

WILTON PUBLIC SCHOOLS
2018 Asbestos Operations and Maintenance Program

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1.0 OVERVIEW OF THE ASBESTOS OPERATIONS AND MAINTENANCE PROGRAM

Because Wilton Public Schools contains known and suspected ACBM (PACM) that may become friable, the LEA has an Asbestos Operations and Maintenance Program (O&M Program) that addresses how the school will maintain the ACBM and PACM in good condition.

This document describes policies, programs, and procedures that are in place to achieve this goal. The O&M Program will remain in effect until all ACBM has been removed from Wilton Public Schools.

The O&M Program consists of:

- An Asbestos Program Manager
- Provisions for assessing the condition of ACBM in buildings and Periodic Building Inspections
- Provisions for retaining qualified professionals for Asbestos Work
- Communications Program that includes Asbestos Warning Labels, Annual Notifications, Asbestos and Hazard Communication Training, and Contractors
- Building Cleaning Procedures
- Emergency Procedures for Unintentional Fiber Releases
- Preventative Measures to Avoid Fiber Releases
- In-house Operations, Repair, and Maintenance Program
- Worker Protection Program¹
- Record Keeping and Reporting Program

2.0 PURPOSE OF THE O&M PROGRAM

- 2.1 To ensure students, parents and guardians, visitors, school employees, and contractors are protected from the hazards associated with asbestos in school buildings.
- 2.2 To ensure Wilton Public Schools complies with federal and state Asbestos-In-Schools laws and regulations.
- 2.3 To have a framework under which Asbestos policies, programs, and procedures are communicated.

3.0 ASBESTOS PROGRAM MANAGER

- 3.1 The Asbestos Program Manager for the Wilton Public Schools is Mr. Jose Figueroa of the Town of Wilton Public Schools. His office telephone number is (203) 216-6427.
- 3.2 The success of this program depends partially on the participation of all Wilton Public School employees. The Asbestos Program Manager whole-heartedly appreciates all co-operative efforts to maintain school buildings safe and healthy for all building occupants, visitors, and the general public.

4.0 BUILDING SURVEYS AND HAZARD ASSESSMENTS

- 4.1 Wilton Public Schools comply with state and federal Asbestos-In-School requirements to inspect

1. OSHA Asbestos Regulation 29 CFR 1926.1101, Occupational Exposure to Asbestos.

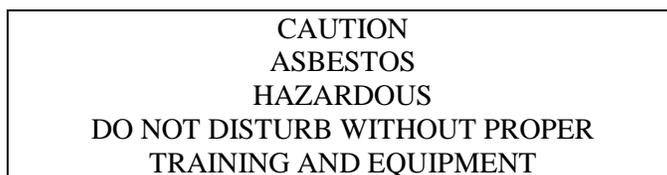
and re-inspect all school buildings every three years, have an Asbestos Management Plan, and implement it.

- 4.2 The most current building survey is on file in the School Office. The survey contains a list of ACBM and PACM in the building, and the risk assessment posed by these materials. This survey is available for review on Mondays through Fridays between 9 a.m. and 3 p.m.
- 4.3 Every 6 months, Maintenance visually inspects ACBM and PACM in school buildings for signs of damage and deterioration. If any materials are damaged or have deteriorated, the Asbestos Program Manager takes any necessary action to isolate occupants from the damaged materials and to restore the materials to an undamaged condition, or remove them. If any employee or staff member finds damaged ACBM, he or she should report it to the Asbestos Program Manager or one of the Maintenance staff.

5.0 COMMUNICATIONS

- 5.1 Notices will be posted in public areas of the school to inform students, parents and guardians, employees, and visitors of any upcoming asbestos abatement work.
- 5.2 The Asbestos Program Manager annually notifies employees and building occupants, or their legal guardians, of the location and availability of the Asbestos Management Plan, and any Inspections, Response Actions, Periodic Surveillance, Asbestos Abatement Work, and other asbestos-related activities that will occur during the school year.
- 5.3 Maintenance places Asbestos Warning Labels on friable and non-friable ACBM and PACM in maintenance areas, including boiler rooms, mechanical rooms, maintenance work rooms, maintenance storage rooms, custodian rooms, and janitorial closets. If the Labels might be destroyed by heat or other conditions, Labels are placed next to the ACBM and PACM.

Asbestos Warning Labels are prominently displayed so that a person that enters the room can easily see the label and avoid contact with the material. The Labels state the following in black letters on contrasting yellow background:



Asbestos Warning Labels will remain posted on ACBM and PACM until they are removed or are tested and re-classified as non-asbestos.

Building materials that are suspected of containing asbestos, i.e., PACM materials will be tested over time to determine whether they contain asbestos or not. When laboratory results indicate a material is a non-asbestos material, Maintenance will remove the Asbestos Warning Label on the PACM and update its records.

- 5.4 Asbestos information will be reviewed with employees during annual Hazard Communication Program training. All employees of Wilton Public Schools are asked to report any damaged ACBM or PACM and debris to the Asbestos Program Manager or Maintenance office.

- 5.5 The Asbestos Program Manager will notify the State of Connecticut Department of Public Health Asbestos Division within 24 hours if any major fiber release episode occurs, first by telephone, then by providing a copy of the Fiber Release Record.

6.0 ASBESTOS ABATEMENT PROJECTS

- 6.1 Before any building renovation work occurs that involves disturbance of more than three square or linear feet of PACM, the Asbestos Program Manager will arrange to have an accredited and licensed Asbestos Inspector collect samples of the PACM and have them analyzed to determine if the PACM is an asbestos-containing building material.
- 6.2 The Asbestos Program Manager will retain Asbestos Consultants and Asbestos Abatement Contractors that are accredited and licensed by the State of Connecticut for all work involving the disturbance of more than three square or linear feet of ACBM.

7.0 OUTSIDE CONTRACTORS

- 7.1 The Asbestos Program Manager will provide outside contractors with information about the asbestos program and policies and procedures at Wilton Public Schools.
- 7.2 If any asbestos abatement work is scheduled to occur on the same day that non-asbestos contractors will be working, the location of the asbestos abatement project will be provided to the non-asbestos contractor.
- 7.3 The locations of asbestos and suspected asbestos-containing materials in buildings in which a non-asbestos contractor will be working will be supplied to the contractor before the work is scheduled to begin.
- 7.4 Contracts will include a provision that requires the non-asbestos contractor inform each of their workers and subcontractor employees of asbestos abatement projects that will be in progress at the same time they will be working. Contracts will also identify the locations of ACBM and PACM in the buildings in which non-asbestos contractors are scheduled to work, and the school's requirements to prevent damage to the ACBM and PACM.

8.0 ASBESTOS OPERATIONS AND MAINTENANCE PROGRAM

The Asbestos Program Manager approves all work that is defined as Asbestos Operations and Maintenance work, and arranges to have only qualified Maintenance staff perform asbestos-related work that is necessary to continue to operate and maintain school buildings.

8.1 Definitions

Operations and Maintenance activities means Class III and Class IV asbestos work as defined under OSHA 29 CFR 1926.1101.

Class III asbestos work means repair and maintenance activities and operations in which ACBM or PACM is likely to be disturbed.

Class IV asbestos work means maintenance and custodial activities that involves contact with ACBM or PACM but does not disturb ACBM or PACM, and activities to clean up ACBM or PACM dust, waste, and debris.

PACM means presumed asbestos containing material.

Presumed Asbestos Containing Material means (1) thermal system insulation (TSI) and surfacing material (SM) in buildings constructed before 1981, and (2) Miscellaneous building materials (Misc) that have not been tested per 1926.1101(k)(5).

Disturbance and disturb means any activities, work, or operations that disrupt the matrix of ACBM or PACM, crumbles or pulverizes ACBM or PACM, or generates visible debris from ACBM or PACM. Disturbance includes cutting away small amounts of ACBM and PACM in order to access a building component. In no event shall the amount of ACBM or PACM so disturbed exceed three (3) square feet or 3 linear feet, and in no event shall the disturbed amount exceed that which can be contained in one (1) 60"x60" glove bag or waste bag.

Operations and Maintenance activities include, but are not limited to:

- Removal of a maximum of three (3) square *or* three (3) linear feet of ACBM or PACM in order to perform another maintenance activity and the activity is not intended as asbestos removal or abatement.
- Removal includes removal of a maximum of 3 square *or* linear feet of ACBM and PACM Thermal System Insulation, removal of a maximum of 3 square *or* linear feet of ACBM and PACM Surfacing Material on substrates, and removal of a maximum of 3 square *or* linear feet of ACBM and PACM Miscellaneous materials.
- Replacement of an asbestos-containing gasket on a valve.
- Removal of a maximum of 3 square or linear feet of drywall (sheet rock, wall board) with joint compound.
- Access above suspended ceilings that contain asbestos thermal insulation, surfacing material, or miscellaneous materials.
- Installation of electrical conduits through or proximate to ACBM and PACM.
- Repair of a maximum of 3 square or linear feet of damaged thermal system insulation that does not require removal.
- Repair of a maximum of 3 square or linear feet of ACBM and PACM wallboard, ceiling board, ceiling tiles, floor tiles and mastic, cove base and mastic, or carpet glued in place with mastic.
- Repairs involving encapsulation, enclosure, or removal of a maximum of 3 square or linear feet of ACBM or PACM only if required in the performance of emergency or routine maintenance activities and the activity is not intended as asbestos removal or abatement.

- 8.2 The Asbestos Program Manager approves all operation, repair, and maintenance activities. All O&M activities will be documented through the O&M Task form in Appendix H.
- 8.3 Emergency procedures for responding to accidental disturbances and releases of ACBM and PACM are located in Appendix A.
- 8.4 The Asbestos Program Manager arranges for all Maintenance employees training involved in O&M work. A description of the Asbestos Training Program is in Appendix B.

All employees involved in O&M work are required to wear negative-pressure air-purifying respirators and protective clothing, and participate in the Asbestos Medical Surveillance Program. The Asbestos Medical Surveillance Program is described in Appendix C.

- 8.5 The Asbestos Program Manager will supply adequate and appropriate asbestos work equipment, tools, supplies, respirators, and protective clothing and equipment for asbestos O&M activities and work.

A description of approved work rules, equipment, tools, supplies, procedures, respirators, and protective clothing and equipment is in Appendix D.

It is the responsibility of the worker to ensure all equipment, supplies, and protective clothing, equipment, and devices are at the location where asbestos-related activities and work will be conducted before beginning the work, and to use them.

- 8.6 Procedures for cleaning buildings that contain ACBM and PACM are in Appendix E.

- 8.7 To ensure ACBM and PACM remains in good condition, i.e., physically intact and undamaged, Maintenance visually examines ACBM and PACM listed in the most recent AHERA 3-Year Asbestos Re-Inspection Report every six (6) months for signs of damage and deterioration. These reports are given to the Asbestos Program Manager. If materials are damaged, the Asbestos Program Manager takes appropriate action. 6-Month Periodic Surveillance Reports are filed in the Asbestos Management Plan (AMP).

9.0 HANDLING AND DISPOSAL OF WASTE

- 9.1 All ACBM and PACM debris and waste that is, or might be, contaminated with asbestos shall be treated as asbestos waste.
- 9.2 Persons that clean up asbestos waste shall keep it wet. Waste will be placed into a 6-mil labeled polyethylene asbestos disposal bag and sealed, then the sealed bag placed into another 6-mil labeled polyethylene asbestos disposal bag and sealed. The quantity, type of waste, and location that it was found will be documented and supplied to the Asbestos Program Manager.
- 9.3 Bagged waste shall be transported to the asbestos waste holding area for storage.
- 9.4 The Asbestos Program Manager will arrange for waste disposal through a licensed asbestos waste transporter. The Waste Shipment Record will be filed with the O&M Task Record.

10.0 WORKER PROTECTION PROGRAM

- 10.1 Wilton Public Schools complies with the State of Connecticut regulations on Worker Protection, i.e., OSHA's Asbestos Standard, 29 CFR 1926.1101, by:
1. Ensuring affected O&M workers participate in the Asbestos Medical Surveillance Program
 2. Providing Asbestos Respirator Training and Fit Tests
 3. Maintaining a written Respiratory Protection Program
 4. Providing asbestos equipment, supplies, protective clothing and equipment, and requiring their use

5. Establishing procedures for O&M work and cleaning work
6. Measuring Worker Exposure to Asbestos during O&M Tasks
7. Documenting O&M Tasks

11.0 RECORD KEEPING

The Asbestos Program Manager maintains the following records, except as noted below:

11.1 O&M Task Record

All work and activities related to ACBM and PACM that are performed by Maintenance staff are known as “O&M Tasks”. All work and activities are recorded on the “O&M Task” form in Appendix H.

Supporting documents such as air sampling forms and results, bulk sampling forms and results, incident reports, waste shipment records, and so on, are filed with the O&M Task form.

Completed O&M Task forms are given to the Maintenance Office secretary/administrative assistant, who files the documents in chronological order.

O&M Task documents will be filed with AMP records and documents and kept in Maintenance Office for 30 years.

11.2 Equipment Records

Records of equipment obtained for O&M Program work and activities are kept with O&M Program documents. Equipment records include operating manuals, maintenance instructions, maintenance and repair records, list of parts and replacement parts, and the source of the equipment.

11.3 Major Fiber Release Episode Records

An incident report shall be generated on the Major Fiber Release form in Appendix H. The record will be filed in the O&M Task file in chronological order. A copy of the Major Fiber Release form will be placed in the Asbestos Abatement Project record.

The Asbestos Program Manager will call the State of Connecticut Department of Public Health Asbestos Division within 24 hours to notify them of the incident, and fax or mail a copy of the Major Fiber Release form to them within 5 business days of the incident.

11.4 Employee Asbestos Exposure Records

Employee exposure monitoring forms and laboratory reports will be filed with O&M Tasks forms and maintained for 30 years.

The Consultant that performs exposure monitoring shall be required to provide the following information in worker exposure monitoring reports:

- the date that the exposure was measured
- a description of the work or activity being performed

- sampling and analytical methods used and evidence of their precision and accuracy
- the number, duration, and results of the samples that were collected
- the types of personal protective clothing and respirator that the employee wore
- the name and social security number of the monitored employee
- the exposure concentration
- the name and signature of the person conducting the exposure monitoring
- the name and signature of the supervisor of the person that conducted exposure monitoring and his or her credentials
- the name of the Consulting firm

11.5 Employee Asbestos Medical Surveillance Records

Medical records shall be maintained in the Personnel Office in the affected employee's individual file. Medical records shall be kept for the duration of the employee's employment plus thirty (30) years.

The Physician or Contract Physician that Wilton Public Schools retains to perform asbestos medical surveillance shall be required to provide the following information for each worker medical examination:

- the name and social security number of the examined employee
- a copy of the employee's medical examination results, including medical history, questionnaire responses, results of clinical tests, the examining physician's opinions, and the examining physician's recommendations
- physician written opinions on the ability of the worker to use a respirator, and any restrictions on respirator use
- employee medical complaints and concerns related to exposure to asbestos
- a copy of information that was provided to the examining physician, i.e., a copy of Appendix X to 29 CFR 1926.1101 and copy of this O&M program
- the examining physician's signature and date of signature

The examining physician must not, and shall not, provide any information or opinions that are *not* related to the employee's asbestos exposure and asbestos-related illnesses. Wilton Public Schools will not breach the doctor-patient confidentiality relationship in any health matters that do not pertain to occupational asbestos work, activities, or exposure, or the employee's capability of using a respirator to protect the employee's health during asbestos-related work and activities.

11.6 Employee Asbestos Training Records

The following employee training records will be kept for one (1) year after the last date of employment for all employees that have been involved in the O&M Program:

- 2-Hour Asbestos Awareness training documented on Asbestos Awareness Training form in Appendix H.
- 16-Hour Asbestos Operations and Maintenance Training certificates awarded to maintenance workers and supervisors involved in asbestos-related activities and work under the O&M Program.

- 16-Hour Asbestos Operations and Maintenance Training and 40-Hour Asbestos Management Planner certificates awarded to Asbestos Program Managers.
- Respirator Training documented on Asbestos Respirator Training form in Appendix H.
- Respirator Fit-Test records will be kept until replaced a more recent fit test record. Records will be discarded one year after the employee no longer performs O&M work.

11.7 Asbestos Abatement Project Records

Every asbestos abatement project that is conducted will generate documents that include design specifications, written project records, waste shipment records, monitoring records, inspection records, and so on.

Project records will be filed by building, with the Asbestos Management Plan.

Appendix A

Emergencies Involving Unintentional Fiber Releases

Emergencies Involving Unintentional Fiber Releases

This procedure will be used when there is a concern or possibility that asbestos might have been released.

When ACBM or PACM is damaged or disturbed, there may be elevated levels of airborne fibers in that area. The first person that discovers the unintentional disturbance or release shall:

1. Immediately leave the area in which the release occurred. If possible, secure the area (close doors, warn others not to enter, instruct persons to leave, etc.). Find the nearest telephone.
2. Call the Program Manager at (203) 216-6427.
3. Inform the person that answers that there has been a possible asbestos release. Give your name, the building, and location where the release occurred, and the telephone number at which you are calling.
4. Remain near, but not in, the area in which the release occurred. When Maintenance arrives, point out the affected area.
5. Maintenance will determine if the release involves ACBM or PACM. If ACBM or PACM is involved, Maintenance will secure the area, assess the amount of ACBM or PACM that is involved, and initiate an O&M Task.
6. The person completing the O&M Task form shall list the names of all persons that were in the area when the release occurred.
7. The Asbestos Program Manager will review the scene and amount of ACBM and PACM involved, and initiate either Minor or Major Release procedures.

Minor ACBM and PACM Releases (Up to 3 Square or 3 Linear Feet)

1. Thoroughly saturate the debris with water that has been mixed with a surfactant using an airless sprayer.
2. Vacuum up debris with a vacuum cleaner that is equipped with a high-efficiency particulate air (HEPA2) filter or clean up debris with wet cloths.
3. Place waste, debris, the vacuum cleaner filter, mop head, cloths, or towels in a leak-proof container that is at least 6-mil thick and seal. Place the sealed bag into another leak-proof container that is at least 6-mil thick, and seal.
4. Label the bag with a label that states:

<p>DANGER CONTAINS ASBESTOS FIBERS AVOID CREATING DUST CANCER AND LUNG DISEASE HAZARD AVOID BREAKING CONTAINER AND BREATHING</p>
--

². HEPA – filters rated as capturing 99.97% of particles that are 0.3 microns in diameter.

DUST

5. Transport sealed containers to the designated asbestos waste holding area.
6. Dispose of waste through an approved asbestos waste disposal company.

Any subsequent maintenance and repair work that may be necessary will be performed by Maintenance employees with 16-hour Operations and Maintenance training.

Major ACBM or PACM Releases (More than 3 Square or 3 Linear Feet)

1. Restrict all entry to the area.
2. If the area has an HVAC system, shut it off and lock it out. Shut off all fans in the area.
3. Post Asbestos Warning Label at all approaches to the area.
4. Arrange for clean up and abatement by an Asbestos Abatement Contractor.
5. Notify the State of Connecticut Department of Public Health, Asbestos-In-Schools Division, within 24 hours of the major fiber-release episode. Provide a copy of the Report within five (5) business days.
6. After abatement work is completed, restore HVAC system.
7. Maintain a copy of the Incident Report and O&M Task with Asbestos Abatement Project Records.

Appendix B

Asbestos Training Program

Asbestos Training Program

Asbestos Awareness Training

State of Connecticut Regulation RCSA 19a-333-9(a)(1) requires each member of a school's maintenance and custodial staff attend a 2-Hour Asbestos Awareness Training class that includes at least the following information:

- The properties and types of asbestos
- Building materials that contain or may contain asbestos
- Health effects caused by exposure to airborne asbestos
- Locations of ACBM and suspect ACBM in school buildings
- How to recognize damaged, deteriorated, and delaminated asbestos materials
- The name and telephone number of the Asbestos Program Manager
- The school's responsibilities under State of Connecticut Asbestos-In-Schools regulations (RCSA 19a-333-2)
- The location and availability of the school Asbestos Management Plan for review

Frequency of Training

- New information on ACBM and suspect ACBM is reviewed with Maintenance and custodial staff annually.
- New maintenance personnel receive 2-Hour Asbestos Awareness training within sixty (60) days of their date of hire.

Record Keeping

- Asbestos Awareness Training is documented and filed in the AMP. The form used to document training is located in Appendix H.

Asbestos Training for Maintenance Staff That Will Perform O&M Tasks

State of Connecticut Asbestos-In-Schools regulations requires each school employee that will perform asbestos-related O&M work to attend a fourteen (14) hour training course, in addition to the 2-hour Asbestos Awareness class, that includes at least the following:

- descriptions of the proper methods of handling ACBM and suspect ACBM
- information on the use of respiratory protection as contained in the EPA/NIOSH Guide to Respiratory Protection for the Asbestos Abatement Industry, September 1986 (EPA Publication No. 560/OPTS-86-001), and other personal protection measures
- review of the provisions in:
 - » RCSA Sections 19a-333-8 and 192-333-9
 - » EPA regulations in 40 CFR Part 763, Subpart E, Appendices A, B, C, and D
 - » EPA regulations in 40 CFR Part 763, Subpart G
 - » EPA regulations in 40 CFR Part 61, Subpart M
 - » OSHA regulations in 29 CFR 1926.1101
- hands-on training in the use of respiratory protection, other personal protection measures, and good work practices

Employees that have not been issued a certificate that states that employee has successfully completed this

training course will not perform O&M work.

These employees will also attend a Respirator Training class.

Frequency of O&M Training

Training will be provided by Wilton Public Schools before any school employee is assigned to perform O&M tasks.

Employees will attend 16-hour O&M Refresher Training annually.

Hazard Communication Training

Wilton Public Schools employees will be informed of the following during annual Hazard Communication training:

- Existence and location of the Asbestos Management Plan
- Name of the Asbestos Program Manager
- Health effects associated with exposure to asbestos
- Where to obtain information on the location of ACBM and PACM in buildings
- Preventative Measure to Avoid Fiber Releases
- Reporting Damaged ACBM and PACM
- Emergency Response Procedures

Respirator Training

Before an employee is given a respirator, the employee must be trained by a competent person designated by the Program Administrator. Training will include:

- Recognizing respiratory hazards
- The nature, extent, and health effects associated with exposure to asbestos
- The purpose, proper use, capabilities, and limitations of respirators
- Types of situations that can result in exposure to asbestos
- The importance of minimizing exposure by using required equipment, work practices and procedures, respirators, and protective clothing
- Respirator selection, user checks, cleaning, inspection, and maintenance procedures
- Respirator fit-test
- The reasons for the asbestos medical surveillance program

Appendix C

Asbestos Medical Surveillance Program

Asbestos Medical Surveillance Program

1.0 Applicability

This program applies to Maintenance employees that perform Class III O&M work, employees assigned to clean-up O&M work debris, and employees that are required to wear negative-pressure air-purifying respirators for asbestos.

2.0 Asbestos Medical Examinations

Medical examinations and procedures are performed by or under the supervision of a licensed physician at no cost to the employee, and at a reasonable time and place.

Pulmonary function tests must be administered only by persons that have completed a training course in spirometry that was sponsored by an appropriate academic or professional institution.

Examinations will be provided before an employee is assigned to O&M work and annually thereafter. If the examining physician determines an examination should be provided more frequently, the examinations will be provided.

3.0 Asbestos Medical Examinations Contents

Medical examinations will include:

- A medical and work history with special emphasis on the pulmonary, cardiovascular, and gastrointestinal systems.
- On initial examination, the Initial Medical Questionnaire in Appendix D, and, on annual examination, the Annual Medical Questionnaire of Appendix D of the OSHA regulation.
- A physical examination of the pulmonary and gastrointestinal systems that includes a chest roentgenogram and pulmonary function tests of forced vital capacity (FVC) and forced expiratory volume at one second (FEV(1)). Interpretation and classification of chest roentgenograms will be conducted in accordance with Appendix E.
- Any other examinations or tests deemed necessary by the examining physician.

4.0 Information Provided to the Physician

The Asbestos Program Manager will provide the examining physician with the following information:

- A copy of the OSHA Standard on Asbestos and Appendices D, E, and I;
- A copy of the O&M Program;
- The employee's representative exposure level or anticipated exposure level; and,
- A description of any personal protective and respiratory equipment used or to be used.

5.0 Physician's Written Opinion

Wilton Public Schools are required to obtain a written opinion from the examining physician containing the results of each employee's medical examination and:

- The physician's opinion as to whether the employee has any medical conditions that would place the employee at an increased risk of impairment from exposure to asbestos;
- Any recommended limitations on the employee or on the use of personal protective equipment such as respirators; and,
- A statement that the employee has been informed by the physician of the results of the medical

- examination and of any medical conditions that may result from asbestos exposure.
- A statement that the employee has been informed by the physician of the increased risk of lung cancer attributable to the combined effect of smoking and asbestos exposure.

Wilton Public Schools will instruct the physician not to reveal specific findings or diagnoses that are not related to occupational exposure to asbestos.

Wilton Public Schools will provide a copy of the physician's written opinion to the affected employee within 30 days from its receipt.

Appendix D

Operations and Maintenance Procedures

Operations and Maintenance Procedures

1.0 Applicability

- 1.1 This section applies to O&M Tasks, i.e., maintenance and repair tasks that involve disturbing ACBM and PACM
- 1.2 Tasks must be performed by Maintenance employees with 16-hour Operations and Maintenance Training.

2.0 Rules

- 2.1 All O&M Tasks will be approved by the Asbestos Program Manager.
- 2.2 Access to restricted areas is limited to employees authorized by the Asbestos Program Manager.
- 2.3 If ACBM and PACM cannot be kept wet, or if air monitoring indicates exposure is above 0.1 fibers/cc, activities will stop, and arrangements made to have the work performed by an Asbestos Abatement Contractor.

3.0 O&M Tasks

Employees that perform O&M Tasks must use the following equipment and procedures to minimize exposure and prevent debris from dispersing into surrounding areas.

- 3.1 Bring all equipment, tools, and protective clothing and gear to the area, including a HEPA vacuum cleaner³, an airless sprayer that contains amended water⁴, impermeable drop cloths, air-purifying respirator with HEPA cartridges, disposable full body coveralls with head and foot coverings, duct tape, disposable towels and/or cloths, Asbestos Signs and Caution tape, pre-labeled asbestos waste disposal bags, glove bag or mini-enclosure, and tools, equipment, and supplies.
- 3.2 Secure the work area and restrict access by:

Verifying the area is not occupied.
Shutting down and locking out the HVAC system.
Demarcating the area with "Asbestos Caution" tape.
Placing Asbestos Danger Signs at all approaches and entrances to the area that state:

<p>DANGER ASBESTOS CANCER AND LUNG DISEASE HAZARD AUTHORIZED PERSONNEL ONLY RESPIRATORS AND PROTECTION CLOTHING ARE REQUIRED IN THIS AREA</p>

- 3.3 If work involves, or might involve, contact with any electrical system, any moving mechanical equipment, fluids or gases in pipes, hydraulic equipment, or objects that may fall, implement and follow Lock-out Tag-out procedures before beginning work. At minimum, de-energize electrical equipment, discharge capacitors, block all equipment that may move, secure doors open with a

³ A vacuum cleaner that is has a high efficiency particulate air filter, i.e., one rated to filter out 99.97% of particles that are 0.3 microns in diameter.

⁴ Water to which a surfactant has been added to make wetting easier.

chain and lock, break and bleed lines, cover valve with a lockout device, and block hydraulic equipment. Secure each with lock-out/tag-out devices, and apply personal locks and tags.

- 3.4 Place impermeable drop cloths on the floor and other horizontal surfaces where debris may fall.
 - 3.4.1 If work involves disturbing thermal insulation or surfacing ACBM or PACM by drilling, cutting, abrading, sanding, chipping, breaking, or sawing, isolate the work area from non-work areas by installing a mini-enclosure or a glove bag. Place impermeable drop cloths in locations where debris may fall.
- 3.5 In an area that is outside of the work area, don your respirator and perform a user seal check. Put on full-body disposable coveralls with head and foot coverings.
- 3.6 Wet ACBM or PACM with water that has been treated with a wetting agent, applying it with an airless sprayer. Keep the ACBM or PACM wet during the entire job.
- 3.7 Perform the required work in accordance with 16-hour O&M training. Pause whenever necessary to apply amended water to keep the ACBM and PACM wet.
- 3.8 Vacuum the ACBM or PACM to remove any loose material, then vacuum up all waste and debris that fell onto the drop cloths. Wet wipe surfaces.
- 3.9 Promptly clean up waste and debris and bag. Refer to procedures in Section 9.0, Handling and Disposal of Waste.

Wet all ACBM and PACM debris and waste, including drop cloths, glove bags, vacuum cleaner filter, towels, cloths, and rags, dust inside the vacuum cleaner collector, and any other waste, and place in a pre-labeled 6-mil asbestos disposal bag. Clean tools and equipment with amended water. Collect rinse water in the waste bag. Seal the waste bag. Perform a visual inspection.
- 3.10 After the area and equipment are clean and waste bagged, remove full-body coveralls and place it in a clean pre-labeled 6-mil asbestos disposal bag. Remove the respirator cartridges and place them in the waste bag. Seal the bag. Remove the respirator.
- 3.11 Place both waste bags into a clean pre-labeled 6-mil asbestos disposal bag and seal the bag. Transport the waste to the waste holding area. Return equipment and supplies. Notify others that work has been completed. Inspect, clean and disinfect respirator. Air dry, then store it.

4.0 Prohibitions

- 4.1 The following is prohibited during O&M tasks:
 - Eating, drinking, smoking, chewing tobacco or gum, using personal care products.
 - High-speed abrasive disc saws that are not equipped with point of cut ventilation and enclosure with HEPA filtered exhaust air.
 - Compressed air used to remove ACBM or PACM *unless* the compressed air is used in conjunction with an enclosed ventilation system designed to capture the dust cloud created by the compressed air.
 - Dry sweeping, shoveling, or other dry clean-up of dust and debris containing ACBM and PACM.

Appendix E

Building Cleaning

Building Cleaning

1.0 Applicability

- 1.1 This section applies to Class 4 O&M Cleaning Tasks that involve building cleaning, cleaning up no more than 3 square or linear feet of ACBM and PACM debris, and normal housekeeping and custodial tasks that involve contact with ACBM and PACM but not disturbance.
- 1.2 Tasks must be performed by Maintenance employees with 2-hour Asbestos Awareness Training.
- 1.3 Asbestos-In-Schools Regulations require school buildings that contain ACBM and PACM be:
 - kept free of ACBM and PACM debris,
 - cleaned before the start of an Asbestos Abatement Project,
 - re-cleaned whenever a Management Planner recommends additional cleaning because debris is present.

2.0 Rules

- 2.1 Housekeeping and custodial employees should assume all dust and debris from thermal insulation, surfacing materials, and miscellaneous building materials contains asbestos.
- 2.2 Employees must use wet methods, a vacuum cleaner equipped with a HEPA filter to collect all debris and dust, and promptly bag all waste for all tasks.
- 2.3 Eating, drinking, smoking, chewing tobacco or gum, using personal care products is prohibited during cleaning work
- 2.4 Building cleaning, debris clean-up, and housekeeping and custodial work that involves contact with ACBM and PACM but not disturbance, such as cleaning floor tiles, will be performed only by employees with 2-hour Asbestos Awareness Training.

3.0 Cleaning Procedures

- 3.1 Bring a HEPA vacuum cleaner, an airless sprayer that contains amended water, disposable towels or cloths, mops with disposable mop heads, and pre-labeled asbestos waste disposal bags to the location.
- 3.2 If debris consists of pieces of ACBM or PACM, thoroughly wet the debris with water that has been mixed with a surfactant using the airless sprayer.
- 3.3 Vacuum debris on carpets with a HEPA vacuum cleaner or a steam-cleaner.
- 3.4 Vacuum debris on floors and horizontal surfaces with a HEPA vacuum cleaner, or, clean up with wet towels or cloths.
- 3.5 Place waste, debris, vacuum cleaner filter, mop head, cloths, and towels in a leak-proof container that is at least 6-mil thick and seal. Place the sealed bag into another leak-proof container that is at least 6-mil thick, and seal.
- 3.6 Verify the bag has the following asbestos warning label:

DANGER

CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
AVOID BREAKING CONTAINER AND BREATHING
DUST

- 3.7 Transport sealed containers to the waste holding area.
- 3.8 The Asbestos Program Manager will make arrangements to dispose of the waste through an approved asbestos waste disposal company.

4.0 Initial/Additional Cleaning

School workers that have received 2-hour Asbestos Awareness Training are qualified to perform cleaning.

Initial Cleaning. School buildings with friable and non-friable ACM and PACM must be cleaned before a Response Action is initiated (other than O&M) as follows:

1. Vacuum carpets with a HEPA filtered vacuum cleaner.
2. Wet wipe or vacuum floors and horizontal surfaces with a HEPA filtered vacuum.
3. Place waste, debris, vacuum cleaner filters, mop heads and cloths in sealed, leak-tight containers and attach asbestos waste labels to each container.
4. Transport sealed containers to the asbestos waste holding area, and arrange for disposal as asbestos waste through an approved asbestos waste disposal company.

Additional Cleaning. The accredited management planner shall make a written recommendation to the LEA whether additional cleaning is needed, and if so, the methods and frequency of such cleaning.

5.0 Cleaning Resilient Flooring

Although the asbestos in floor tiles, linoleum, and roll flooring such as vinyl flooring are considered non-friable, excessive friction during routine cleaning can release fibers. To avoid release, observe the following:

- Always strip floors wet, never dry.
- Pre-treat floors: wet the floor with cleaning liquid to soften the wax.
- Operate floor strippers and buffers at low speed, up to 300 rpm. Above 300 rpm, fiber release may occur.
- Keep floors well-polished.
- After stripping and re-finishing, use a wet-mop to clean floors.

Appendix F

Respiratory Protection Program

Respiratory Protection Program

1.0 Purpose

- 1.1 The purpose of this Respiratory Protection Program is to protect the health of maintenance employees that perform O&M Tasks under the school's Asbestos Programs by providing respiratory devices that will protect them against inhaling airborne asbestos fibers during the course of work.
- 1.2 The primary goal of any Respiratory Protection Program is to prevent toxic and hazardous materials from being released into the air by the use of engineering control equipment and preventative work procedures and practices. Respirators are recognized by industry as only a supplement to primary protective devices, because respiratory protective devices are not fail-safe.

2.0 Key Persons

- 2.1 The Asbestos Program Manager is the Administrator of the Respiratory Protection Program. Mr. Figueroa is responsible for all aspects of the respirator program, and has the authority to make decisions concerning this program. This authority includes purchasing and issuing respirators and supplies, overseeing use and maintenance of respirators, record keeping, and stopping any work where there is a risk of personal injury.
- 2.2 Mr. Figueroa will make decisions in consultation with a Certified Industrial Hygienist.
- 2.3 The Certified Industrial Hygienist will assist the Asbestos Program Manager in respirator selection, employee training, medical surveillance program, and respirator fit testing.
- 2.4 Maintenance employees that must wear respirators during O&M Tasks are responsible for using and caring for their assigned respirator in accordance with this program, training and instructions, and regulations.

3.0 Training

- 3.1 Before an employee is given a respirator, the employee must be trained by a competent person designated by the Program Administrator. Training will include:
 - Recognizing respiratory hazards
 - The nature, extent, and health effects associated with exposure to asbestos
 - The purpose, proper use, capabilities, and limitations of respirators
 - Types of situations that can result in exposure to asbestos
 - The importance of minimizing exposure by using required equipment, work practices and procedures, respirators, and protective clothing
 - Respirator selection, user checks, cleaning, inspection, and maintenance procedures
 - Respirator fit-test
 - The reasons for the asbestos medical surveillance program

4.0 Asbestos and Respirator Medical Surveillance Program

- 4.1 All workers that will Perform O&M Tasks must participate in the Asbestos Medical Surveillance Program.
- 4.2 Before an employee is assigned to O&M Tasks or to wear a respirator, the employee will be given an asbestos medical examination. Examinations will be provided annually thereafter.

- 4.3 During the examination, the physician will evaluate the employee to determine if he or she is able to safely wear an air-purifying respirator while performing O&M Tasks.
- 4.4 If the examining physician is of the opinion that the employee cannot safely wear a respirator, the employee will not be assigned to perform O&M Tasks.
- 4.5 Respirators will be issued only after the physician has supplied the Asbestos Program Manager with his or her written opinion and the employee has passed a Respirator Fit Test.

5.0 Respirator Program Policies and Procedures

- 5.1 Air-purifying respirators (APRs) equipped with high-efficiency particulate air filter cartridges will be used for O&M activities.
- 5.2 All APRs and replacement parts shall be approved by the National Institute of Occupational Safety and Health (NIOSH) and have a TC number. If any parts of the respirator must be replaced, only approved replacement parts for that particular make and model of respirator will be used.
- 5.3 A consulting Certified Industrial Hygienist will select the respirators that employees will wear, in accordance with EPA/NIOSH publications and exposure monitoring results.
- 5.4 Each individual wearer shall pass a respirator fit-test with the make, model, and size respirator that he or she will wear, before being allowed to perform O&M activities and wear a respirator, and annually thereafter. A consulting Certified Industrial Hygienist or Industrial Hygienist will perform the fit tests. Fit-testing procedures will conform to required protocols in OSHA 29 CFR 1926.1101. Upon successful completion of the fit test, the consulting Certified Industrial Hygienist or Industrial Hygienist will complete a "Respirator Fit Test Record" and provide it to the Asbestos Program Manager. The form will be maintained in an Asbestos Respirator Fit Test file in the Maintenance Office with O&M records.
- 5.5 Each individual wearer shall perform a "user seal check" each time the respirator is donned, to verify a face-to-face piece seal has been achieved, following procedures provided during respirator training:
 - 5.5.1 A Negative Pressure Test will be performed by covering the air intake with the palm of the hand. The employee will inhale so that the face piece collapses slightly and remains collapsed for at least ten (10) seconds. If the facepiece remains slightly collapsed and no inward leakage of air is noted, the face seal is considered satisfactory.
 - 5.5.2 A Positive Pressure Test will be performed by covering the filters with the palms of the hands. The employee will exhale gently into the face piece so it slightly bulges and remains bulged for at least ten (10) seconds. If a slight positive pressure can be maintained inside the facepiece and there are no signs of air leakage through the face piece, the fit is considered satisfactory.
- 5.6 Respirators will be assigned to employees individually for their exclusive use. Employees shall never share their respirators. Borrowing a respirator is unacceptable because the respirator has not been fit-tested.
- 5.7 Respirators shall be cleaned and disinfected after each use as described in the instruction booklet provided by the respirator manufacturer.
- 5.8 After cleaning and drying the respirator, it should be placed in a clean plastic bag and stored in a designated cabinet away from heat, sunlight, cold, dust, and chemicals. The respirators should be stored upright so the chin rests on a flat surface to prevent distortion of the face piece. Head straps

should be fully extended.

- 5.9 Before donning the respirator and during cleaning, the employee shall inspect it for signs of wear and damage as described in the manufacturer's booklet provided with the respirator, and specifically checking the following:
- 5.9.1 Inspect the face piece for, (a) dirt (clean off all dirt); (b) cracks, tears, or holes (obtain new face piece); (c) distortion (allow face piece to sit free from any constraints and see if distortion disappears; if not, obtain new face piece); (d) cracked, scraped, or loose fitting lenses (contact respirator manufacturer to see if replacement is possible; otherwise, obtain new face piece).
 - 5.9.2 Inspect head straps for, (a) breaks or tears (replace head straps); (b) loss of elasticity (replace head straps); (c) broken or malfunctioning buckles or attachments (obtain new buckles).
 - 5.9.3 Inspect inhalation and exhalation valves for, (a) detergent residue, dust particles, or dirt on valve or valve seat (clean residue with soap and water); (b) cracks, tears, or distortion in the valve material or valve seat (obtain replacement valves from manufacturer); (c) missing or defective valve covers (obtain valve cover from manufacturer).
 - 5.9.4 Inspect filter element(s) for, (a) HEPA filter rating; (b) approval number; (c) missing or worn gaskets (contact manufacturer for replacement); (d) worn threads on both the filter and face piece threads (replace filter or face piece, whichever is applicable.)
- 5.10 Only HEPA filter cartridges approved by NIOSH shall be used. Filters should be removed and replaced whenever an increase in breathing resistance is detected. Filters shall be discarded as asbestos waste at the end of each task.

6.0 Special Considerations

- 6.1 In order to ensure the face-to-face seal is achieved and maintained, employees that will wear a respirator shall be clean shaven before when wearing the respirator. No beards, long sideburns, long mustaches, or stubble is allowed.
- 6.2 Employees that wear eye glasses who must wear a full facepiece respirator will be provided with corrective lenses that can be mounted inside the face piece.
- 6.3 No protective clothing or coverings is allowed between the face and respirator face piece. Coveralls with hoods or head coverings must be put on over the respirator.
- 6.4 A weight loss or gain affects the respirator fit. Employees that gain or loose more than twenty (20) pounds since their last fit test must be re-fitted.
- 6.5 Employees that wear dental appliances must ensure they wear them when wearing a respirator to ensure the face piece seal is maintained.
- 6.6 Don and remove respirators in areas that are clean. Don the respirator before entering the work area, and remove it after leaving it.

7.0 Annual Respirator Program Evaluation

- 7.1 The Asbestos Program Manager will periodically arrange to have a consulting Certified Industrial Hygienist evaluate the asbestos respiratory protection program to ensure its continued effectiveness. In addition, the respirator training program will be reviewed and updated as necessary.

- 7.2 The Asbestos Program Manager and Maintenance supervisors will be involved in this evaluation by making unannounced field and office inspections, and discussing respirator comfort, use, and maintenance issues with wearers.

Appendix G

Preventative Measures to Prevent Fiber Releases

Preventative Measures to Prevent Fiber Releases

Floor Tiles, Linoleum, Roll Flooring, and Cove Base

Although the asbestos in floor tiles, linoleum, and roll flooring such as vinyl flooring are considered non-friable, excessive friction during routine cleaning can release fibers. To avoid release, observe the following:

- Always strip floors wet, never dry.
- Pre-treat floors: wet the floor with cleaning liquid to soften the wax.
- Operate floor strippers and buffers at low speed, up to 300 rpm. Above 300 rpm, fiber release may occur.
- Keep floors well-polished.
- Use a floor finish with a high solids content.
- After stripping and re-finishing, use a wet-mop to clean floors.
- During winter months when salt and sand are used, place 12-20 foot floor mats at entrances to the building.

Old and new flooring materials and old and new cove base may contain asbestos. If the flooring or cove base cracks, chips, wears down, or separates from the floor or wall, asbestos fibers can be released. Avoid damaging the materials. Do not cut, drill, saw, sand, remove, or repair them unless you are specifically trained, authorized, and use proper work practices, procedures, equipment, and protective clothing. Report any damage to the Asbestos Program Manager or Maintenance Office.

When asbestos floor tiles, linoleum, and roll flooring are covered with carpets or other non-asbestos flooring, the asbestos flooring is inaccessible until the carpet or non-asbestos flooring is removed or is damaged.

Mastics and Adhesives under Floor Tiles, Linoleum, Roll Flooring, Carpets, Cove Base, and Ceiling Tiles

While carpets are not considered to be a suspected asbestos-containing material, the mastics, adhesives, and glues that are used to hold them in place are likely to contain asbestos. Mastics, adhesives, and glues used under floor tiles cove base, and ceiling tiles may also contain asbestos. Mastics are inaccessible after the material that covers them is in place, but if the overlaying material becomes damaged, asbestos will be released from the exposed mastic.

Do not cut, drill, saw, sand, remove, or repair these materials unless you are specifically trained, authorized, and use proper work practices, procedures, and protective clothing.

All non-asbestos flooring, cove base, carpets, and ceiling tiles that have asbestos-containing mastic must be treated as asbestos materials, because they cannot be removed without disturbing and releasing the asbestos in the mastic. This means that removal must be conducted as asbestos abatement.

Flexible Cloth Connectors on Ductwork

Cloth should be kept in good condition and intact. Avoid physical contact with the cloth, and any activity that disturbs the integrity of the cloth, such as cutting, unless you are specifically trained, authorized, and use proper work practices, procedures, equipment, and protective clothing.

Thermal Insulation (pipe and fitting insulation, tank and boiler insulation)

Thermal insulation consists of inner insulation that contains asbestos and binders and a protective outer covering, or jacket, that holds the insulation in place around the pipe, tank, boiler, or other surface. The covering also keeps the friable insulation from being released. The hardness and thickness of coverings and jackets vary greatly.

However, if a cover is damaged, the asbestos fibers can be released, become airborne, and be inhaled. Therefore, care must be taken to avoid damaging the coverings and the insulation.

Insulation may crush if it is hit, walked on, or objects are leaned against it or hung from it. This loosens the asbestos from the binders and the cover from the insulation. Water can also dissolve the binders, and cause the cover to deteriorate. Coverings and insulation may deteriorate over time due to moisture in the air, contact with water, and heat.

If the covering is damaged, the insulation may release dusts that contain fibers, and the dust will disperse.

The best way to prevent fibers from being released is to avoid contacting and damaging the insulation and covering. Avoid hitting the insulation. Do not lay objects on top of insulation, hang materials from it, or walk on it. Never drill, sand, score, cut, or gouge it. Avoid dropping things on it.

Insulation covers should be kept in good condition and physically intact. If it is accidentally damaged, immediately leave the area and report the damage to the Asbestos Program Manager or Maintenance Office.

Do not cut, drill, saw, sand, remove, or repair any insulation unless you are specifically trained, authorized, and use proper work practices, procedures, equipment, and protective clothing.

Insulation that is located in highly accessible areas and subject to frequent and repeated contact should have a solid barrier placed around it to avoid accidental damage.

Thermal Insulation Behind Walls and Above Ceilings

There may be pipes with asbestos-containing insulation behind fixed walls and above fixed and suspended ceilings in some buildings. Look for evidence of pipe penetrations through walls and ceilings before beginning renovation work. Exploratory demolition may be required before project initiation to determine if insulation is present. If insulation is discovered, arrange for a licensed Asbestos Inspector to collect samples and arrange for laboratory analysis. Asbestos abatement is necessary before renovation occurs.

Ceiling Tiles

Ceiling tiles may contain asbestos; therefore efforts must be made to avoid contacting and damaging them. Most ceiling tiles sold today usually do not contain asbestos, but some may. Ceiling tiles may be hard or soft to the touch. Avoid hitting ceiling tiles. Do not move, cut, drill, saw, sand, remove, or repair them unless you are specifically trained, authorized, and use proper work practices, procedures, equipment, and protective clothing. Do not hang anything from them or their supports. If ceiling tiles are damaged, report them immediately.

Wallboard and Ceiling Board with Joint Compound

Wall and ceiling boards are not likely to contain asbestos, but some may. Joint compound used to cover nails, cracks, and seams is likely to contain asbestos. Joint compound is rarely applied over the entire board, so after the boards are painted or wallpapered, it is difficult to determine exactly where the joint compound is present. The entire board is suspect.

Asbestos can be released when wallboard and ceiling board with joint compound becomes damaged. Dust may be released and dispersed. Like other asbestos-containing materials, care must be taken to avoid damaging them.

Do not cut, drill, saw, sand, remove, or repair any walls or ceilings unless you are specifically trained, authorized, and use proper work practices, procedures, equipment, and protective clothing.

All non-asbestos wall and ceiling boards that have asbestos-containing joint compound on them must be treated as asbestos materials, because they cannot be removed without disturbing and releasing the asbestos in the joint compound. This means that removal must be conducted as asbestos abatement.

Appendix H

Forms

O&M Task Record

Date: _____ Start Time: _____ Stop Time: _____

Location: _____

Task: _____

Personnel:

_____ Inside Work Area _____

_____ Outside Work Area _____

_____ Others _____

Notifications and Approvals

_____ Director of Facilities _____

_____ Building Personnel _____

_____ Other _____

Isolation of Area

_____ HVAC system shut off

_____ Fans shut off

_____ Equipment isolated

_____ Barrier Tape

_____ Signs posted at outside areas

_____ Glove bag

_____ Mini-enclosure and control ventilation

_____ HEPA vacuum

_____ Plastic floor covering

_____ Other _____

Other Equipment / Supplies

_____ Amended water

_____ Airless sprayer

_____ Disposable towels / cloths

_____ Duct tape

_____ Waste bags

_____ Tools

_____ Lockdown sealant

_____ Other _____

Personal Protection

_____ Respirator, Half-mask

_____ Respirator, Full face

_____ Respirator, PAPR

_____ Coveralls with head and foot coverings

_____ Safety Glasses

_____ Safety Goggles

_____ Gloves

_____ Other _____

Other

_____ Material removed _____

_____ Quantity removed _____

Air Sampling

_____ Personal

_____ Area

Release of Area

_____ HEPA vacuum area

_____ Double-bag waste

_____ Waste quantity _____

_____ Wet wipe surfaces

_____ Visually inspect area

_____ Remove signs and barrier tape

_____ Restore isolated equipment

_____ Restore ventilation

_____ Transport bagged waste to holding area

_____ Notify personnel when done

Supervisor

Name, signature, date _____

