postal Service has established the following minimum policy principles:

1. All postal-owned or -leased space built prior to 1990 (see section on Surveys for details) must be surveyed for the presence of ACBMs.
2. Asbestos surveys must be conducted by an inspector accredited in accordance with the Asbestos Hazard Emergency Response Act (AHERA).
3. Operations and maintenance (O&M) plans for facilities with ACBMs must be developed by AHERA-accredited management planners.
4. Facilities that contain ACBMs must undergo 6-month surveillance by persons trained to conduct visual surveillance of ACBMs that have been previously surveyed and assessed. These persons need not be AHERA-accredited. (There is no postal requirement for a 3-year reinspection of facilities with ACBMs as required of schools by AHERA.)
5. Bulk sampling inspection protocols must be in accordance with AHERA.

CONTENTS

Policy

Responsibilities

- Headquarters
- Areas
- Performance Clusters

Asbestos Control Program

- Area Program
- Surveys
- Asbestos Management
- Work Practices
- Communication and Notifications
- Training
- Postal Service Work Authorization
- Real Estate Actions
- Fiber Releases and Emergency Response
- Medical Surveillance
- Recordkeeping
- Budget Process

6. Air monitoring for asbestos must be conducted in accordance with the sampling and analytical procedures found in the Environmental Protection Agency (EPA), AHERA, or National Emission Standards for Hazardous Air Pollutants (NESHAPs) regulations and/or the applicable OSHA regulations, as determined by the purpose of the monitoring, e.g., assessment of ACBMs or employee exposure.
7. Asbestos training and hazard communication for employees and other building occupants must be provided in accordance with OSHA asbestos regulations.
8. Pending completion of facility asbestos surveys and fully implemented O&M plans, compliance with OSHA regulations must be ensured through communication, as noted in 7 above, and controls to prevent disturbance of ACBMs and/or PACMs. O&M plans must be implemented no later than 3 months following completion of an AHERA survey.

Responsibilities

Headquarters

Environmental Management Policy, Engineering

Environmental Management Policy (EMP):

1. Coordinates with Headquarters Human Resources and other Headquarters organizations on policy and procedures regarding ACBMs and PACMs in buildings.
2. Provides assistance on EPA and state asbestos regulations and guidelines and ensures that information regarding United States Postal Service asbestos policies and procedures is disseminated to the area environmental compliance coordinators (AECCs).
3. Coordinates with Headquarters Finance regarding annual budget requests submitted by the areas for completion of asbestos-related activities.

Safety and Workplace Assistance, Human Resources

Safety and Workplace Assistance (S&WA) coordinates with EMP and other Headquarters organizations to ensure that policies and procedures protect the health of postal employees and comply with OSHA regulations. S&WA:

1. Provides interpretations and guidance on OSHA asbestos regulations and technical assistance on employee exposure and other asbestos-related issues.
2. Maintains a liaison with OSHA on compliance matters at the national level.

3. Ensures that information regarding Postal Service asbestos policies and procedures is disseminated to the area human resources analysts and other safety and health personnel.

National Medical Director, Human Resources

S&WA, through the National Medical Director, provides policy and guidance on medical surveillance, evaluation for asbestos exposure, and other matters related to asbestos and employee health.

National Center for Employee Development (NCED), Human Resources

The National Center for Employee Development (NCED), formerly the Technical Training Center, provides asbestos training that does not require state or federal accreditation and maintains the records of such training. Training is updated in consultation with EMP and S&WA.

Employee Development, Human Resources

Employee Development develops and maintains a system for field employee asbestos training and recordkeeping.

Facilities

Facilities at Headquarters coordinates with EMP and S&WA and its field counterparts to ensure that all real estate actions and repair and alteration activities that are part of facility management under its control are in compliance with this policy.

Facilities establishes policies and procedures consistent with Postal Service asbestos policy and area environmental strategic plans to prevent projects under its control from disturbing ACBMs, to manage abatement and repair of ACBMs through contracted asbestos experts, and to ensure that no new space is occupied that contains asbestos-containing surfacing materials or other ACBMs in such condition that removal is necessary to protect all building occupants.

Purchasing and Materials

The Policy, Planning, and Diversity unit of Purchasing and Materials coordinates with EMP and S&WA to ensure that all national purchasing procedures are in compliance with this policy.

Managers of purchasing and materials service centers implement purchasing procedures consistent with national asbestos policy and area environmental strategies.

Maintenance Policies and Programs

Maintenance Policies and Programs (MPP), in conjunction with EMP and S&WA, develops national maintenance work practices and policies for maintenance organizations regarding asbestos issues. MPP disseminates the policies to field maintenance organizations.

ACRONYMS

- ACBM** — asbestos-containing building material
- AECC** — area environmental compliance coordinator
- AHERA** — Asbestos Hazard Emergency Response Act
- ASO** — administrative service office
- DAPC** — district asbestos program coordinator
- DECC** — district environmental compliance coordinator
- EMP** — Environmental Management Policy
- EPA** — Environmental Protection Agency
- FAC** — facility asbestos coordinator
- FSO** — facilities service office
- MMO** — Maintenance Management Order
- MPP** — Maintenance Policies and Programs
- NCL** — new construction lease
- NCED** — National Center for Employee Development
- NEA** — negative exposure assessment
- NESHAP** — National Emission Standards for Hazardous Air Pollutants
- O&M** — operations and maintenance
- OSHA** — Occupational Safety and Health Administration
- PACM** — presumed asbestos-containing material
- RCRA** — Resource Conservation and Recovery Act
- S&WA** — Safety and Workplace Assistance
- SOW** — statement of work
- TSI** — thermal system insulation
- USPS** — United States Postal Service
- VMF** — vehicle maintenance facility

Headquarters Field Units

Managers of facilities service offices (FSOs) follow policies and procedures to prevent projects under their control from disturbing ACBMs, to properly manage asbestos abatement and repair projects, and to ensure that no new space contains prohibited ACBMs or PACMs.

Managers of purchasing and materials service centers implement procedures to ensure that no projects are funded that might disturb ACBMs unless provisions are made for proper controls.

Managers of Headquarters field units ensure that policies contained in this instruction are followed in their facilities. For assistance, they should consult the area environmental compliance coordinator and human resources analysts in the area in which they are domiciled.

Other Headquarters Functions

All other Headquarters functions such as Engineering, Retail, Information Systems, and Operations are responsible for planning new programs, in coordination with EMP and S&WA, to ensure that they are consistent with Postal Service asbestos policy and area environmental strategic plans and to prevent projects under their control from disturbing ACBMs. New programs and projects that may disturb ACBMs in postal facilities nationwide must include funding to meet these requirements.

Areas

Vice President, Area Operations

The vice president of Area Operations has overall responsibility for implementation and maintenance of an effective asbestos control program to ensure that the presence of ACBMs in postal facilities does not adversely affect the three *CustomerPerfect!* goals.

Area Environmental Compliance Coordinator

The AECC coordinates with the area Human Resources function to develop an areawide asbestos control program. The plan is to be presented to area management for concurrence and approval. Upon approval, the area asbestos control program serves as the basis for asbestos control programs at the performance cluster level that complement the area plan. The AECC provides direction and support to performance clusters regarding EPA, state, and local asbestos regulations. This direction and support includes:

1. Development and implementation of the area asbestos management plan.
2. Completion of asbestos surveys.
3. Preparation of site-specific O&M plans.

4. Provision for initial training for asbestos management in accordance with site-specific O&M plans.
5. Assistance with funding requirements.

Human Resources

Human resources analysts with safety and health responsibilities coordinate with AECCs on employee health aspects of asbestos control and evaluate performance cluster, district, and plant programs for compliance with OSHA regulations and postal asbestos policies. Human resources analysts provide technical assistance, disseminate information, and, through district and plant safety personnel, post analytical results in facilities as required by OSHA. Human resource analysts, through district and plant safety personnel, are responsible for the following:

1. Responding to employee inquiries.
2. Providing for exposure evaluations.
3. Coordinating with medical personnel on medical surveillance or evaluations, as necessary, in the event of a suspected exposure of postal employees to asbestos fibers.

Maintenance

The manager of Maintenance Support provides assistance to the AECC in development and review of maintenance requirements for the area asbestos control plan. The manager of Maintenance Support also assists field maintenance organizations in fulfilling their responsibilities in the O&M plan.

Performance Clusters

District and Plant Managers

District and plant managers must ensure that all facilities within the performance cluster remain in compliance with this instruction so that the presence of ACBMs does not adversely affect the three *Customer-Perfect!* goals. District managers must designate a district asbestos program coordinator (DAPC). This policy affords managers discretion in making business decisions on the appropriate individual to appoint to this important task, taking into account local resources, individual qualifications, and prior asbestos program efforts.

District Asbestos Program Coordinator

The district asbestos program coordinator must have the skills and training to provide overall coordination, administration, and implementation of asbestos control programs for the district and plant consistent with the area asbestos program.

DAPCs are responsible for the following:

1. Coordinating with performance cluster functional organizations to ensure that asbestos-related matters are considered in planning and execution of postal programs.
2. Providing assistance on EPA and state regulations and guidelines where necessary.
3. Submitting annual budget requests for asbestos-related activities for facilities within their performance cluster.
4. Maintaining district asbestos control program records.

They will be expected to coordinate with the district environmental compliance coordinator, district senior safety specialist, and operations and support managers (e.g., manager of Administrative Support) for effective asbestos program management and implementation.

Manager, Administrative Services

The manager of Administrative Services must coordinate with the DAPC for prioritization and implementation of asbestos-related projects and properly manage abatement and repair projects. The contracting officer must follow established procedures, including Facilities procedures, to prevent projects under his or her control from disturbing ACBMs.

Senior District and Plant Safety and Health Specialist and Medical Personnel

The safety and health specialist:

1. Coordinates with the DAPC and the maintenance function to ensure that employee health is protected and OSHA regulations are followed.
2. Monitors and evaluates compliance with OSHA regulations at all performance cluster facilities. Compliance elements include providing employee asbestos training, monitoring employee exposure, maintaining negative exposure assessments (NEAs), and establishing work authorization programs.

Medical personnel (e.g., nurse administrators, staff nurses, contractor medical personnel):

1. Maintain employee exposure and other asbestos-related records in employee medical folders.
2. Provide medical surveillance and evaluations as necessary and maintain related documentation.

District Environmental Compliance Coordinator

The district environmental compliance coordinator (DECC):

1. Coordinates with the DAPC to ensure that EPA and state and local asbestos regulations are followed.

2. Monitors and evaluates compliance with EPA and state asbestos environmental regulations, including NESHAPs, AHERA, and Resource Conservation and Recovery Act (RCRA) asbestos-related issues.

Maintenance

Managers of Maintenance within the performance cluster must ensure that all maintenance activities are consistent with Postal Service asbestos policy and their site O&M plans.

Installation Head

The installation head or designee functions as the facility asbestos coordinator (FAC) and is the custodian of the asbestos control program records for the facility. The FAC is responsible for coordinating asbestos control for each facility with ACBMs. The FAC ensures that employees are trained and follow proper asbestos-related procedures, and that no project with the potential to disturb ACBMs is begun in the buildings for which he or she is responsible before the proper controls are instituted. Work authorization programs must be established to prevent disturbance of ACBMs. No asbestos abatement or repair activity may be contracted for without consultation with the administrative service office (ASO) or FSO as appropriate.

Asbestos Control Program

Area Program

The area program is to be a written document reflecting the specific asbestos requirements of all facilities within the area and is to be closely coordinated with the performance clusters. The program status must be reviewed annually and updated as needed. Major elements of the program that must be addressed and documented are:

1. Surveys.
2. Asbestos management.
3. Work practices and use of competent persons.
4. Communication and notifications.
5. Training.
6. Work authorizations.
7. Real estate actions.
8. Medical surveillance.
9. Recordkeeping.
10. Budget process.

Surveys

All postal-owned and -leased buildings must be surveyed for asbestos with the exception of buildings built after 1990 that have been certified as not containing ACBMs, in writing, by the architect-engineer, an accredited asbestos inspector, the construction contractor, or the owner/lessor (in the case of new construction leases (NCLs)). The priority and scheduling of surveys is a significant element of the area asbestos control plan. Protocols for asbestos surveys must be in accordance with AHERA. However, 3-year reinspections (required for schools) are *not* required for postal facilities.

Previous building surveys by an accredited inspector must be reviewed by the district asbestos program coordinator for accuracy and compliance with postal policy. If an adequate survey already exists, no further action is necessary. If the existing survey does not meet current postal standards, it must be supplemented with an additional survey. A completely new survey should be undertaken only if no practical alternative exists.

If an asbestos survey has not been completed in buildings built prior to 1981, certain building materials must be presumed to be asbestos-containing material, and appropriate OSHA regulations must be followed. Included in this category are all thermal system insulation (TSI), sprayed-on, troweled-on materials, and vinyl and asphalt flooring. Other materials commonly known to contain asbestos that may also be a concern if significantly disturbed, such as ceiling tiles, should be treated as ACBM. (See Handbook AS-556 for details.)

Asbestos Management

In those buildings that are identified as having ACBMs, a written O&M plan must be established that meets the requirements of all applicable federal and state environmental laws and regulations established by the federal Occupational Safety and Health Administration. The preferred practice for ACBMs that do not pose a risk to human health is management in place.

Operations and Maintenance Plans

A successful O&M plan should include the following elements:

1. Asbestos hazard communication — a plan to tell all workers, tenants, and other building occupants where ACBM is located and how and why to avoid disturbing the ACBM.
2. Signs and labels — specification of content and placement of signs and labels communicating the presence of ACBMs and PACMs in accordance with OSHA standards and OSHA compliance directives.

3. Surveillance — regular (6-month) ACBM visual surveillance to note, assess, and document any change in the condition of ACBMs.
4. Control — work authorization and quality assurance measures to control activities that might disturb ACBM.
5. Work practices — O&M work practices to avoid or minimize asbestos fiber release during custodial or maintenance activities, and appointment of trained competent persons per OSHA regulations.
6. Recordkeeping — records that document O&M activities.
7. Worker protection — medical surveillance and respiratory protection programs, as applicable.
8. Training — asbestos program manager (e.g., DAPC), competent person, and custodial and maintenance staff training.

Details of these plan elements are contained in Handbook AS-556.

Abatement

The Postal Service must use the AHERA Assessment Protocols for determining abatement (e.g., removal, encapsulation, repair) requirements. (See Handbook AS-556 for details of the assessment process and management of abatement projects.)

Mandated Removal

Surfacing Materials

Sprayed-on or troweled-on ACBMs (defined as “surfacing materials” by OSHA) must be removed following discovery regardless of their condition and exposure assessment, as experience has shown that such materials have a high potential for disturbance and fiber release. This has been a consistent Postal Service policy since the early 1980s.

Such materials that have been previously encapsulated or enclosed, however, may be managed in place provided that they are in good condition.

Other ACBMs

ACBMs must be managed in place except in the following cases:

1. An assessment in accordance with AHERA protocols indicates a need for removal.
2. Removal is made necessary because of renovation or alteration projects as required by NESHAPs.
3. Removal can be shown to be more cost-effective than long-term management in place.

Work Practices

Employees

To protect the health of postal employees and ensure compliance with state and federal regulations, postal employees are limited to performing only the asbestos-related tasks described in Handbook AS-556, and then only when properly trained, equipped, and supervised. All other tasks that may disturb ACBMs and PACMs must be performed by contractors in accordance with applicable federal and state regulations, Postal Service handbooks, and related Maintenance Management Orders (MMOs).

Competent Persons

The “competent person” as defined by OSHA ensures that asbestos-related work done by Postal Service employees is conducted properly, e.g., employees are trained, work practices are followed, and a negative exposure assessment can be confirmed for the work. To ensure that Class III and IV competent persons meet OSHA and Postal Service expectations, the following requirements are established:

1. Competent persons receive 16-hour O&M training.
2. Competent persons have at least 6 months’ experience in asbestos control (for the first year following publication of this management instruction, this requirement is waived providing the person has other safety-related supervisory experience or training, e.g., completion of safety training courses for maintenance supervisors.
3. Authority for ensuring that asbestos-related tasks are performed safely.
4. Annual refresher training.

Contractors

All work performed by contractors must be done in accordance with the statements of work (SOW) found or referenced in Handbook AS-556 or other SOWs that are equivalent.

Communication and Notifications

OSHA regulations require that the Postal Service, as a building owner or lessee, must notify employees, other employers, on-site contractors, building owners, lessors, or tenants of the presence and location of ACBMs and PACMs. For notifications for other projects that may disturb ACBMs, see Handbook AS-556.

Training

Training requirements, to be defined by facility-specific O&M plans, must meet the minimum requirements as defined by OSHA. The following types of training, at a minimum, are required:

1. Asbestos hazard communication (awareness).
2. Competent person.
3. Housekeeping.
4. Class III and Class IV maintenance and custodial training, as needed per the site-specific O&M plan.
5. Annual refresher training as indicated.

Handbook AS-556 contains additional guidance on training requirements.

Postal Service Work Authorization

No maintenance, equipment installation, renovation, alteration, demolition, or any other project that may disturb ACBMs may be initiated until management is certain *either* that no ACBMs are present *or* that proper asbestos control procedures are followed in relation to ACBMs that are present.

A work authorization is required in accordance with procedures established in Handbook AS-556.

Real Estate Actions

Building Decisions Regarding New Space Acquisitions

No building purchases for existing structures may be executed until an asbestos survey has been completed by the FSO, unless the purchase is being undertaken pursuant to a purchase option on leased space for which an adequate survey has already been completed.

No lease space previously unoccupied by postal employees may be occupied by postal personnel until an asbestos survey has been completed; this prohibition does not apply to NCLs for which an adequate certification has been obtained pursuant to this instruction.

Space may not be occupied until the building has been inspected by the Postal Service unless (1) the building was constructed after 1990 and the architect-engineer, construction contractor, or owner/lessor (in the case of NCLs) has certified that no ACBMs are present, or (2) previous inspections by an accredited inspector have been reviewed by the facilities environmental specialist and appropriate action (e.g., abatement, removal, O&M program established) taken.

No building may be occupied until surfacing material and other ACBMs requiring abatement in accordance with Handbook AS-556 have been removed. (See Asbestos Management, Mandated Removal.)

Outlease and Sublease

From time to time, the Postal Service may initiate leases for space that will be totally or partially lessee controlled. Records of all known ACBM and PACM must be communicated to the lessee. Repair and alteration projects performed either by the Postal Service or by the lessee within outleased or subleased space must comply with the requirements contained in this management instruction. The lessee must keep records of all asbestos-related activities in accordance with this directive and Handbook AS-556 and transfer them to the Postal Service at the termination of the lease.

Transfer of Postal Service Real Property

Records of all known ACBM and PACM must be provided to the buyer or subsequent operating lessees of Postal Service property. When ownership of leased facilities changes during any lease term, records of all known ACBM and PACM must be provided to the buyer or subsequent operating lessor. When management of subleased or outleased property changes during any sublease or outlease term, records of all known ACBM and PACM must be provided to the subsequent operating lessee. Records of all known ACBM and PACM will also be turned over to the building owner upon termination of the lease. These actions are the responsibility of the FSO.

Fiber Releases and Emergency Response

If ACBMs are disturbed by natural disasters, unauthorized work, or inadvertent contact, safety personnel must work with managers to isolate the area and take appropriate steps to prevent employee exposure and further release of asbestos. Emergency response must be in accordance with Management Instruction EL-810-96-1, *Response to Hazardous Materials Releases*, and the decision tree outlined in Handbook AS-556. In most cases cleanup will require an accredited asbestos contractor. Employee exposure evaluations, if deemed necessary, must be conducted by a certified industrial hygienist in accordance with OSHA regulations and guidance in Handbook AS-556.

Medical Surveillance

Medical evaluations and medical surveillance of postal employees who work with asbestos are governed by OSHA regulations. Vehicle maintenance facilities (VMF) employees who work on brakes and clutches that contain asbestos may require medical surveillance (see Management Instruction EL-830-95-2, *Asbestos Surveillance and Control in Vehicle Maintenance Facilities*).

Medical *evaluations*, as opposed to continued surveillance under OSHA standards, may be indicated, on a case-by-case basis, for employees who inadvertently disturb ACBMs or are exposed to asbestos fibers from disturbed ACBMs.

Medical and safety personnel should use guidelines in Handbook AS-556 to determine when medical surveillance or evaluations are necessary.

Recordkeeping

Facility Level

Asbestos survey reports, asbestos abatement documentation, O&M plans, training, and other appropriate asbestos-related documents are treated as accountable records by the facility asbestos coordinator. The original records are maintained at the facility as active records as long as ACBMs are contained in the facility. Records of surveys, abatement, and O&M programs must be transferred to any subsequent owner of the building property. Copies of such records must be provided to the appropriate FSO.

District Level

District asbestos program coordinators maintain records necessary for the administration of the asbestos control program for the district and plant, including records related to annual budget requests for asbestos-related activities.

Area Level

AECCs develop and maintain the area asbestos control program documentation. In addition, AECCs and area human resources analysts (safety and health) establish data analysis programs sufficient to track program implementation, budget, and other program needs. (See Handbook AS-556 for details.)

Medical

Medical records are maintained by medical personnel responsible for the facility (e.g., nurse administrator, staff nurse, contractor), and retention of exposure data and other medical information pertinent to individual employees must be in accordance with OSHA regulations.

Training

The National Center for Employee Development (NCED) tracks training and retains asbestos training records. See Handbook AS-556 for details.

Budget Process

Funds necessary for the completion of asbestos surveys, O&M plans, training, equipment, interim controls, and abatement activity are to be identified on an annual basis as part of the appropriate budgeting process.

Funding for Postal Service national and local projects that may disturb ACBMs must be provided for in the project budget.