MAINTENANCE TECHNICAL SUPPORT CENTER / MAINTENANCE POLICIES & PROGRAMS ENGINEERING / UNITED STATES POSTAL SERVICE

Maintenance Management Order

SUBJECT: Asbestos Work Practices

DATE: November 9, 2009

NO: MMO-127-09

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TO:
1. Maintenance Manager
2. Plant Manager
3. Manager, Maintenance Support, Area Offices
4. Human Resource Analyst/Safety, Area Offices
5. Manager, Safety and Health, District Offices
6. Plant Safety Specialist

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Online Change Record		
Change #	**Date**	**Description of Change**
1	3/08/2017	This online change updates Attachment 10, Attachment 11, and Attachment 12 replacing a no longer available drill shroud with the Bosch HDC200 SDS-max Dust Collection Attachment drill shroud and updates the drilling process.

The purpose of this Maintenance Management Order (MMO) is to provide updated information relating to asbestos work practices used by postal employees who may disturb asbestos containing materials while performing certain maintenance tasks. This MMO supersedes MMO-029-00, Asbestos Work Practices.

This bulletin applies to all facilities which have asbestos containing building materials (ACBM) or presumed asbestos containing building materials (PACM). These include facilities which:

- Have been surveyed according to Chapter 5 of AS-556, Asbestos Management Guide, and found to contain ACBM.
- Were built before 1990 and have not been inspected.

The bulletin only applies to certain activities which are regulated by OSHA's Construction Standard relating to building maintenance work. Work covered by the General Industry Standard, which applies to custodial floor care, brake and clutch work (automotive and otherwise), drilling into safes, and other non-construction-related work, will be covered by other instructions.

The bulletin does not apply to buildings built after 1990 that have been certified as not containing ACBM, in writing, by the architect/engineer, accredited asbestos inspector, the construction contractor, or the owner/lessor in the case of new construction leases.

The use of any or all of these work practices is voluntary; however, if these work practices are not used (see Attachment 4), the asbestos work covered by these work practices must be contracted. All decisions to contract must be made in compliance with Article 32 of EL-912,

Agreement between the United States Postal Service and American Postal Workers Union AFL-CIO.

Direct any questions or comments concerning this bulletin to the HelpDesk, Maintenance Technical Support Center, P.O. Box 1600, Norman OK 73070-1600; telephone FTS 2000 (405) 573-2123 or toll free (800) 366-4123.

Robert E. Albert
Manager
Maintenance Technical Support Center
Maintenance Policies and Programs

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1. Background
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ATTACHMENT 1

BACKGROUND

1.1 OCCUPATIONAL HEALTH AND SAFETY ADMINISTRATION'S GENERAL INDUSTRY STANDARDS

The Occupational Health and Safety Administration's (OSHA) General Industry Asbestos Standard, 29 CFR 1910.1000 requires that employees not be exposed to more than 0.1 asbestos fibers per cubic centimeter (cc) of air for up to 8 hours or no more than 1.0 fibers per cc for a maximum of 15 minutes. This is called the Permissible Exposure Limit (PEL).

Many postal facilities have asbestos containing building materials (ACBM). These materials present no exposure hazard unless they are damaged or disturbed. Working with or around these materials is covered by the OSHA Construction Standard.

1.2 OSHA CONSTRUCTION STANDARDS

The OSHA construction standard for asbestos, 29 CFR 1926.1101, defines and regulates four classes of work which may disturb materials that contain more than 1% asbestos.

Class I – Activities involving the removal of thermal system insulation (TSI) and surfacing asbestos containing material (ACM) and presumed asbestos containing material (PACM).

Class II – Activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III –Repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.

Class IV – Maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

Postal employees may only perform the specified Class III and Class IV work. This bulletin will discuss Class III work only. Class IV work in the Postal Service is primarily floor care of vinyl asbestos tile and asbestos containing floor plank. Class IV floor care information is available from OSHA General Industry Standard 29CFR 1910.1001 (k) (7) and National Center for Employee Development (NCED) PSTN Broadcast course titled Asbestos Awareness.

Many postal facilities have ACBM in asphalt plank and vinyl asbestos tile (VAT) floor coverings. Some drop in ceiling panels, wall plaster, sheet rock joint compounds, thermal insulation (pipe insulation), and transite boards in lookout galleries contain asbestos. OSHA regulates any maintenance work on these materials which is likely to disturb asbestos, such as drilling holes in the materials, as Class III work. OSHA requires controls, which may include onsite air monitoring, respirators, and negative pressure enclosures during the performance of Class III work if the PEL is exceeded. The OSHA standards allow an employer to prove that a work practice cannot produce asbestos exposures above the PEL, and so, eliminate the need to have onsite air monitoring, respirators, and negative pressure enclosures. Use of these proven work practices allow postal maintenance employees to safely work with asbestos so they can install equipment, run wiring, and perform other building maintenance activities.

1.3 WORK PRACTICES

The Postal Service has established proven work practices which include development of specific asbestos procedures validated by extensive air monitoring to show that employees will not be exposed to asbestos above the OSHA limits. OSHA refers to this sampling data as "objective data" [OSHA 29 CFR 1926.1101(f) (2) (iii) (A)]. The local facility must designate at least one EAS employee, known as a competent person, who will review the work practices that are contained in this MMO. The competent person reviews building maintenance work, which disturbs ACBM and determines which if any of the work practices performed by trained craft employees will result in no asbestos exposures above the PEL. (In reality, the tested work practices result in asbestos exposures comparable to background environmental conditions.) This is known as a negative exposure assessment (NEA). (If none of the work practices apply, the work must be contracted to a licensed asbestos contractor.)

1.4 U. S. POSTAL SERVICE'S RESPONSE TO OSHA REGULATIONS

As background information, the Postal Service's response to the regulations includes:

- Surveying buildings built before 1990 for asbestos building materials. (Buildings built before 1990 which have not been surveyed are presumed to have asbestos containing building materials (ACBM).)
- Establishing District Asbestos Program Coordinators (DAPC) in all Districts.
- Establishing and maintaining an asbestos Operation and Maintenance Plan for each facility which contains ACBM.
- Providing training, as required by regulation, to management and craft employees.
- Publishing MI-EL-890-2007-2, Asbestos-Containing Building Materials Control Program.
- Publishing Handbook AS-556, Asbestos Management Guide.
- Developing the work practices, objective data, and publishing this MMO, which explains the requirements and procedures to allow Postal Service Maintenance Employees to perform limited Class III asbestos work.

Full details of the requirements for meeting all of the OSHA requirements for postal employees to perform Class III work are contained in Attachments 2 through 14.

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ATTACHMENT 2

WORK PRACTICE ELEMENTS

2.1 HEADQUARTERS PROVIDED ELEMENTS

2.1.1 Work Practice Procedures

The work practice procedures provided in this MMO were developed and tested by the Southeast and Northeast Areas by contracting with firms which specialize in industrial hygiene work. The work practices were selected after several postal maintenance managers were polled to determine the most common activities, performed by postal employees, which can disturb asbestos. Initial air sampling was done using the contractor's employees, respirators, and air monitoring. The work practices were then verified using postal maintenance employees in postal facilities under actual operating conditions. During the development phase there were several changes made to the procedures and equipment to make the work practices as efficient as possible and still assure that employees would not be exposed to asbestos above the OSHA PEL.

2.1.2 Objective Data

During the testing phases, extensive air samples were conducted by certified industrial hygienists (CIH). The sample data were analyzed to assure that trained employees using these procedures would not cause an exposure to asbestos above the OSHA PEL. Further, all work practices were verified to ensure that negligible asbestos fibers were released. The complete report, Negative Exposure Assessments for Targeted Asbestos Work Activities, including sampling data may be found on the MTSC web site at:

http://www1.mtsc.usps.gov/equipment/SAFETY_EXTERNAL/Files/NegExpAssess.htm

OSHA may want to verify that the objective data does exist during an inspection.

2.1.3 Form 8210, Work Authorization – Asbestos

The Form 8210, Work Authorization – Asbestos, was developed to:

- Assure asbestos is not accidentally disturbed.
- Generate a paper trail of asbestos work in a facility for OSHA compliance.

Details of the completion and use of the form for Class III work performed by postal employees are explained in Attachment 2.2.2. (Form 8210 is available in Adobe Form Client Filler and in Attachment 6.)

2.2 LOCAL ELEMENTS

2.2.1 Competent Person

Each facility or Facility Maintenance Office which is responsible for buildings with ACBM and has elected to use postal employees to perform Class III asbestos work must designate at least one competent person. This designation must be in writing and the original must be kept in the

asbestos file for the building, a copy sent to the DAPC, and a copy should be retained in the maintenance office. A competent person is one who:

- Has knowledge of the facility.
- Has been specifically delegated in writing as a competent person by the facility.
- Has experience and training in work place safety beyond that provided in the 16 hour Class III O&M training program.
- Has had the EPA accredited Operation and Maintenance (O&M) training for buildings with ACBM. (See Training below.)
- Is capable of identifying existing asbestos hazards, selecting the appropriate control strategy (i.e. work practice), and has the authority to correct the hazards or stop the work if, in his/her opinion, fibers will be released in excess of the exposure limits set by OSHA.
- Reviews building maintenance work which will disturb ACBM. He/she determines and prescribes the appropriate work practice are to be performed by trained craft employees to assure asbestos exposures will be below the limits set by OSHA. This is known as a negative exposure assessment. (If none of the work practices apply, the work must be contracted to a licensed asbestos contractor.)

The competent person in most facilities will be a Maintenance Supervisor. It may also be the local safety professional or facility safety coordinator (FSC). The decision on who will be a competent person is left up to the local facility management. (Note that other organizations within the Postal Service, such as Districts, Areas, etc., may also have competent persons.)

There are no specific requirements that the competent person be on site at all times. Therefore, it is possible to send a trained maintenance craft employee to a remote site alone and allow them to perform the attached work practices. The competent person should review the job and be familiar with the facility prior to the performance of a work practice.

2.2.2 Form 8210, Work Authorization – Asbestos

The Form 8210, Work Authorization – Asbestos, is to be completed before the commencement of building maintenance work which will disturb asbestos. (Form 8210 is available in Adobe Form Client Filler and in Attachment 6.) The completed original must be kept in the asbestos file for the building, a copy sent to the District Asbestos Program Coordinator (DAPC), and a copy should be retained in the maintenance office.

Form 8210 is designed to be used for a wide variety of situations where work is to be performed on postal buildings which contain asbestos. The following discussion concerns use of the form only for Class III work performed by postal employees.

The instructions state that the person responsible for the proposed work initiates the form. Since most non-maintenance groups in a facility do not have the expertise, usually, the form will be initiated by maintenance support or other maintenance function. It may be initiated by maintenance craft employees such as Area Maintenance Technicians who identify the need to disturb asbestos at a remote facility. The initiator will complete Section A-1 through A-4, Section B, and Section D.

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The designated facility safety coordinator (FSC) will complete Sections C and E, or F-1 and F-2. Where asbestos will be disturbed by postal employees using an approved work practice, C-1, C-2, C-3, and C-4 will be marked as yes by the FSC.

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NOTE

Section F-1, Expiration Date for this Work Authorization. This allows specific work, (such as, drilling holes in asbestos containing plank on the workroom floor) for twelve months without having to complete a new form each time work is performed. Prior to re-authorizing the work for another twelve months the Maintenance Manager must assure that Class III workers and competent people are designated and properly trained.

2.2.3 Class III Worker and Competent Person Training

The training required by OSHA is the same for the Class III worker and the competent person. (See Section 2.2.1 for additional requirements for competent persons.) For training, OSHA requires the training be consistent with the Environmental Protection Agency's (EPA) standards, 40 CFR 763.92 (a) (2), for training of school maintenance and custodial staff. Since the EPA has approved many of the state programs for compliance with EPA regulations, any training under the state program will meet OSHA standards. Your servicing environmental specialist or the District Senior Safety Specialist can provide a list of EPA or state approved programs. The NCED also provides training to meet this standard.

The 16 hour O&M Training is required for the competent person and the workers before any of these work practices can be used. Additionally, the competent person and workers must receive refresher training annually. Neither OSHA nor EPA specifies what the annual refresher training should contain or how long it should take. The Postal Service has determined that 4 hours is required and that the work practices and asbestos disposal methods should be reviewed as a minimum.

2.2.4 Maximum Class III Working Days

OSHA requirements can be interpreted to mean employees performing Class III asbestos work for more than 29 days per year must undergo annual medical surveillance. Although the procedures authorized by the Postal Service demonstrate that there is little or no asbestos exposure, it is Class III asbestos work and the medical surveillance requirement may be required. Postal policy limits each postal maintenance employee to no more than 29 days per year of Class III asbestos work.

OSHA requires that more than an hour of Class III work be counted as a complete day, while work totaling less than an hour is not counted. Postal policy places the following additional restrictions on Class III work:

- Time counted towards the Class III workday begins with the first element of work which could disturb asbestos containing material (i.e. when the first hole is drilled) and continues, uninterrupted, (except for scheduled lunch breaks) until cleanup is complete or the employee leaves the Class III work assignment. Work, prior to drilling the first hole, such as marking the hole locations, moving rolling stock out of the work area, etc., will not be considered as Class III work.
- Employees will not be rotated or tag teamed to stay below the one hour per day limit.

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- Managers must also determine if an employee has performed Class III work for more than 30 days in any calendar year since the revised OSHA Asbestos Construction Standard has been in effect (October 11, 1994). These employees must be offered medical surveillance in accordance with the standard for as long as they perform Class III work. Medical surveillance can be arranged through the District Safety Manager.
- No employee will be allowed to perform Class III work for more than eight hours per day. (Some OSHA asbestos exposure limits are based on an eight-hour day. This restriction eliminates the need to recalculate exposure limits for more than eight hours of Class III work).
- Limiting the pool of Class III workers will improve the ability to track employee asbestos work hours. However the pool must be large enough to accomplish required asbestos work and ensure that no postal employee performs asbestos work for more than 29 days in a 12 month period.

This policy is intended to further limit any potential employee exposure and to avoid unnecessary risks associated with medical surveillance (i.e. X-rays) when OSHA has determined that it is not beneficial to the employee.

Managers of Maintenance in offices performing Class III work will maintain a log for each employee to assure that the 29 day limit is not exceeded. The log must contain the employee's name, date of Class III work, start and stop times of the work, and a brief description of the work. The employee must initial the entries to indicate that the work is properly recorded. The log must be updated by the end of the tour when an employee performs Class III work.

In order to better track the work hours of employees that work with Asbestos Containing Building Material (ACBM), several enhancements have been added to eMARS. Sites that utilize the asbestos work tracking feature in eMARS do not need to maintain a hardcopy log. However periodic auditing of the PS 8210s and the eMARS tracking feature is recommended to improve asbestos program oversight and compliance.

USING the eMARS TRACKING FEATURE

Creating a new work order: When creating a new work order, a pop-up message will ask: Does this work involve any asbestos containing building material (ACBM)? In most cases, the answer will be "No", and you can proceed as you have normally done in the past. However, if this is a Building related work order, and you have been told that the work involves ACBM, click on "Yes". The work order will default to a work code of 25 (Asbestos containing building material). The "Add work order" screen will have additional information in **blue** that says **"PS Form 8210 must be approved prior to creating any ACBM work orders. To access form, Click PS Form 8210".** Clicking this link will take you to the Asbestos Work Authorization (PS Form 8210) in Adobe Form Client Filler.

Tracking ACBM work hours by employee: Some ground rules about working with ACBM: Any more than one hour of ACBM work is counted as one day of ACBM work. Postal policy limits each postal maintenance employee to no more than 29 days per year of ACBM work. To see how much ACBM work an employee has done over the past 12 months, go to: Reports / Personnel / Scheduling / Crew Work Schedule. The far right hand side of the report shows total ACBM days (prior 12 months). For further details on individual employees, go to: Reports / Personnel / ACBM / Employee Report.

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Scheduling the ACBM work order: All ACBM (Work Code 25) work orders to be scheduled will be highlighted in **pink**. Select the work order and assign it to an employee. If the employee has the appropriate ACBM training listed in the Pers/Training module, you can schedule normally. If the employee does not have the appropriate asbestos training and/or the training record has not been entered in eMARS, the following pop-up message will appear: "One or more of the work order(s) selected contains ACBM. The employee selected does not have the proper training to work with Asbestos Containing Building Material (ACBM). Do you still want to assign work to the employee?" This message will not prevent you from scheduling the employee. It's designed to make you think twice before assigning someone to work with ACBM that has not been trained. One other caveat when scheduling a code 25 route, a warning message will pop up if the employee you are scheduling has worked on ACBM between 25-29 days in the past 12 months. Another warning message will pop up if the employee being scheduled has worked more than 29 days in the past 12 months. Postal employees must not work on ACBM more than 29 days in a 12 month period.

Completed Actions: When entering a code 25 work order in the Completed Actions module, you will see a new field for ACBM time. Enter the actual time the employee spent working with ACBM in the "ACBM Time" field. This may or may not be less than the total work order time. You still need to enter the total time for the work order in the "Time" field.

2.2.5 Record Keeping

Since OSHA will likely determine if an office is in compliance with the standards by examining records, it is imperative that each office maintains, within the maintenance organization, the following information:

- List of the work practices used at the facility. (It is not necessary to train employees for work practices that are not needed or are impractical to use in your facility.)
- List of all competent persons and the work practices for which they are responsible.
- List of employees who will use these work practices and the work practices for which they have been trained.
- Copies of the completed Forms 8210.
- Records of the days each worker has worked on Class III asbestos (See Section 2.2.4).
- For competent persons and workers the following training information must be maintained on the 16 hour O&M Course and the annual 4 hour refresher training:

  Name of course
  Name of firm, providing training
  Proof of the firm's state or federal EPA accreditation
  Instructor's name
  Dates of the course
  Location of the training
  Work practices covered

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ATTACHMENT 3

EQUIPMENT

3.1 Equipment

The equipment to be used in these work practices is listed in each work practice. Note that some of the work practices list multiple vacuums or two drills. These may be used as determined by the competent person. No other substitutions are allowed as this would negate the objective data and lead to potential exposure to asbestos above the PEL.

Since MMO-029-00 was issued NILFISK of America, Inc.® has changed its name to NILFISK-ADVANCE AMERICA, Inc®. NILFISK-ADVANCE AMERICA, Inc® will be referred to as NILFISK® in the remainder of this MMO. In addition, NILFISK® has updated the models of vacuums that were used previously in the work practices included in MMO-029-00. The following information discusses the different models.

NILFISK® GM 625 is the model that replaced NILFISK® model GS 625. The two vacuums can be used interchangeably according to NILFISK®. The only difference between the two models is the motor. GM 625 uses a motor that provides increased water lift and air flow.

NILFISK® GM 80 series is the model that replaced NILFISK® model GS 80 series. The two vacuums can be used interchangeably according to NILFISK®. The only difference between the two models is the motor. GM 80 series uses a motor that provides increased water lift.

The NILFISK® GS 80 series HEPA Vacuum listed in the updated ASB25 can be used interchangeably with the NILFISK® GS 80i series HEPA vacuum listed in the other work practices. The only differences between the 80 series and the 80i series is the 80i series uses a heavy duty trolley and neoprene hose versus a light duty trolley and plastic hose.

Two additional vacuums have been approved for use in the various asbestos work practices. The two vacuums include Nilfisk® Model 135 and Pullman Holt model 86ASB-5D4C. The Pullman Holt vacuum is the same model that was previously purchased for use in cleaning mail-processing equipment. If a Pullman Holt vacuum that was used for cleaning equipment is used to perform asbestos work practices, it must be cleaned, filters and bags replaced, and checked to ensure that it is functioning properly before it can be used for asbestos work. If the vacuum has not been used previously to clean asbestos or other hazardous materials, the cleaning and replacement of filters and bags may be performed by postal maintenance employees. If the vacuum has been used to clean asbestos materials see section 3.3. The vacuum must be marked as an asbestos vacuum as discussed in the paragraph below.

All vacuums used in performing asbestos work must be labeled to indicate they contain asbestos to ensure compliance with OSHA 1926.1101(k) (8) (i) which states that asbestos labels shall be affixed to all products containing asbestos and to all containers containing such products, including waste containers. This OSHA requirement can be met by ensuring the 4 inch square postal "A" label (USP-RL) is affixed to the vacuum canister signifying that it contains ACM. This label can be ordered from MSC Industrial Supply Company using MSC's part number 85638500.

The color-coded warning labels (the “A” symbol) are adhesive. Peel the adhesive backing off of the label and firmly affix it to the canister. As a precaution against removal, it is recommended that clear packing tape be placed over the entire label.

The equipment will not be procured nationally.

3.2 Nilfisk Vacuum Repair Information

The original asbestos work practice MMO was issued in 2000 and required the purchase of either the Nilfisk® GS 625 or the GS 80i. Since 2000, there may be sites with a Nilfisk vacuum that needs repaired. Local sites can use the following process to obtain the necessary repairs for Nilfisk vacuums.

- All repairs would be handled on a case by case basis.
- Each repair request must be called into Nilfisk’s customer service at 800-645-3475 or emailed to uspaemailorders@nilfisk-advance.com to receive an RA number which needs to be placed on the outside of the box for identification.
- All repairs are sent to the Nilfisk facility in Pennsylvania located at 300 Technology Drive, Malvern PA 19355.
- All vacuums must be decontaminated prior to shipment for shipping purposes as well as the safety of Nilfisk’s technicians.
- Once the technician reviews the vacuum, the technician draws up an estimate and calls the customer for authorization to proceed with the repair. Once the repair is complete an order is in entered into Nilfisk’s system and processed for payment.
- You may choose to have the bag and filters replaced at the time of the repair; however, you will incur labor charges that are currently at a rate of $60 per hour. It usually takes about a half hour to change all filters and the bag.

3.3 Changing Vacuum Filter Elements

High Efficiency Particulate Air (HEPA) filters and bags that have been used in performing asbestos work will not be changed by postal employees as they could present an exposure to asbestos above the limits set by OSHA. When the filters or bags need to be changed, contract with a licensed asbestos abatement contractor to perform the work. Your environmental specialist or District Safety Manager can provide names of licensed contractors.

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ATTACHMENT 4

LIMITATIONS

4.1 CONTRACTOR USE OF WORK PRACTICES

These work practices are to be used only by postal employees performing postal work. The work practices are not to be given to contractors for their use, even on postal premises. (Issues of Postal Service liability could arise in the event of a fiber release episode if a contractor used a postal work practice.) See Attachment 5.

4.2 POSTAL WORK ON NON-POSTAL PREMISES

These work practices may be used on non-postal premises occupied by postal employees who are performing Postal Service work. (Mounting vending equipment to the vinyl asbestos tile floor in a store would be an example.) The building owner should be consulted to determine if the work could disturb asbestos. If the asbestos may be disturbed, or if it is unclear if asbestos is present, use the appropriate work practice. It will be necessary to provide building owners information on the Postal Service's competent person, Class III workers, and the work practice for their asbestos records.

4.3 ALTERNATE WORK PRACTICES

Postal employees will not normally use work practices other than those presented in this MMO. If you have funded development of your own work practices, and wish to continue using them, contact the MTSC HelpDesk at (405) 573-2123 or toll free (800) 366-4123, and open a safety log requesting a review and approval of your work practices. A printed copy of your work practices and supporting objective data must be sent to the MTSC HelpDesk at Maintenance Technical Support Center, P.O. Box 1600, Norman OK 73070-1600. For tracking purposes, include your contact information and your MTSC HelpDesk log number in the package.

4.4 PERMITTED ACTIVITIES

Activities that do not require power tools and which do not create dust or friable material are permitted without a work practice. For example, such activities include driving a nail to hang a picture or using a screwdriver to install or remove screws.

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ATTACHMENT 5

ASBESTOS WORK NOT COVERED BY WORK PRACTICES

5.1 GENERAL

Postal employees who perform asbestos work are limited to Class III work which is covered by one of the attached work practices. Other asbestos work must be contracted to an asbestos contractor as described below.

5.2 BACKGROUND INFORMATION (for USPS employees only)

The asbestos work must be accomplished in accordance with 29 CFR 1926.1101, and not expose workers or building occupants to airborne concentrations of asbestos which exceed the Permissible Exposure Limit (PEL) of 0.1 fiber per cubic centimeter or create uncontrolled fiber release episodes which may result in building shutdown. The contractor's competent person must determine the appropriate class of work per 29 CFR 1926.1101 by performance of an initial exposure assessment. The work may require the establishment of “Regulated Areas” with negative pressure enclosures and air sampling.

The USPS person requesting the work will have to initiate form PS 8210 and complete sections A, B, and D. The facility safety coordinator (FSC) will have to approve the PS 8210 prior to commencement of work.

Consult your District Asbestos Program Coordinator or District Safety Manager before contracting for asbestos work.

5.3 SUGGESTED CONTRACT REQUIREMENTS FOR SMALL CLASS III JOBS

If the work potentially disturbs asbestos, it must be accomplished in accordance with 29 CFR 1926.1101, and not expose workers or building occupants to hazardous airborne concentrations of asbestos, or create uncontrolled fiber release episodes. The contractor's competent person will determine how the work is to be accomplished. Prior to approval to start work the contractor will provide to (name of USPS responsible individual):

- The name and telephone number of the competent person.
- Documentation to show that the competent person and asbestos workers meet asbestos training and experience requirements as defined in 29 CFR 1926.1101 or as defined by applicable state requirements.
- Brief description of how the work is to be accomplished and how the procedure prevents exposure of workers or building occupants to hazardous airborne concentrations of asbestos (e.g., uncontrolled fiber release episodes).
- Documentation that the procedures set forth in the EL-800 have been complied with.

The Facilities Department also manages the "Facilities Single Source Provider (FSSP)" program (a.k.a. ‘Response Line’), a 24 hour a day, seven day a week phone line for any building-related items to be called in for Facilities support. The realm of calls includes asbestos matters that can not be handled locally. Facilities Real Estate and Design and Construction staff will work with installation heads, maintenance and local safety and/or environmental personnel to help resolve

asbestos issues at leased or owned facilities. A list of FSSP/Response Line phone numbers is included below.

List of Facilities Service Office (FSO) "Facilities Single Source Provider" (FSSP) Program Response Line Phone Numbers:

- Northeast FSO: (866)298-8910
- New York FSO: (866)331-1144
- Eastern FSO: (866)350-3801
- Southeast FSO: (888)557-3376 aka (888)55SEFSO
- Great Lakes FSO: (866)334-5376 aka (866)33GLFSO
- Western FSO: (866)764-4589
- Southwestern FSO: (866)622-2393
- Pacific FSO: (866)722-3762 aka (866)PACFSO2

The phone numbers listed above are current as of the date this MMO is issued. In the future, should a phone number change you can use the following link to access the Facilities Department web site which provides links to each Facilities Service Office (FSO), http://hqfso.usps.gov/index.cfm?menu508=1&id=4664.

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ATTACHMENT 6

PS FORM 8210, WORK AUTHORIZATION – ASBESTOS

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Work Authorization — Asbestos

U.S. Postal Service

(See Instructions on Reverse)

Required for Renovation, Alteration, Construction, Demolition, and Building Maintenance Work in Facilities with Asbestos-Containing Building Materials (ACBM) or in Facilities Where ACBM Presence Has Not Been Confirmed.

NOTE: In facilities where asbestos is present or its presence is not known, this form must be completed and submitted to the facility asbestos coordinator (FAC) for all construction and building maintenance work. An authorization must be signed before any work can proceed. Six-month blanket approvals may be issued for construction or building maintenance activities where no ACBM will be disturbed or for building maintenance activities covered by Postal Service approved work practices.

A. General Information (Completed by person responsible for proposed work)

1. Facility Finance/Sublocation No.	2. Date	3a. Facility Name

3b. Facility Address

4a. Project Manager Name	4b. Telephone No. (Include Area Code)	4c. Project No.
5a. Contractor Name	5b. Contractor Street Address	
5c. City	5d. State	5e. ZIP Code
5f. Contractor's Rep. Name		5g. Telephone No. (Include Area Code)
6a. COR's Name		6b. Telephone No. (Include Area Code)

B. Work Description (Completed by person responsible for proposed work)

1. Location (Include building number, room number, functional area or other description)

2. Type of Work to Be Performed

3. Proposed Start Date	4. Proposed Completion Date

C. Assessment of Work (Completed by FAC or Installation Head (IH))

1. Is ACBM present in the vacinity of the proposed work?	☐ Yes (Go to C2)	☐ No (Go to F1)
2. Will ACBM be disturbed or affected by the proposed work?	☐ Yes (Go to C3)	☐ No (Go to F1)
3. Is the work to be performed by Postal Service personnel?	☐ Yes (Go to C4)	☐ No (Go to C5)
4. Is the work based on an approved Postal Service work practice?	☐ Yes (Go to D)	☐ No (Go to E)
5. Is the work to be performed by a contractor using an approved scope of work?	☐ Yes (Go to D)	☐ No (Go to E)

D. Project Contact (If completed, go to section F)

1. Name of Competent Person	2. Telephone No. (Include Area Code)

E. Work Denial

1. This Request Was Denied for the Following Reasons

2a. Printed Name	2b. Signature	
2c. Title	2d. Telephone No. (Include Area Code)	2e. Date

F. Work Authorization

Prior to authorization, the FAC or IH must review the asbestos survey, the operations and maintenance plan, section B of this form, and approved asbestos work practices.

1. Expiration Date for this Work Authorization (Not to exceed 6 months)

2a. Name of FAC or IH	2b. Signature of FAC or IH	2c. Date
3a. Name of Contracting Officer (If applicable)	3b. Signature of Contracting Officer	3c. Date

TransFORM PS Form 8210, November 1997

Original - O&M Plan

MAINTENANCE MANAGEMENT ORDER

MAINTENANCE MANAGEMENT ORDER

General Instructions

If the facility does not contain Asbestos-Containing Building Materials (ACBM), this form is not required. Sections A and B are to be completed by the person responsible for the proposed work. Sections C through F are to be completed by the facility asbestos coordinator (FAC), the installation head (IH), or the contracting officer, as appropriate.

A. General Information

Contractor information should be completed by the contractor, the contracting officer's representative (COR), the project manager, the FAC, or the IH. The project manager is the person responsible for overseeing the project and may be the COR.

B. Work Description

1. Information on the location of proposed work must be consistent with the information contained in the operations and maintenance (O&M) plan for the affected functional area.
2. Provide narrative description of work. If Postal Service maintenance personnel are to perform the work, then specify the work practices that will be used to complete the job, for example, hole drilling, tile removal, wall board cutting, ceiling tile removal.
3. The "proposed start date" is the date work is scheduled to start.
4. The "proposed completion date" is the date that the work should be completed.

C. Assessment of Work

1. Refer to O&M plan to determine if ACBM is present and will be disturbed.
2. Review the work procedures with the contractor or the appropriate Postal Service personnel assigned to the work to determine if ACBM will be disturbed or affected.
3. Postal Service personnel are only authorized to undertake Postal Service-approved work practices.
4. Approved work practices are established by the Postal Service and are applied to Postal Service personnel for asbestos work activities.
5. If the work disturbs or affects asbestos, the services of an approved asbestos contractor must be retained using an approved scope of work.

D. Project Contact

Insert the name and telephone number of the competent person for the project. The name of the competent person may be obtained from the project manager, the FAC, or the contracting officer.

E. Work Denial

Work denials usually include, but are not limited to the following:

- Proposed disturbance of asbestos without approved work practices, an approved contractor, or authorization from a contracting officer.
- Failure to provide information on the location and type of work to be performed.

Only the FAC or IH may sign if work is denied.

F. Work Authorization

In all cases, the FAC or IH will sign the form, whether or not a contracting officer signature is required.

1. The FAC or IH signs this section if all necessary information is provided in sections A through D. Approved Postal Service work practices are authorized for up to 6 months. Maintenance staff using Postal Service-approved work practices must be trained in those work practices.
2. The contracting officer will send Form 8210, Work Authorization — Asbestos, to the FAC or IH for signature prior to the proposed start date.

TransFORM PS Form 8210, November 1997

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MAINTENANCE MANAGEMENT ORDER

AUTHORIZED WORK PRACTICES

ATTACHMENT 7

ASB25 - ASBESTOS FLOOR DRILLING

Work practice ASB25, ASBESTOS FLOOR DRILLING, has been updated since MMO-029-00 was issued and now allows the NILFISK® GM 625, the NILFISK® GM 80 Series, Nilfisk® 135, or the Pullman Holt 86ASB-5D4C vacuums to be used when performing the floor drilling procedure.

Previously ASB25 required the use of the NILFISK® GS 625 vacuum. Refer to Attachment 3 paragraph 3.1, for information regarding the difference in NILFISK® vacuum models that apply to this MMO.

MAINTENANCE MANAGEMENT ORDER

ASB25 - Asbestos floor drilling

Application:

Drilling holes into asbestos floor tile (VAT or asphalt planking) using the dustless drilling system:

The dustless drilling system is comprised of an approved HEPA vacuum system with the appropriate shrouded drilling equipment as stated in the Specialized Equipment section below.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos*, by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.

Tools and Equipment for This Work Practice:

The equipment required for this work practice include standard equipment required for most work practices and also specialized equipment as described below:

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

***Specialized Equipment*:**

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

MAINTENANCE MANAGEMENT ORDER

In addition to one of the above approved HEPA vacuums the following equipment is also required:

- Shrouded Bosch rotary hammer drill.
- Drill bit of the appropriate diameter and length.
- Drill shroud (appropriate length drill shroud should be obtained from the manufacturer. The shroud when attached to the particular drill should extend beyond the end of the drill bit but not so far as to make operation difficult).
- Regular nylon snap bushings from Serve-A-Lite, Moline, IL, Part No. NSB-18-254 (call 1-800-447-6760 for local availability).
- Ground Fault Circuit Interrupter (GFCI) junction cord.
- USPS barricade tape with asbestos symbol from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33”x50” 6 mil bag).

The approved HEPA vacuum in combination with the shrouded drilling equipment listed above will be referred to in the Work Practices as the dustless drilling system.

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the Facility Safety Coordinator (FSC).

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone.
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

MAINTENANCE MANAGEMENT ORDER

NOTE

Bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. Assemble Equipment:
   a. Connect the hose to the HEPA vacuum.
   b. To prevent hand injury, do not connect the drill to an electrical power source until the drill is assembled. Attach the drill shroud and the auxiliary handle:
      1) Loosen the auxiliary handle.
      2) Insert the drill neck into the drill shroud collar.
      3) Adjust the depth gauge.
      4) Tighten the auxiliary handle.
   c. Insert a Special Drive System (SDS) bit through the drill shroud and into the SDS chuck.
   d. Connect the vacuum hose to the drill shroud tube.

4. Mark the holes to be drilled. ***Do not position holes closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this work practice.***

MAINTENANCE MANAGEMENT ORDER

5. Prepare to drill the holes:
   a. Wet the location to be drilled by spraying with amended water.
   b. Turn on the vacuum.
   c. Pull back the shroud to center the bit on the mark. Release the shroud such that the full circumference of the shroud is in contact with the floor. ***Do not try to drill at an oblique angle to the floor or the shroud may not be able to function as required by this work practice.***
   d. Set the drill to the rotary hammer setting.

6. Drill the hole:
   a. Allow the machine to do the work.
   b. Use the depth gauge to prevent over drilling. ***Vibration from the hammer drill can cause numbness and tingling. Use scheduled rest breaks or worker rotation (as necessary) to avoid these effects.***

7. After the hole is drilled to the desired depth:
   a. Unload pressure on the drill.
   b. After the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.
   c. While maintaining hold of the drill, grasp the shroud.
   d. Slowly separate the shroud seal from the floor surface and vacuum the area that was drilled.
   e. While the vacuum is running, stretch the drill shroud out and hold it upright to dislodge into the vacuum any debris that might have accumulated inside the shroud.

8. If there are more holes ready to drill:
   a. Prepare to drill the next hole (follow steps 5 through 7).
   b. If there are no more holes to drill, wipe off the bit and shroud with a disposable, moistened towelette. Detach from the drill the connector hose that connects the drill to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Dispose of the towelette by sucking it into the HEPA vacuum or by placing it into an approved asbestos disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed in an asbestos disposal bag. Return the tools and equipment to their storage location(s).
2. Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

MAINTENANCE MANAGEMENT ORDER

ASB25 - Continued

3. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.
4. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

IF YOU NEED TO DRILL A HOLE DEEPER THAN THE DUSTLESS DRILLING SYSTEM IS DESIGNED TO DRILL:

If you need to drill a hole deeper than the dustless drilling system is designed to drill, you can use the dustless drilling system to start the hole and then finish with another drill that can drill the hole as deep as you need. **This activity can only be conducted if asbestos is limited to the floor tile and/or mastic. If the floor deck or foundation contains asbestos or if you are not sure if you can drill the hole without disturbing ACM, contact FSC or Facility Manager to hire an asbestos abatement contractor.**

- *Start by drilling a hole twice as wide as required with the dustless drilling system.*
- *Stop drilling with the dustless drilling system after you have completely penetrated the floor tile or asphalt plank floor (an inch or two is usually sufficient).*
- *Remove the drill bit as described in step 7 (above).*
- *Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the floor tile or asphalt plank. Don't hammer the bushing when installing.*
- *Using a drill with a longer bit, drill a hole of the required diameter through the center of the conduit bushing and into the substrate. When drilling, stay in the center of the hole to avoid damaging the bushing. Continue drilling to the desired depth.*
- *Attach the hardware to the floor through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.*

MAINTENANCE MANAGEMENT ORDER

AUTHORIZED WORK PRACTICES

ATTACHMENT 8

ASB26 - LIFTING SMALL SECTIONS OF VINYL ASBESTOS TILE (VAT) AND SCRAPING OFF MASTIC

MAINTENANCE MANAGEMENT ORDER

MAINTENANCE MANAGEMENT ORDER

AUTHORIZED WORK PRACTICES

ASB26 – Lifting small sections of vinyl asbestos tile (VAT) and scraping off mastic

Application:

Lifting small sections of VAT (up to 9 square feet) in non-friable condition provided that the tile will not become friable during removal.

WARNING

Certain states have National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations that specify different maximum amounts of asbestos-containing materials that can be removed before the task is considered an asbestos abatement project (rather than O&M). Prior to performing this activity, contact your District Asbestos Program Coordinator (DAPC) for assistance in identifying state-specific requirements that may apply or that may limit or prohibit this activity.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved *PS Form 8210,* Work Authorization - Asbestos, by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

This work practice is designed to allow for lifting up to 9 square feet of floor tile in non-friable condition to install equipment or replace a tile in the event that a tile pops up or needs to be replaced. You can replace asbestos-containing floor tile with another asbestos-containing floor tile if you have an existing inventory, as long as the overall building has a large amount of asbestos floor tile. The competent person can assist you to decide about using asbestos-containing floor tile.

This work practice is not to be used repeatedly during the same project where the total amount of floor tile removed will exceed 9 square feet. Only 9 square feet of floor tile may be removed under each approved PS Form 8210, Work Authorization - Asbestos. The time to complete the removal of a maximum of 9 square feet of VAT flooring should not exceed 2 hours in a workday.

Work practice ASB26 should only be conducted on non-friable, whole, or cracked floor tile in good condition. Work Practice ASB 26 cannot be used for the removal of floor tile in friable condition. A friable condition is considered present if <u>any part</u> of the tile is crumbled or pulverized. If floor tile is in friable condition, contact the FSC or competent person.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

ASB26 – Continued

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

Tools and Equipment for This Work Practice:

The equipment required for this work practice include standard equipment required for most work practices and also specialized equipment as described below:

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

Specialized Equipment:

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

In addition to one of the above approved HEPA vacuums, the following equipment is also required:

- 12-inch wheeled floor nozzle (Part No. 111422), GSA Contract No. GS-07F-8356C.
- 6-inch crevice nozzle (Part No. 811409); GSA Contract No. GS-07F-8356C.
- 2-inch or 3-inch scraper (a longer handle can provide extra leverage).
- WD-40 oil for cleaning.
- Heat Gun (Master Appliance Heat Gun Model HG-501A) from Grainger's 1-800-323-0620, Grainger's part number 4Z715.
- Wood or rawhide hammer.
- USPS barricade tape with asbestos symbol from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33"x50" 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

MAINTENANCE MANAGEMENT ORDER

MAINTENANCE MANAGEMENT ORDER

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

MAINTENANCE MANAGEMENT ORDER

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. The Heating portion of the work practice is a critical element and must been done according to specific methods. These methods are as follows:

   - Perform the floor heating activities using approved heat sources only (see specialized equipment section).
   - Operate the heat gun using the lowest temperature setting available so that the work can be done in a time efficient manner. Care should be taken during the heating activity so that the VAT flooring does not melt.
   - The tip of the heat gun nozzle may not be placed any closer than one to four inches from the surface being heated.
   - The tip of the nozzle should be moving in a back & forth motion during the heating process. Do not hold the tip of the heat gun stationary on any one spot for more than 15 seconds at a time. The worker should heat the VAT in a manner that does not cause the surface to melt.
   - Start the removal of the tile by heating a tile with a heat source and carefully wedging the scraper or prying tool between the seam of two adjoining tiles and gradually lifting the edge of the tile up and away from the floor.
   - Try not to break pieces of the tile, but continue to work the balance of the tile up by working the scraper or prying tool beneath the tile and exerting both forward pressure and a twisting action on the blade to promote the release of the floor tile from the adhesive and the floor.
   - Some tiles will release quite easily while others require a varying degree of force. When the adhesive is spread heavily or the tile is bonded tightly, it may be easier to force the scraper or prying tool through the tightly adhered areas by striking its handle with a hammer.

4. After the tile has been removed, place the tile in an approved disposal bag. Level off any high spots on the floor using the scraper. Spray amended water on the work area as necessary to keep the work area wet. ***Do not sand or grind the floor to level-off high spots. This activity may release asbestos fibers.*** HEPA vacuum any dust or chips scraped off.

5. Remove the tile adhesive or mastic by wetting the area where the tile was removed with amended water and scraping the mastic off with the scraper making sure that the mastic remains wet. Place removed mastic in an approved disposal bag. Vacuum the area where the mastic was removed with the HEPA vacuum. If a chemical product is required for the completion of mastic removal, use only a USPS-approved non-hazardous chemical. Contact your Environmental Specialist for guidance on chemical usage.

6. Repeat steps 3 through 5 to complete the project, lifting a maximum of 9 square feet of tile for each Work Authorization or any lesser amount established by the DAPC (refer to previous footnote regarding state NESHAPS regulations concerning the amount of material lifted). The time to complete the removal of a maximum of 9 square feet of VAT flooring should not exceed 2 hours in a workday.

ASB26 – Continued

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed into an asbestos disposal bag. The hand scraper can be cleaned with WD-40 oil or placed in the approved disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

MAINTENANCE MANAGEMENT ORDER

ATTACHMENT 9

ASB27 - LIFTING SMALL SECTIONS OF ASPHALT PLANK FLOORING

MAINTENANCE MANAGEMENT ORDER

ASB27 - Lifting small sections of asphalt plank flooring

Application:

Lifting small sections of asphalt plank flooring (up to 9 square feet) in non-friable condition provided that the asphalt plank will not become friable during removal.

WARNING

Certain states have National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations that specify different maximum amounts of asbestos-containing materials that can be removed before the task is considered an asbestos abatement project (rather than O&M). Prior to performing this activity, contact your District Asbestos Program Coordinator (DAPC) for assistance in identifying state-specific requirements that may apply or that may limit or prohibit this activity.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos,* by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

This work practice is designed to allow for lifting up to 9 square feet of asphalt plank flooring in non-friable condition to install equipment or replace a plank in the event that a plank pops up or needs to be replaced. You can replace an asbestos-containing asphalt plank with another asbestos-containing asphalt plank if you have an existing inventory, as long as the overall building has a large amount of asbestos asphalt plank flooring. The competent person can assist you to decide about using asbestos containing asphalt plank.

This work practice is not to be used repeatedly during the same project where the total amount of asphalt plank flooring removed will exceed 9 square feet. Only 9 square feet of asphalt plank flooring may be removed under each approved PS Form 8210, Work Authorization - Asbestos. The time to complete the removal of a maximum of 9 square feet of asphalt plank flooring should not exceed 2 hours in a workday.

Work practice ASB27 should only be conducted on non-friable, whole, or cracked asphalt plank flooring in good condition. Work Practice ASB 27 cannot be used for the removal of asphalt plank flooring in friable condition. A friable condition is considered present if any part of the asphalt plank flooring is crumbled or pulverized. If the asphalt plank floor is in friable condition, contact the FSC or competent person.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

MAINTENANCE MANAGEMENT ORDER

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

MAINTENANCE MANAGEMENT ORDER

Tools and Equipment for This Work Practice:

The equipment required for this work practice include standard equipment required for most work practices and also specialized equipment as described below:

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

Specialized Equipment:

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

In addition to one of the above approved HEPA vacuums the following equipment is also required:

- 12-inch wheeled floor nozzle (Part No. 111422), GSA Contract No. GS-07F-8356C.
- 6-inch crevice nozzle (Part No. 811409), GSA Contract No. GS-07F-8356C.
- 2-inch or 3-inch scraper (a longer handle can provide extra leverage).
- WD-40 oil for cleaning.
- Heat Gun (Master Appliance Heat Gun Model HG-501A) from Grainger's 1-800-323-0620, Grainger's part number 4Z715.
- Wood or rawhide hammer.
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33"x50" 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

ASB27 – Continued

MAINTENANCE MANAGEMENT ORDER

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

MAINTENANCE MANAGEMENT ORDER

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. The Heating portion of the work practice is a critical element and must been done according to specific methods. These methods are as follows:

   - Perform the floor heating activities using approved heat sources only (see specialized equipment section).
   - Operate the heat gun using the lowest temperature setting available so that the work can be done in a time efficient manner. Care should be taken during the heating activity so that the asphalt flooring does not melt.
   - The tip of the heat gun nozzle may not be placed any closer than one to four inches from the surface being heated.
   - The tip of the nozzle should be moving in a back & forth motion during the heating process. Do not hold the tip of the heat gun stationary on any one spot for more than 15 seconds at a time. The worker should heat the asphalt plank flooring in a manner that does not cause the surface to melt.
   - Start the removal of the tile by heating a tile with a heat source and carefully wedging the scraper or prying tool between the seam of two adjoining tiles and gradually lifting the edge of the tile up and away from the floor.
   - Try not to break pieces of the tile, but continue to work the balance of the tile up by working the scraper or prying tool beneath the tile and exerting both forward pressure and a twisting action on the blade to promote the release of the floor tile from the adhesive and the floor.

4. Some tiles will release quite easily while others require a varying degree of force. When the adhesive is spread heavily or the tile is bonded tightly, it may be easier to force the scraper or prying tool through the tightly adhered areas by striking its handle with a hammer. After the plank has been removed, place the plank in an approved disposal bag. Level off any high spots on the floor using the scraper. Spray amended water on the work area as necessary to keep the work area wet. ***Do not sand or grind the floor to level-off high spots. This activity may release asbestos fibers.*** HEPA vacuum any dust or chips scraped off.

5. Remove the plank adhesive by wetting the area where the plank was removed with amended water and scraping the adhesive off with the scraper making sure that the adhesive remains wet. Place removed adhesive in an approved disposal bag. Vacuum the area where the adhesive was removed with the HEPA vacuum. If a chemical product is required for the completion of adhesive removal, use only a USPS-approved non-hazardous chemical. Contact your Environmental Specialist for guidance on chemical usage.

ASB27 – Continued

6. Repeat steps 3 through 5 to complete the project, lifting a maximum of 9 square feet of plank flooring for each Work Authorization or any lesser amount established by the DAPC (refer to previous footnote regarding state NESHAPS regulations concerning the amount of material lifted). The time to complete the removal of a maximum of 9 square feet of asphalt plank flooring should not exceed 2 hours in a workday.

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed into an asbestos disposal bag. The hand scraper can be cleaned with WD-40 oil or placed in the approved disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

MAINTENANCE MANAGEMENT ORDER

AUTHORIZED WORK PRACTICES

ATTACHMENT 10

ASB28 - DRILLING HOLES THROUGH SOLID OR HOLLOW WALLS CONTAINING ASBESTOS PLASTER, ASBESTOS STUCCO, ASBESTOS PAINT, OR ASBESTOS DRYWALL MUD

MAINTENANCE MANAGEMENT ORDER

ASB28-Drilling holes through solid or hollow walls containing asbestos plaster, asbestos stucco, asbestos paint, or asbestos drywall mud.

Application:

Drilling holes through solid or hollow walls containing asbestos plaster, asbestos stucco, or asbestos drywall mud to attach hooks, picture hangers, screws, or other hardware.

NOTE

This work practice cannot be conducted if the wall where the bit will exit contains asbestos. If the wall where the bit will exit contains asbestos, contact the Facility Manager or Facility Safety Coordinator (FSC) to hire an asbestos abatement contractor to complete this work.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos,* by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

For safety, this work practice requires a stable working surface.

Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.

Tools and Equipment for This Work Practice:

The equipment required for this work practice includes standard equipment required for most work practices and also specialized equipment as described below:

MAINTENANCE MANAGEMENT ORDER

ASB28 - Continued

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

Specialized Equipment:

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C
- Bosch drill shroud, HDC200 SDS-max® Dust Collection Attachment

In addition to one of the above approved, the following equipment is also required:

- Drill bit of the appropriate diameter and length.
- Regular nylon snap bushings from Serve-A-Lite, Moline, IL, Part No. NSB-18-254 (call 1-800-447-6760 for local availability).
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33”x50” 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.

MAINTENANCE MANAGEMENT ORDER

4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.

5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. Assemble Equipment:
   a. Connect the hose to the HEPA vacuum.
   b. To prevent hand injury, do not connect the drill to an electrical power source until the drill is assembled.
   c. Insert the drill neck into the drill shroud collar.
   d. Attach the drill shroud to the drill.
   e. Adjust the depth gauge, if used.
   f. Insert a bit through the matching (appropriate length) shroud and into the chuck.
   g. Connect the vacuum hose to the drill shroud tube.

4. Mark the holes to be drilled. ***Do not position holes closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this work practice.***

MAINTENANCE MANAGEMENT ORDER

MAINTENANCE MANAGEMENT ORDER

5. A debris collection device can be used on the opposite side wall to collect the non-asbestos debris disturbed when the bit exits the wall. Poly sheeting on the floor or a plastic sheet loosely taped over the exit location are both acceptable solutions.

6. Prepare to drill the holes:
   a. Turn on the vacuum.
   b. Pull back the shroud to center the bit on the mark. Release the shroud such that the full circumference of the shroud is in contact with the wall. ***Do not try to drill at an oblique angle to the wall or the shroud may not be able to function as required by this work practice.***

7. Drill the hole:
   a. Allow the machine to do the work.
   b. ***If used, a hammer drill can cause numbness and tingling from vibration. Use scheduled rest breaks or worker rotation (as necessary) to avoid these effects***.

8. Clean the drill insertion point with a wet rag or towelette:
   a. Unload pressure on the drill.
   b. After the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.
   c. While maintaining hold of the drill, grasp the shroud.
   d. Slowly separate the shroud seal from the wall surface and vacuum the area that was drilled.
   e. While the vacuum is running, stretch the drill shroud out and hold it upright to dislodge into the vacuum any debris that might have accumulated inside the shroud.

9. If there are more holes ready to drill, prepare to drill the next hole (follow steps 6 through 8).
   a. If there are no more holes to drill, dismantle the shroud and wipe off the bit and shroud with a disposable, moistened towelette. Detach from the drill the connector hose that connects the drill to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Dispose of the towelette by sucking it into the HEPA vacuum or by placing it into an approved asbestos disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed in an asbestos disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

MAINTENANCE MANAGEMENT ORDER

IF YOU NEED TO DRILL A HOLE DEEPER THAN THE DUSTLESS DRILLING SYSTEM IS DESIGNED TO DRILL:

If you need to drill a hole through a wall that is thicker than the dustless drilling system is designed to drill, you can use the system to start the hole and then finish with another drill that can drill through the wall. **This activity can only be conducted if asbestos is limited to the plaster, stucco, or drywall mud. If a material beneath the surface contains asbestos or if you are not sure if you can drill the hole without disturbing ACM, contact the Facility Safety Coordinator (FSC) or Facility Manager to hire an asbestos abatement contractor.**

- *Start by drilling a hole twice as wide as required with the dustless drilling system.*
- *Stop drilling with the dustless drilling system after you have completely penetrated the asbestos plaster, stucco, or drywall mud (an inch or two is usually sufficient).*
- *Remove the drill bit as described in step 8 (above).*
- *Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the asbestos plaster, stucco or drywall compound. Don't hammer the bushing when installing.*
- *Using another drill with a longer bit, drill a hole of the required diameter through the center of the conduit bushing and through the wall. When drilling, stay in the center of the hole to avoid damaging the bushing.*
- *Attach the hardware to the wall through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.*

ATTACHMENT 11

ASB29 - DRILLING BLIND HOLES INTO SOLID OR HOLLOW WALLS CONTAINING ASBESTOS PLASTER, ASBESTOS STUCCO, ASBESTOS PAINT, OR ASBESTOS DRYWALL MUD

MAINTENANCE MANAGEMENT ORDER

ASB29 - Drilling blind holes into solid or hollow walls containing asbestos plaster, asbestos stucco, asbestos paint, or asbestos drywall mud

Application:

Drilling blind holes (holes that will not penetrate the wall into another occupied space) into solid or hollow walls containing asbestos plaster, asbestos stucco, or asbestos drywall mud to attach hooks, picture hangers, screws, or other hardware.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos,* by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

For safety, this work practice requires a stable working surface.

Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.

Tools and Equipment for This Work Practice:

The equipment required for this work practice includes standard equipment required for most work practices and also specialized equipment as described below:

MAINTENANCE MANAGEMENT ORDER

ASB29 - Continued

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

***Specialized Equipment*:**

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C
- Bosch drill shroud, HDC200 SDS-max® Dust Collection Attachment

NOTE

Any of the above HEPA vacuums will work as long as they have a minimum listed water lift or 71.5 inches and a minimum airflow of 87 CFM.

In addition to one of the above approved, the following equipment is also required:

- Drill bit of the appropriate diameter and length.
- Regular nylon snap bushings from Serve-A-Lite, Moline, IL, Part No. NSB-18-254 (call 1-800-447-6760 for local availability).
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33”x50” 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.

MAINTENANCE MANAGEMENT ORDER

3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. Assemble equipment:
   a. Connect the hose to the HEPA vacuum.
   b. To prevent hand injury, do not connect the drill to an electrical power source until the drill is assembled.
   c. Insert the drill neck into the drill shroud collar.
   d. Attach the drill shroud to the drill.
   e. Adjust the depth gauge, if used.
   f. Insert a bit through the matching (appropriate length) shroud and into the chuck.
   g. Connect the vacuum hose to the drill shroud tube.

4. Mark the holes to be drilled. ***Do not position holes closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this work practice.***

MAINTENANCE MANAGEMENT ORDER

ASB29 - Continued

5. Prepare to drill the holes:
   a. Turn on the vacuum.
   b. Pull back the shroud to center the bit on the mark. Release the shroud such that the full circumference of the shroud is in contact with the wall. ***Do not try to drill at an oblique angle to the wall or the shroud may not be able to function as required by this work practice.***

6. Drill the hole:
   a. Allow the machine to do the work.
   b. ***If used, a hammer drill can cause numbness and tingling from vibration. Use scheduled rest breaks or worker rotation (as necessary) to avoid these effects.***

7. Clean the drill insertion point with a wet rag or towelette:
   a. Unload pressure on the drill.
   b. After the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.
   c. While maintaining hold of the drill, grasp the shroud.
   d. Slowly separate the shroud seal from the wall surface and vacuum the area that was drilled.

8. While the vacuum is running, stretch the drill shroud out and hold it upright to dislodge into the vacuum any debris that might have accumulated inside the shroud.

9. If there are more holes ready to drill, prepare to drill the next hole (follow steps 5 through 7).
   a. If there are no more holes to drill, dismantle the shroud and wipe off the bit and shroud with a disposable, moistened towelette. Detach from the drill the connector hose that connects the drill to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Dispose of the towelette by sucking it into the HEPA vacuum or by placing it into an approved asbestos disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed in an asbestos disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

MAINTENANCE MANAGEMENT ORDER

ASB29 - Continued

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

IF YOU NEED TO DRILL A HOLE DEEPER THAN THE DUSTLESS DRILLING SYSTEM IS DESIGNED TO DRILL:

If you need to drill a hole deeper than the dustless drilling system is designed to drill, you can use the system to start the hole and then finish with another drill that can drill the hole as deep as you need. **This activity can only be conducted if asbestos is limited to the plaster, stucco, or drywall mud. If a material beneath the surface contains asbestos or if you are not sure if you can drill the hole without disturbing ACM, contact the Facility Safety Coordinator (FSC) or Facility Manager to hire an asbestos abatement contractor.**

- *Start by drilling a hole twice as wide as required with the dustless drilling system.*
- *Stop drilling with the dustless drilling system after you have completely penetrated the asbestos plaster, stucco, or drywall mud (an inch or two is usually sufficient).*
- *Remove the drill bit as described in step 7 (above).*
- *Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the asbestos plaster, stucco or drywall compound. Don't hammer the bushing when installing.*
- *Using another drill with a longer bit, drill a hole of the required diameter through the center of the conduit bushing and into the wall. When drilling, stay in the center of the hole to avoid damaging the bushing.*
- *Attach the hardware to the wall through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.*

MAINTENANCE MANAGEMENT ORDER

ATTACHMENT 12

ASB30 - DRILLING BLIND HOLES INTO SOLID OR HOLLOW WALLS CONTAINING ASBESTOS TRANSITE®

MAINTENANCE MANAGEMENT ORDER

ASB30 - Drilling blind holes into solid or hollow walls containing asbestos transite®

Application:

Drilling blind holes (holes that will not penetrate the wall into another occupied space) into solid or hollow walls containing asbestos transite® board (e.g. siding on a Postal Inspector's gallery) to attach hooks, picture hangers, screws, or other hardware.

NOTE

This work practice can only be used on flat transite® board. Do not attempt to drill a hole into corrugated or ridged transite® since the drill shroud will not form a tight seal on an irregular surface. Drilling into corrugated transite® board may cause asbestos exposure.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos*, by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

For safety, this work practice requires a stable working surface.

Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.

Tools and Equipment for This Work Practice:

The equipment required for this work practice includes standard equipment required for most work practices and also specialized equipment as described below:

MAINTENANCE MANAGEMENT ORDER

ASB30 - Continued

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

***Specialized Equipment*:**

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C
- Bosch drill shroud, HDC200 SDS-max® Dust Collection Attachment

NOTE

Any of the above HEPA vacuums will work as long as they have a minimum listed water lift or 71.5 inches and a minimum airflow of 87 CFM.

In addition to one of the above approved, the following equipment is also required:

- Drill bit of the appropriate diameter and length.
- Regular nylon snap bushings from Serve-A-Lite, Moline, IL, Part No. NSB-18-254 (call 1-800-447-6760 for local availability).
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33”x50” 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.

MAINTENANCE MANAGEMENT ORDER

3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. Assemble equipment:
   a. Connect the hose to the HEPA vacuum.
   b. To prevent hand injury, do not connect the drill to an electrical power source until the drill is assembled.
   c. Insert the drill neck into the drill shroud collar.
   d. Attach the drill shroud to the drill.
   e. Adjust the depth gauge, if used.
   f. Insert a bit through the matching (appropriate length) gauge and into the chuck.
   g. Connect the vacuum hose to the drill shroud tube.

4. Mark the holes to be drilled. ***Do not position holes closer than 2" to the nearest wall or other immovable object. If the shroud is obstructed by such items, it cannot function in the way required by this work practice.***

MAINTENANCE MANAGEMENT ORDER

5. Prepare to drill the holes:
   a. Turn on the vacuum.
   b. Pull back the shroud to center the bit on the mark. Release the shroud such that the full circumference of the shroud is in contact with the wall. ***Do not try to drill at an oblique angle to the wall or the shroud may not be able to function as required by this work practice.***

6. Drill the hole:
   a. Allow the machine to do the work.
   b. ***If used, a hammer drill can cause numbness and tingling from vibrations. Use scheduled rest breaks or worker rotation (as necessary) to avoid these effects.***

7. Clean the drill insertion point with a wet rag or towelette:
   a. Unload pressure on the drill.
   b. After the flutes of the bit pull loose material from the hole, withdraw the bit and stop the drill.
   c. While maintaining hold of the drill, grasp the shroud.
   d. Slowly separate the shroud seal from the wall surface and vacuum the area that was drilled.
   e. While the vacuum is running, stretch the drill shroud out and hold it upright to dislodge into the vacuum any debris that might have accumulated inside the shroud.

8. If there are more holes ready to drill, prepare to drill the next hole (follow steps 5 through 7).
   a. If there are no more holes to drill, dismantle the shroud and wipe off the bit and shroud with a disposable, moistened towelette. Detach from the drill the connector hose that connects the drill to the standard vacuum hose. Detach the other end of the connector hose from the vacuum hose. Seal the connector hose with duct tape. Dispose of the towelette by sucking it into the HEPA vacuum or by placing it into an approved asbestos disposal bag. Turn off the vacuum and seal the vacuum hose end or connect the appropriate attachment to vacuum the work area.

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed in an asbestos disposal bag. Return the tools and equipment to their storage location(s).

MAINTENANCE MANAGEMENT ORDER

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NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

IF YOU NEED TO DRILL A HOLE DEEPER THAN THE DUSTLESS DRILLING SYSTEM IS DESIGNED TO DRILL:

If you need to drill a hole deeper than the dustless drilling system is designed to drill, you can use the system to start the hole and then finish with another drill that can drill the hole as deep as you need. **This activity can only be conducted if asbestos is limited to the transite. If a material beneath the surface contains asbestos or if you are not sure if you can drill the hole without disturbing ACM, contact the Facility Safety Coordinator (FSC) or Facility Manager to hire an asbestos abatement contractor.**

- *Start by drilling a hole twice as wide as required with the dustless drilling system.*
- *Stop drilling with the dustless drilling system after you have completely penetrated the asbestos transite (an inch or two is usually sufficient).*
- *Remove the drill bit as described in step 7 (above).*
- *Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the asbestos transite. Don't hammer the bushing when installing.*
- *Using another drill with a longer bit, drill a hole of the required diameter through the center of the conduit bushing and into the wall. When drilling, stay in the center of the hole to avoid damaging the bushing.*
- *Attach the hardware to the wall through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.*

ATTACHMENT 13

ASB31 - DISPLACE AND RESET AN ASBESTOS CEILING TILE (WITHOUT ASBESTOS IN THE CEILING SPACE)

MAINTENANCE MANAGEMENT ORDER

ASB31 - Displace and reset an asbestos ceiling tile (without asbestos in the ceiling space). - Refer to the asbestos facility survey to verify that there is no asbestos in the ceiling space above the tile.

Application:

Displace and reset an asbestos-containing ceiling tile in a suspended ceiling where no asbestos pipe insulation or friable surfacing material is present above the suspended ceiling.

NOTE

This work practice is not designed to be used to replace asbestos ceiling tiles. It is to be used only to provide access to the space above the suspended ceiling.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos*, by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

This work practice cannot be used to remove a ceiling tile in a spline ceiling system (tiles fixed to supports or those that do not freely lift up) or if the tile is adhered to any surface. In addition, it cannot be used in facilities for which an asbestos survey of the materials in the ceiling space has not been conducted.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

Tools and Equipment for This Work Practice:

The equipment required for this work practice includes standard equipment required for most work practices and also specialized equipment as described below:

MAINTENANCE MANAGEMENT ORDER

ASB31 - Continued

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, polyethylene (poly) sheeting (4 or 6 mil), temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water, a ladder in good condition that meets OSHA requirements.

***Specialized Equipment*:**

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

In addition to one of the above approved HEPA vacuums the following equipment is also required:

- 12-inch wheeled floor nozzle (Part No. 111422), GSA Contract No. GS-07F-8356C.
- 6-inch crevice nozzle (Part No. 811409), GSA Contract No. GS-07F-8356C.
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33”x50” 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.

ASB31 - Continued

5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

MAINTENANCE MANAGEMENT ORDER

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Remove objects that can be easily moved from the work area and, where appropriate, cover objects that cannot be easily moved with poly sheeting.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Place the tools, equipment, and materials needed into the work area.
3. Place ladder directly under the tile to be removed.
4. Check to see that the vacuum hose is of adequate length for the ceiling height. If a hose of adequate length is not available, work from a stable platform with the vacuum secured so that it cannot move or fall off; or call the competent person for instructions.
5. Keeping the ceiling tile as level as possible, carefully lift up the ceiling tile while HEPA vacuuming around the edges of the panel.
6. **If the ceiling tile does not move, discontinue work using this work practice.**
7. If the ceiling tile can be moved, lift the ceiling tile slightly above the grid system, and slowly slide the tile to one side, leaving the tile on top of an adjacent panel.
8. HEPA vacuum the ceiling suspension system in the work area and the underside of the panel that was moved.
9. Lightly mist with amended water any surface area where work will occur.

ASB31 - Continued

NOTE

Do not spray electrical equipment. Perform any required work above the suspended ceiling. Reset the asbestos ceiling tile. If the asbestos ceiling tile breaks or becomes friable, stop work and contact the competent person for instructions.

Clean-up and Tear Down Procedures:

HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed into an asbestos disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

MAINTENANCE MANAGEMENT ORDER

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ATTACHMENT 14

ASB32 - PUNCHING HOLES IN ASBESTOS FLOORING MATERIALS

MAINTENANCE MANAGEMENT ORDER

ASB32 - Punching holes in asbestos flooring materials

Application:

Punching holes into non-friable vinyl asbestos floor tile or non-friable asbestos containing asphalt plank using a suitable punch.

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved PS Form 8210, *Work Authorization - Asbestos,* by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

Tools and Equipment for This Work Practice:

The equipment required for this work practice includes standard equipment required for most work practices and also specialized equipment as described below:

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

MAINTENANCE MANAGEMENT ORDER

***Specialized Equipment*:**

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

In addition to one of the above approved HEPA vacuums the following equipment is also required:

- 12-inch wheeled floor nozzle (Part No. 111422), GSA Contract No. GS-07F-8356C.
- 6-inch crevice nozzle (Part No. 811409), GSA Contract No. GS-07F-8356C.
- Appropriate diameter "arch" hole punch, Order No. 149, manufactured by the Osborne Company, Harrison, NJ, 1-973-483-3232.
- Regular nylon snap bushings, Serve-A-Lite, Moline, IL, Part No. NSB-18-254, call 1-800-447-6760 for local availability.
- Heat Gun (Master Appliance Heat Gun Model HG-501A), from Grainger's 1-800-323-0620, Grainger's part number 4Z715.
- Wood or rawhide hammer.
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33"x50" 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).
2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.

5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

MAINTENANCE MANAGEMENT ORDER

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.

2. Place the tools, equipment, and materials needed into the work area.

3. Assemble equipment:
   a. Select a punch with a diameter greater than the diameter of the desired hole.
   b. Inspect the punch to ensure that the cutting surfaces are sharp and not damaged. Place duct tape over the punch ejection hole to avoid flying debris.

NOTE

The tile can be preheated to reduce the potential for cracking. If the tile is not preheated, spray the work area with amended water before punching. Position the punch on the surface of the flooring material where the hole is desired.

4. Strike the top of the punch squarely. Repeatedly strike the top of the punch until you have reached the desired depth. The punch can also penetrate a wood substrate by repeatedly striking the tool until the desired depth is reached. However, if you need the hole to penetrate a non-asbestos substrate (such as wood) more than an inch or two, consider using a drill to drill out the hole to the desired depth (see procedure below).

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Remove the duct tape from the punch. Dislodge any debris from the punch into the HEPA vacuum. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed in an asbestos disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.

3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

MAINTENANCE MANAGEMENT ORDER

IF YOU NEED A HOLE DEEPER THAN IS PRACTICABLE USING A PUNCH ALONE:

If you need a hole deeper than practicable using a punch alone, you can use the punch to start the hole and then finish with the dustless drilling system that can drill the hole as deep as you need. **This activity can only be conducted if asbestos is limited to the floor tile and/or mastic. If the floor deck or foundation contains asbestos or if you are not sure if you can drill the hole without disturbing ACM, contact the FSC or Facility Manager to hire an asbestos abatement contractor.**

- *Start by punching a hole twice as wide as required.*
- *Stop after you have completely penetrated the floor tile or asphalt plank floor (an inch or two is usually sufficient).*
- *Insert a plastic conduit bushing that fits the hole. Make sure that the conduit bushing completely covers the edge of the floor tile or asphalt plank. Don't hammer the bushing when installing.*
- ***Prior to drilling, verify that you will not penetrate electrical lines, water lines, or other utilities.***
- *Use a drill equipped with the dustless drilling system to drill a hole of the required diameter through the center of the conduit bushing and into the substrate. When drilling, stay in the center of the hole to avoid damaging the bushing. Continue drilling to the desired depth.*
- *Attach the hardware to the floor through the center of the conduit bushing. If necessary, remove the bushing prior to installing the hardware.*

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MAINTENANCE MANAGEMENT ORDER

ATTACHMENT 15

ASB33 - USING POWDER-ACTUATED TOOL TO ANCHOR FASTENERS INTO ASBESTOS FLOORING (THIS WORK PRACTICE CANNOT BE USED FOR WALLS)

MAINTENANCE MANAGEMENT ORDER

AUTHORIZED WORK PRACTICES

ASB33 - Using powder-actuated tool to anchor fasteners into asbestos flooring. (This work practice cannot be used for walls.)

Application:

Using a powder-actuated tool (the HILTI DX-36M fastening tool) to drive fasteners into concrete floors overlain with vinyl asbestos tile (VAT) or asbestos plank. **(Worker must be HILTI certified.) This work practice cannot be used for walls.**

NOTES

All asbestos Operation and Maintenance (O&M) activity requires the completion of a signed and approved *PS Form 8210, Work Authorization - Asbestos,* by the Facility Safety Coordinator (FSC) prior to the commencement of the work activity.

All employees who will be engaged in this work practice must have received the 16-hour Class III Asbestos O&M training.

As a Class III activity, this work practice must comply with the following procedures. If you cannot fully comply with these procedures, you cannot perform this work.

Observe all local safety procedures and use any and all PPE required by the competent person and your supervisor. Use of a respirator is not required for USPS personnel if the work practice is conducted following the steps listed below.

All personnel using the HILTI DX-36M must complete the specialized training in the use of the equipment given by an authorized HILTI DX representative. Training must be provided in the proper use of and safety procedures for this powder-actuated equipment, including the storage of safety boosters (charges), the procedures to be followed in the event of misfires during the performance of the work, and the proper disposal of spent charges. Upon completion of the training, the HILTI representative will provide operators with a certification card indicating that they have successfully completed the training.

The work practice must be implemented only on floors that are constructed of material that warrants the use of powder-actuated equipment for fastener installation in concrete. Charges used in the powder-actuated equipment must be carefully selected, based on the thickness and characteristics of the flooring material.

During the performance of the work practice, operators must ensure the floor is made of concrete and that no personnel are present on the opposite side of any flooring locations where the fasteners are to be installed (e.g., in the event that the flooring is located above a basement or other areas where workers or the public could be present). Operators also must ensure that the powder-actuated charges and tool settings are appropriate to drive the fasteners into, but not through, the flooring material.

Prior to installing fasteners, verify that you will not penetrate electrical lines, water lines, or other utilities.

MAINTENANCE MANAGEMENT ORDER

ASB33 - Continued

Tools and Equipment for This Work Practice:

The equipment required for this work practice includes standard equipment required for most work practices and also specialized equipment as described below:

Standard Equipment, materials or equipment that can be obtained at local hardware stores unless otherwise noted: safety cones, wet wipes (baby wipes), disposable towels or rags, duct tape, temporary work lights, amended water (8:1 water/dishwashing liquid), sprayer bottle for amended water.

***Specialized Equipment*:**

- NILFISK® GS 625 / GM 625, Order No. 01798360, GSA Contract No. GS-07F-8356C
- NILFISK® GS 80i / GM 80 Series, Order No. 01790660, GSA Contract No. GS-07F-8356C
- NILFISK® Model 135, GSA Contract No. GS-07F-8356C
- Pullman Holt 86ASB-5D4C

In addition to one of the above approved HEPA vacuums the following equipment is also required:

- 12-inch wheeled floor nozzle (Part No. 111422), GSA Contract No. GS-07F-8356C.
- 6-inch crevice nozzle (Part No. 811409), GSA Contract No. GS-07F-8356C.
- HILTI DX-36M Fastening Tool manufactured by HILTI, Inc., Tulsa, OK, 1-800-879-8000 (certification required for use).
- USPS barricade tape with asbestos symbol, from MSC® Industrial Supply Company, 1-800.672.4468, Part number 04331435.
- Asbestos disposal bag, from ARAMSCO, 1-800-767-6933, Part No. 56132 (33”x50” 6 mil bag).

Pre-Work Activities Checklist:

PS Form 8210, *Work Authorization - Asbestos*, has been completed and signed by the FSC.

All employees engaged in the work practice have 16-hour asbestos training.

Confirm that all workers involved in the work practice have the appropriate PPE.

Assemble all required tools and equipment, including standard and specialized equipment listed above.

Visually inspect the vacuum motor canister seal and collection compartment to be sure it is closed and locked.

Turn on the vacuum and check for normal operating conditions:

1. Check the manometer gauge to see that the reading is not in the red zone (GS 625 only).

MAINTENANCE MANAGEMENT ORDER

2. Check for normal suction: Hold hand over the open end of the hose and, letting the hose hang free, raise vertically to four feet. With normal suction, the hose should remain stuck to hand.
3. Slowly remove hand from the open end of the hose. You should observe normal suction and airflow.
4. Listen to the motor. If the motor is running fast or sounds high pitched, the bag may be full or the filter clogged.
5. If the vacuum is not operating normally or if the manometer gauge is in the red zone, contact the competent person or your supervisor to have the vacuum bag and/or filter replaced by an asbestos contractor.

NOTE

For the GS 625 vacuum unit, bag or filter replacement is not required if the vacuum performance and the manometer gauge reading can be restored by depressing the plunger on top of the unit several times.

Work Area Preparation Checklist:

Prepare the work area by clearing from the work area all personnel and building occupants who are not directly involved in the completion of the work practice. Establish traffic control barriers to the work area that will exclude unauthorized personnel by using cones and the specified barricade tape with the Postal Service Asbestos "A" symbol and "Restricted Area" repeatedly printed along the length of the tape.

HEPA vacuum the work area. Avoid using the HEPA vacuum to vacuum water or wet debris that can clog and shorten the life of the filters.

Conducting the Work Practice:

1. Ensure that eating, drinking, smoking, and applying cosmetics are not permitted in the work area.
2. Place the tools, equipment, and materials needed into the work area.
3. Select the type of fasteners, powder charges, and equipment settings appropriate to the materials involved.
4. Ensure that any accessible areas below the locations where the work practice (i.e., on the other side of the floor into which the fasteners will be installed) will be performed are cordoned off such that there is no entry to any personnel.
5. Inspect the HILTI gun to ensure that it is in proper working order.
6. Verify that the charges, fasteners, and powder-actuated tool settings are appropriate to the type of material into which the fasteners will be installed.
7. Wet the work location by spraying with amended water and position the HILTI fastening tool on the surface of the material where the fastener is to be installed.

8. Operate the HILTI fastening tool in accordance with the manufacturer's written instructions. Operators of the HILTI DX-36M must be certified in the proper use of and safety procedures for this powder-actuated equipment, including how to select appropriate charges, fasteners, and equipment settings and how to handle misfires.
9. After the completion of the fastener installation, dispose of misfires in accordance with the manufacturer's instructions and disposal specifications contained in the product's Material Safety Data Sheet.

Clean-up and Tear Down Procedures:

1. HEPA vacuum the work area, tools, and equipment used during the work practice. Wet wipe the work area, the tools, and the equipment. Used wet wipes can be sucked into the vacuum or placed in an asbestos disposal bag. Return the tools and equipment to their storage location(s).

NOTE

Prior to handling debris and waste material, make sure they are wetted with amended water. Place all debris and waste materials into an approved asbestos disposal bag.

2. Seal the asbestos disposal bag. Contact your competent person and perform any additional containerization, labeling, storage, transport, and disposal of the bagged asbestos waste in accordance with his/her instructions.
3. Inspect the work area to ensure that the site is free of any visible dust, debris, or contamination before the area is cleared for re-occupancy and access barriers are removed.

MAINTENANCE MANAGEMENT ORDER