

**UNIVERSITY OF ROCHESTER
ENVIRONMENTAL HEALTH & SAFETY**

Policy No.: AC001	Approved by: Mark Cavanaugh
Title: Asbestos O & M Procedure	Date: October 10, 2016
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Prepared by: Tom Mueller	

I. PURPOSE

This procedure establishes the process to conduct asbestos work as it applies to Operation and Maintenance activities, including emergencies.

II. PERSONNEL AFFECTED

Asbestos Control Group
University of Rochester Facilities.

III. DEFINITIONS

Abatement - Procedures to control fiber release from asbestos material. This includes removal, encapsulation, enclosure or repair.

Asbestos Containing Material (ACM) - Any material containing more than 1% asbestos.

Asbestos Control Group (ACG) - The University group responsible for asbestos regulatory oversight for the University. ACG reports to EHS through Occupational Safety and includes Asbestos Control Managers. This oversight must conform to the regulations set forward by OSHA and the NYSDOL

Disturbance - As used in this document a disturbance is any penetration, removal, repair or other manipulation of asbestos containing material, including, but not limited to walls, floor tiles, transite fixtures, laboratory counter tops, ceiling tiles, some mastics.

EHS - Environmental Health & Safety

Emergencies – As used in this document an emergency is when maintenance failures occur during off hours and weekends and there is ACM or PACM material involved and the Asbestos Control Group is not working.

Occupational Safety (OS) - A unit of Environmental Health and Safety (EHS) responsible for employee health and safety

Operations and Maintenance - Often referred to as O&M, defined by New York State Industrial Code Rule 56 as a minor project and is a disturbance of 10 square feet or less or 25 linear feet or less. Projects larger than this shall follow the process outlined in of *Asbestos Management for UR Construction Procedure*. EPA cites

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three categories of maintenance activities with regard to their potential for disturbing ACM. The examples contained within are purely examples:

- Those which are unlikely to involve any direct disturbance of ACM; for example, cleaning shelves or counter tops with a damp cloth.
- Those which may cause accidental disturbance of ACM; for example, working on a fixture near a ceiling with surfacing ACM.
- Those which involve intentional small-scale manipulation or disturbance of ACM; for example, removing a small segment of thermal system insulation (TSI) ACM to repair a pipe leak

NYSDOL Industrial Code Rule 56 (cited as NYCRR Part 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.

Presumed Asbestos Containing Material (PACM) - Material suspected of containing asbestos of 1% or greater, for which no test results are presently available.

Supervisory Personnel - As used in this document, individuals responsible for supervising or coordinating a minor project involving disturbance or possible disturbance of ACM or PCM. This could be a trades supervisor or schedule planner, or other person or persons responsible for managing or overseeing O&M work.

Survey - An evaluation of a location including a certified lab analysis report that includes a determination if asbestos is present.

IV. RESPONSIBILITIES

Supervisory personnel will prohibit University of Rochester employees from disturbing any ACM or PACM material without express authorization EHS, OS, or the ACG.

ACG will assist supervisory personnel in the review and filing of asbestos documentation

V. PROCEDURES

Activities involving the disturbance of ACM or PACM, including the penetration of a wall, ceiling, or floor require a request of the ACG to have the area assessed prior to the work to confirm whether the building material contains asbestos or have the material tested.

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- In material is found to contain asbestos, the penetration, abatement or other disturbance will be made by NYS certified asbestos O&M certified asbestos handler.
- No disturbances will be made by UR employees without prior approval from OS and the ACG accompanied by written documentation.

O&M tasks are typically performed within plastic tent enclosures or glove bags. Wet methods and HEPA vacuums are utilized.

Asbestos waste from O&M projects must be double bagged and placed in an approved waste container.

If the location of the disturbance is found to be free of asbestos, the applicable facility operations group can make the penetration.

The Supervisory Personnel must work with the ACG to ensure the appropriate documentation for this area.

All O&M Work

- Requester calls ACG for survey information
- ACG informs requester of status (negative, positive, no info)
 - Negative
 - Proceed with Work
 - Positive
 - Requester contacts contractor to abate
 - No Information
 - Requester contacts contractor to survey (sample) area
 - Survey results go to ACG
 - ACG interprets results and informs requester of status
 - Results determine cleared to work or need for abatement contractor
 - ACG files report for current and future reference
 - Requester contacts on-site abatement contractor for task
- Abatement contractor schedules task with requester and notifies ACG of time
 - ACG randomly audits jobs
- Abatement contractor notifies requester and ACG of job completion
- Billing and payment for survey and abatement is processed by requester

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Emergency/After Hour Work

- **Do not handle the asbestos unless you are a licensed asbestos handler.**
- If you become contaminated with asbestos, take first aid measure (leave the immediate area and take off contaminated clothing (do not brush off clothing). After first aid measure are taken, fill out an employee incident report form (SMH-115)
- Until investigated, assume a 25 foot perimeter (“red zone”) is contaminated (based on Code Rule 56) unless the area of contamination is obviously larger. Depending on the situation, Public Safety should be called to help secure the area.
- Contact the Facilities Asbestos Control Group (ACG)
 - Work Dispatch X3-4567 Ask that they contact:
 - Tom Mueller X3-4635, cell 732-9204
 - Randy Smallridge x5-7024, cell 278-5900
 - Mike Liberty X3-3409, pager220-3617
- Let the representative of the ACG know where the ACM was disturbed
- Verify the occupants vacated the immediate area and the area is secured. Depending on the situation, Public Safety should be called to help secure the area
- Once the ACG arrives, they will assess the materials disturbed. Samples may be taken for analysis to confirm the content of the materials present.
- Should no one from ACG be available, a contractor shall be called in to perform a cleanup of the space with appropriate PPE and equipment.
 - Spartan Environmental: Scott Ives (cell phone 794-1095)
 - AAC Contracting, Inc.: Jim Mathews (527-8000, cell 314-0920)
 - Environmental Construction Group Bob Gibbs 478-2232 cell
- Air sampling may be performed (depending on the scope, location, materials disturbed and requirements for cleanup). The ACG will arrange for the necessary air sampling.

- Once the area is cleaned up and air sampling results are reviewed which show the area to be “clean”, occupants can return to the area.

Training

All I persons who can reasonably be expected to come in contact with asbestos containing materials must receive annual asbestos awareness training.

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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://www2.epa.gov/asbestos>
- EPA *What is an Operation and Maintenance Program*
<http://www2.epa.gov/asbestos/what-operations-and-maintenance-om-program>
- EHS Procedure Asbestos Management for UR Construction

VII. APPENDICES/FORMS

Appendix A: [Flow Chart for Asbestos Exposures](#)

Appendix B: [Asbestos Exposure Procedures](#)

Asbestos Process	Construction	In-House Construction	O&M	IT
History	ACG	ACG	ACG	ACG
Survey/Scoping	ACG with CPDCM	ACG with Facilities	Facilities	Facilities
Walkthrough w contractor	ACG with CPDCM	ACG with Facilities	Facilities	Facilities
Direct/ coordinate Sampling	ACG with CPDCM	ACG	Facilities	ACG
Bid/Request	ACG & Campus Planning Design & Construction Management	ACG	N/A	N/A
Collect Samples	3rd Party	3rd Party	3rd Party	3rd Party
Abate	3rd Party	3rd Party	3rd Party	3rd Party
Review invoices/confirm-approve invoices	ACG	ACG	Facilities	Facilities
Forward project invoice fro payment	ACG	ACG	Facilities	Facilities
Process FAMIS	N/A	ACG	Facilities	Facilities
Pay bills; follow-up on delinquent payments	Campus Planning Design & Construction Management	Facilities	Facilities	Facilities
Audit/Confirm Compliance	ACG/3rd Party Project Monitor	ACG/3rd Party Project Monitor	ACG	ACG
Update database	ACG	ACG	ACG	ACG

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VIII. REVISION HISTORY

Date	Revision No.	Description
3/11/15	New	New procedure giving direction of how the university asbestos control program works for O&M activities
4/10/15	1	Added detail on after hour and emergency O&M work involving PACM or ACM material
10/10/16	2	Updated contact information to reflect change in staffing