

10.21.22

ASBESTOS

WE WILL DO AS-BEST-OS WE CAN.

It is the policy of the Company, to use a qualified subcontractor or qualified employee-owners to remove asbestos material to perform the work. For inspections, walk-throughs, or other non-invasive tasks, proper training must be completed first.

Asbestos-containing material (ACM) and/or presumed Asbestos Containing Material (PACM - certain materials pre-1980) are classified as a hazardous material by OSHA and the EPA. The Company shall avoid taking on any role that leads to being classified as a hazardous waste generator. That designation and the associated responsibility must remain with the facility owner. Any scope of work requiring demolition (no matter quantities) will require a complete asbestos inspection/survey by the building and/or facility owner to determine the presence, location, and quantity of ACM and/or PACM.

In the event that ACM is discovered or disturbed, the Safety Manager must be contacted immediately. A contracted asbestos expert will be contacted to advise and ensure proper notification, protection, best practices, and protocol are followed, and the owner will begin the abatement process. Only a licensed contractor will repair and/or abate disturbed or damaged ACM/PACM material. When ACM/PACM is found, all work will stop and possible exposed crafts will be removed from the area. All notifications will be made, and proper labeling and material control measures will be put in place until the hazardous material is abated. The immediate area at the ACM/PACM will be barricaded with no entry until authorized by the Safety Manager.

When ACM/PACM is identified and/or introduced into the scope of work, employee-owners performing work or demolition that may come in contact with the ACM/PACM, will complete asbestos awareness training to provide a general understanding of the hazards and responsibilities, including known ACM products, cancer and lung effects, and protective measures. All subcontractors will provide proof of asbestos awareness training for their employees working onsite that may come into contact with areas that contain ACM/PACM.

PRE-CONSTRUCTION

Identify and consult the certified asbestos inspector/expert that will help evaluate facility asbestos inspection completeness relevant to the Company's scope of work and provide support if ACM is discovered after abatement. The asbestos inspection report is to remain at the project through completion for review by employee-owners or regulators if requested.

Work will not start on any project requiring demolition until the asbestos inspection is provided by the facility owner (per OSHA regulations §CFR 1926.1101(k)(2)(i)). The asbestos report, locations, and quantities of ACM/PACM will be communicated to the subcontractors that will be exposed to these sites prior to work beginning. This notification will be documented in a pre-construction orientation. ACM material that will remain in the facility during the renovation will be posted/identified and all crafts with possible exposure will be notified of the ACM location and the requirement not to disturb.