

# 3. Asbestos Handling Program

## 1.0 Introduction

This program will establish guidelines and procedures in the operations and maintenance of asbestos containing materials at PLU to protect all employees, contractors, visitors and vendors from potential health hazards of asbestos related diseases.

This program applies to all buildings and structures owned by PLU, to all employees and sub contractors of PLU, to occupants of PLU buildings and to external organizations who may come into contact with or disturb asbestos-containing material in PLU buildings. This program applies to routine work during which an employee might encounter asbestos.

## 2.0 Policy

PLU will strive to protect the health and safety of employees and students by ensuring that only qualified employees shall be involved in any asbestos repairs, maintenance or removal. All unqualified employees shall be protected from exposure to asbestos fibers by isolating and controlling access to all affected areas during asbestos work. Proper personal protective equipment, vacuums, and HEPA filters shall be used and maintained. Employees shall be trained to recognize and correct asbestos hazards. PLU shall communicate the location of asbestos materials to building occupants.

## 3.0 Responsibilities

The responsibilities defined below are required in order to implement an effective campus program that provides for a safe environment for building occupants, identifies unsafe asbestos conditions, provides training and protection to employees and effectively administers contracts to remove friable asbestos that presents a risk to building occupants.

### 3.1 Environmental Health & Safety Manager

- Work with Facilities Management and other departments to ensure that all asbestos material is identified and labeled.
- Work with supervisors to arrange training for employees.
- Arrange for inspections of buildings and materials that are suspected of containing asbestos material by an accredited asbestos inspector.
- Work with the accredited asbestos project designer and PLU project manager to determine a safe course of action for managing proven or presumed asbestos containing material (ACM).
- Interface with Engineering and Construction Office on asbestos abatement projects.
- Maintain and update Campus Asbestos Management Plan.
- Maintain records of locations of asbestos-containing building materials (ACBM).
- Coordinate the periodic inspections of friable ACBM.
- Arrange for air sampling as needed.
- Interface with regulatory agencies on matters relating to asbestos.

### 3.2 Project Managers

- Notify potential contractors and employees of the presumed and/or known presence of asbestos containing materials (ACM), or of the absence of ACM, or of the certainty of non-disturbance. This information may be obtained from the Environmental Health & Safety Manager).
- Ensure that employees or contractors that provide asbestos services, including abatement and supervision, are certified to carry out this work. Project managers shall forward documentation of all completed asbestos work to the Environmental Health & Safety Manager.
- Ensure proper disposal of asbestos materials.
- Work with the accredited asbestos project designer and PLU Environmental Health & Safety Manager to determine a safe course of action for managing proven or presumed ACM.
- Administer campus contracts for asbestos abatement

### **3.3 Supervisors**

- Ensure that affected employees are trained at the appropriate level to conduct their work safely around ACM and Presumed ACM (PACM).
- Communicate to the employee the specific asbestos hazards associated with their work before assigning such work.
- Assist the Environmental Health & Safety Manager in identifying and labeling ACM and PACM in the workplace by communicating the location of suspected ACM and PACM.

### **3.4 Employees & Building Occupants**

- Assume that all thermal system insulation, sprayed or troweled-on surfacing material, and asphalt or vinyl flooring installed on or before 1980 contains asbestos, unless documentation exists to prove otherwise.
- Observe the work practices (procedures) and engineering controls detailed in this program to protect themselves from asbestos exposure.
- Occupationally exposed employees will attend training according to the level of work and potential exposure inherent in his or her job.
- Assist the university in protecting its employees and students by communicating newly identified locations of suspected ACM and PACM to the Environmental Health & Safety Manager.

### **3.5 All Employees**

- When in doubt, treat all material as containing asbestos and comply with all applicable rules, regulations, and protective measures.
- No employee shall disturb, dislodge, or otherwise damage any building materials in any areas of campus without first determining whether the material may contain asbestos. Examples of activities that could disturb ACM include hammering, peeling, sawing, removing, breaking and chipping building materials.
- Any employee who discovers ACM or suspect ACM in damaged or poor condition shall report it to their supervisor and to the Environmental Health & Safety Manager so that the identified material can be repaired.

## **4.0 Work Practices (Procedures) and Engineering Controls**

### **4.1 Housekeeping**

#### Dust:

All surfaces shall be maintained as free as practicable of accumulations of dusts and waste potentially containing asbestos. This is a particular concern in areas containing Thermal System Insulation (TSI is ACM applied to pipes, fittings, boilers, breaching, tanks, ducts, or other structural component to prevent heat loss or gain.) or surfacing ACM/PACM or visibly deteriorated ACM. The surface may be cleaned by applying a mist of water and wiping the surface or by using a HEPA filtered vacuum.

#### Vacuuuming

HEPA filtered vacuuming equipment shall be used for vacuuming asbestos dust. Vacuum bags or disposable paper filters should not be cleaned, but should be sprayed with a fine water mist and placed into a labeled waste container.

#### Floors

Stripping of finishes shall be conducted using wet methods and low abrasion pads at speeds lower than 300 rpm. Burnishing or dry buffing may only be performed on asbestos containing flooring/decking that has sufficient finish so that the pad cannot contact the asbestos containing material.

## **4.2 Maintenance**

Employees who are uncertified will not handle any ACM. This will include encapsulation projects, renovation/removal and/or demolition of any type of structure.

When an uncertified employee questions whether they may be handling suspect ACM, the employee will immediately contact their supervisor. The employee shall not resume work at the site until the area has been checked to verify the material is not ACM.

Should an employee encounter material that is not identified and is not listed in the asbestos inventory and which might reasonably be expected to be asbestos, the person will stop any work that could create airborne asbestos and report the discovery to a supervisor. When it is determined that friable asbestos-containing material is in a condition that could likely lead to inhalation exposure, the supervisor will immediately limit access to the location and initiate repairs, removal or encapsulation.

If upon reviewing the work situation, the employee believes that normal work practices do not provide an adequate measure of safety, the employee will report these concerns to the supervisor.

## **4.3 Renovation or Demolition Activities**

Asbestos and asbestos containing material that has become damaged or deteriorated shall be repaired, enclosed, encapsulated, or removed. Employees may report such damage to the PLU Environmental Health & Safety Manager. An accredited asbestos inspector/management planner will make the determination on which action is appropriate and a certified asbestos contractor will conduct the work.

Project managers shall notify the PLU Environmental Health & Safety Manager before the start of any renovation and/or demolition project. The Environmental Health & Safety Manager will arrange a survey and testing for suspect ACM in the project area before commencing with the project. An accredited inspector will provide a written report documenting the presence or absence of asbestos materials. If asbestos material is found in

the project area, the material must be enclosed, encapsulated, or removed by a certified asbestos worker under the direct, on-site supervision of a certified asbestos supervisor.

The contractor shall ensure that all work is carried out according to state regulations. The contractor shall ensure that cleanup is properly completed and that all ACM is properly collected and disposed of in accord with applicable regulations. The contractor shall submit air-testing results to demonstrate that the cleanup has been carried out properly and the area can be reoccupied safely.

#### **4.4 Automotive Brakes**

Employees shall use the following procedure for disassembling, reassembling, repairing, or inspecting brakes or clutches. Dry brushing is prohibited.

- Use a spray bottle, hose nozzle, or other implement capable of delivering a fine mist of water or amended water at low pressure to thoroughly wet the brake and clutch parts.
- Wipe the brake or clutch component clean with a cloth.
- Clean up any solvent spill or asbestos containing waste materials immediately, using wet methods. Place the cloth and other ACM in an impermeable container and label the container.
- Contact PLU Environmental Health & Safety for disposal.

#### **4.5 Disposal**

Please contact the Environmental Health & Safety Manager for advice on disposing of asbestos containing materials.

#### **4.6 Spills**

Should asbestos materials become damaged resulting in a spill or airborne release, the employee shall leave the area. Contact the university Environmental Health & Safety Manager at x7233 or Campus Safety at x7911 to report the spill. The area shall be secured and a warning sign posted to prevent exposure to others. Trained and licensed personnel or contractors shall clean up all spills and sudden releases of material containing asbestos as soon as possible.

### **5.0 Procedures for Damaged Asbestos**

The following safety precautions should be followed when any suspicious loose friable (readily crumbled) material is seen (especially if your work area has incurred any damage involving loose dust and debris of unknown materials), or if you are engaged in any operation(s) that may cause fibers to be released into the air:

- Do not attempt to clean the material up or make contact with the material in any way.
- If the qualified maintenance employee has any doubts or is unable to determine the type of material and there is evidence of dust and debris, he/she should immediately contact the university Environmental Health & Safety Manager
- If the contents of the material are in doubt, the Environmental Health & Safety Manager will sample the material prior to any repair or cleanup taking place. If an emergency repair is needed, **treat all suspect material as asbestos.**

## **5.1 Before Going Back to Work**

Check with the Environmental Health & Safety Office to determine whether or not work will involve any contact with asbestos containing material. If YES (contact is possible) or asbestos content is unknown, the material in the area being impacted must be abated or tested. If NO (contact is not possible), follow your normal work procedures.

## **6.0 Asbestos Inventory And Monitoring Program**

PLU has conducted both limited and full surveys and prepared a written inventory of asbestos-containing material. This inventory contains information on the type, location, and condition of asbestos-containing material and advises on whether to remove, encapsulate, or maintain the materials. Any materials not specifically addressed in the inventory shall be presumed to contain asbestos unless proven otherwise. See the Environmental Health & Safety Manager or your supervisor for a summary of this information.

PLU program for identifying and characterizing the condition of asbestos in buildings will include:

- Periodic Surveillance of Friable ACM
- Identification of Non-Friable ACM
- Bulk Material Sampling and Analysis
- Pre-Demolition and Renovation Inspections

Also attached in the later appendices are full survey reports with findings and recommendations. It is the intent of PLU to complete full surveys for all building associated with PLU.

### **6.1 Periodic Surveillance of Friable ACBM**

In order to prevent exposure of building occupants to asbestos fibers, periodic surveillance of known locations of friable asbestos will be performed. Periodic surveillance allows for an evaluation of the condition of the asbestos to determine if deterioration has occurred. If deterioration has occurred that increases the potential for exposure of building occupants to asbestos, the Environmental Health & Safety Manager should take the following steps.

The Environmental Health & Safety Manager will work with Facilities Management and a certified asbestos project manager to determine the best course of action for damaged asbestos materials.

Periodic surveillance of friable asbestos locations will be performed annually by EHS.

## **7.0 Communication of Hazard**

State law (WAC 296.62.07721) requires notification to employees working in a building that contains asbestos. PLU will provide as much information to building occupants as possible about the locations of asbestos, health risks associated with asbestos, and possible exposure.

The asbestos surveys and monitoring data for a building or work area will be kept centrally at the Environmental Health and Safety Office and posted in the immediate area of the asbestos work.

### **7.1 Contracted Work**

The PLU Project Manager shall provide all contractors submitting a bid on any construction, renovation, remodeling, maintenance, repair, or demolition project with a written statement either of the reasonable certainty of non-disturbance of asbestos or of the presence of ACM or PACM. The notification shall include known locations and types of ACM. Contractors must be provided this information *before* they apply or bid for work. The information must be documented and a copy maintained on-site, in a contract or letter to the contractor.

The contractor must post a copy of the written report regarding the presence/absence of asbestos. It shall be prepared by an accredited inspector and posted conspicuously at the location where contracted employees report to work.

## **7.2 Signage**

The Environmental Health & Safety Manager shall post signs in mechanical rooms or other areas where employees can reasonably be expected to enter and that contain TSI or surfacing ACM or PACM. The signs shall identify the type of material present, its location, and appropriate work practices to use to ensure that ACM or PACM will not be disturbed.

## **7.3 Labels**

The Environmental Health & Safety Manager shall label ACM or PACM on installed asbestos products where feasible to communicate the hazard associated with damaging the material and releasing asbestos fibers.

## **7.4 Notices**

PLU Environmental Health & Safety will annually publish an updated booklet entitled, "Asbestos on Campus," to comply with this notification requirement. This booklet will be distributed to all employees of the University and posted in Residence Halls.

The Environmental Health & Safety Manager shall post notices in key locations, such as break rooms or workrooms or safety bulletin boards, identifying areas where ACM or PACM have been previously installed. The notices shall be posted where employees who may work around these materials can easily notice them.

This includes the results of monitoring that are conducted in compliance with the asbestos standard for review by affected employees.

## **7.5 Training**

All PLU employees who work around friable asbestos and those whose work might disturb friable asbestos-containing material will be given awareness training to carry out their work without endangering themselves, their co-workers or other building occupants.

All employees working or supervising asbestos projects shall be certified. Currently, PLU does not have anyone trained to work on or supervise asbestos projects. PLU project managers shall hire a contracted firm with certified asbestos workers and supervisors to complete such work.

### **Who Must be Trained**

- Employees and supervisors of employees who conduct telecommunications, maintenance and custodial activities, or who contract with outside vendors to do such work shall receive two-hour asbestos awareness training.

- Employees whose work requires additional training will attend classes provided by a qualified asbestos trainer. The Environmental Health & Safety Manager may assist in selecting and scheduling employee training.

**The training course will include:**

- The health effects associated with asbestos exposure.
- Locations of ACM and PACM in PLU facilities.
- Recognition of ACM and PACM damage and deterioration.
- Requirements in WAC 296-62-077 pertaining to housekeeping.
- Proper response to fiber release episodes.

## **8.0 Recordkeeping**

A record shall be kept of employee training for one year beyond the last date of employment of that employee.

Data that is used to demonstrate that a PACM does not contain asbestos must be kept for as long as the data is relied upon to refute the presumption that it does contain asbestos.

Project Managers and the Environmental Health & Safety Manager shall maintain records of notifications given and received concerning the identification, location, and quantity of ACM or PACM. These records shall be maintained for the duration of ownership and transferred to successive owners of PLU facilities

