



Angelo State University
Operating Policy and Procedure

OP 34.08: Asbestos Compliance and Abatement Program

DATE: March 16, 2021

PURPOSE: The purpose of this Operating Policy/Procedure (OP) is to establish a campus asbestos compliance and abatement program that will comply with the Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA), and Texas Department of State Health Services (TDSHS) regulations relating to asbestos exposure.

REVIEW: This OP will be reviewed in March every four years, or as needed, by the director of risk and emergency management with recommended revisions forwarded through the vice president for finance and administration to the president by April 15.

POLICY/PROCEDURE

1. Overview

Asbestos is the name for a group of natural minerals that separate into strong, very fine fibers. These fibers are heat-resistant and extremely durable, making their qualities very useful in construction and industry for fireproofing, insulation, structural strengthening, sound dampening, cost savings, and aesthetics. The potential of an asbestos-containing product to release fibers is dependent upon several factors, including its location and its degree of friability. Friability means that it can be crumbled with hand pressure and, therefore, is likely to emit fibers when disturbed. Asbestos-containing materials (ACM) contain greater than one percent asbestos when analyzed by polarized light microscopy techniques.

2. Angelo State University Asbestos Program

Asbestos management is the responsibility of Facilities Management (FM). FM is responsible for training, surveying, sampling, analysis, quality control, recordkeeping, and communication to other departments. The Director of Facilities Management or designee shall act as the Asbestos Program Manager and shall attend training necessary to remain competent and current.

FM operates under departmental procedures that meet or exceed governmental regulations. Federal and state regulatory agencies with jurisdiction over asbestos at ASU are the Environmental Protection Agency, U.S. Department of Transportation, Texas Department of State Health Services, and the Commission on Environment Quality. Additional agencies with limited jurisdiction are the Railroad Commission of Texas, Texas Department of Public Safety, and the San Angelo City/County Health Department. Additionally, employees of

private contractors working at ASU are subject to the regulations promulgated by the United States Department of Labor's Occupational Safety and Health Administration.

3. Responsibilities

A successful program requires commitment at all levels of management. Program responsibilities are as follows:

a. Facilities Management

Survey campus facilities and coordinate bulk sampling of suspected materials to determine the presence or absence of asbestos. After completion of surveys, evaluate the survey data to determine the potential for asbestos fiber release. Develop an Operations and Maintenance (O&M) Program.

- (1) Systemically rank, in order from worst to best, asbestos locations posing the greatest threat of exposure.
- (2) Conduct or coordinate appropriate training classes for staff members who frequent areas where asbestos exposure is a possibility.
- (3) Keep departmental chairs informed of abatement projects and progress being made in their area. If, at any time, it is suspected that a fiber release has occurred that could endanger public health, building occupants will be asked to vacate the suspected area until a survey can be conducted to determine the extent of the problem. Results of the survey will be reported to the following individuals:
 - (a) Affected Department Chairs and/or Deans
 - (b) Vice President for Finance and Administration
 - (c) Provost and Vice President for Academic Affairs
 - (d) Vice President for Student Affairs and Enrollment Management
 - (e) Director of Risk and Emergency Management
 - (f) Director of Facilities Planning and Construction
- (4) Notify the appropriate vice presidents of those projects requiring the relocation of employees or students. An estimated time of displacement will be provided with updates as needed.
- (5) Maintain permanent files of written documents, employee exposure records, medical exams, and training.
- (6) Provide Facilities Planning & Construction (FP&C) with submittal requirements and minimum acceptable standards for asbestos-related contractors, asbestos engineering firms, and asbestos technical services firms.

- (7) Conduct pre-planned abatement meetings with FP&C to assure compliance with appropriate regulations.
- (8) Serve as the intermediary and contact point for all ASU activities involving regulatory agencies.
- (9) Inform the director of the appropriate auxiliary of the impact of the project on custodial and maintenance services.
- (10) Inform Custodial Services when their services are to be stopped and then restarted.
- (11) Ensure ACM waste and ACM-contaminated waste are properly disposed of in an approved manner at approved landfills.
- (12) Provide required notification of asbestos abatement projects at ASU to proper regulatory agencies.
- (13) Provide notification of asbestos abatement projects at ASU to all departments potentially impacted by any asbestos abatement activities.

b. Building Maintenance and Construction

- (1) When a Building Modification Request form or service work order involving demolition, modification, or construction is received from a department or FP&C, FM will be notified so that a survey of the work site can be conducted.
- (2) Notify FM immediately of any unplanned release of suspected asbestos.
- (3) FM and FP&C will ensure that employees under their direction are informed of all asbestos projects that might affect their job responsibilities.
- (4) All supervisors in FM shall ensure that those areas in which their personnel will work are inspected for asbestos-containing materials. Such inspections may consist of a review of asbestos building surveys or visual inspection of the work area by the Director of Facilities Management.
- (5) Supervisors in Facilities Management shall ensure that all building materials used for new construction or maintenance activities including, but not limited to, floor tile, floor tile adhesive, caulking, plaster, and roofing materials, are asbestos free. In the event a requirement is identified that can be satisfied only by the use of an asbestos-containing material, a written request must be provided to the director of Facilities Management prior to use of the material.

c. Facilities Planning and Construction

- (1) Review reports of prior inspections a minimum of three weeks prior to the initiation of any project that may involve the disturbance of asbestos containing materials or be suspected asbestos containing materials so that a survey, bulk sampling, and assessment can be scheduled and conducted.

- (2) Provide notification to the Texas Department of State Health Services before beginning renovation projects, which include the disturbance of any asbestos-containing material (ACM) in a building or facility, or before the demolition of a building or facility, even when no asbestos is present. The department shall be notified using the Online Asbestos Notification System or by mailing the Asbestos Abatement/Demolition Notification Form to the department. Notification shall be made no less than 10 working days (not calendar days) prior to the start of demolition or asbestos abatement activity or any other activity that will disturb asbestos (except for emergencies or ordered demolitions).
 - (3) Notify FM immediately of any suspected asbestos fiber release episodes whether caused by or attributed to contractor personnel, employees or students. FM will notify Environmental Health, Safety, and Risk Management, and shall also notify Human Resources if the suspected release may have exposed involved employees.
 - (4) Involve FM in all final inspections of contracted abatement projects.
 - (5) Contracted abatement projects and asbestos engineers will be under the direction of FP&C or FM.
 - (6) Project managers shall ensure building materials for new construction projects and/or renovation/repair projects shall be asbestos free. A written certification stating the project was completed without the use of asbestos-containing materials shall be furnished to FM by the primary contractor when the project is completed. Should a special circumstance arise in which only a product containing asbestos can be utilized and there are no known substitutes, the FP&C project manager shall inform FM. A written statement shall be provided that will justify the use of the special asbestos-containing material **prior** to the use of the product.
- d. Appropriate Dean, and/or Department Chair
- (1) Responsible for the relocation of employees or students in their areas of responsibility where it is determined that there is asbestos contamination or areas to be abated. This should be coordinated with the Academic and Student Affairs.
 - (2) Keep building occupants informed of possible utility shutdowns.
- e. Contracting and Environment Health, Safety, and Risk Management
- (1) Maintain copies of all certificates of insurance for all contractors and service managers.
 - (2) Evaluate insurance carriers presented by asbestos contractors and/or asbestos consultants for financial stability. An annual review of insurance requirements shall be conducted to ensure proper coverage.
- f. Students
- Students will not knowingly be used in areas or projects that could pose an asbestos exposure.

g. Contractors

- (1) Contractors performing renovation and/or demolition activities at ASU shall ensure that their employees are trained in accordance with the provisions of 29 Code of Federal Regulations, §§ 1910.1001 or 1926.1101, Asbestos, as promulgated by the U.S. Department of Labor Occupational Safety and Health Administration. This requirement is not applicable to contractors whose employees would be working in buildings or facilities determined by the university to be asbestos free or whose employees would be performing job duties that would not involve the potential to intentionally or accidentally disturb asbestos-containing materials, presumed asbestos-containing materials, or suspected asbestos-containing materials. Specific examples of job duties requiring such training are cable installers, demolition workers, electricians, and plumbers.
- (2) For each renovation or demolition project conducted at ASU in which there is a potential for the contractor's employees to accidentally or intentionally damage asbestos-containing materials or presumed asbestos-containing materials, the contractor shall obtain the services of an asbestos-competent person. The training requirements for the asbestos-competent person shall consist of either a 32-hour asbestos contractor/supervisor course or a 40-hour asbestos contractor/supervisor course. The asbestos-competent person shall have received this training or evidence of an 8-hour asbestos contractor/supervisor refresher course within the previous two years. Providers licensed in the state of Texas or accredited and approved by the EPA shall teach the training courses.
- (3) For each renovation or demolition project conducted at ASU in which there is a potential for the contractor's employees to accidentally or intentionally damage asbestos-containing materials or presumed asbestos-containing materials, the contractor, her/his employees, as well as the employees of sub-contractors working under contract for the project must have attended a two-hour asbestos awareness course or an annual asbestos awareness refresher course prior to the start of the project. This requirement is not applicable to contractors whose employees would be working in buildings or facilities determined by the university to be asbestos free or whose employees would be performing job duties that would not involve the potential to intentionally or accidentally disturb asbestos-containing materials, presumed asbestos-containing materials, or suspected asbestos-containing materials. Specific examples of job duties requiring such training are cable installers, demolition workers, electricians, and plumbers.
- (4) The contractor shall provide evidence of training for the personnel covered by these requirements prior to the project start date.

h. Others

- (1) All projects or duties requiring individuals to perform cable installation, repair or installation of equipment, or renovation work that will require disturbance of potential asbestos-containing materials in tunnels, equipment rooms, attics, false ceilings, acoustically treated ceilings or any area that might have asbestos contamination will require notification of FM or will be considered contaminated and will require appropriate protective equipment worn.

- (2) Medical examinations will be required before wearing a respirator (see OP 34.05). These requirements are not limited to ASU personnel but shall also apply to individuals employed by outside contractors.
- (3) It shall be the responsibility of the project manager and/or departmental supervisor to ensure compliance with the ASU operating policies/procedures. Any ASU personnel who might potentially come into contact with or, as a result of job duties, accidentally disturb asbestos-containing material shall have completed, at a minimum, the two-hour asbestos awareness training.
- (4) Departmental supervisors shall ensure that building materials for new construction and/or renovation/repair supplied by contractors, sub-contractors, or departmental employees shall be asbestos free. The primary contractor shall provide to the departmental supervisor at the completion of the project a written certificate stating that materials used in any construction and renovation projects were non-asbestos. If special circumstances arise in which only a product containing asbestos could be utilized and there are no suitable substitutes, the departmental supervisor shall inform FM. A written statement shall be provided to FM justifying the use of the asbestos-containing material. FM shall be notified of the special requirement **prior** to the use of the product.

4. Hazard Assessment and Response Actions

The following guidelines were adopted from regulations promulgated by the EPA:

- a. Following completion of a building survey and/or a specific job inspection, an assessment of the hazard posed by those materials determined or assumed to be ACM shall be made.
- b. Each homogenous area containing ACM will be evaluated to determine:
 - (1) Type of building material (surfacing, thermal, and miscellaneous);
 - (2) Friability or non-friability of the ACM;
 - (3) Condition of the ACM; and
 - (4) Potential for further damage.

Determination of the response action specified by the various categories must be made on a case-by-case basis. A given response action, applicable for the ACM condition category, shall be arrived at following consultations with all interested parties. The main consideration involved in the selection of the response action shall always be the health and safety of the employees and students of Angelo State University. Other factors that can be taken into consideration are funding, technical feasibility, and building use.

5. Restricted Use of Asbestos-containing Materials

Due to the hazards associated with the disturbance of asbestos-containing materials and the strict regulatory intent to minimize the environmental and occupational exposure to air borne asbestos fibers, it is the intent of the university to severely restrict the use of asbestos-

containing materials in the construction of new facilities and the renovation of existing facilities. The use of an asbestos-containing material, either in the case of new construction or in the case of renovation work, is limited to only those building materials for which there is no adequate non-asbestos substitute. Any such use of asbestos-containing materials must be approved in advance and in writing by the FM. Any use of asbestos-containing materials not approved in advance by FM is prohibited, and any such use shall result in the removal of the material. The responsibility for such removal shall be that of the contractor and/or the university's construction manager for the given project.

6. Comprehensive Asbestos Surveys for New Construction Projects

In order to ensure that materials used in the construction of new facilities or the renovation of existing facilities are non asbestos-containing, the university's project manager shall prepare or have prepared, as part of the construction work, a comprehensive asbestos survey for the new or extensively renovated facility. The comprehensive asbestos survey for new construction shall consist of the following:

- a. A signed letter from the architect for the project detailing those actions taken to ensure that the new materials used in the new construction work were non-asbestos.

Specific actions would include, but not be limited to, on-site periodic inspections by the architect or employees of the architect of product material labeling and a review of the contractor's final submittal, which would include the *Safety Data Sheets* for all materials used in the new construction work.

- b. A signed letter from the engineer for the project detailing those actions taken to ensure that the new materials used in the new construction work were non-asbestos.

Specific actions would include, but not be limited to, on-site periodic inspections by the engineer or employees of the engineer of product material labeling and a review of the contractor's final submittal, which would include the *Safety Data Sheets* for all materials used in the new construction work.

- c. A signed letter from the university's project manager for the project detailing those actions taken to ensure the new materials used in the new construction work were non-asbestos.

Specific actions would include, but not be limited to, on-site periodic inspections by the project manager or employees of the university of product material labeling, periodic letters to the contractor reiterating the university's desire to utilize non-asbestos building products, and a review of the contractor's final submittal, which would include the *Safety Data Sheets* for all materials used in the new construction work.

- d. A signed letter from the contractor for the project detailing those actions taken to ensure the new materials used in the new construction work were non-asbestos.

Specific actions would include, but not be limited to, site inspections by the contractor's project superintendent of product material labeling, an on-going review of the *Safety Data Sheets* for all materials used in the new construction work, and maintenance of a complete, comprehensive submittal including copies of *Safety Data Sheets* for all products used in the construction or renovation work.

The university's construction manager shall prepare or cause to be prepared a comprehensive asbestos building survey for new construction projects and/or projects involving the extensive renovation of existing facilities. The comprehensive asbestos building survey shall meet the requirements of TDSHS regulations. The project manager may elect to utilize either the *Safety Data Sheets* provided by the contractor for the materials installed or sample results for materials used in the construction work, provided the samples were analyzed by a laboratory licensed to perform polarized light microscopy analytical procedures in the state of Texas. The sample results shall be provided to the construction manager during the construction work or collected from the building materials at the completion of the project. Regardless, the samples must be collected in accordance with the regulations of TDSHS. The comprehensive asbestos survey shall detail the materials installed and figures indicating the locations in the facility where the non-asbestos materials were installed. The comprehensive asbestos survey shall include the letters from the architect, engineer, contractor, and project manager regarding the efforts performed to ensure that no asbestos-containing materials were utilized in the construction or renovation of the facility.