Asbestos Management Plan

Office of Environmental Health & Safety

Revised 1 R Y H P E H U

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Introduction

The Cleveland State University & 6 8 Asbestos Management Program has been developed to comply with the requirements of the Occupational Safety and Health Administration (OSHA) Asbestos Standards for General Industry (29 CFR 1910.1001) and Construction (29 CFR 1926.1101), the Environmental Protection Agency (EPA), Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61 Subpart M), and Asbestos Hazard Emergency Response Act (AHERA) (40 CFR Part 763 Subpart E & G), and Ohio Environmental Protection Agency (OEPA) found in the Ohio Administrative Code's (OAC) Chapter 3745-20.

C 6 8 is committed to the health and safety of the entire campus community (employees, students, and visitors). The presence of asbestos containing material (ACM) in some University buildings has been established through survey and inspection procedures. The objectives of this asbestos management program include, but are not limited to, the inspection and identification of asbestos-containing materials (ACM), hazard communication, training, maintenance and repair or removal ACM in University owned facilities. This program is intended to protect employees, students, and visitors from potential health hazards associated with asbestos, and to ensure ACM will be handled in compliance with all applicable federal, state, and local regulations.

Scope

The & 6 8 Asbestos Management Program applies to all University owned buildings and employees (including contracted employees) performing maintenance, repair, and housekeeping services. In addition, all capital planning, construction, demolition, and renovation projects are subject to the provisions of this program. Facilities Management Staff and Project Managers shall contact EHS early in the planning stages of a project to review the potential for regulatory liability and to ensure an adequate source of funding in the project budget to address asbestos issues. EHS shall be consulted and/or notified prior to physically disturbing any building material, structure, or other potentially ACM.

I. Program Administration

EHS shall be responsible for administration of the University's Asbestos Management Program. Various departments across campus may be affected by the provisions of this program, including but not limited to: Facilities Services, Informational Service and Technology (IS&T), and Campus Safety.

A. Environmental Health and Safety – Asbestos Management

EHS is responsible for the development, implementation, and administration of the University Asbestos Management Program, including but not limited to:

- Asbestos Management Program development, direction, and implementation.

Conducting and/or supervising all asbestos building surveys and inspections.
Reviewing all asbestos abatement projects for compliance.
Management and oversight of activities performed by asbestos consultants.
Conduct air monitoring when necessary.
Maintaining all records and documentation pertaining to asbestos compliance.

II. Permissible Exposure Limits (PEL)

OSHA has established the PEL for airborne concentrations of asbestos which no employee may be exposed at 0.1 fibers per cubic centimeter (f/cc) for an eight (8) hour time weighted average (TWA).

In addition, a short-term exposure limit (STEL) for asbestos as averaged over a sampling period of thirty (30) minutes at 1.0 f/cc.

III. Location of Asbestos-Containing Material on Campu (II.)Tj 0.s1 (o)-4 (4 (i...) 5)]TJ EMC ET

IV. Classification of Asbestos Work

OSHA classifies work involving ACM by the class and type of material:

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

Class II Asbestos Work – Activities involving the removal of ACM which is not TSI or surfacing material. This includes, but is not limited to: the removal of miscellaneous ceiling, material, wallboard, flooring, roofing and shingles, and construction mastics.

Class III Asbestos Work – Any repair and maintenance operations where ACM is likely to be disturbed, up to 1 glove bag or disposal bag.

Class IV Asbestos Work – Maintenance, trade, and custodial activities during which employees may be in contact but do not disturb ACM and PACM.

V. Class I, II, and II Asbestos Work

A. Facilities Services

Facilities Services conducts maintenance in areas known to contain ACM, repairs ACM that may become damaged during maintenance, and performs major or minor abatement. Designated individuals assigned to these tasks possess certification and hold state licensure (if required). Team members are provided medical exams and fit testing of respiratory equipment (PPE). Designated individuals working with ACM are to:

Respond to emergencies involving ACM and potential fiber releases.

Coordinate removal and disposal of all ACM with HSE. (l)-2 (e)-6 (a)4 (s)-1 tf4 (l)-C3.9 (ed

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X. Contractors

Contractors working in areas where ACM is present shall comply with all state and federal regulatory agencies.

XI. Disposal of Asbestos Containing Waste

All asbestos containing waste material is to be saturated with amended water and placed polyethylene bags (double bagged) at least six (6) mil in thickness bearing the following information/labels:

First label: In accordance with 29 CFR 1910.1200(f) of OSHA's Hazard Communication Standard:

MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATH DUST
AVOID CREATING DUST

Second label: In accordance with the U.S. Department of Transportation regulation on hazardous waste marking, 49 CFR parts 171 and 172 Hazardous Substances Final Rule:

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University employees trained to

; , 9 Medical Surveillance

Designated individuals who possess certifications to perform Class I, II, and III Asbestos Work are required to participate in the Medical Surveillance Program. Prior to performing asbestos work, individuals are to undergo a medical examination.

; 9 Respiratory Protection

Designated individuals who are required to wear respiratory protection are enrolled in the University's Respiratory Protection Program. Initially before assignment, and annually thereafter, workers are to undergo a qualitative fit test.

; 9 , Training

Employees are provided required training based on the particular class of work they may perform:

Class I and II Asbestos Work – employees complete a 32-hour course addressing the performance of asbestos abatement activities. Once the initial course has been completed an eight (8) hour refresher will be required every year after the initial course has been completed. Course content includes background information pertaining to asbestos, health effects, personal protective equipment, respiratory protection, safe work practices, and regulatory requirements.

Some employees are provided specialized training on removal of Class II flooring. These employees may remove and replace cracked/damaged floor tile that is non-friable only.

Class III Asbestos Work (Operations and Maintenance) – employees complete a 16-hour course addressing asbestos activities. These employees may be involved in work that may disturb ACM for the purpose of accessing building components and equipment. Course content includes background information pertaining to asbestos, health effects, legal issues, respiratory protection, work practices, supervisory skills, and regulatory requirements. Hands on training includes the use of protective equipment, asbestos removal techniques, and preparation of work areas for abatement. Class I asbestos workers may act as competent persons for Class III and IV asbestos activities.

Class IV asbestos work – employees complete a Q D V E Awareness course which includes general information on the types of asb Hstos, labeling, identifying hazardous areas associated health effects, and how to reduce the risk of exposure using safe work practices.

; 9 , , Contractor Awareness

Contractors employed by the University shall be informed in writing by the Project Manager (PM) for the project/repair of the location of suspect and known ACM in the area they are to perform work. Contractors shall not disturb any suspect ACM hð eF² ðÀÆKà6Tk!/ X

XX. Air Monitoring

Air samples measuring for asbestos will either use a Phase Contrast Microscopy or Transmission Electron Microscopy method for the following procedures:

- Background
- Environmental
- Final Air Clearance
- Surveillance

A. Air Sampling Requirements

Minimum of 560 liters is required to be collected for background, environmental, or surveillance monitoring purposes. (It is recommended to collect 1200-1800 liters).

Minimum of 1200 liters is required for final air clearance.

Air monitoring results will be reads from a third party lab.

If results of the readings are listed as “Incomplete” or Overloaded” they are to be deemed as “Void.”