



ASBESTOS & HAZARDOUS-MATERIAL ASSESSMENT

Pre-Demolition, Renovation and Material-Disturbance Planning

POLICY STANDARD

No demolition, cutting, drilling, grinding, burning, excavation or other disturbance may begin until affected materials have been evaluated and required controls, notifications and qualified personnel are in place.

PHEIFER BROTHERS CONSTRUCTION CO., INC.

Effective August 23, 2026 | Revision 1

Table of Contents

SECTION	TOPIC	PAGE
1	Purpose, Scope and Responsibilities	3
2	Pre-Work Hazardous-Material Assessment	4
3	Asbestos Identification, Classification and Planning	5
4	Wisconsin Certification, Notification and Coordination	6
5	Work Controls, Regulated Areas and Exposure Assessment	7
6	PPE, Respiratory Protection and Decontamination	8
7	Other Hazardous Materials, Waste and Unexpected Finds	9
8	Emergency Response, Training, Records and Enforcement	10
9	Test Your Knowledge	11

USE OF THIS POLICY

This policy establishes minimum company expectations. Project specifications, owner/WisDOT requirements, laboratory findings and federal, state or local rules may require additional controls or licensed specialists.

Primary Regulatory References

- 29 CFR 1926.1101 - Asbestos in construction
- 29 CFR 1926.62, 1926.1126 and 1926.1153 - Lead, chromium (VI) and respirable crystalline silica
- 29 CFR 1926.59 and 1910.1200 - Hazard communication
- 29 CFR 1926.103 and 1910.134 - Respiratory protection
- Wis. Admin. Code ch. DHS 159 - Asbestos certification and regulated activities
- Wis. Admin. Code ch. NR 447 - Asbestos demolition/renovation emissions and notification
- Wis. Admin. Code chs. NR 502 and NR 506 - Asbestos waste storage, transport and disposal

Official references: www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.1101 | dnr.wisconsin.gov/topic/Demo/Asbestos.html | dhs.wisconsin.gov/asbestos

1. Purpose, Scope and Responsibilities

Purpose and Scope

This policy prevents employee, public and environmental exposure to asbestos and other hazardous materials before and during bridge, highway, demolition, renovation, repair, utility and excavation work. It applies whenever work may disturb an existing structure, coating, insulation, joint material, conduit, pipe, soil, debris or unknown material.

Potential hazards include asbestos, lead, hexavalent chromium, silica, PCBs, mercury, cadmium, arsenic, mold, bird/bat waste, contaminated soil, petroleum products, treated wood, refrigerants and other chemicals. The assessment must match the actual scope; a general building survey may not cover concealed or inaccessible materials affected by the work.

Management / Policy Owner

- Maintain this policy and access to qualified environmental, industrial-hygiene and certified asbestos resources.
- Provide required assessments, exposure controls, PPE, training, medical evaluations and recordkeeping.
- Use Wisconsin-certified companies and individuals for regulated asbestos activities.
- Ensure contracts and schedules allow assessment, notification and abatement before disturbance.

Project Manager / Foreman

- Define the disturbance area and obtain surveys, laboratory reports, SDSs, owner records and utility information before work begins.
- Verify the assessment covers all affected materials and that required permits, notifications and qualified contractors are in place.
- Communicate hazards and restricted areas to employees, subcontractors and the controlling contractor.
- Stop work for unexpected materials, damaged containment, dust migration or changed conditions.

Employees

- Review the pre-task plan and do not disturb unassessed material.
- Follow regulated-area, PPE, hygiene and waste requirements.
- Immediately report suspect materials, unusual dust/odor, buried containers, stained soil, spills or symptoms.
- Do not collect samples, clean up or remove suspected asbestos unless trained, certified and assigned.

STOP-WORK AUTHORITY

If material identity is unknown, the assessment does not match the work, or controls fail, stop without disturbing the material, isolate the area and notify the foreman. Work resumes only after qualified evaluation and authorization.

2. Pre-Work Hazardous-Material Assessment

Scope Definition

- Identify every component to be demolished, cut, drilled, ground, blasted, burned, removed, excavated or penetrated.
- Include temporary access, rigging points, saw cuts, utility relocations, anchor holes, containment attachments and equipment staging.
- Review structure age, prior repairs, plans, owner/WisDOT data, environmental documents and known releases.
- Account for hidden layers, inaccessible spaces, buried materials and work expanded by field changes.

Qualified Assessment

A qualified person shall determine which materials require inspection, sampling or other evaluation. Wisconsin-regulated asbestos inspection and bulk sampling shall be performed by a properly certified asbestos inspector or other person specifically authorized by state rules. Samples shall be analyzed by a qualified laboratory using an appropriate method.

Common Bridge/Highway Materials to Evaluate

- Pipe, boiler, duct and equipment insulation; fireproofing; cement board; transite conduit or panels.
- Expansion-joint filler, bearing pads, gaskets, packing, mastics, caulk, sealants and waterproofing.
- Roofing, siding, flooring and wall/ceiling materials in buildings acquired or removed for transportation projects.
- Lead/chromate coatings, abrasive-blasting debris, welding/torch-cutting fumes and silica-bearing concrete or masonry.
- Mercury switches/lamps, PCB-containing electrical equipment or caulk, refrigerants, batteries and treated wood.
- Contaminated soil, tanks, drums, pipelines, petroleum, sewage, mold and biological waste.

Assessment Report and Release

- Describe inspected areas, materials, sample locations, analytical results, limitations and inaccessible areas.
- Map or clearly mark affected materials and provide the report to planning and field supervision.
- Identify required abatement, controls, notifications, waste profiles and remaining material to protect in place.
- Issue a written release identifying the approved scope. A release is invalid if the work or conditions change.

NO VISUAL CLEARANCE

Material cannot be declared asbestos-free or otherwise nonhazardous based on color, age, appearance, manufacturer name or employee experience. Use a qualified assessment and reliable documentation.

3. Asbestos Identification, Classification and Planning

ACM and PACM

Asbestos-containing material (ACM) contains more than 1% asbestos. OSHA requires certain older installed materials to be treated as presumed asbestos-containing material (PACM) unless rebutted through compliant records or analysis. Presumptions and owner notifications must be carried into project planning.

OSHA Work Classes

CLASS	DESCRIPTION
I	Removal of thermal-system insulation or surfacing ACM/PACM.
II	Removal of other ACM, such as roofing, siding, panels, flooring, mastics or gaskets.
III	Repair or maintenance likely to disturb ACM/PACM.
IV	Maintenance/custodial contact without disturbance and cleanup of dust/debris from Class I-III work.

Planning Requirements

- Determine whether ACM must be removed before demolition or can lawfully remain under the approved demolition/renovation method.
- Engage a certified asbestos company and appropriately certified workers/supervisors whenever regulated activity is performed.
- Designate the OSHA asbestos competent person with training appropriate to the work class.
- Establish regulated areas, control methods, respiratory/PPE requirements, decontamination and waste routes before mobilization.
- Complete the initial exposure assessment before or at the start of the operation and in time to implement all triggered protections.
- Coordinate fall protection, traffic, confined-space, electrical, fire, water, structural-stability and emergency requirements.

Prohibited Practices

- No uncontrolled cutting, grinding, sanding, drilling or breakage of ACM/PACM.
- No dry sweeping/shoveling of ACM/PACM dust or debris.
- No compressed-air asbestos cleaning unless used with an enclosed system that captures the dust cloud.
- No employee rotation to reduce asbestos exposure.
- No removal or disturbance by untrained or uncertified personnel.

PRESUME AND PROTECT

When asbestos status is unresolved, protect the material from disturbance and treat it as suspect/PACM until a qualified determination is completed.

4. Wisconsin Certification, Notification and Coordination

Wisconsin-Certified Resources

- Companies performing, supervising or advertising regulated asbestos work must hold the applicable Wisconsin asbestos-company certification.
- Inspection and bulk sampling must be performed by appropriately certified personnel. Abatement crews require certified workers and onsite certified supervision.
- Exterior-only certification is limited to qualifying exterior nonfriable material that remains nonfriable; it does not authorize friable or interior work.
- Verify current company and individual credentials before award and again before work. Required certification proof must be available onsite.

Wisconsin DNR Demolition/Renovation Notification

- A subject facility must be inspected for asbestos before demolition or renovation. Wisconsin examples include bridges, tunnels and many structures associated with transportation projects.
- DNR notification is generally required for demolition of a subject facility even when no asbestos is found.
- For regulated renovation/abatement quantities, submit the required notification and fees. Standard notification generally must be received at least 10 working days before work.
- Project management shall confirm current thresholds, exemptions, emergency provisions and start-date changes directly with DNR; do not rely solely on this policy summary.
- Maintain the accepted notification onsite and ensure the actual contractor, dates, quantities and methods match it.

Multi-Employer Coordination

- Obtain the owner's asbestos information and give affected employers the location and quantity of ACM/PACM.
- Before work, the asbestos contractor informs the owner and employers of regulated-area locations and protective measures.
- The general/controlling contractor exercises overall supervisory authority and requires correction of observed noncompliance.
- Employers adjacent to an asbestos regulated area check containment integrity/control effectiveness daily and protect or remove employees if migration is suspected.
- Coordinate traffic, public access, utilities, environmental protection and emergency services without breaching containment.

SCHEDULE HOLD POINT

Demolition or renovation shall not start until inspection, certification, notification waiting periods, abatement and written release requirements are complete.

5. Work Controls, Regulated Areas and Exposure Assessment

Exposure Limits

Employee asbestos exposure shall not exceed 0.1 fiber per cubic centimeter (f/cc) as an 8-hour TWA or 1.0 f/cc averaged over 30 minutes (excursion limit). Exposure is evaluated without credit for respirator use.

Assessment and Monitoring

- The asbestos competent person conducts the initial exposure assessment before or at initiation and determines expected TWA and excursion exposure.
- A negative exposure assessment must satisfy OSHA criteria and represent closely similar work, materials, controls and conditions. Absence of visible dust is not an NEA.
- Perform representative breathing-zone monitoring when required and additional monitoring when conditions, materials or controls change.
- Provide affected employees monitoring results as required and correct exposures above a limit.

Regulated Areas

- Conduct all Class I, II and III work in a regulated area; establish one for other operations when a PEL may be exceeded.
- Demarcate the area to minimize entry and prevent migration; post required asbestos warning signs.
- Allow only authorized persons. Prohibit eating, drinking, smoking, chewing gum/tobacco and cosmetics.
- The competent person supervises asbestos work and makes frequent and regular inspections. Class I work requires at least one onsite inspection each shift and whenever an employee reasonably requests one.

Engineering and Work-Practice Controls

- Use wet methods unless infeasible or creating a greater documented hazard.
- Use HEPA-filtered local exhaust, intact removal methods, critical barriers, negative-pressure enclosures, glove bags or other class-specific controls required by 29 CFR 1926.1101.
- Prevent ACM debris from dropping, breaking or migrating outside the regulated area.
- Stop work if barriers tear, negative pressure fails, material becomes more friable, dust escapes or actual conditions differ from the assessment.

CONTROL FAILURE

Suspected fiber migration requires immediate stop-work, isolation of adjacent employees, repair of the control system and competent-person reassessment before restart.

6. PPE, Respiratory Protection and Decontamination

Respiratory Protection

- Required respirator use shall comply with 29 CFR 1926.1101 and the company Respiratory Protection Program.
- Provide medical evaluation before fit testing/use, annual fit testing for tight-fitting facepieces, training and NIOSH-approved equipment.
- Select respirators from the work class, exposure assessment, measured/anticipated concentration and asbestos-specific minimum selection requirements.
- Use HEPA filters for air-purifying asbestos respirators. Never use a filtering facepiece/disposable dust mask for required asbestos protection.
- Facial hair or PPE may not interfere with the face seal, valves, vision or respirator function.

Protective Clothing and PPE

- Provide whole-body clothing, head covering, gloves and foot coverings when required by the standard or exposure assessment.
- Use eye/face, hearing, fall, high-visibility, PFD and other site PPE compatible with asbestos protection.
- Inspect PPE before use and place contaminated disposable/reusable items in closed, labeled containers.
- Do not wear or take contaminated clothing, footwear or equipment into vehicles, offices or homes.

Decontamination and Hygiene

- Provide the class- and exposure-appropriate decontamination area, equipment room, clean room, shower or washing facilities.
- Follow the established entry/exit sequence. HEPA-vacuum gross contamination before removing protective clothing.
- Do not eat, drink, smoke, chew or apply cosmetics in regulated areas. Wash hands and face before these activities.
- Keep street clothing and personal items separated from contaminated clothing/equipment.
- Inform laundry/cleaning personnel of asbestos hazards; employees shall not clean contaminated clothing at home.

Housekeeping

- Use HEPA vacuums and wet cleanup methods; promptly collect debris in leak-tight labeled containers.
- Never dry sweep asbestos debris or use ordinary vacuums.
- Maintain surfaces as free as practicable of asbestos and prevent recontamination of cleared areas.

NO TAKE-HOME EXPOSURE

Decontaminate before entering clean areas or vehicles. Contaminated clothing, tools and waste stay under controlled handling.

7. Other Hazardous Materials, Waste and Unexpected Finds

Hazard-Specific Controls

The project assessment shall identify which separate company programs and regulations apply. Asbestos clearance does not establish that a material is safe from lead, chromium, silica, PCBs or other hazards.

HAZARD	MINIMUM PLANNING RESPONSE
Lead / Cr(VI)	Coating survey, exposure assessment, regulated area, hygiene, respiratory/PPE and medical requirements.
Silica	Task controls or exposure assessment under the construction silica standard; written exposure-control plan.
PCBs / mercury	Identify equipment, lamps, caulk or oils; prevent breakage/release; use approved handling and disposal.
Soil / tanks / spills	Stop excavation, isolate, evaluate vapor/contact hazards, notify owner and environmental personnel.
Biological hazards	Assess mold, sewage and bird/bat waste; control aerosols/contact and determine respiratory/PPE needs.

Unexpected Material or Release

- Stop equipment without further disturbance. Do not touch, smell, sweep, sample or move the material.
- Keep people and ignition sources away; move upwind when vapor, gas or dust is possible.
- Barricade the area and notify the foreman/project manager. Call emergency services for fire, vapor cloud, symptoms, leaking cylinder/drum or uncontrolled release.
- Document location, appearance and circumstances from a safe distance. Preserve the scene for qualified assessment.
- Restart only after material identification, exposure evaluation, cleanup/control and written authorization.

Waste Management

- Keep waste streams separated and characterize before disposal. Never mix suspect material with ordinary construction debris.
- Asbestos waste containing at least 1% asbestos is subject to Wisconsin storage, transport and disposal requirements regardless of project quantity.
- Use leak-tight, appropriately labeled containers; maintain waste shipment records/manifests and approved disposal documentation.
- Prevent discharge to soil, storm drains and waterways. Secure containers against traffic, weather and unauthorized access.

UNKNOWN = STOP

An unmarked pipe wrap, gasket, board, coating, soil stain or buried container is not ordinary debris until a qualified assessment says so.

8. Emergency Response, Training, Records and Enforcement

Emergency Response

- Stop work, isolate the area and prevent further disturbance or spread.
- For potential exposure, move to a safe area without spreading contamination; do not remove contaminated PPE in an uncontrolled clean area.
- Call 911 for serious symptoms, fire, explosion, oxygen deficiency, uncontrolled vapor/gas, major spill or other immediate danger.
- Do not enter a contaminated/IDLH area for rescue unless trained, equipped and assigned under an approved rescue plan.
- Notify management and required owner/regulatory contacts. Preserve evidence and begin incident/exposure evaluation.

Training

- Provide asbestos awareness to employees who may encounter ACM/PACM without disturbing it.
- Provide class-specific OSHA training and Wisconsin certification for employees assigned regulated asbestos activities.
- Train affected employees on the hazardous-material assessment, labels/SDSs, regulated areas, PPE, hygiene, emergency actions and stop-work expectations.
- Retrain when assignments, materials, controls or regulations change or when knowledge/use is inadequate.

Records and Field Verification

- Keep surveys, sample chains of custody, lab results, notices, certifications, exposure data, NEAs, clearance reports and waste records.
- Keep training, respiratory, medical, inspection, incident and corrective-action records for applicable retention periods.
- Before each shift, verify the approved scope, regulated areas, controls, credentials, decontamination, waste containers and emergency access.
- Printed copies are uncontrolled unless issued through the company document-control process. Review at least annually and after changes or incidents.

Enforcement

Unauthorized disturbance, bypassing a regulated area, dry cleanup, bringing contamination into clean areas, or continuing after a stop-work condition is a serious safety violation subject to corrective action under company policy.

RESTART AUTHORIZATION

After an unexpected find, containment failure, exposure concern or scope change, work resumes only after qualified reassessment, required notification/abatement and foreman or project-management authorization.

9. Test Your Knowledge

Circle the best answer. Review any missed question with your foreman before disturbing existing materials.

1. When may demolition begin? A. After a visual walk-through B. After affected materials are assessed and required controls are ready C. When equipment arrives	2. Who may collect regulated asbestos bulk samples? A. Any foreman B. A properly certified person C. Any employee in gloves
3. What is asbestos ACM? A. Material containing more than 1% asbestos B. Any old material C. Only pipe insulation	4. What is the asbestos 8-hour PEL? A. 1.0 f/cc B. 0.1 f/cc C. 5 µg/m³
5. May asbestos debris be dry swept? A. Yes B. Only outdoors C. No	6. Does a general survey cover every hidden material? A. Always B. No; it must match the disturbance scope C. Only on bridges
7. Who may enter a regulated area? A. Authorized persons using required protection B. Anyone with a hard hat C. Delivery drivers	8. What should happen after an unexpected find? A. Sample it yourself B. Stop, isolate and notify C. Place it in ordinary trash
9. May contaminated clothing go home? A. Yes, if bagged B. Only on Friday C. No	10. What is required before restart? A. Qualified reassessment and authorization B. A verbal guess C. Waiting five minutes

EMPLOYEE: _____

DATE: _____

ANSWER KEY: 1-B | 2-B | 3-A | 4-B | 5-C | 6-B | 7-A | 8-B | 9-C | 10-A