



# DEPARTMENT OF AVIATION

## ASBESTOS PROGRAM POLICY

### 1. **OBJECTIVE**

Asbestos is a known human carcinogen that was and still is used in many different types of building materials. It is important to note that asbestos, if left undisturbed, is not considered hazardous. Due to the potential health effects associated with asbestos exposure if the material may become airborne (friable), federal, state and local regulations are in place to control activities impacting asbestos containing materials. The purpose of this policy is to ensure compliance with these regulations and to minimize any risk of exposure for customers, employees and the general public at Department of Aviation (DOA) facilities.

The purpose of this program is to ensure compliance with the standards and regulations required by State of Nevada Occupational Safety and Health Standards, 29 CFR 1910.1001 and 29 CFR 1926.1101. When possible, the DOA utilizes a pro-active, in-place asbestos management program whenever asbestos-containing materials (ACM) are discovered at DOA facilities.

### 2. **SCOPE**

The objective of the DOA asbestos program includes the implementation and maintaining of an asbestos operations and maintenance (O&M) plan for asbestos containing materials known or assumed to exist in DOA structures. The asbestos O&M plan is periodically reviewed and updated in accordance with regulatory requirements.

The O&M plan is utilized to minimize the potential for exposure to ACM by DOA employees, occupants, contractors and visitors. The asbestos O&M plan outlines training, work practices and surveillance to accomplish this objective, and to maintain ACM in good condition and minimize the potential for exposure.

Using a proactive approach, DOA has characterized many areas as to the presence, condition and quantity of ACM. As conditions and activities warrant, this pro-active approach for identifying and characterizing ACM at DOA facilities will continue until all areas that contain ACM have been identified.

In regard to asbestos exposure at DOA facilities, airport occupants fall into two classifications: those who in their normal functions are unlikely to be involved in direct

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contact with ACM, and those who in their normal functions may come into contact with ACM.

Occupants who are unlikely to have any direct contact with ACM are administrative personnel, tenants, and visitors. Those occupants who have the potential to come into contact with ACM in the performance of their job duties include maintenance, custodial, construction, and subcontracting personnel.

### 3. DEFINITIONS

ACM: Abbreviation for "asbestos-containing material," which means any material containing more than 1% asbestos.

Asbestos: A naturally occurring mineral substance with fire-resistant properties. Exposure to airborne asbestos fibers has been shown to cause various illnesses including cancer.

Exposure: The inhalation or other absorption of asbestos fibers into the body through the nose, mouth and lungs, or other mucous membranes.

Sampling: Taking samples of a material for laboratory testing to determine the presence and quantity of asbestos content.

Suspect material: building materials such as fireproofing, sheetrock systems, plaster, floor tiles, mastic, ceiling tiles, thermal system insulation, stucco, etc., that have not been sampled for asbestos. All such materials are considered ACM until sampling has proven they do not contain asbestos.

### 4. RESPONSIBILITIES

#### Supervisors shall:

Ensure that all of their employees who have the potential to come into contact with ACM complete the required asbestos hazard awareness training as required by 29 CFR 1926.1101(k)(9)(vi).

Be familiar with building locations where ACM is known to be present or may be present but has not been sampled. Contact the DOA Safety, Environmental and Risk Management Section for guidance.

Notify employees of any job assignments that may bring them into contact with any identified ACM or suspect material.



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Follow the Job-Site Control Program of the asbestos O&M plan for each project. Contact the Safety, Environmental and Risk Management Section prior to instructing any employees to work in any areas containing suspect materials, or to work with suspect materials that have not been previously sampled. Use the Environmental Assessment Request Form available in the asbestos O&M plan and Tenant Improvement Manual to describe the proposed scope of work for the project. The Safety, Environmental and Risk Management Section may collect samples for lab analysis to determine if ACM is present in the work area.

Notify the Safety, Environmental and Risk Management Section immediately of any damaged ACM or suspect material that comes to their attention.

### Employees shall:

Complete asbestos hazard awareness training as required by 29 CFR 1926.1101(k)(9)(vi) if their job duties may bring them into contact with ACM.

Stop work and notify their supervisor immediately upon noticing any damaged ACM or suspect materials. The supervisor will then notify the Safety, Environmental and Risk Management Section, which will take the necessary steps to abate the hazard.

Not perform ACM abatement, repair or cleanup activities.

### Safety, Environmental and Risk Management Section shall:

Maintain the sample location inventory to ensure that all areas that have been inspected and sampled are identified throughout the facility, and provide this information to supervisors and DOA construction project coordinators upon request.

Continue to sample suspect materials and collect data to expand the ACM inventory.

An asbestos inspection must be performed on every DOA building prior to the start of any renovation or demolition, including tenant improvements. This inspection may be performed only by qualified and licensed employees of Safety, Environmental and Risk Management Section or by qualified inspectors approved by the DOA. Safety, Environmental and Risk Management Section Project will notify managers of the presence of ACM by issuing an Environmental Work Authorization Form for the specific project.

Respond immediately to any reports of damaged ACM or suspect material, and take steps to limit exposure to employees and the public.

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### 5. POLICY AND PROCEDURES

#### Training

All DOA employees who have the potential to come into contact with ACM are required to complete annual asbestos hazard awareness training as required by 29 CFR Section 1926.1101(k)(9)(vi).

This training will inform employees of the locations where ACM has been identified in DOA facilities, the health effects related to asbestos exposure, federal, state and local asbestos regulations, and whom to notify if they encounter ACM in their workplace. Training will include a review of suspect materials that may be located at DOA facilities. The list of suspect materials is included as an attachment to this policy.

DOA employees will be assigned annual refresher training. Employees will be assigned immediate refresher training if any change in job assignment or responsibilities results in greater potential for exposure to ACM.

#### Contractors/Tenants

Contractors/Tenants who are required to work in areas that contain ACM will be informed about the presence and location of ACM prior to starting work.

Contractors/Tenants will stop work and notify the Safety, Environmental and Risk Management Section if they find or cause any damage to ACM or suspect materials, or if they encounter unexpected suspect materials during their work activities.

Once notified, the Safety, Environmental and Risk Management Section will be responsible for ensuring that any hazard is abated prior to resumption of work.

If the contractors/tenants caused the disturbance and/or damage to the ACM or suspect material, the contractors/tenants are responsible for the clean-up/abatement activities for the disturbance and/or damage.

#### Abatement Activities

All work at DOA facilities that involves the removing, repairing, sampling, and/or identification of ACM, will be done by an experienced asbestos contractor licensed by the State of Nevada and approved by DOA.

All work and other activities at DOA facilities that involve the disturbance of ACM will be performed in adherence to the regulations set forth in the State of Nevada Occupational



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Safety and Health Standards, Asbestos Control Program Regulations, Sections 1910.1001 and 1926.1101.

Oversight of activities at DOA facilities that involve the disturbance of ACM will be the responsibility of the Safety, Environmental and Risk Management Section.

DOA employees shall not perform abatement, cleanup or repair of ACM or suspect materials.

### **6. RECORDS**

The Safety, Environmental and Risk Management Section will maintain all asbestos-related sampling records.

The Safety, Environmental and Risk Management Section will maintain all training records related to this program.

### **7. REFERENCES**

State of Nevada Occupational Safety and Health Standards for General Industry, 29 CFR1910.1001, "Asbestos"

State of Nevada Occupational Safety and Health Standards for the Construction Industry, 29 CFR1926.1101, "Asbestos"

Environmental Protection Agency (EPA) Guidelines, "Managing Asbestos in Place: A Building-Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials"

Clark County Department of Aviation Asbestos Operations and Maintenance Plan

## **ASBESTOS SUSPECT MATERIAL LIST**

Asbestos is found in numerous building materials. Identification can be difficult because the appearance may change between rooms. Materials that may contain asbestos have been identified in Clark County Department of Aviation facilities. Examples of materials that may contain asbestos include:

- Adhesives
- Caulking
- Ceiling Tiles
- Concrete Products
- Cooling Tower Baffles
- Fire Door Insulation
- Fireproofing
- Electrical Wire Insulation
- Elevator Brakes
- Floor Linoleum
- Mastics
- Insulation
- Joint Compound
- Laboratory Furniture and Hoods
- Pipe Insulation (AKA: Thermal System Insulation or TSI)
- Plaster, both Decorative and Non-Decorative
- Popcorn Ceiling Texture
- Roofing Tar
- Stucco
- Transite Pipes for Underground Plumbing
- Vinyl Floor Tiles
- Wall Texture
- Waterproofing

Any materials other than glass, wood or steel should be considered suspect ACM. Contact the DOA Asbestos Management Planner for more information at 702-261-5166.