

**UNIVERSITY OF ROCHESTER
ENVIRONMENTAL HEALTH & SAFETY**

Policy No.: AC001	Approved by: Mike Liberty
Title: Asbestos O & M Procedure	Date: 9/10/2021
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Prepared by: Dan Ziegler	

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 EH&S 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.

EH&S - 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 (EH&S) 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 three categories of maintenance activities with regard to their potential for disturbing ACM. The examples contained within are purely examples:

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- 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 EH&S, 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 perform the work.

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

All O&M Work

- Requester contacts 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 273-4567 Ask that they contact:
 - Randy Smallridge 278-5900
 - Daniel Ziegler 261-1756
 - Mike Liberty 362-0196
- 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 794-1095)
 - AAC Contracting, Inc.: Jim Mathews (527-8000, cell 314-0920)/ Tom Robbins (527-6270)
 - 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 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>
- EH&S Procedure Asbestos Management for UR Construction

VII. APPENDICES/FORMS

- Appendix A: [Flow Chart for Asbestos Exposures](#)
Appendix B: [Asbestos Emergency Procedures](#)

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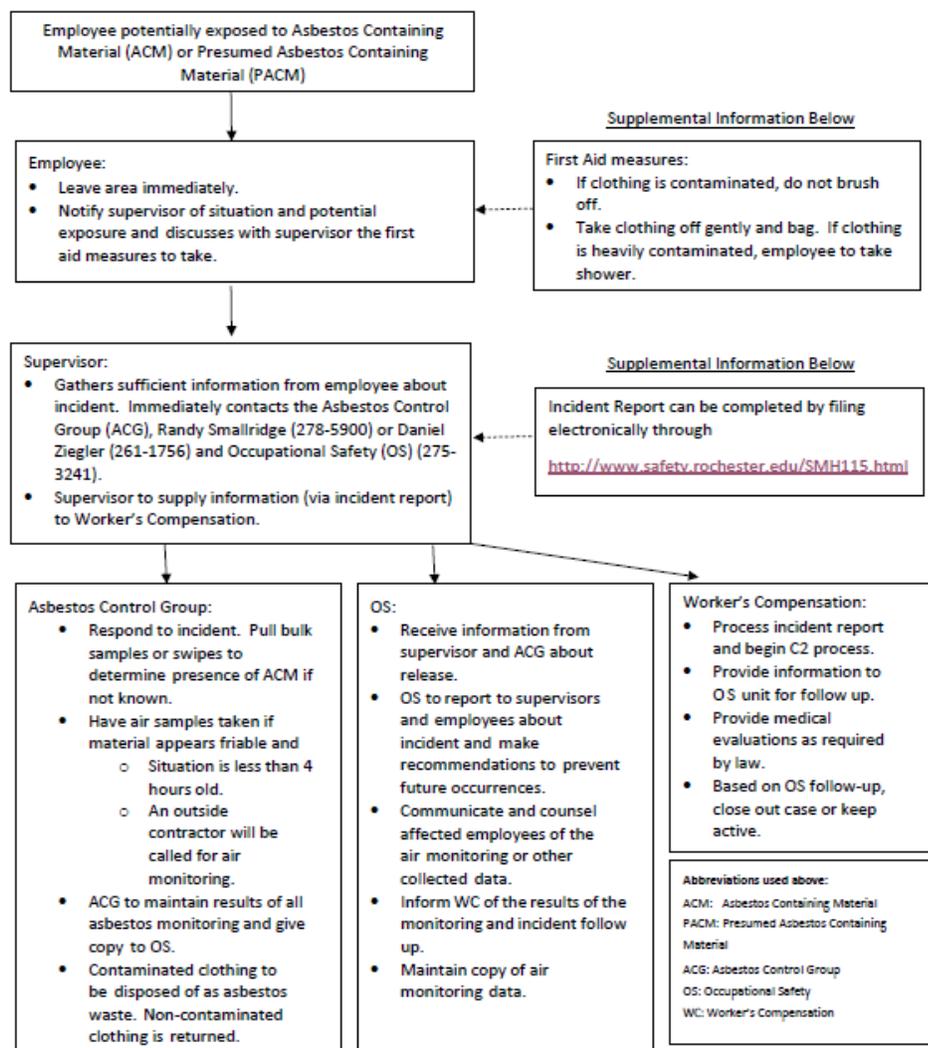
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APPENDIX A
Flow Chart for Asbestos Exposures

ASBESTOS

ACM or PACM Potential Exposures

This flow chart is to be used until further notice for any accidental release of asbestos by a Facilities employee.



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**APPENDIX B:
GUIDANCE DOCUMENT FOR
ASBESTOS EMERGENCY PROCEDURES**

Asbestos is a highly regulated substance. Asbestos can be found in a variety of items that can include:

Pipe insulation	Floor tiles	Sprayed on fireproofing
Ceiling tiles	Mastics	Roofing materials
Dry wall spackle	Laboratory bench tops	Transite panels in fume hoods
Incubators	Lighting equipment	Laboratory drying ovens
Fire doors		

All asbestos removal or handling **MUST** be performed by certified and licensed individuals following all OSHA, NYS DOL, and EPA regulations.

PROCEDURE:

In the event asbestos (or presumed asbestos) containing materials (ACM) are disturbed, the following procedure shall be followed:

1. If you became contaminated with asbestos, take first aid measures (leave the immediate area and take off contaminated clothing (do not brush off clothing). After first aid measures are taken, fill out an employee incident report.
2. Vacate and secure the area to a perimeter of 25 feet from the disturbance (edge of visible asbestos). Have the occupants leave the space. Depending upon the situation, Security should be called to help secure the area.
3. Contact the Facilities Asbestos Control Group through Facilities' Work Dispatch (273-4567). Provide the location of the release and state what actions have been taken so far.
4. The Asbestos Control Group will:
 - a. Upon arrival, assess the likelihood that the disturbed material contains asbestos.
 - b. Samples may be taken for analysis to confirm the contents of the material.
 - c. Should no one be available from Asbestos Control, a certified and licensed contractor shall be called in to perform a cleanup of the space using appropriate PPE and equipment.
 - d. Air samples may be taken depending upon the scope, location, and condition of the material(s) disturbed and requirements for cleanup.
 - e. If the release occurs in Strong Memorial Hospital, follow the SMH procedures and contact the Administrator on Call.
 - f. Once the area is cleaned and the air sampling results are reviewed and show the area to be 'clean', the occupants can return to the area.

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VIII. REVISION HISTORY

Date	Revision No.	Description
3/11/2015	New	New procedure giving direction of how the university asbestos control program works for O&M activities
4/10/2015	1	Added detail on after hour and emergency O&M work involving PACM or ACM material
10/10/2016	2	Updated contact information to reflect change in staffing
6/26/2018	3	Updated Process FAMIS for In-House constructions. Added Emergency Contact to AAC.
9/20/2021	4	Triennial Review