

- Implement interim control procedures (see Section 3.3).
- Evaluate and select among alternative abatement or special operations and maintenance measures (see Sections 3.3 and 3.4).
- Develop a bidding process if an abatement contractor is needed (see Section 2.4).
- Direct and/or monitor abatement activities, and evaluate contractor performance for those projects undertaken by an abatement contractor (see Sections 2.4, 4.1, and 4.2).
- Monitor building maintenance activities on a continuing basis if asbestos-containing materials have not been completely removed (see Sections 2.4 and 3.3).
- Maintain records of survey results and all remedial actions (see Section 2.5).

The plan should include a list of the tasks required, a description of work practices and a time schedule for completion of each task.

The first five activities listed above focus on detecting asbestos and selecting a strategy for controlling asbestos if it is present. As noted, Chapter 3 discusses these activities in detail. Other activities involve program management and surveillance. General guidance for these activities is given in the remaining sections of this chapter. Criteria for determining abatement project completion are discussed in Chapter 4.

2.3 Obtaining Advice

In developing and implementing the program plan, the program manager should identify persons within the school system or affiliated with the building owner who are familiar with structural or operating characteristics of the building under consideration, or who have specialized legal, medical, or communications expertise. Included among this group of technical advisors are:

- school board or building architects;
- custodial staff supervisors;
- heating and ventilation engineers;
- loss control specialists (especially where catastrophic insurance is in force);
- the building owner's attorneys (and other legal specialists as needed);
- medical specialists; and
- public relations specialists.

Expert assistance in detecting the presence of asbestos, in assessing the need for corrective measures, and in undertaking control actions may also be needed. This expertise may be provided by a person already working with the building owner who has or can gain experience in asbestos assessment and control, or by an outside consultant, such as an engineer, industrial hygienist, or architect. The technical expert may be asked to participate in program planning prior to determining if asbestos-containing materials are present. If the program manager is confident about implementing the method offered in previous EPA guidance for inspecting, sampling, and analyzing to detect asbestos (Lucas, et al 1980a and 1980b, and the FEDERAL REGISTER [47 FR 23360]), then the assistance of the technical expert may be postponed until it is determined that asbestos is present. In either case, the expert should be prepared to participate in developing the control program plan.