

Policy: **Asbestos Management**

Policy Number: **E-2**

Responsibility for Policy: Facilities; Environmental Health & Safety

Most recent approval date: April 2022

Governance Body Oversight: College Council

Date of Last Review: January 2022

### **Policy Statement**

Presumed and identified asbestos containing materials will be managed in a safe and proper manner.

### **Reason for Policy**

This policy is intended to ensure appropriate management of Presumed Asbestos Containing Material (PACM) and identified Asbestos Containing Material (ACM) at the College. College employees and designated supervisors of outside contractors whose work may involve existing PACM and/or ACM on College property must be informed of this policy prior to commencement of work.

### **Applicability of the Policy**

This policy applies to all persons at the College, including outside contractors, who may undertake work that has the potential to result in the release, removal, disturbance, encapsulation or disposal of asbestos or ACM and/or PACM.

### **Definitions**

ACM- Asbestos Containing Material - any material containing more than 1% asbestos (by weight)

Asbestos- any naturally occurring hydrated mineral silicate separable into commercially usable fibers, including chrysotile (serpentine), amosite (cummingtonite-grunerite), crocidolite (riebeckite), tremolite, anthophyllite and actinolite

Asbestos Project- Work that involves the removal, encapsulation, enclosure, repair or disturbance of friable or non-friable asbestos, or any handling of asbestos material that may result in the release of asbestos fibers

Competent Person- the responsible, knowledgeable, on-site person who assumes regulatory responsibility for work performed

DEC- New York State Department of Environmental Conservation

DOL- New York State Department of Labor

EPA- United States Environmental Protection Agency

Friable- any asbestos containing material that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure, or is capable of being released into the air by hand pressure.

Non-friable – Any material that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure, and is not capable of being released into the air by hand pressure.

OSHA- Occupational Safety and Health Administration

Outside Contractor- independent contractors, who are not employees of the College, yet perform a job or a service on College-operated property

PACM- Presumed ACM; All Thermal System Insulations and Surfacing Materials found in buildings constructed no later than 1980. PACM is considered to be ACM unless proven otherwise by appropriate bulk sampling and laboratory analyses.

PEL- Permissible Exposure Limit;

Exposure limits designed to protect employees where asbestos work is performed. Employee exposure to asbestos must not exceed 0.1 fiber per cubic centimeter (f/cc) of air, averaged over an 8-hour work shift. Short-term exposure must also be limited to not more than 1 f/cc, averaged over 30 minutes. Rotation of employees to achieve compliance with either permissible exposure limit (PEL) is prohibited.

Regulated Area (also called Restricted Area) - a controlled zone established by the College for the abatement portion of an asbestos project to demarcate areas where airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the permissible exposure limits. Eating, smoking, drinking, chewing tobacco or gum, and applying cosmetics in these areas is prohibited. This area shall include, but not be limited to the regulated abatement work area and any contiguous decontamination facilities, adjoining staging areas where work materials, debris or waste from such work may accumulate, remote decontamination areas, and waste storage areas.

Regulated Abatement Work Area - The portion of the regulated area where abatement work actually occurs.

**Related Documents**

- 12 NYCRR Part 56 - Asbestos
- 6 NYCRR Part 360 and 364 – Relating to Asbestos Waste and Disposal
- 40 CFR Part 61, Subpart M – National Emission Standard for Asbestos
- 29 CFR Part 1910.1001 – Asbestos
- 29 CFR Part 1926.1101 – Asbestos

**Review date/action taken:**

- March 2011: original approval date
- September 2012: substantive changes to policy
- July 2015: no revisions
- 2017: substantive revisions to policy
- January 2022: non-substantive revisions to policy

Procedure: **Asbestos Management**

Procedure Number: **E-2**

Responsibility for Procedure: Facilities; Environmental Health & Safety

Most recent effective date: April 2022

Governance Body Oversight: College Council

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## **Procedures**

Asbestos management procedures are implemented and maintained through Facilities and Environmental Health & Safety to ensure that:

- Members of the College community are not exposed to significant levels of asbestos fibers
- Asbestos waste is handled and disposed of properly
- Members of the College community have access to information, assistance, guidance, and interpretation regarding asbestos-related matters

## **Federal and State Regulations**

Federal and state regulations govern removal of PACM and/or ACM within New York State.

EPA regulates the emission standard for asbestos (40 CFR Part 61, Subpart M) and addresses the requirements for the manufacturing, application, removal, and disposal of asbestos. The sections of the EPA regulations that pertain to the College are those that govern removal from renovation or demolition areas and the disposal of asbestos.

OSHA addresses asbestos (29 CFR 1910.1001 and 29 CFR 1926.1001) by specifying limitations of workers' exposure through engineering controls, protective equipment, hygiene facilities, monitoring and training. OSHA also provides requirements for the specifications and posting of caution signs, labels and respiratory protection guidelines.

The New York State Department of Labor (DOL) promulgated 12 NYCRR Part 56 (Industrial Code Rule) to address the risks to public safety and health during the removal, encapsulation, enclosure, repair or disturbance of friable or non-friable asbestos or handling of asbestos or asbestos material that may result in the release of asbestos fiber.

The New York State Department of Environmental Conservation (DEC) regulates the transportation of asbestos waste (6 NYCRR Part 364) and also the disposal in New York State landfills (6 NYCRR Part 360).

All asbestos projects performed at the College, whether by College employees or outside contractors, shall comply with applicable provisions of the cited regulations.

*Asbestos Projects:* An asbestos project includes any activity that may result in the disturbance of PACM and/or ACM, even if unintentional. At the College, this could include renovation projects which are not intended or expected to involve asbestos, but which are undertaken in an area where PACM is present and may be disturbed. College personnel and outside contractors involved in work which may disturb PACM, are required to contact Facilities in advance of the planned work for a determination of "Asbestos Project" status. Outside asbestos contractors must notify Facilities with the name of the designated "competent person" for each College asbestos project. This person will serve as the responsible, on-site party and assume regulatory responsibility for all asbestos work performed.

## **Asbestos Work Performed by Outside Contractors**

Facilities will ensure that all outside contractors hired for asbestos work possess appropriate credentials.

## **Identification of Asbestos**

### **Building Assessments and Surveys**

The College has conducted a building assessment at the Main Canandaigua Campus to determine the presence, location and quantity of ACM.

## Monitoring

An initial exposure assessment in areas containing PACM and/or ACM will be conducted before the start of a planned asbestos project. This will evaluate potential exceedances of the Permissible Exposure Limit (PEL) and will be conducted by DOL certified workers in accordance with applicable requirements. Initial monitoring will not be required if objective data exists to demonstrate that asbestos will not be released in excess of the PEL. Monitoring services will be procured and supervised by Facilities.

*Notice to Employees:* College employees working in buildings with installed PACM and/or ACM who may be potentially exposed will receive asbestos awareness training, conducted by an appropriate representative. This training will be provided annually and whenever the employee receives a new building assignment. Asbestos-related information will be provided to outside contractors whose employees may be potentially exposed to PACM and/or ACM.

## Notice Upon Discovery of Asbestos

Employees of the College and employees of contractors must notify their supervisor immediately upon discovery of PACM which could be disturbed by work activity. Such work activity includes, but is not limited to cutting or sawing, drilling, sanding, grinding, or stripping. College supervisors or outside contractors must immediately notify Facilities upon discovery. Any work already begun which could disturb the PACM and cause aerosolization must be immediately terminated. All such work will be postponed until authorization to proceed has been issued by Facilities in conjunction with Environmental, Health and Safety.

## Notice to Regulatory Agencies

Notice to regulatory agencies is required if the College or its contractor proposes to conduct an asbestos project involving quantities of PACM and/or ACM in excess of specified thresholds. Facilities will be responsible to ensure that appropriate notifications are made.

## Notice of Asbestos Projects

The College and the asbestos abatement contractor are responsible for ensuring that notice is provided to occupants. Written notice shall be provided to occupants, including visitors, 10 calendar days prior to the commencement of Phase II A projects or 3 calendar days prior to commencement (for small and minor size asbestos projects only).

## **Labeling and Signage**

### Regulated Areas

Warning signs must demarcate all regulated areas. Regulated areas may also include areas in and adjacent to locations where certain classes of work involving the actual or likely disturbance of PACM and/or ACM are conducted. Only certified asbestos workers with appropriate PPE may enter regulated areas.

### Warning Labels

Warning labels must be affixed to all raw materials, mixtures, scrap, waste, debris and other products containing Asbestos fibers or to their containers. These labeling requirements do not apply where the asbestos fibers have been modified by a binding agent, coating, binder or other material, provided that during their reasonably foreseeable use handling, storage, disposal, processing or transportation, no airborne concentrations of fibers of asbestos in excess of the TWA PEL and/or excursion limit will be released. The requirements also do not apply to products with an Asbestos concentration of less than one percent (1%).

### Installed ACM/PACM Labeling

At the entrance to mechanical rooms/areas in which employees reasonably can be expected to enter and which contain ACM and/or PACM, the College will post signs which identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that ACM and/or PACM will not be disturbed. The College will ensure, to the extent feasible, that employees who come in contact with these signs can comprehend them. Means to ensure employee comprehension may include the use of foreign languages, pictographs, graphics and awareness training.

### Label and Warning Sign Specifications

Warning signs will be provided and displayed at each regulated area. In addition, warning signs will be posted at all approaches to regulated areas so that an employee may read the signs and take necessary protective steps before entering the area. Warning signs must bear the following information:

DANGER

ASBESTOS

MAY CAUSE CANCER

CAUSES DAMAGE TO LUNGS

AUTHORIZED PERSONNEL ONLY

### **Transportation and Disposal of Waste**

Contractors who remove PACM and/or ACM from the College must comply with all federal, state and local regulations regarding the proper handling and disposal of the waste containing asbestos. PACM and/or ACM waste generated at the College will be transported to appropriate disposal facilities by waste haulers with valid DEC permits.

### **Forms/Online Processes**

- None

### **Appendix**

- None

### **Review date/action taken:**

- March 2011: original effective date
- September 2012: substantive changes to procedures
- July 2015: no revisions
- 2018: substantive changes to procedures
- January 2022: non-substantive revisions to procedures