CHAPTER 2 — DEVELOPING A CONTROL PROGRAM

An asbestos control program for schools and other buildings begins with an investigation for evidence of asbestos-containing materials. If the presence of asbestos is confirmed, the program proceeds with an assessment of the need for corrective action, the implementation of asbestos control measures, and, if necessary, periodic reassessment.

This chapter addresses issues related to the organization and management of an asbestos control program for buildings where the presence of asbestos is suspected. Based on the experience of several school boards over the last few years, the development and execution of a successful asbestos control program involve the following activities:

Establishing Responsibility: An asbestos program manager is designated and is given the responsibility for directing and managing control program activities. The program manager obtains guidance from the appropriate EPA Regional Asbestos Coordinator (RAC) and becomes familiar with the key organizational, procedural, and technical elements of an asbestos control program.

Planning: A program plan is developed to guide and schedule the program activities.

Selecting Advisors and Obtaining Advice: The program manager identifies technical advisors and experts who will assist in plan development and implementation.

Implementing Corrective Measures: Corrective measures may be implemented by in-house staff or by a contracting firm. If in-house staff or persons initially unfamiliar with methods of asbestos control are to participate, they must be thoroughly trained and provided with adequate protective devices. If the need for corrective action involves the employment of abatement contractors, serious attention should be given to contractor selection and project surveillance.

Recordkeeping: Detailed records of all program activities, decisions, and analyses are maintained.

Figure 2 is a chart of the general control program organization.

This chapter emphasizes planning and management. The activities listed above are discussed in that context. Chapters 3 and 4 discuss important technical issues involved in executing specific aspects of the program plan.

Since asbestos-containing materials are present in buildings in many forms, it is important for this discussion to identify those that constitute the greatest potential hazard.* Most efforts to reduce asbestos levels in buildings have focused on friable materials, that is, materials that can be crumbled, pulverized, or reduced to powder by hand pressure. (The Asbestos-in-Schools rule issued in May 1982 addresses only friable asbestos-containing materials.) Friable materials are generally believed to have a higher potential for fiber release than nonfriable materials. As a result, the starting point for most asbestos control programs is an inspection for friable materials in the building. Typically, friable materials have been sprayed or troweled onto surfaces for fireproofing, insulation, soundproofing, or decoration. Nonfriable materials cannot be ignored because they also may release fibers if disturbed or mechanically altered during building repair or remodeling, or if damaged during normal

*Asbestos-containing materials may be found in schools and other buildings in the form of cement products, acoustical plaster, fireproofing textiles, vinyl floor tiles, thermal insulation, and other construction materials. Descriptions of these and other asbestos-containing materials appear in Appendix C.

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