

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 1 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

**I. PURPOSE**

This procedure provides *minimum* guidance to ensure that Asbestos Containing Material (ACM) is being properly identified and managed in accordance with applicable regulations to provide a safe environment for all University students, staff, visitors, patients and contractors. Any questions must be directed to the Asbestos Control Group (ACG).

**II. PERSONNEL AFFECTED**

Asbestos Control Group (ACG)  
(585) 278-5900 or (585) 261-1756 or (585) 275-3241  
Medical Center Facility Operations (MCFO)  
Medical Center Construction and Renovation Group  
Planning and Project Management (PPM)  
Real Estate Services  
River Campus Facility Operations (RCFO)  
River Campus Construction and Renovation Group  
University Facilities and Services (UF&S)  
University Information Technology (IT)

**III. DEFINITIONS**

**Abatement:** Procedures to control fiber release from asbestos material. This includes removal, encapsulation, enclosure, repair, or handling of asbestos material that may result in the release of asbestos fibers.

**Asbestos:** Any naturally occurring hydrated mineral silicate separable into commercially usable fibers, including chrysotile, amosite, crocidolite, tremolite, anthrophyllite, and actinolite.

**Asbestos Contractors:** Any contractor the performs work in preparation for or as part of an asbestos project. The Asbestos Abatement Contractor and Asbestos Air/Project Monitor cannot be the same contractor.

- **Asbestos Abatement Contractor:** A contractor who performs abatement during an asbestos project. All asbestos abatement must be performed by a NYSDOL certified asbestos supervisor and/or asbestos handler.
- **Asbestos Air/Project Monitor:** A contractor who performs project air sampling and/or asbestos project oversight during an asbestos project. All asbestos air and

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 2 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

project monitoring must be performed by a NYSDOL certified asbestos air monitor and/or project monitor.

- **Asbestos Building Inspector:** A contractor who performs asbestos surveys. All asbestos surveys must be performed by a NYSDOL certified asbestos inspector.

**Asbestos Containing Material (ACM):** Any material containing more than 1% asbestos. Common ACM include, but not limited to:

- Drywall
- Laboratory counter tops
- Fireproofing
- Window glaze
- Plaster walls and ceilings
- Floor tiles
- Pipe insulation or coverings
- Roofing materials
- Ceiling tiles
- Vermiculite
- Joint compound or spackling patch
- Chemical fume hood liners
- Window, door, or other caulking
- Electrical wiring
- Duct work
- Floor or wall adhesives
- Gaskets
- Fire blankets, curtains, or draperies
- Acoustical panels or tiles
- Popcorn ceilings

**Asbestos Control Group (ACG):** The University group responsible for asbestos regulatory oversight for the University. ACG reports to EH&S through Occupational Safety and includes Asbestos Control Specialists. This oversight must conform to the regulations set forward by OSHA and NYSDOL.

**Asbestos Project:** Any construction, renovation, or maintenance activities where ACM may be disturbed.

- Minor sized project: 10 square feet or less; 25 linear feet or less.
- Small sized project: >10 but less than 160 square feet; >25 but less than 260 linear feet.
- Large sized project: 160 square feet or greater; 260 linear feet or greater.

**Asbestos Survey:** An inspection and identification of all PACM, suspect ACM, or ACM throughout the building or space to be demolished, renovated, remodeled, or repaired.

**Disturbance:** Any activities that may disrupt the matrix of ACM or PACM, or generate debris, visible emissions, or airborne asbestos fibers. This includes moving of friable asbestos containing material from one place to another.

**EH&S:** Environmental Health & Safety

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 3 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

**Emergencies:** An unexpected, unanticipated, or unforeseen occurrence, including but not limited to, a steam, chemical, gas, or water line rupture, a boiler failure, or an act of nature which may pose an asbestos-related risk to the health and safety of the public.

**Environmental Laboratory Approval Program (ELAP):** A laboratory certified in NYS for performing analysis for asbestos and fibers by optical microscopy, identifies bulk asbestos using polarized light microscopy (PLM), and fibers in air using phase contrast microscopy (PCM). All environmental laboratories analyzing samples from the State of New York must be certified.

**Friable:** Any material that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

**Incidental Disturbance:** The unintentional disturbance of ACM or PACM.

**Non-Friable:** Any material that when dry, can't be crumbled, pulverized, or reduced to powder by hand pressure.

**Non-Friable Organically Bound (NOB) Asbestos Material:** Non-friable asbestos materials embedded in flexible-to-rigid asphalt or vinyl matrices. These materials include, but not limited to flooring materials, adhesives, mastics, asphalt shingles, roofing materials and caulks.

**NYSDOL:** New York State Department of Labor

**NYSDOL Industrial Code Rule 56:** Specifies actions needed to protect the public safety and health for handling asbestos containing materials that may result in the release of asbestos fibers.

**NYSDOL Industrial Code Rule 56 Certifications:**

- Only certified supervisor, handler, or O&M personnel are permitted to abate asbestos.
- Only certified air sampling technicians or project monitors can conduct project air monitoring.
- Only certified inspectors can collect bulk samples of suspect ACM for an asbestos survey.

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 4 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

**Occupational Safety Unit (OSU):** A unit of Environmental Health and Safety (EH&S) responsible for employee health and safety.

**OSHA:** U.S. Occupational Safety & Health Administration

**OSHA Asbestos Standards:** In addition to NYSDOL Code Rule 56, asbestos must be handled in accordance with both the OSHA Construction Industry Standard for Asbestos (29 CFR 1926.1101) and OSHA General Industry Standard for Asbestos (29 CFR 1910.1001).

**Presumed Asbestos Containing Material (PACM):** Material suspected of containing more than 1% asbestos, for which no test results are presently available.

**Project Manager:** As used in this document, an employee of the University of Rochester responsible for supervising or coordinating a project involving construction, renovation, demolition, or maintenance. This may be, but is not limited to, a project manager, project coordinator, supervisor, working leader, etc.

**Thermal System Insulation (TSI):** Insulation material applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat gain or loss.

#### **IV. RESPONSIBILITIES**

##### **A. Asbestos Control Group:**

- Maintain NYSDOL certified staff to facilitate asbestos management to ensure the University maintains compliance with the requirements of NYSDOL, OSHA, and other regulatory agencies.
- Maintain NYSDOL Asbestos Handling License to allow ACG to take bulk asbestos samples for an asbestos survey in an urgent, emergency situation.
- Maintain annual physicals, respirator fit testing, and training as required by Code Rule 56 and OSHA regulations.
- Oversee asbestos surveys of the project site to confirm they are conducted in compliance with New York State Code Rule 56 and any other applicable regulations.
- Review results of the asbestos survey with the project manager to ensure there is a clear understanding of the presence and location(s) of any ACM in the proposed project area.
- Provide oversight to assure project activities involving ACM or PACM are conducted in accordance with University policy and applicable laws and regulations.

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 5 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

- Oversee the implementation and completion of asbestos emergency procedures in the event of an emergency or incidental disturbance.
- Ensure required air monitoring is conducted on asbestos activities.
- Ensure the abated asbestos waste is properly disposed of in an approved landfill in compliance with EPA NESHAP regulations.
- Maintain a record of all asbestos surveys, air sampling reports, and all other project documentation for all asbestos work.
- Assist with asbestos awareness training where possible.
- Maintain the EHS Asbestos Awareness training on MyPath.

**B. Project Managers:**

- Prior to the start of any project, they must notify ACG of the project, scope of work, and any additional associated activities. The scope of work shall include the boundaries of the work area, including all points of connection that may exist outside the boundaries of the work area (electrical, plumbing, HVAC, etc.).
- In coordination with ACG, obtain an asbestos survey of all materials within the scope of work.
- Review the asbestos survey with the project team; distribute copies to the appropriate team members and contractors, and determine if asbestos design is required/appropriate.
- All communication with any asbestos contractors must be shared with, or include ACG. This includes but isn't limited to any scheduling, requests for quotes, or changes to the scope of work.
- Request quotes from the asbestos abatement and air/project monitoring contractors. ACG will provide contact information for approved vendors. ACG must receive a copy of all quotes associated with any portion of the asbestos project.
- Ensure the asbestos contractors have all the proper access, time, and utilities needed to complete their portion of the project.
- Notify ACG of any changes to the scope of work that may occur at any point throughout the entirety of the project.

**C. Facilities:**

- Prior to the start of any maintenance, renovation, or demolition activities where suspect ACM may be impacted, they must notify ACG of the scope of work.
- Upon the discovery of any incidental disturbance or previously untested suspect ACM, they must stop work and contact ACG.
- Must complete the EH&S Asbestos Awareness Training through MyPath on an annual basis.

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 6 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

**D. IT Leads and Managers:**

- Prior to the start of any IT project where activities may impact suspect ACM, they must notify ACG of the scope of work.
- In coordination with ACG, obtain an asbestos survey of all materials within the scope of work.
- Upon the discovery of any incidental disturbance or previously untested suspect ACM, they must stop work and contact ACG.

**V. PROCEDURES**

**A. Project Asbestos Management:**

- As part of the planning of the project, the project manager, with the assistance of ACG, will schedule to have an asbestos survey completed. The asbestos survey must encompass the entirety of the project scope of work.
- If ACM is identified in an asbestos survey, within the scope of work, and being impacted as part of the project, the ACM must be completely removed as part of the project. If it is not possible to remove the asbestos as part of the project, the intent to leave any asbestos in-place must be approved by ACG in writing. This includes, but is not limited to the following;
  - All Asbestos-containing floor mastic must be removed as a part of any flooring project
  - Asbestos containing Thermal System Insulation (TSI), Pipe Insulation (PI), or Mudded Joint Packing (MJP) must be completely removed if the project impacts the system, piping, or materials in close proximity to the ACM.
  - Asbestos-containing wall or ceiling systems must be completely removed if a majority of the wall is being impacted as a part of the project.
- Prior to the start of the project, the project manager or General Contractor (GC) will schedule the start date of the asbestos project with the asbestos abatement contractor.
  - If air and/or project monitoring is required, the project monitor, with the assistance of ACG, will schedule with the air/project monitoring contractor. The GC will never schedule project air monitoring.
- Upon completion of all asbestos portions of the project, the project manager must notify ACG of the completion. The project manager must promptly provide ACG with the following.
  - A complete copy of the asbestos contractor's invoice or a completed invoice table (appendix A) for all projects where the asbestos abatement costs are directly billed to a general contractor.

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 7 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

- A certification from any contractor that installed new materials stating that they reviewed the Safety Data Sheets (SDS) for all new products installed and, based on the SDS, the product(s) did not contain asbestos (by itself or by any of its names) as an ingredient.

**B. Suspected asbestos material discovered during a project or facilities work site:**

- If a previously unidentified material that is suspected to contain asbestos is discovered, all work will stop in the affected area/room, secure the area/room from other personnel and report the condition immediately to their Supervisor. The Supervisor will notify the project manager immediately.
- The Project Manager shall immediately notify ACG of the discovery.
- ACG will arrange to have the suspected ACM tested by a certified inspector and lab.
- Any follow-up remedial activities shall be arranged by ACG.

**C. Incidental Disturbance discovered during the course of any work activity:**

If an incidental disturbance of asbestos or suspected asbestos containing material has occurred or if damaged asbestos or suspected asbestos containing material is discovered, the following protocol must be followed:

- Do not handle the ACM or suspect ACM.
- Immediately notify your Supervisor of the location and details of the disturbance.
- Assume a 25-foot perimeter around the disturbance is contaminated unless the area of contamination is obviously larger.
- If contaminated with asbestos, leave the immediate contaminated area then carefully remove any contaminated clothing (do not brush off clothing).
- Notify all persons in the immediate vicinity of the disturbed or damaged material to vacate the room/area.
- Close the doors or limit access to the area to prevent entry into the area. Depending on the situation, Public Safety should be called to help secure the area.

Upon being notified of a discovery of damaged or incident disturbance of asbestos, Supervisory personnel or Project Managers shall:

- Contact ACG. Let the representative of ACG know where the ACM has been disturbed and any details of the disturbance.
- If ACG is not available, or the above attempted notifications go to voicemail during regular business hours, call 732-9204 or 278-5900 to prevent a delayed report. Facilities Customer Service Center (x 3-4567) is to be called if unable to make contact with the others.

**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 8 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

- In the event of a potential public safety problem, contact University Public Safety at 275-3333 or x13.
- In the event of potential exposure, OSU shall also be contacted by calling 275-3241.
- Submit an employee incident report at <http://www.safety.rochester.edu/SMH115.html>

Upon notification of the disturbance ACG will, at a minimum:

- Respond to the site or contact a certified asbestos contractor to respond.
- Upon arrival, the member of ACG or the contractor will visually inspect the location and make a determination of the required actions from their observations.
- ACG will arrange for the collection of asbestos survey bulk samples for analysis. ACG will not collect samples unless the delay presents a hazard to University or other personnel.
- Air sampling may be performed to determine if asbestos fibers were released (depending on the material, location and cause of disturbance).
- For any location where air monitoring showed asbestos fibers were present and in excess of the OSHA Excursion Level of 1.0 fibers/cc and any employees were believed to be in the location for approximately 30 minutes or more, the following medical tests shall be offered:
  - Physical
  - Pulmonary Function Test
  - Chest x-ray
- In the case of a suspected exposure, all air monitoring test data shall be shared with OSU, UHS and/or OEM as well as the potentially exposed individual(s).
- OSU will conduct a follow up and provide the information to HR and UHS for any medical follow-up, if required.

**D. Sample collection and analysis.**

Bulk samples will be collected and analyzed in compliance with NYSDOH ELAP regulations.

For asbestos abatement projects requiring air monitoring, all air monitoring will be conducted by a NYSDOL certified asbestos air sampling technician in compliance with Code Rule 56. All samples must be submitted to a NYSDOH ELAP approved laboratory certified for asbestos analyses. A copy of all laboratory results must be provided to ACG.

**E. Record Keeping and Records Management:**

Records required by Federal and State regulations shall be retained and filed by ACG. These include:



**UNIVERSITY OF ROCHESTER  
ENVIRONMENTAL HEALTH & SAFETY**

<b>Procedure No.: AC001</b>	<b>Approved by: Carolyn Place</b>
<b>Title: Asbestos Management</b>	<b>Date: 6/8/2023</b>
<b>Revision No.: 3</b>	<b>Page 9 of 10</b>
<b>Prepared by: Daniel Ziegler</b>	
<b>EH&amp;S Department Use Only: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</b>	<b>UR Website: <input checked="" type="checkbox"/> Public <input type="checkbox"/> Restricted</b>

- Air monitoring logs, removal documentation, and waste tracking manifests, and all other data that demonstrates compliance with applicable regulations.
- University employee exposure records and follow-up reports are maintained by UHS or OEM as appropriate. These records are to be kept for the duration of the employee’s employment, plus 30 years.
- HR/Leave Administration will retain copies of any incident report filed by the employee for potential asbestos exposures. The incident report and the follow up will be retained by HR/Leave Administration for the duration of the employee’s employment, plus 30 years.

**F. Training:**

Staff that may encounter asbestos during the course of their normal work routine, such as Facilities workers, must receive annual asbestos awareness training. The employees’ department is responsible for assigning the current EHS Asbestos Awareness Training through MyPath.

**VI. REFERENCES**

- NYS DOL Asbestos Regulations (12 NYCRR Part 56)
- NYS DOL Asbestos Regulations Guidance Document (Supplement to Part 56)
- OSHA 29CFR 1910.1001 Asbestos in General Industry
- OSHA 29CFR 1926.1101 Asbestos in the Construction Industry
- EPA Learn About Asbestos: <http://www.epa.gov/asbestos>
- EPA What is an Operation and Maintenance Program: <http://www.epa.gov/asbestos/what-operations-and-maintenance-om-program>
- EH&S Occupational Safety Unit Subject Index: <https://www.safety.rochester.edu/ih/ihalphaindex.html>

**VII. APPENDICES/FORMS**

Appendix A: Project Invoice Table

**VIII. REVISION HISTORY**

Date	Revision No.	Description
5/11/2018	1	Updated Processing FAMIS to N/A for In house Construction

