JACKSONVILLE STATE UNIVERSITY

Manual of Policies and Procedures

POLICY NO.: I:06:01 **DATE: February 2021**

REVIEW/REVISION DATES: TBD

SUBJECT: Asbestos Policy

APPROVED: Dr. Don C. Killingsworth, Jr., President

PURPOSE

Asbestos is a confirmed human carcinogen that was previously used in many different types of building materials[1]. It is important to note that asbestos in an undisturbed state is not considered hazardous[2]. Due to the potential hazards associated with asbestos exposure if the material becomes airborne, Federal and State regulations are in place to control activities impacting asbestos containing materials[3]. This policy ensures compliance with these regulations with the intent to minimize any risk of exposure for students, faculty, staff, and visitors at Jacksonville State University.

POLICY

All asbestos related activities shall be conducted in a safe manner and in full compliance with applicable Federal and State regulations.

The use of respiratory protection may be required for some asbestos-related activities. Each division conducting activities that disturb asbestos containing materials must also comply with the University respiratory protection program requirements.

All activities involving the removal of asbestos-containing materials require written notification of Capital Planning & Facilities leadership and University Safety, and must receive written approval from University Safety. No removal activities can begin until receipt of the written approval of University Safety. The written request must be

[1] Per the Agency for Toxic Substances and Disease Registry (ATSDR)
[2] Per the Environmental Protection Agency (EPA)
[3] Per the Alabama Administrative Code and the Federal Uniform Guidance

received by University Safety at least ten business days prior to the anticipated start date of any asbestos project to provide time for a safety review of the project.

The asbestos contractor, demolition contractor or in-house abatement team performing the work is responsible for submitting an additional notification to the designated regulatory authority, typically the Alabama Department of Environmental Management (ADEM).

RESPONSIBILITIES

University Safety

University Safety is responsible for administrative decisions regarding asbestos control and abatement activities at Jacksonville State University. All activities involving asbestos containing materials require prior approval from University Safety, which shall provide consultative and technical assistance to campus organizations involved in activities related to asbestos. AHERA[4] accredited inspectors in University Safety shall conduct annual inspections of known asbestos containing materials for the purposes of assessing any changes in the materials' condition.

University Safety will serve as the University liaison with regulatory agencies and serve as the clearinghouse for the dissemination of regulatory and University requirements and new information to groups involved in asbestos related activities.

University Safety shall have stop-work authority for any asbestos removal project that deviates from the regulatory requirements or that represents an immediate health and safety risk. Stop-work authority shall also be extended to any construction project of the University in which the unauthorized removal of asbestos or suspected asbestos containing materials is observed. University Safety shall give notification to the Department supervising the asbestos work as soon as possible after stop-work is issued.

[4] AHERA = Asbestos Hazard Emergency Response Act

Capital Planning & Facilities

Each department, unit, or division, as appropriate for its organizational structure, shall appoint a management-level staff member to serve as an Asbestos Coordinator.

The coordinator will act as liaison between department, unit, or division and University Safety and shall be responsible for the coordination of all asbestos activities within their respective division or department.

Such activities include the identification of projects involving asbestos, informing all contractors of the presence of asbestos, providing the University policy for addressing asbestos within their work areas, and the implementation of asbestos surveys and abatement projects within a department, unit, or divisions.

The division directors shall have overall responsibility for compliance with all applicable asbestos regulations and the University policy by their staff and by contractors working under their oversight.

Project Managers[5]

Project managers are responsible for obtaining asbestos information either through completion of a formal survey or through contact with the Office of University Safety prior to the start of a project.

PROCEDURES

Asbestos Operations and Maintenance Plan:

University Safety shall implement and maintain an asbestos operations and maintenance (O&M) plan for asbestos containing materials known or assumed to exist in University buildings. The asbestos O&M plan shall be periodically reviewed and updated in accordance with regulatory requirements.

[5] Project Managers are defined as the supervisor responsible for the department/facility in which potential asbestos-like material may be disturbed.

Asbestos Surveys:

An asbestos survey meeting the requirements of Federal and State regulations shall be completed prior to the commencement of any renovation, remodeling or demolition project involving a University-owned building; component of a University-owned building or of a building scheduled to be purchased by the University. A survey is required regardless of the age of the building. Asbestos surveys must be conducted by an Alabama Licensed Asbestos Consultant (LAC) or their appointed representative.

A limited survey, based on a review of the project scope of work, may be authorized by University Safety. All surveys are required to be submitted to University Safety for review prior to the start of a construction project. Environmental Health and Safety reserves the authority to reject a survey based on incomplete content or failure to follow regulatory requirements. Bulk sample analysis by TEM NOB[6] methods may be required if ambiguous initial bulk sample results are received.

Identified asbestos directly impacted by the scope of the renovation/demolition project is required to be removed by a licensed asbestos abatement contractor.

Friable asbestos in poor condition is required to be removed if identified within a planned work area even if not included in the project scope of work. An example would be the presence of friable pipe insulation in poor condition above a ceiling that is scheduled to be removed and replaced. Additional removal would be necessary if the planned work occurs near friable asbestos where damage or disturbance of the material may occur.

A copy of the completed asbestos survey must be kept on-site for the duration of a construction project.

[6] Transmission Electron Microscopy Non-Friable Organically Bound Material

Abatement Procedures:

University personnel conducting removal work solely for maintenance purposes involving less than 160 square feet of asbestos containing materials or less than 260 linear feet of asbestos containing materials on pipes are exempt from the state asbestos contractor licensing requirements, but must comply with all federal and state requirements pertaining to notifications, training, monitoring, and documentation. Prior approval by University Safety must be obtained for any in-house abatement activities. Based on the type and amount of asbestos containing material being removed, University Safety can, at their discretion, require air monitoring during removal activities. Asbestos abatement work involving amounts greater than 160 square and 260 linear feet must be conducted by an Alabama licensed asbestos contractor. All asbestos removal activities must comply with the applicable federal and state regulations.

Asbestos-containing roofing may be removed by a state-certified or registered roofing contractor, as long as all removal activities are performed under the direction of an on-site roofing supervisor. The supervisor must remain on-site at all times while removal activities are taking place. The supervisor is required to have completed an approved asbestos roofing course prior to engaging in the removal of asbestos containing roofing materials and copies of training documentation must be provided to University Safety before job commencement.

Training:

University personnel involved in the removal of asbestos containing materials must have training appropriate to their assigned job duties. Individuals must comply with the requirements of the EPA's Model Accreditation Plan (MAP) for asbestos abatement project supervisors and workers.

Personnel involved with asbestos floor tile removal according to the RFCI method must comply with the training requirements of the OSHA Asbestos Construction Standard (29 CFR1926.1101).

All maintenance personnel with the potential to come into contact with an asbestos-containing material during their normal work assignment are required to have annual asbestos awareness training. Annual awareness training is provided by University Safety.

Recordkeeping:

Copies of all documentation related to asbestos activities including the consultant and contractor final reports and waste disposal manifests must be provided to University Safety within 45 days of the completion of an abatement project.

University Safety shall be responsible for maintaining and archiving all asbestos related documentation for the time mandated by federal regulatory requirements.

HELPFUL LINKS:

ATSDR:
https://www.atsdr.cdc.gov/

EPA:
EPA Asbestos Statement

Alabaman Administrative Code:
Chapter 335-3-11

Unform Guidance:
40 CFR Part 61 Subpart M

RESPONSIBILITY

The Chief Safety Officer is responsible for this policy.

EVALUATION

This policy will be reviewed at least every five (5) by the Chief Safety Officer.