ARIZONA DEPARTMENT OF TRANSPORTATION
POLICIES AND PROCEDURES

SAF-6.01 ASBESTOS MANAGEMENT POLICY

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Responsible Office: Office of Enterprise Safety and Business Continuity (602) 712-7327

1.1 PURPOSE

To set forth uniform policies and procedures for the identification, disturbance, repair, maintenance, renovation and demolition of any building or structure which may contain asbestos and that is owned, leased, operated, controlled or supervised by the Arizona Department of Transportation (ADOT).

1.2 SCOPE

This policy applies to all ADOT employees, consultants, contractors and subcontractors involved in any asbestos identification, disturbance, maintenance, repair, renovation, and demolition activities at any ADOT facility. Violations of this policy may result in disciplinary action up to and including dismissal.

1.3 AUTHORITY

United States (US) Environmental Protection Administration (EPA) 40 Code of Federal Regulations (CFR) Part 61, Subpart M
EPA 40 CFR Part 763, Subpart E
US Occupational Safety and Health Administration (OSHA) 29 CFR Part 1926.1101
OSHA 29 CFR Part 1910.1001

1.4 BACKGROUND

A. The term “asbestos” describes six naturally occurring fibrous minerals found in certain types of rock formations. Of that general group, the minerals chrysotile, amosite and crocidolite have been most commonly used in building products. When mined and processed, asbestos is typically separated into very thin fibers. Asbestos fibers are commonly mixed during processing with a material which binds them together so that they can be used in many different products. Asbestos became a popular commercial product because it is strong, will not burn, is chemically resistant, resists corrosion and insulates well. Building materials containing asbestos include, but are not limited to, adhesive

thermal insulation, fireproofing, floor coverings, ceiling tile, caulking compounds, cement pipe, wall components and acoustical and decorative treatment for ceilings and walls.

B. Unfortunately, asbestos fibers can cause serious health problems. When these fibers are present in the air, they are normally invisible to the naked eye. If inhaled, they can cause diseases which don't necessarily manifest for 15 to 40 years. These disease effects disrupt normal functioning of the lungs and can cause asbestosis (a scarring of the lungs), lung cancer and mesothelioma (a cancer of the lining of the chest or abdominal cavity).

C. Actual determinations of the presence or absence of asbestos can only be made by instrumental analysis. All building materials with the exception of unpainted metal, unpainted wood or unpainted glass are suspect. Until a product is tested, it must be assumed that the product contains asbestos. ADOT is aware that asbestos can be a health hazard, but with proper management and work practices the hazard can be minimized.

1.5 DEFINITIONS

Abatement	The removal of asbestos-containing material (ACM).
ADOT Asbestos Program Coordinator	The person required by EPA Consent Decree to maintain ADOT records of Asbestos National Emissions Standard for Hazardous Air Pollutants (NESHAPS) demolition and renovation notifications. (Currently R/W Demolition Coordinator and Office of Enterprise Safety Asbestos Program Manager.)
ADOT Facility	Any building or structure owned, leased, operated, controlled or supervised by ADOT including, but not limited to, all offices buildings, shops, warehouses, storage units, individual dwelling units, mobile homes, culverts, pipes, bridges and highway structures, and any active or inactive waste disposal site.
ADOT National Emissions Standard for Hazardous Air Pollutants (NESHAP) Monitoring Personnel	Persons within ADOT with Asbestos NESHAPS Program Personnel expertise. Currently, the Enterprise Safety Asbestos Program Manager, R/W Demolition Coordinator, Infrastructure, Delivery and Operations (IDO) Hazardous Materials Coordinator, IDO Assistant Hazardous Materials Coordinator, and Enterprise Safety Health & Safety Industrial Hygienist. **NOTE:** The Office of Enterprise Safety Health & Safety Industrial Hygienist is a backup role to the Enterprise Safety Asbestos Program Manager.
AHERA	The Asbestos Hazard Emergency Response Act (AHERA). AHERA regulations are 40 CFR 763, Subpart E and are enforced by the EPA.

AHERA Accredited Building Inspector	An AHERA accredited building inspector is one who has received and maintains this accreditation through an EPA accredited training facility.
AHERA Accredited Contractor/ Supervisor	An AHERA accredited contractor/supervisor is an individual who has received and maintains this accreditation through an EPA accredited training facility authorized to issue AHERA certifications. **NOTE:** All contracted Assessment/Oversight Consultants, Asbestos Abatement Contractors, and AHERA Building Inspectors must hold current AHERA Contractor/Supervisor accreditations. **NOTE:** Referring to an AHERA training provider is not considered an endorsement.
Asbestos	Any group of naturally occurring minerals such as Chrysotile, Amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, and actinolite or any other forms of amphibole asbestos.
Asbestos-Containing Material (ACM)	Any materials containing more than 1% asbestos.
Category I Non-Friable ACM	Asbestos-containing products such as packing, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos. Category I non-friable ACM pertains to NESHAP regulations.
Category II Non-Friable ACM	Any materials, excluding Category I non-friable ACM such as cement asbestos-containing pipe (ACP or Transite), panels, siding and other similar materials containing more than 1% percent asbestos. Category II non-friable ACM pertains to NESHAP regulations.
Class I Asbestos Work	OSHA regulated activities involving the removal of thermal system insulation (TSI) and surfacing ACM and presumed-asbestos containing material (PACM). A competent person is required to oversee all Class I asbestos work. Workers shall be certified to the Class I asbestos worker level, receiving 32 hours of training, or the AHERA contractor/supervisor level and receive 40 hours of training.

Class II Asbestos Work	OSHA regulated activities involving the removal of ACM, which is not TSI or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles and construction mastics. A competent person shall oversee all Class II asbestos work. Workers shall receive 8 hours of material specific training or be certified at the Class I asbestos worker level.
Class III Asbestos Work	OSHA regulated repair and maintenance operations, where ACM, including TSI and surfacing ACM and PACM, is likely to be disturbed. Class III asbestos work is limited to the disturbance of ACM and PACM materials not to exceed one glove bag or waste bag 60 inches in length and width. Sixteen (16) hours of training at a minimum is required for all employees who perform Class III asbestos work.
Class IV Asbestos Work	OSHA regulated maintenance and custodial activities during which employees contact ACM and PACM, and activities to clean up waste and debris containing ACM and PACM. This includes dusting surfaces, vacuuming carpets, mopping floors, and cleaning up ACM or PACM materials from thermal system insulation or surfacing ACM/PACM. Two (2) hours of training is required for all employees who perform Class IV asbestos work.
Competent Person	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 them. In addition, for Class I and Class II work, an individual who is specially trained in a training course which meets the criteria of EPA's Model Accreditation Plan (40 CFR part 763) for supervisor, or its equivalent and, for Class III and Class IV work, an individual who is trained in a manner consistent with EPA requirements for training of local education agency maintenance and custodial staff as set forth at 40 CFR 763.92 (a) (2).
Contractor	Firm or individual hired by ADOT pursuant to a state procurement contract to perform asbestos program activities under the direct or indirect supervision of ADOT staff.
Demolition	The wrecking, taking out, or alteration of any load-bearing structural member of a facility together with any related handling operations or the intentional burning of any facility. Demolition activity includes relocating a modular building or moving a building or other structure off a foundation.

Disturbance	Activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM PACM, or generate visible debris from ACM or PACM.
Facility	Any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, and any active or inactive waste disposal site). Any structure, installation or building that was previously subject to Asbestos NESHAP is not excluded regardless of its current use or function.
Facility Component	Any part of a facility including equipment.
Friable ACM	Any materials containing more than 1% asbestos that when dry can be crumbled, pulverized, or reduced to powder by hand pressure. From the NESHAP regulations, friable ACM includes previously non-friable materials which have been made friable.
Homogeneous Area	An area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.
Industrial Hygiene	Science devoted to the anticipation, recognition, evaluation, and control of those environmental factors or stresses arising in or from the workplace which may cause sickness, impaired health and well-being, or significant discomfort among workers or among citizens of the community.
Industrial Hygienist	A person with a college or university degree or degrees in engineering, chemistry, physics, medicine, or related physical and biological sciences who, or by virtue of special studies, training and experience, has acquired competence in industrial hygiene.
NESHAP	National Emissions Standard for Hazardous Air Pollutants; Asbestos NESHAP regulations are 40 CFR 61, Subpart M and are enforced by the EPA, the Arizona Department of Environmental Quality (DEQ), the Maricopa County DEQ, the Pinal County Air Quality Control District (PCAQD), the Pima County DEQ, and the Navajo EPA.
Non-Friable ACM	Any material containing more than 1% asbestos that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Phase Contrast Microscopy (PCM)	A technique using a light microscope equipped to provide enhanced contrast between the fibers and the background. Samples for PCM are collected on a mixed cellulose ester membrane filter with a 0.8 micrometer (micron) pore size. Filters are then cleared with an acetone vapor so that trapped particulate material can be viewed through the microscope at a magnification of approximately 400X. This method does not distinguish between fiber types and only counts those fibers five microns or longer, and at least three times as long as they are wide (3:1 aspect ratio). Because of these limitations, fiber counts by PCM typically provide only an index of the total concentration of airborne asbestos in the environment monitored. As the proportion of the airborne fibers, which are less than 0.25 micrometers (micron) in diameter increases, PCM becomes a less reliable analytical tool.
Polarized Light Microscopy (PLM)	PLM is the most commonly accepted method for analyzing bulk materials for the presence of asbestos. PLM is based on optical mineralogy using a light microscope equipped with polarizing filters. Identification of asbestos fiber bundles is based on the determination of optical properties displayed when the sample is treated with various dispersion staining liquids (refraction index liquids). In addition, identification can be substantiated by morphology of the fiber and the effect of polarized light on the fiber.
Presumed ACM (PACM)	Under OSHA regulations, all building materials with the exception of unpainted glass, unpainted wood or unpainted metal, are presumed to contain ACM unless proven otherwise. Typically PACM is TSI and surfacing material in buildings constructed no later than 1980. Demonstration that PACM does not contain more than 1% asbestos may be 1) having a complete inspection conducted pursuant to the requirements of EPA 40 CFR Part 763, Subpart E, or by 2) performing tests of the material containing PACM to demonstrate that no ACM is present in the material. Such tests shall include analysis of bulk samples collected in the manner described in 40 CFR 763.86.
Project Delivery & Operations (PDO) Asbestos NESHAP Coordinator(s)	A person required by EPA Consent Decree to review all transportation system development related asbestos NESHAP demolition and renovation notices prior to submission by a demolition or renovation contractor to an appropriate regulator. (Currently EPA Hazardous Materials Coordinator and Assistant Hazardous Materials Coordinator).

Regulated ACM (RACM)	Under NESHAP regulations, RACM is 1) friable asbestos material, 2) Category I non-friable ACM that has become friable, 3) Category II non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or 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. **NOTE:** EPA has also ruled that certain materials or activities produce RACM aside from friability, e.g. mechanical means, sanding, grinding, grading, abrading or pulverization. The NESHAP requirements apply to each owner or operator of an abatement activity if the combined amount of RACM is: 1. At least 260 linear feet on pipes. 2. At least 160 square feet on other facility components. 3. At least 35 cubic feet of facility components where the length or area could not be measured previously. At a NESHAP facility, removal of RACM below the EPA threshold amounts, and any amounts of Category I and Category II non-friable ACM is not subject to the asbestos NESHAP standards. However, NESHAP requires a thorough inspection before any work to establish whether the threshold amounts are present. **NOTE:** Even though demolition or renovation work may not be subjected to the asbestos NESHAP standards, <u>All</u> asbestos related work activities are regulated by OSHA.
Regulated Area	An area established by the contractor 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 accumulates; and a work area within which airborne concentrations of asbestos exceed or there is a reasonable possibility they may exceed the OSHA permissible exposure limit (PEL) of 0.1 f/cc.
Removal	All operations where ACM, RACM and/or PACM are taken out or stripped from structures or substrates, including demolition operations.
Renovation	Altering a facility or one or more facility components in any way, including the stripping or removal of ACM and/or RACM from a facility component.

	NOTE: Operations in which load-supporting structural members are wrecked or taken out are demolitions.
Repair	Overhauling, rebuilding, reconstruction, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates which return damaged material to an intact condition.
Requesting Party Project Manager	The ADOT employee who initiates departmental actions which cause implementation of this policy to ensure compliance with the provisions within.
Responsible Asbestos Management Groups and Staff	Those ADOT program groups, administrative organizations or staff with varying degrees of ADOT asbestos program compliance responsibility and supervision as identified by this policy.
Surfacing ACM	Surfacing material, which contains more than 1% asbestos.
Surfacing Material	Material that is sprayed troweled-on or otherwise applied to surfaces such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes.
Thermal System Insulation (ACM)	Thermal system insulation materials, which contains more than 1% asbestos.
Thermal System Insulation (TSI)	Materials applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural and/or mechanical components to prevent heat loss or gain.
Transmission Electron Microscopy (TEM)	TEM is a technique which focuses an electron beam onto a thin sample. As the beam is transmitted through certain areas of the sample, an image resulting from varying densities of materials within the sample is projected onto a fluorescent screen. TEM is currently considered the best available analytical method for identifying asbestos fibers collected in air samples. TEM can be used to identify the smallest fibers. Only AHERA (for asbestos abatement projects in schools) requires TEM analysis of samples for final air clearances.
TRIRIGA	TRIRIGA is a computerized maintenance management system used to support the Facilities Management and Support Group (FM&SG) maintenance program. The purpose of TRIRIGA is to provide a scheduling tool and data repository containing preprogrammed maintenance job plans and important historical

	data for each ADOT facility maintained by FM&SG.
Working Day	Any day of what would be considered a regular workweek (Monday - Friday) excluding recognized holidays.

1.6 POLICY

A. No facility owned, leased, operated, controlled or supervised by ADOT shall be remodeled, modified, repaired, altered or changed in any way, including the installation or removal of equipment or devices, that disturbs any portion of the building or building systems, nor shall buildings or structures, which will require modification, be added to the ADOT facilities inventory without the written authorization of the appropriate responsible individual as defined in Section 1.7.

B. No facility owned by ADOT may be demolished without the written authorization of the appropriate responsible individual as defined in Section 1.7.

C. Every ADOT facility must be inspected to determine if ACM is present prior to the disturbance of any surface by demolition, maintenance, renovation, or abatement activities. If ACM is identified, it must be properly abated prior to the planned disturbance.

D. All materials installed during the construction of any new facility, or during any renovation, repair and maintenance operations shall be asbestos free.

E. All costs associated with regulatory compliance will be the responsibility of the requesting party within ADOT unless the inspection, repair and maintenance, renovation, abatement, disposal and/or demolition are part of a project for which capital improvement funds have been appropriated.

F. An appropriate number of employees from Right-of-Way Property Management, Environmental Planning, PDO Districts, Facilities Management and Support Group, and Enterprise Safety shall receive and maintain AHERA Contractor/Supervisor certification so as to ensure compliance with all NESHAP and OSHA regulations and with the policies and procedures contained herein.

G. Violations of this policy may result in disciplinary action up to and including dismissal.

1.7 RESPONSIBLE ASBESTOS MANAGEMENT GROUPS AND STAFF

A. The ADOT Facilities Management and Support Group Manager, or Designee, is responsible for the management and monitoring of asbestos and asbestos related issues associated with all buildings that are ADOT owned, leased, operated, controlled or supervised by ADOT for business purposes.

B. The ADOT Right-Of-Way Property Management Section Manager, Demolition Coordinator

and/or Environmental Liaison position is responsible for the management and monitoring of asbestos and asbestos-related issues associated with buildings acquired as part of ADOT's right-of-way acquisitions, otherwise known as ADOT Asbestos Program Coordinator.

C. The ADOT Environmental Planning Hazardous Material Coordinator and Assistant Hazardous Materials Coordinator are responsible for the management and monitoring of asbestos and asbestos related issues associated with all ADOT bridges and highway structures on highway development and construction projects.

D. The District Maintenance Superintendents and ADOT designated EPA/NESHAP primary and backup contacts are responsible for monitoring compliance with asbestos NESHAP regulations on all ADOT asbestos abatement, demolition, and renovation projects for both highway development and non-development as needs and circumstances require.

E. The ADOT Enterprise Safety and Business Continuity Office (ESBC), in coordination with other relevant ADOT organizations, is responsible for facility maintenance work orders and, in coordination with Environmental Planning, for writing the Asbestos Management Policy.

1. ESBC is responsible for providing consultations on safety and health issues pertaining to asbestos work activities and for providing Class IV Asbestos Awareness training.

2. ESBC is also responsible for providing those asbestos abatement services required of Assessment/Oversight Contractors to ADOT Facilities Management and Support Group (FM&SG). ESBC is also responsible for scheduling annual contractor/supervisor refresher training.

F. The Assessment/Oversight Contractors are responsible for providing asbestos management and consulting services, for assessing and characterizing the ACM, for developing primary and alternative recommendations for remediation, providing oversight on NESHAP-regulated abatement projects, coordinating project activities and ensuring project compliance with contract provisions and with all applicable Federal, State, County, tribal and local rules and regulations on ADOT projects.

1. All Assessment /Oversight Contractors must hold current AHERA contractor/supervisor and AHERA building inspector certifications.

G. Assessment/Oversight Contractors must be on the Statewide Environmental Consulting Services for Asbestos contract.

1.8 PROCEDURES FOR ASBESTOS INSPECTIONS

Responsibility	Action
Requesting Party Project Manager	1. For a facility owned, operated and maintained by ADOT Facilities Management Group, the requesting party project manager calls the Facilities Work Order Desk at (602) 712-7888 or sends an email to facilitiesworkorderdesk@azdot.gov. This work order request will be processed through the ADOT TRIRIGA work order tracking data management system.
	2. For a facility owned by ADOT situated within the roadway prism, and has been identified for demolition or renovation as a result of highway construction, the following process for asbestos inspections shall be followed:
	a. The ADOT District representative, who maintains a current asbestos program accreditation, shall provide a draft asbestos notification at least 15 working days prior to the demolition/renovation activity start date, to the IDO Asbestos NESHAPS coordinator. The IDO Asbestos NESHAPS coordinator shall review, comment, and approve notification and communicate these results to the ADOT District representative within five calendar days.
	b. The District representative shall ensure the project construction contractor with supervisory responsibility provides the notice to the appropriate regulator within 10 working days of the start date.
	c. The IDO Asbestos NESHAPS Coordinator will provide a copy of the notification to the ADOT Asbestos Coordinator for records retention.
	3. The ACRF form shall include the following:
	a. Where appropriate, the project number, parcel number, any identifying signs, structure or building type, numbers or names, and address of the facility.
	b. Photos, site plan and/or floor plan.
	c. Description of what work is to be performed that necessitates the need for an inspection.
	d. Desired or mandated completion date of the planned work.

e. Instructions on how to gain access to the facility.

4. Checks files to determine if an asbestos inspection has been completed and if it is current. If an inspection has not been performed or the existing inspection is out of date, arranges for an inspection or re-certification of existing inspection in accordance with all federal, state, county, tribal, OSHA regulations, and state procurement rules and contracts.

NOTE: For demolition or renovation activities in Maricopa County, refer to Air Pollution Control regulations Rule 370.

Assessment/ Oversight Contractor

1. If an asbestos inspection needs to be performed, all asbestos inspections shall be performed by an AHERA accredited building inspector. Inspections shall include, at a minimum:

a. A review of available documents, blueprints, construction specifications, etc.

b. A visual inspection of the facility areas and elements to locate suspect ACM.

c. Identification of all homogeneous areas of friable suspected ACM and all homogenous areas of non-friable suspected ACM.

d. Sampling of suspect ACM. The inspector shall use safe handling procedures and generally accepted laboratory practices for sample preparation and analysis. Sampling of suspect ACM shall be conducted as follows:

i. **Surfacing Material.** The inspector shall collect, in a statistically random manner that is representative of the homogeneous area, bulk samples from each homogeneous area of friable surfacing material that is not assumed to be ACM, and shall collect the samples as follows:

1. At least three bulk samples shall be collected from each homogeneous area that is 1,000 ft^2 or less.

2. At least five bulk samples shall be collected from each homogeneous area that is greater than 1,000 $ft^{2,}$ but less than 5,000 ft^2.

3. At least seven bulk samples shall be collected from

each homogeneous area that is greater than 5,000 ft^2.

ii. **Thermal system insulation:**

1. Except as provided in paragraphs b) through c) of this section, an accredited inspector shall collect, in a randomly distributed manner, at least three bulk samples from each homogeneous area of thermal system insulation that is not assumed to be ACM.

2. Collect at least one bulk sample from each homogeneous area of patched thermal system insulation that is not assumed to be ACM if the patched section is less than six linear or square feet.

e. In a manner sufficient to determine whether the material is ACM or not ACM, collect bulk samples from each insulated mechanical system that is not assumed to be ACM where cement or plaster is used on fittings such as tees, elbows, or valves.

i. **Miscellaneous Material.** In a manner sufficient to determine whether material is ACM or not ACM, an accredited inspector shall collect bulk samples from each homogeneous area of friable miscellaneous material that is not assumed to be ACM.

ii. **Non-friable suspected ACM.** If any homogeneous area of non-friable suspected ACM is not assumed to be ACM, then an accredited inspector shall collect, in a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from the homogeneous area of non-friable suspected ACM that is not assumed to be ACM.

NOTE: A homogeneous area shall be determined to contain ACM based on a finding that the results of at least one sample collected from that area shows that asbestos is present in an amount greater than 1%.

2. Analysis of the samples shall be by an accredited NVLAP (National Voluntary Laboratory Accreditation Program) laboratory. Analysis of the samples collected shall be by, at a minimum, polarized light microscopy.

3. If asbestos is present and proposed work may alter the ACM, schedule a meeting as required with ADOT responsible individual(s) to develop plans for asbestos management or abatement.

4. Designation of appropriate response action.

5. The Assessment/Oversight Contractor shall provide a report for each inspection conducted. The report shall include, at a minimum:

    a. Details of the property surveyed including physical address and legal description.

    b. Classification of ACM materials in categories of RACM (TSI, surfacing, Category I, and II) and non-friable Category I and II ACM materials.

    c. Description, location and quantity of RACM and non-friable Category I and II ACM present at the facility surveyed.

    d. Condition of ACM, if present.

    e. Type and details of any recommended remediation or removal.

    f. A site plan of the exact locations where samples were collected during the inspection and where asbestos-containing materials are located, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, and a copy of the AHERA inspector certificate.

    g. Name of accredited analytical laboratory, the laboratory's accreditations, methods of sample analysis, chain of custody records and laboratory reports.

Responsible Asbestos Management Group	Forwards a copy of the current inspection results to the requesting party. A copy of the inspection results shall also be forwarded to the appropriate District Maintenance Construction Superintendent and/or Phoenix Construction Superintendent and ADOT designated EPA/ NESHAP primary and backup contact personnel for monitoring compliance during demolition and asbestos abatement projects regulated by NESHAP.

1.9 PROCEDURES FOR DEMOLITION ACTIVITIES

Responsibility	Action
Requesting Party Project Manager	Completes the Asbestos Clearance Request.

1. For a facility owned, operated and maintained by ADOT Facilities Management Group, the requesting party project manager calls the Facilities Work Order Desk at (602) 712-7888 or sends an email to facilitiesworkorderdesk@azdot.gov. This work order request will be processed through the ADOT TRIRIGA work order tracking data management system.

2. For a facility owned by ADOT situated within the roadway prism, and has been identified for demolition or renovation as a result of highway construction, the following process shall be followed:

    a. The ADOT District representative, who maintains a current asbestos program accreditation, shall provide a draft asbestos notification to the IDO Asbestos NESHAPS Coordinator at least 15 working days prior to the demolition/renovation activity start date. The IDO Asbestos NESHAPS Coordinator shall review, comment, and approve asbestos notification and communicate this information to the ADOT District representative within five working days.

    b. The District representative shall ensure the project construction contractor with supervisory responsibility provides the notice to the appropriate regulator within 10 working days of start date.

    c. The IDO Asbestos NESHAPS Coordinator will provide a copy of the notification to the ADOT Asbestos Coordinator for records retention.

3. The clearance request shall include the following:

    a. Where appropriate, the project number, parcel number, any identifying signs, building or structure function type, numbers or names, and address of the facility.

    b. Description of recommendations for demolition.

    c. The desired or mandatory completion date.

    d. Instructions for gaining access to the facility.

e. Instruction for gaining access to the facility.

For Facilities Management and Support Group (FM&SG) only	Forwards an Authorization For Demolition of ADOT Building (see Exhibit B) form to the ADOT Fixed Assets Manager.
Fixed Assets Manager	1. Determines the appropriate authorization process and authorizes demolition by ADOT or disposal through the Arizona Department of Administration (ADOA) Surplus Property. 2. If demolition is authorized, the Fixed Assets Manager will sign the authorization form and forward it to Facilities Management and Support Group.
For FM&SG only	1. Has the State Building Inspector conduct an inspection of the building to be demolished and prepares a written report and recommendation to the FM&SG Group Manager. 2. If the demolition is warranted, the Building Inspector will sign the authorization form provided by the Fixed Assets Manager and forward it to the FM&SG Manager. 3. If the demolition is unwarranted, the FM&SG shall notify the requesting party of the finding and determine if additional action is required.
Responsible Asbestos Management Group	If demolition is warranted, the Responsible Asbestos Management Group shall check the files to determine if an asbestos inspection has been completed and if it is current. If an inspection has not been performed or the existing inspection is out of date as per county regulations and ADOT internal practices, e. g. greater than one year, the group arranges for an inspection or re-certification of existing inspection in accordance with all state and county DEQ and OSHA regulations, state procurement rules and contracts and as outlined in section 1.8. **NOTE**: If asbestos is present in the facility, see Section 1.11. 1. If asbestos is not present, determines with the requesting party how demolition will be accomplished. If an outside contractor will be used, arranges for a demolition contractor in accordance with State procurement rules.

2. Obtains municipal, county, or tribal demolition permit(s) as necessary.

3. Ensures that the required NESHAP Notification for Renovation and Demolition Activities form is submitted to the applicable EPA, state, county or tribal NESHAP Coordinator.

    a. The demolition contractor must send a copy of the NESHAP notification form to ADOT for review prior to the start of any demolition work.

    b. The NESHAP notification form sent to the applicable EPA, state, county or tribal NESHAP Coordinator must be properly filled out and must bear a postmark or dated receipt stamp of at least 10 working days prior to the planned demolition start date.

    c. When the demolition start date will begin on a date earlier than the original start date, ADOT shall require the contractor to notify applicable EPA, state, county, or tribal NESHAP Coordinators and ADOT with a written notice of the new start date at least 10 working days before the new start date.

    d. When the planned start date for demolition is revised to begin after the date contained in the notice, ADOT shall require the contractor to notify the applicable EPA, ADEQ, county, or tribal NESHAP Coordinator and ADOT by telephone and fax as soon as possible and before the original start date and also notify the applicable EPA, ADEQ, county or tribal NESHAP Coordinator in writing by hand delivery or by certified mail, prior to the expiration of the original start date.

    e. The notice must be submitted to the applicable EPA, state, county or tribal NESHAP Coordinator, even if no asbestos was found in the facility to be demolished.

    NOTE: The demolition/abatement contractor is the person or entity that MUST file the 10-day notice prior to demolition or partial demolition.

4. Sends a signed and dated copy of the Authorization for Demolition of ADOT Building form, a copy of the NESHAP notification form, a copy of the asbestos inspection report and any other applicable information to the appropriate District Maintenance Superintendent, and/or Phoenix Construction Superintendent, and the ADOT designated EPA/NESHAP primary and backup contact personnel for the monitoring of compliance during demolition.

ADOT NESHAP Monitoring Personnel	1. Reviews all forms and reports received from responsible ADOT Asbestos Management Group to ensure that there are no discrepancies with any NESHAP regulations. 2. Notifies responsible ADOT Asbestos Management Group if any discrepancies are found.
Responsible Asbestos Management Group	1. Ensures that the facility demolition activity begins on the start date as specified on the NESHAP Notification of Renovation and Demolition Activities form. 2. Oversees actual demolition and ensures compliance with all applicable state and county DEQ and OSHA regulatory requirements. **NOTE:** If suspect material(s) were not accessible for testing and is therefore discovered during the renovation/demolition project, the demolition of those material(s) shall not proceed until the suspect material(s) is tested to confirm whether or not it is RACM. Or the material(s) may be assumed to be ACM and assessed at that time based on its friability as a result of the demolition activity. **NOTE:** If the material(s) is RACM, and for safety reasons cannot be safely removed, the exposed RACM and any asbestos-contaminated debris must be treated as asbestos-containing waste material and be kept adequately wet at all times until disposed of.
FM&SG only	1. Secures appropriate witness signatures of demolition authorization form attesting to the demolition of the facility or facility component. 2. Forwards copies of completed forms to the Fixed Assets Manager and Asbestos Program Manager.
Responsible Asbestos Management Group:]	Retains a copy of all demolition records, including NESHAP Notification forms, for at least 5 years.

1.10 PROCEDURES FOR RENOVATION, REPAIR AND MAINTENANCE ACTIVITIES INVOLVING NO ASBESTOS MATERIALS

Responsibility	Action
Request Party Project Manager	1. For a facility owned, operated and maintained by ADOT Facilities Management Group, the requesting party project manager calls the Facilities Work Order Desk at (602) 712-7888 or sends an email to facilitiesworkorderdesk@azdot.gov. This work order request will be processed through the ADOT TRIRIGA work order tracking data management system. **NOTE:** Work orders are required for maintenance and repair work when there will be a disturbance of materials other than unpainted glass, unpainted wood, and unpainted metal. **NOTE:** For renovation, repair and maintenance activities involving no asbestos materials in buildings that are not in the FM&SG inventory, then contact the Right of Way Demolition Coordinator for additional instruction. **NOTE:** If structures are not buildings then see Section 1.9, Paragraph 2 and 3. 2. The clearance request form shall include the following: a. Where appropriate, the project number, parcel number, any identifying signs, building or structure function numbers or names, and address of the facility. b. Site plan and/or floor plan. c. Description of what planned work is to be performed that necessitates the need for an asbestos inspection or clearance. d. The desired or mandated completion date of the planned work. e. Instructions on how to gain access to the facility.
Responsible Asbestos Management Group	1. If the renovation, repair or maintenance request is not approved, the Responsible Asbestos Management Group shall notify the requesting party by e-mail or inter-office memorandum.

2. If the renovation, repair or maintenance request is approved, the Responsible Asbestos Management Group shall check the files to determine if an asbestos inspection has been completed and if it is current. If an inspection has not been performed or the existing inspection is out of date, arranges for an inspection or re-certification of existing inspection in accordance with all state, county, and OSHA regulations, state procurement rules and contracts and as outlined in Section 1.7, Paragraph D.

3. If asbestos is present, see Section 1.11.

4. If asbestos is not present, works with the requesting party to determine how the renovation, repair or maintenance work will be accomplished. If an outside contractor will be used, arranges for a contractor in accordance with state procurement rules.

5. All contracts shall require all materials installed in any renovation, repair and maintenance project to be asbestos free.

6. The contractor shall be required to supply Safety Data Sheets (SDS) for all materials, with the exception of glass, wood and metal, installed during any renovation, repair and maintenance project.

   NOTE: NESHAP will still require sampling of newly installed materials prior to any additional renovation or demolition regardless of SDS sheets.

7. Forwards a copy of the signed and dated Asbestos Clearance Request form indicating asbestos clearance has been given for the work planned to the appropriate District Maintenance Superintendent, and/or Phoenix Construction Superintendent and the ADOT designated EPA/NESHAP primary and backup contacts. The clearance request form must be signed and dated by the responsible ADOT Asbestos Management Group authorized to give clearance.

Requesting Party Project Manager

1. Oversees actual renovation, repair and maintenance to ensure compliance with all OSHA regulations and SDSs.

2. Forwards all SDSs received to appropriate ADOT Asbestos Management Group.

Requesting Party Project Manager	1. Oversees actual renovation, repair and maintenance to ensure compliance with all OSHA regulations and SDSs.
	2. Forwards all SDSs received to appropriate ADOT Asbestos Management Group.

1.11 PROCEDURES FOR ASBESTOS ABATEMENT ACTIVITIES SUBJECT TO NESHAP REQUIREMENTS

Responsibility	Action
Responsible Asbestos Management Group	1. If the review of asbestos inspection reports for requested demolition, renovation, repair or maintenance work shows asbestos is present and the requested work is approved, the responsible ADOT Asbestos Management Group who received the clearance request form shall arrange for an Assessment Contractor and asbestos abatement contractor for the planned work in accordance with all State procurement rules and State contracts. **NOTE:** If the planned work involves the removal of ACM not subject to NESHAP regulations see Section 1.12. **See definitions of regulated ACM for abatement work regulated by NESHAP.** a. Contracts shall only be awarded to abatement contractors that have had no enforcement action issued to them in the past two years by a regulating NESHAP program authority and/or any unresolved outstanding enforcement actions imposed upon them by a regulating enforcement authority as a means of ensuring ADOT's compliance with all state and county NESHAP regulations. Compliance and enforcement history for contractors, consultants, etc. can be found at: http://www.epa.gov/echo/. b. Contracts shall only be awarded to abatement contractors who are currently on the state approved contractors list. Contractors must possess current Asbestos Contractor/Supervisor certifications and ensure their workers possess the appropriate current Class I, II, III and/or IV certifications depending upon the type of asbestos work activities that are required to be performed. c. Contracts shall require the abatement contractors to have an AHERA accredited Contractor/Supervisor on site for the duration of any asbestos abatement projects.

d. Contracts shall require abatement contractors to have a sufficient number of “inspection viewing windows” on all asbestos- abatement projects. Inspection viewing windows shall be required so as to allow ADOT personnel to view the regulated activities inside a regulated area from the outside which will in turn limit the need for ADOT personnel to enter a regulated area for monitoring purposes

NOTE: There should be a singularly compelling reason for ADOT personnel to enter containment.

NOTE: Maricopa County already requires inspection viewing window or viewing devices on all NESHAP regulated jobsites.

2. Works with the Assessment/Oversight Contractor and asbestos abatement contractor to coordinate their activities to establish a start date and completion date.

3. Provides the abatement contractor with specific written information concerning the project; this may be accomplished via a task order format. The information provided shall include:

   a. The address of the site where services are required including a specific description of the site (e.g., boiler room, steam tunnel, residential structures, commercial building, etc.).

   b. A drawing, map or similar illustration of the area buildings and any construction records, e.g. floor plan, that might identify asbestos construction materials.

   c. Other inspection reports.

   d. Purpose for the project: emergency removal/cleanup, renovation, demolition, and repair or maintenance.

   e. Other hazards, which require assessment by technically trained inspectors.

   f. Other abatement contractors whose work they may be monitoring and items in other contracts that need to be coordinated with the assessment contractor’s service activities.

   g. Coordination for moving of employees, inmates, etc.

4. Ensures that the required NESHAP Notification for Renovation and Demolition Activities form is submitted to the applicable federal,

state, county or tribal NESHAP Coordinator. The abatement contractor must send a copy of the NESHAP notification form to ADOT for review at least three weeks prior to the start of any asbestos abatement work.

a. The NESHAP notification form sent to the applicable federal, state, county, or tribal Asbestos Coordinator must be properly filled out and must bear a postmark or dated receipt stamp of at least 10 working days prior to the planned asbestos abatement start date. The start date includes any site preparation that would break up, dislodge or similarly disturb ACM.

   NOTE: The abatement contractor is the person or entity that must send the 10-day notification to the applicable federal, state, county, or tribal NESHAP Coordinator.

b. When the asbestos abatement activity will begin on a date earlier than the original start date, ADOT shall require the contractor to notify the applicable federal, state, county or tribal NESHAP Coordinator and ADOT with a written notice of the new start date at least 10 working days before the new start date.

c. When the planned start date for asbestos removal is revised to begin after the date contained in the notice, ADOT shall require each contractor to notify the applicable federal, state, county or tribal NESHAP Coordinator and ADOT by telephone and fax as soon as possible and before the original start date and also notify ADEQ and/or the appropriate NESHAP Coordinator in writing by hand delivery or by certified mail, prior to the expiration of the original start date.

5. Sends copy of Asbestos Clearance Request form as required, signed and dated by the responsible ADOT Asbestos Abatement Management Group authorized to give clearance, the NESHAP notification form, the asbestos inspection report and any other applicable information to the appropriate District Maintenance Superintendent and/or Phoenix Construction Superintendent, and the ADOT designated EPA/NESHAP primary and backup contacts for monitoring of compliance during asbestos abatement.

Assessment/ Oversight Contractor

Oversees the actual asbestos abatement or repair and maintenance project to ensure compliance with all applicable NESHAP and OSHA regulatory requirements and state contract requirements.

The Assessment/Oversight Contractor responsibilities shall include:

1. Acts as ADOT's Agent throughout the asbestos abatement

project. The Assessment/Oversight Contractor shall have the authority to stop the work if the asbestos abatement contractor is violating any laws or regulations. A written report shall be completed for any violation found on an abatement project. The report shall include:

a. The date and time the violation was observed.

b. The name of the abatement contractor and name of the contractor's AHERA accredited Contractor/Supervisor on the project.

c. Description of the violation.

d. Any comments given by the abatement contractor's supervisor regarding reasons or causes for observed violation.

e. If possible, photos of the observed violation.

f. Date and time the violation was corrected.

g. Date and time the abatement project was allowed to resume.

2. Complies with the requirements of the following regulations governing asbestos projects, removal, training, and disposal:

a. NESHAP regulations: 40 CFR Part 61, Subpart M.

b. AHERA regulations: 40 CFR Part 763 Subpart E.

c. OSHA regulations: 29 CFR Part 1926.1101.

d. Arizona Revised Statutes Title 49.

e. Any other applicable federal, state, county, tribal, or local rules and regulations.

3. Retains all copies of the regulations stated above on each site when work is being accomplished.

4. Ensures the abatement contractor notifies ADOT, ADEQ, and any designated county agencies, local and tribal agencies prior to the scheduled work being implemented.

5. Meets with ADOT to review the work schedule and specify special needs. At that time, the assessment contractor shall identify a project manager for the duration of the project with authority to act as the assessment contractor's authorized representative.

6. Ensures the abatement contractor provides a safety plan with provisions including:

   a. First aid and emergency procedures and equipment.

   b. Delineation of restricted work zones and barricading of openings in the work area. Any restrictions shall be coordinated in advance with ADOT.

   c. Securing of equipment and materials against accident or tampering.

   d. Air monitoring for detection of possible explosive or toxic vapors, or oxygen deficient atmosphere, as necessary.

   e. Designated "No Smoking" areas.

   f. Personal protective equipment requirements.

   g. Employee training in pertinent safety procedures including fire and explosion prevention, heat stress, confined spaces, and toxic vapors identification.

   h. Sanitation, eating and drinking facilities.

   i. Traffic control and safe vehicle operations.

   j. Safety of State of Arizona employees and visitors.

   k. Dust control.

   l. Housekeeping.

   m. Site restoration.

   n. Posting, if necessary, of any contaminated areas.

7. Checks the asbestos abatement contractor's employee records to ensure all medical and training records and certifications are

current. The assessment contractor shall have at the site a copy of the current written safety, respiratory and hazardous communications program manuals.

8. Meets and distributes all notes of project meetings.

9. Ensures that all barriers, signs, and appropriate labels are posted as required pursuant to any or all regulations.

10. Inspects the enclosure or regulated area during construction, and approves, prior to completion and before asbestos abatement is implemented.

11. Authorizes ADOT representatives access to the work site, materials, records, or any other relevant data specified herein, and, furthermore, the assessment contractor shall provide proper facilities for such access and inspection. Only authorized personnel will be allowed on the work site, providing that they have obtained an Information Technology (IT) infrastructure security clearance permit from ADOT.

12. Conducts any and all site inspections, estimations of quantity of work, or recognitions of unusual or special situations, which may affect a timely and scheduled completion of the work.

13. Performs workspace air monitoring in accordance with NESHAP and OSHA standards and as follows:

    a. Ensures asbestos abatement contractor is conducting personnel monitoring. A minimum of one worker per day shall be monitored during actual removal of asbestos. Additional personnel monitoring shall be accomplished when warranted by the size of the project or by circumstances that may require excursion level monitoring.

    b. Area monitoring outside the exhaust, decontamination and load-out areas when full enclosures are used, to demonstrate control of fiber release to the outside air.

    c. Monitoring to ensure that the negative air condition is maintained inside the enclosure when they are used.

    d. Final clearance monitoring for all enclosures when required by NESHAP and OSHA regulations. The number of samples shall be determined by the size of the area and the configuration of the space in each enclosure. However, a

minimum set of three samples should be taken. Analysis shall be by Phase Contrast Microscopy (PCM) unless otherwise specifically stated. Air samples results shall be available on the job site within 24 hours (turnaround time), or less.

e. PCM final air clearance shall be to the AHERA standard of less than or equal to 0.01 f/cc for all samples before the enclosure can be removed and the area reoccupied. If TEM is used for final clearance, TEM final air clearance shall be less than or equal to 70 asbestos structures/mm2 of filter surface area.

f. Submits final report including all the monitoring results, copies of manifests, field notes, floor plan showing location of work, reports of abatement contractor violations and recommendations related to the project to the responsible ADOT Asbestos Management Group prior to final payment.

ADOT NESHAP Monitoring Personnel

1. Visit the work site at least once per work shift (if feasible) during the course of the asbestos abatement project to ensure the compliance with all NESHAP and OSHA regulatory requirements.

   NOTE: The responsible ADOT Asbestos Management personnel may also be the ADOT NESHAP monitoring personnel.

2. If the regulated area is not in compliance with NESHAP regulations, the ADOT Monitoring Personnel shall instruct the Assessment/ Oversight Contractor to stop work until the violation is rectified.

3. A written report shall be completed for any violation found on the project. In addition to identifying the Assessment Contractor (company name) and their authorized Project Manager for the project, the report shall include all information outlined in Paragraph 7(a) of this section. These reports, in addition to the Assessment/Oversight Contractor's reports shall be used to determine future contract awards.

Responsible Asbestos Management Group

Retains a copy of all NESHAP notifications, project reports, notes and records and waste shipment records in accordance with ADOT records retention policies.

1.12 WORK ACTIVITIES INVOLVING THE REMOVAL OF ASBESTOS-CONTAINING MATERIALS NOT SUBJECT TO NESHAP REGULATIONS

The following policy and procedures applies to all asbestos related work activities involving the abatement of ACM not subject to the NESHAP regulations. This includes all OSHA Class I, II, III, and IV asbestos work activity. Contracting with an Assessment/Oversight Contractor for oversight shall be at the discretion of the responsible Asbestos Management Group. In the unlikely event that a contract is not awarded to an Assessment Contractor, oversight of the project shall be the responsibility of the Asbestos Management Group.

Responsibility	**Action**
Responsible Asbestos Management Group	1. If the review of asbestos inspection reports for requested renovation, repair or maintenance work shows asbestos is present and the requested work is approved, the responsible ADOT Asbestos Management Group who received the clearance request form shall arrange with ADOT Asbestos Monitoring Personnel for an asbestos abatement contractor or an appropriate repair and maintenance contractor for the planned work in accordance with all state procurement rules.
	b. Contracts shall only be awarded to contractors that have had no enforcement action issued to them in the past two years by a regulating DEQ authority and/or have no unresolved outstanding enforcement actions imposed upon them by a regulating DEQ authority. Compliance and enforcement history for contractors, consultants, etc. can be found at: https://www.epa.gov/echo/.
	c. Contracts shall only be awarded to contractors who possess current Asbestos Contractor/Supervisor certifications and whose workers possess the appropriate current Class I, II, III and/or IV certifications depending upon the type of asbestos work activities that are required to be performed.
	d. Contracts shall require the contractors to have an AHERA accredited Contractor/Supervisor on site for the duration of any asbestos abatement or repair and maintenance projects.
	e. Contracts shall require contractors to have sufficient number of “inspection viewing windows” on all asbestos abatement projects. Inspection viewing windows shall be required so as to allow ADOT personnel to view the regulated activities inside a regulated area from the

outside which will in turn limit the need for ADOT personnel to enter a regulated area for monitoring purposes.

2. Works with the contractor to coordinate their activities to establish a start date and completion date.

3. Provides the contractor with specific written information concerning the project and may be accomplished via a task order format. The information provided shall include:

   a. The address of the site where services are required including a specific description of the site (e.g., boiler room, steam tunnel, residential structures, commercial building, etc.).

   b. A drawing or map of the area buildings and any construction records, e.g. floor plan showing location of work which might identify asbestos construction materials.

   c. Other inspection reports.

   d. Purpose for the project: emergency removal/cleanup, renovation, demolition, and repair or maintenance.

   e. Other hazards, which require assessment by technically trained inspectors.

   f. Other abatement contractors whose work they may be monitoring and items in other contracts that need to be coordinated with the assessment contractor's service activities.

   g. Coordination for moving of employees, inmates, etc.

4. Oversees the renovation or repair and maintenance project to ensure compliance with all OSHA regulatory requirements and state contract requirements.

5. Checks the contractor's employee records to ensure all medical and training records and certifications are current.

Contractor

The contractor's responsibilities shall include:

1. Provide a safety plan with provisions as outlined in Section 1.11.

2. Comply with all OSHA regulations governing Class I, II, and III asbestos projects, removal, training and disposal. Retain a copy of

the OSHA 29 CFR Part 1910.1001 on the site when work is being accomplished.

3. On multi-employer worksites, the contractor shall inform other employers on the site of the nature of the contractor work with asbestos and/or PACM, of the existence of and requirements pertaining to regulated areas, and the measures taken to ensure that employees of other employers are not exposed to asbestos.

4. Ensure that all barriers, signs, and appropriate labels are posted as required by OSHA.

5. Inspect the enclosure or regulated area before the renovation, repair or maintenance project is implemented and at least once during each work shift. If there is a breach of the enclosure, the contractor shall repair the breach immediately.

6. Authorize ADOT compliance monitoring personnel access to the work site, materials, records, or any other relevant data specified herein, and, furthermore, the proper facilities for such access and inspection. Only authorized personnel will be allowed project access provided that they have records of proper training and have obtained project clearance from ADOT.

7. Conduct site inspections, estimations of quantity of work, or recognition of unusual or special situations which may affect a timely and scheduled completion of the work.

8. Ensure through on-site supervision, that employees set up, use, and remove engineering controls, use work practices and protective clothing and equipment in compliance with all requirements.

9. Ensure employees use the hygiene facilities and observe the decontamination procedures specified by OSHA.

10. Ensure that through on-site inspection, engineering controls are functioning properly and employees are using proper work practices.

11. Perform air monitoring in accordance with NESHAP and OSHA standards and as follows:

    a. For Class I and II abatement projects, the contractor shall conduct daily monitoring that is representative of the exposure of each employee who is assigned to work within the regulated area who is performing Class I or II work, unless the employer has made a

negative exposure assessment for the entire operation. Additional personnel monitoring shall be performed when warranted by the size of the project or by circumstances that may require excursion level monitoring. Area monitoring outside the exhaust, decon and load-out areas when full enclosures are used, to demonstrate control of fiber release to the outside air.

b. Monitoring to ensure that the negative air condition is maintained inside the enclosure when they are used.

c. On all operations other than Class I and II operations, the contractor shall conduct periodic monitoring of all work where exposures are expected to exceed a PEL, at intervals sufficient to document the validity of the exposure prediction.

Responsible Asbestos Management Group

1. Visit the work site (if feasible) at least once per work shift during the course of the asbestos abatement or repair and maintenance project to ensure the regulated area is in compliance with all OSHA regulations.

2. If the regulated area is not in compliance with OSHA regulations, the responsible Asbestos Management Group shall stop work until the violation is rectified.

3. A written report shall be completed for any violation found on the project. The report shall include:

   a. The date and time the violation was observed.

   b. The name of the abatement contractor and name of the contractor's AHERA accredited Contractor/Supervisor on the project.

   c. Description of the violation.

   d. Any comments given by the abatement contractor's supervisor regarding reasons or causes for observed violation.

   e. If possible, photos of the observed violation.

   f. Date and time the violation was corrected.

   g. Date and time the abatement project was allowed to resume.

NOTE: These reports shall be used to determine future contract awards.

4. The responsible Asbestos Management Group, ADOT Industrial Hygienist or a qualified consultant shall perform final clearance monitoring for all Class I and II work as required by OSHA before the enclosure can be removed and the area is reoccupied. The number of samples shall be determined by the size of the area and the configuration of the space in each enclosure. Analysis shall be by PCM unless otherwise specifically stated. Air samples results shall be available on the job site within 24 hours (turnaround time), or less. PCM final air clearance shall be to the AHERA standard of less than or equal to 0.01 f/cc per sample. If TEM is used for final clearance, TEM clearance shall be less than or equal to 70 asbestos structures/mm2 of filter surface area.

1.13 CLASS IV ASBESTOS WORK

All Facilities Management and Support Group Building Maintenance Specialists and Supervisors and ADOT Information Technologies Technicians shall receive and maintain OSHA Class IV training and certification. Class IV asbestos work activities are OSHA regulated maintenance and custodial activities during which employees contact ACM and PACM. Class IV asbestos work also includes activities that involve cleaning up waste and debris containing ACM and PACM. This includes dusting surfaces, vacuuming carpets, mopping floors, and cleaning up ACM or PACM materials from thermal system insulation or surfacing ACM/PACM. Workers may contact ACM or PACM when performing a wide variety of routine jobs that result in incidental disturbance such as removing a cover plate from an outlet or light switch, moving ceiling panels to gain access to areas above suspended ceilings, changing a light bulb in a light fixture that is attached to a ceiling containing ACM, taping a tear in TSI material where there will be no disturbance of the matrix and the removal and disposal of loose or broken floor tiles. Two hours of training and certification is required for all employees who perform Class IV asbestos work.

1.14 CORRESPONDING POLICIES

FIN-9.06	Project Numbers-Project Number Assignment-Project Number Reference Report
MGT-9.02	Records Management Retention, Destruction and Storage
MGT-12.01	Improvements to Facilities
PER-5.05	Guidelines for Progressive Discipline
SAF-5.01	ADOT-Issued Personal Protective Equipment Usage
SAF-5.09	Respiratory Protection Program