EXPOSURE CONTROL PLAN

1) Purposes & Responsibilities

a) Purposes

i) Surrey School District's asbestos exposure control plan is designed to protect employees from harmful exposure to asbestos fibres.

ii) To achieve this protection, the School District and its employees shall satisfy Part 6 of the WCB Occupational Health and Safety Regulation: Substance Specific Requirements; Asbestos.

b) Responsibilities

i) **The School District**, through the office of the Manager, Health, Safety & Benefits, and in close coordination with the Director, Plant Maintenance and Minor Renovations, shall:

(1) Appoint an asbestos coordinator to oversee all aspects of the Asbestos Exposure Control Plan. The School District Health and Safety Officer is the Asbestos Coordinator.
(2) Conduct the risk identification and assessment of employees' potential exposure to asbestos (currently this is conducted by a qualified outside contractor);
(3) prepare and keep the ACM inventory current;
(4) Implement controls to eliminate or reduce exposure to asbestos-containing materials;
(5) Provide employees with appropriate personal protective equipment;
(6) Ensure that employees with a potential exposure risk receive education and training on asbestos-containing materials and on the exposure control plan;
(7) Ensure that all pertinent records are maintained, and
(8) Annually review the exposure control plan and update it as necessary.

ii) **The School District**, through the offices of the Director, Plant Maintenance and Minor Renovations and the Associate Director, Business Management services, shall:

(1) Hire qualified asbestos abatement contractors and environmental consultants for all low, moderate and high risk asbestos work, including capital and maintenance projects which could lead to worker exposure.
(2) Communicate the nature of all asbestos work to the principal/site manager.
(3) Ensure that a WorkSafeBC Notice of Project (NOP) and asbestos risk assessment are posted within timelines that **comply with WorkSafeBC regulations, for all asbestos work:**
(a) at the location of the asbestos work within the building, and
(b) on the Health & Safety Bulletin Board in the staff room.

iii) **Principals, Managers & Supervisors** are responsible to:

(1) Supervise employees with respect to asbestos;
(2) Prohibit contracted work that disturbs building materials at asbestos-containing sites until they are satisfied that this work has been approved by the Assistant Director, Plant Maintenance and Minor Renovations, or designate
(3) Ensure that employees with a potential exposure risk follow safe work practices;
(4) Ensure that employees with a potential exposure risk wear appropriate personal protective equipment;
(5) Ensure staff involvement and/or attendance of all affected employees at education/training sessions provided on this topic, and
(6) Initiate accident investigations of exposure incidents.

iv) **Employees** who are at risk of exposure to asbestos will:

(1) Use the equipment provided for their protection;
(2) Follow safe work procedures as provided by School District #36 (Surrey);
(3) Attend/participate in education or training opportunities regarding asbestos and the asbestos exposure control plan;
(4) Participate in accident investigations of exposure incidents.

2) Risk Identification & Assessment

a) Action Priority Designations

i) There are three priority designations which have been provided to each worksite and in addition, the District Facilities Centre has documented information in regard to the priority designations throughout the school district.

b) Surveys

i) Asbestos has been identified in building materials in School District #36 (Surrey) over the course of two formal asbestos identification surveys. The first was conducted by Astech Environmental in 1992, the second was conducted by Pinchon, Harris and Holland in 2000. An additional 1171 samples have been taken and/or analyzed by Pacific Environmental from December 1998 ongoing..

ii) The sample results have been combined into one electronic database This database is to be considered the primary source of asbestos identification in the District. Additionally, paper copies have been distributed to all schools/sites where asbestos has been identified, and a set of paper copies is kept at the District Facilities Centre. The District's environmental consultant submits electronic updates to the database monthly.

c) Labels

i) Two types of labels are used to identify asbestos locations; a large label for crawlspace hatches, boiler room doors and other staff-only areas, and a wing (building section) label.

(1) The labels will be completed and affixed by a staff member or consultant designated by the Asbestos Coordinator, in consultation with the Assistant Director, Plant Maintenance and Minor Renovations, or designate. Both types of label are shown in Appendix A. A wing label will be used at the entrance to wings of the site where asbestos is present, indicating which materials in the wing are known or presumed to contain asbestos.

(2) If labels are removed due to painting or other work they are to be returned to their original positions. If that is not possible, the employee who removes the labels must report the removals, including the exact locations, to their supervisor, who must report the details of the label removal to the Asbestos Coordinator, who will provide replacement labels.

d) Ongoing Assessment and Inspections

i) The condition of the asbestos-containing materials is evaluated on the following schedule:

ii) Schools with vermiculite in the brick or block are to be inspected twice per year; one inspection cycle to look at all ACM, the second cycle to look at areas where vermiculite could leak out of cracks/holes in brick or block.

iii) Schools without vermiculite to be inspected annually, unless a particular material has both a high potential for disturbance and high friability, in which case that material at that location will be inspected a second time in the yearly cycle.

iv) The inspections will be performed by District staff and/or an independent consultant, and a report provided to the Facilities Department and the Health, Safety & Benefits

v) Manager. The condition of the asbestos labelling system is also evaluated at this time, and missing or damaged labels are replaced. Labels are altered or added to indicate newly identified ACM.

vi) Inspection checklists are provided for the inspection of the asbestos-containing material of each site. (Sample inspection checklist is contained in Appendix C). These must be completed and filed with the Asbestos Coordinator by August 31 each school year.

vii) The report includes details about the condition of the materials, their friability, accessibility, likelihood of damage and potential for fibre release. If needed, subsequent repair or removal will be coordinated by the Asbestos Coordinator, and the Assistant Director, Plant Maintenance and Minor Renovations. If damaged asbestos-containing

viii) material is discovered during the course of the inspection, the inspector will take interim measures to ensure that asbestos fibres can't be released, post an approved notice advising that the material contains asbestos, and immediately notify the site supervisor and the Asbestos Coordinator. (See Appendix D – Approved Notice and Examples of Interim Measures).

3) Control Procedures

a) All asbestos work will be done by qualified contractors who have agreed, in writing, to comply with all applicable WCB regulations, with the exception of the low risk work that occurs when employees work adjacent to undisturbed ACM.

b) Any work project that involves disturbing any building materials in an asbestos-containing school will require additional sampling for asbestos by the qualified consultant before the work can proceed, unless:
   i) previous sampling indicates that the material DOES contain asbestos, or
   ii) the material is too new to contain asbestos.
   iii) the material could not reasonably be expected to contain asbestos, e.g. wood or drilling into a steel beam

c) If the sampling indicates that no asbestos is present in the material the work may proceed in the usual manner. If the sampling confirms the presence of asbestos the asbestos in the area of the intended work must be removed or rendered incapable of becoming friable before the project can commence.

d) All work orders generated for asbestos-containing sites will indicate that the site contains asbestos, and refer employees to further instructions if building materials are to be disturbed.

e) No one may cut, drill into, mount items onto, remove or otherwise disturb asbestos containing materials without following all the work procedures required by WorkSafeBC. All asbestos containing sites must keep the yellow asbestos inventory binder readily available in the main office and provide access to any employee who wishes to view it.

f) If the binder information indicates that the drywall taping compound sampled in one area contains asbestos, all rooms that were dry walled in the same wing/area of the building where the sample was taken are to be assumed to have drywall taping compound that contains asbestos. The same principle holds for sampling on other materials, such as ceiling tiles, vinyl sheet flooring, etc.

g) Prior to allowing any vendor or contract service provider to do any work that disturbs or potentially disturbs any building materials that potentially contain asbestos at any of these sites, please contact the Manager, Structural & Plumbing Maintenance at the District Facilities Centre. The Manager will either grant permission to allow the contractor or vendor to proceed or will arrange for sampling of the material in question to determine if it contains asbestos. If there is asbestos the

Manager will coordinate all WorkSafeBC approved measures to eliminate the risk of releasing asbestos fibres into the air. Without exception the contractor may not make their own arrangements for identification or removal of asbestos containing materials.

4) Education & Training

a) The asbestos coordinator will have the following training and qualifications:

i) familiarity with the hazards and precautions required for handling and working around asbestos and asbestos-containing materials,

ii) thorough knowledge and understanding of the components of the exposure control plan,

iii) familiarity with the factors used to assess risk associated with asbestos and asbestos-containing materials, such as friability, location, and damage to material,

iv) instruction and training in the administration of the exposure control plan from a health and safety professional with experience in the practice of occupational hygiene as it relates to asbestos management. Alternatively, the person may have completed a course from a widely recognized training program, which would impart equivalent information, methods, practices and procedures to the recipient, such as NIOSH or other similar training program.

b) All Facilities staff will be trained in the specifics of the School District's asbestos exposure control plan, and in the specific work procedures they are expected to follow. Training will be provided by the Asbestos Coordinator or a qualified consultant on an ongoing basis no less every second year. New staff members will be trained at the earliest possible training session, within 6 months from the date of hire.

c) All janitorial staff will be trained in the hazards of asbestos, and the procedures and responsibilities in the asbestos exposure control plan. Training will be provided by the Asbestos Coordinator or a qualified consultant on an ongoing basis no less every second year. New staff members will be trained at the earliest possible training session, within 12 months from the date of hire.

d) Employees who are not members of the Facilities department will be provided with information regarding the hazards of asbestos, the locations of asbestos-containing materials at their site, the necessary precautions to avoid exposure to friable asbestos, and the procedure for reporting concerns about asbestos-containing material. Education sessions will be in the form of information provided to the Principal or Manager by the Asbestos Coordinator for presentation at a staff meeting. The sessions will be scheduled as near as possible to the start of the school year.

5) Written Work Procedures

a) Surrey School District employees do not do any work that involves disturbing asbestos. All of this type of work is performed by contracted asbestos abatement companies.

b) The District provides the following asbestos-related work procedure to all employees (Appendix B):

"Procedure for School/Site-Based Employees: What to do if: a) You Discover Damaged/Disturbed Asbestos-Containing Material, or b) You Suspect a Work Area has been Contaminated with Asbestos"

6) Documentation

a) The following records will be maintained by the Facilities Department, with assistance from Health, Safety & Benefits, for a minimum of ten years.

i) asbestos-containing materials inventories

ii) asbestos-containing materials risk assessments,

iii) asbestos-containing materials inspections

iv) air monitoring results of asbestos removal/remediation work.

v) records of corrective actions to control fibre release,

vi) records of training and instruction of workers,

vii) written work procedures and written notifications to WorkSafeBC (NOPAs)

b) The following records will be maintained in perpetuity by Health, Safety & Benefits:

i) employee reports of exposure to asbestos
ii) reports of investigation into claims of exposure to asbestos

7) Review

a) This Asbestos Exposure Control Plan will be reviewed by the following people and committees by December 31 of each school year:

i) The Manager Health, Safety & Benefits or designate
ii) The Director of Facilities or designate
iii) The Health and Safety Sub-Committees of the affected sites

b) All suggestions or recommendations made during the review process will be considered. The final decision on changes to the plan will be made jointly by the Director of Facilities and the Manager Health, Safety & Benefits.

8) References

a) WCB Regulation Sections 5.48 through 5.55 and 6-1 through 6-6.
b) WCB publication Safe Work Practices for Handling Asbestos

Appendix A
Asbestos Identification & Caution Labels

School District No. 36 (Surrey)
Asbestos Identification Program

Happydale Elementary
North Wing (New)
Comprising rooms 119-146, 219-246 and all associated rooms and corridors.

Asbestos is present in the:

- Drywall taping compound
- Gold floor tile
- Green sheet vinyl flooring
- Green wallboard (washrooms)
- Masonry block walls
- Window putty
- Window putty
- Pipe insulation in above-ceiling spaces
- Fume hood wallboard

Label No. DB1
Location: Doorframe at entrance to N. Wing, 1st Floor

large label for crawlspace hatches

CAUTION

ASBESTOS HAZARD

RESTRICTED ACCESS MEASURES ARE IN PLACE FOR ALL CRAWLSPACE AREAS

PROPER RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING ARE REQUIRED

TO ARRANGE ACCESS, PLEASE CONTACT:

School District #36 (Surrey)
Health & Safety Department
Health & Safety Officer
604-599-7484

HEALTH, SAFETY & BENEFITS

School District 36 (Surrey)

Asbestos-Reporting Procedure for School District Employees

What to do if:

a) You Discover Damaged/Disturbed Asbestos-Containing Material, or
b) You Suspect a Work Area has been Contaminated with Asbestos

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Asbestos-containing material (ACM) is not hazardous to your health while it remains in good condition and is non-friable. When it is damaged it can become friable (can be crumbled, pulverized or powdered by hand pressure) and needs to be dealt with immediately.

If you see damaged ACM or if you suspect a work area has been contaminated with asbestos:

DO

1. Prevent further damage or disturbance that may take place while you are reporting the situation by preventing access to the area.
2. PUT UP A SIGN
3. **Immediately** report the damaged/disturbed or suspect ACM to your principal or site manager.

DON'T

1. Attempt to repair the damage yourself.
2. Clean up any ACM debris.

School District 36 (Surrey), Human Resources Department
14225 – 56 Avenue, Surrey B.C. Tel: 604-599-7400 Fax: 604-596-3192

Appendix **B**
Procedures

HEALTH, SAFETY & BENEFITS

School District No. 36 (Surrey)

Procedure for Principals or Managers Investigating Potential or Known Asbestos

Principals or managers who have an unknown material discovered or reported concern regarding known asbestos containing material should follow the procedure outlined below. **All suspicious materials should be reported to the Facilities Department for assessment.**

1. Employee reports to supervisor (Principal).

2. Principal to check asbestos binder locations/material reported AND contact Facilities.

3. Visually check area of unknown material or reported damage. For safety reasons, do not handle material yourself.

4. Seal off area or evacuate the area until unknown substance is identified and mitigated or repairs to asbestos containing material are complete

5. If material is still unidentified or damage confirmed, submit work order – mark **"urgent"**.

6. Create and post the following sign: "DO NOT ENTER UNLESS PRIOR APPROVAL FROM PRINCIPAL" lock door.

7. Facilities (through the office of Structural/Plumbing Maintenance) will arrange for testing and, if necessary, coordinate cleanup.

8. Notify Assistant Superintendent and the Health, Safety & Benefits Department (specifically Nancy Johnston at 604-599-7484 and/or Mary Campbell at 604-599-7474) for their information.

9. If asbestos is confirmed, Facilities will coordinate clean up by hiring a third party health monitoring consultant who will regularly update the principal on scope of work and anticipated timelines of clean up.

10. Contact Communications Dept and draft letter to inform parents/staff.

11. Notify ALL AFFECTED staff and the Health and Safety Sub-Committee (meetings are preferred). May need to have two meetings in order to accommodate all staff members (CUPE and STA). For those that miss the meetings, minutes must be recorded and placed in letter boxes for all CUPE and STA staff including the caretakers. Health and Safety Committee should post their minutes.

12. Follow up. Continue to update staff as new developments/information arises and ensure they are discussed at the Health & Safety Sub-Committee Meetings.

School District No. 36 (Surrey)

Moderate Risk Entry/Exit Procedures: Asbestos Contaminated Crawlspace Areas (Restricted Access Designation)

Introduction

The following procedures are, at the minimum, to be employed by district personnel and sub-trades for entry to and exit from crawlspace areas in school district facilities which have been designated "**RESTRICTED ACCESS**" due to the presence of asbestos contamination. These procedures follow the WorkSafe BC requirements for Moderate Risk work procedures as defined by the Occupational Heath and Safety Regulation.

Risk Assessment and Worker Training

Prior to entry into a **RESTRICTED ACCESS** crawlspace area, authorization must be provided by SD#36 Health & Safety Department, and Facilities Maintenance Department. All personnel entering these areas must also have received adequate instruction and training in the hazards of asbestos exposure; in the use and maintenance of respiratory protection and protective clothing; in the safe handling of asbestos materials and specifically these procedures.

Note: - It should be noted that some crawlspace areas may be considered Confined Spaces. If this is the case, as determined by a Risk Assessment of the space in question, then all appropriate Confined Space Entry procedures and protocols must be addressed as part of the entry process.

Personal Protective Equipment

Respiratory Protection

- Personnel shall be provided with personally issued, individually identified, air purifying respirators, fitted with approved HEPA filter cartridges.

- All personnel will be trained in the maintenance, use and limitations of their respirators. Personnel will also be fit tested on their respirators, using a protocol acceptable to the WorkSafe BC (quantitative or qualitative test methods). Fit-testing results will be recorded on a standardized fit test record form for each personalized respirator, and this record must be kept with the respirator at all times to show proof of current testing.

- All personnel must perform positive and negative field fit-tests each time a respirator is worn, prior to its use.

- Personnel with facial hair cannot wear half-face respirators or full face-piece Powered Air Purifying Respirators (PAPR), as the facial air will affect the respirator-to-face seal. PAPRs with the loose-fitting hoods are permitted for use by personnel with facial hair, if fit testing confirms the satisfactory performance of the respirator.

Protective Clothing

- Personnel will wear full body, impermeable, disposable Tyvek-style coveralls complete with attached head and footwear covering, designed to fit snugly around the face, at the wrists and ankles. Coveralls are single-use and must never be re-used, and must be disposed of as asbestos waste prior to exiting the work area, as part of the decontamination process.

- Personnel must wear the proper protective footwear as part of these procedures. If rubber boots are to be used, which can be worn outside of the disposable coveralls, these boots must be left within the contaminated area prior to exiting the area, if it is the intention of personnel to re-enter the area. If exiting the contaminated area for the last time, the contaminated rubber boots must be cleaned of any gross contamination and placed within a 6-mil thickness clear polyethylene bag, and then re-sealed within a second 6-mil polyethylene bag, labeled as containing asbestos waste, and sealed utilizing tape, before removal to another site before being re-opened within a contaminated space for re-use. As most rubber boots are equipped with a textile liner material, which cannot be properly decontaminated, the alternative to bagging the boots for re-use in another contaminated space is outright disposal of the boots as asbestos waste.

Materials, Equipment & Tools

- Polyethylene drop sheeting (minimum thickness 6-mil, [0.15mm]) will be used to for the decontamination station at the entrance/exit to the work area.

- Asbestos waste bags: Two separate, impermeable, 6-mil (0.15mm) thick polyethylene disposal bags. The outer container will bear a pre-printed **"Asbestos Waste"** label and will otherwise be acceptable to the disposal site, Provincial Ministry of the Environment - Waste Management Branch and the Personnel Compensation Board of British Columbia.

- **"Caution – Asbestos Hazard",** signs will be posted, warning unauthorized personnel not to enter the work area, to complement asbestos hazard banner tape, which is used to define the boundary of the contaminated area.

- A bucket for water and a sponge is required for the decontamination station at the entrance/exit to the contaminated area.

- A HEPA-filtered vacuum should be available for the decontamination of personnel and equipment exiting the contaminated area.

Area Designation and Preparation

- Clearly mark the boundary of the contaminated area by the placement of asbestos caution banner tape and **"Caution – Asbestos Hazard"** warning signs. **"Caution – Asbestos Hazard"** signs will be posted at all conceivable approaches to contaminated areas (and other locations where airborne concentrations of asbestos may exceed ambient background levels).

The signs will be posted sufficiently far enough away from the work area to permit all personnel to read the sign and take the necessary protective measures to avoid exposure.

- Ensure that all intake and exhaust vents associated with HVAC systems that are in proximity to the entry/exit point and decontamination station, which in the case of crawlspace areas may be the room where the crawlspace access hatch is located, are de-energized and/or sealed while personnel are entering or exiting the designated area.

- Establish a decontamination station on the clean side of the asbestos barrier tape at the entry/exit point. Lay a section of 6-mil polyethylene on the floor to protect surfaces from water damage, and place a full bucket of clean water and a clean sponge on the polyethylene. This water is used by personnel for decontamination of themselves and items they bring out with them (flashlights, small tools, etc.).

Area Entry and Exit Procedures

- All personnel must be fully protected with HEPA filtered respirators and protective clothing prior to entry into a contaminated crawlspace area, and for the full duration they are within the contaminated area, until they exit the area adjacent the decontamination station.

- All personnel must, prior to entering the designated area, put on appropriate respiratory protection, clean disposable coveralls with head and footwear covering. Hard hats, eye protection, gloves, and knee guards shall also be utilized as required. Clean respirators and protective clothing shall be provided and utilized for each person, for each separate entry into the designated area.

- Eating, drinking, chewing, and smoking, are not permitted in contaminated areas.

- Before leaving the work area personnel shall decontaminate their protective clothing using a HEPA vacuum or by damp wiping to remove any bulk contamination. Once cleaned, the disposable coveralls are removed and placed in a 6-mil polyethylene bag within the area for disposal as contaminated waste. Tools or personal protective equipment, such as textile gloves or knee guards with textile liners, which cannot be properly decontaminated, must either be bagged as a contaminated item of re-use elsewhere (as per previous instruction), or disposed of as asbestos waste.

- Before removing their respirator, personnel will wash their hands, exposed portions of their face, and the exterior of their respirator, taking care not to wet the HEPA filter medium. After decontaminating properly, personnel will then exit the contaminated area, at which time the respirator can be removed, and the rest of their face can be thoroughly washed.

- Duct tape is used to completely seal the inlet side of the respirator HEPA filters, to ensure that any fibers are sealed within the filter, or if the filters are clogged or wet they must be disposed of as asbestos contaminated waste.

Area Clean-up:

- All materials, such as disposable coveralls, filters, equipment and other items contaminated with asbestos will be placed in sealed, impermeable, labeled disposal bags.

- Personnel will then remove double-bagged and sealed waste from the contaminated area and transfer to the designated asbestos holding area for eventual transport and disposal at an approved hazardous materials landfill site.

Ref: SD36 - CrawlspaceEntryExitProcedures (Mod.Risk).REV
Last Update: November 18, 2009

Appendix C
Sample Inspection Checklist

FOR USE BY TRAINED SD36 EMPLOYEE	ELEMENTARY SCHOOL BASEMENT	**FOR USE BY ENVIRONMENTAL CONSULTANT OR SD36 HEALTH & SAFETY OFFICER ONLY**			
P = Present & in readable condition **N** = New label required	**LABELS**				
	South Stairwell Landing– 1 label				
	Centre Stairwell Landing – 1 label				

Condition ✓ = good condition **D** = damaged	**LOCATION OF ASBESTOS-CONTAINING MATERIALS**	**Friability**	**Access-ibility & likelihood of Damage**	**Potential for fibre release & exposure of workers**	**Recom-mended Action**
	Corridor 015 (south)				
	- **Asbestos** containing drywall filling compound				
	- Non-asbestos sheet vinyl flooring (beige w/brown spots).				
	Girls Washroom 012				
	- **Asbestos** containing decorative cement board on walls				
	- Suspect **asbestos** containing drywall filling compound on ceiling.				
	- Suspect **asbestos** containing vermiculite insulation in cavities of masonry wall systems.				
	Room 007				
	- Suspect **asbestos** containing vermiculite insulation in cavities of masonry wall systems.				
	- Non-asbestos sheet vinyl flooring (beige/pink w/light brown spots).				
	- Non-asbestos drywall filling compound on walls.				
	Elevator Machine Room (off Room 001)				
	- **Asbestos** containing 9" vinyl floor tile (blue w/brown and white streaks).				
	- Suspect **asbestos** containing 12" vinyl floor tile (beige).				
	- Suspect **asbestos** containing vermiculite insulation in cavities of masonry wall systems.				