


SUNY OSWEGO FACILITY SERVICES
ENVIRONMENTAL HEALTH AND SAFETY

Asbestos O & M Program

Procedure Number EHS-ACM-O&MP	Revision Number 0	Effective Date October 1, 2019
Approval Signature  J. Mitchell Fields AVP – Facilities Services		Approval Date OCT. 21, 2019

1. PURPOSE

SUNY Oswego is committed to the health and safety of the entire campus community (employees, students and visitors). The presence of asbestos-containing material (ACM) in some University Buildings has been established through survey and inspection procedures. The objectives of this asbestos management program include, but are not limited to, the inspection and identification of asbestos-containing materials (ACM), hazard communication, training, and maintenance and repair or removal of ACM in University-owned facilities. This program is intended protect employees, students and visitors from potential health hazards associated with asbestos, and to ensure ACM will be handled in compliance with all applicable federal, state and local regulations.

2. SCOPE

The SUNY Oswego Asbestos Management Program is administered by the Environmental Health & Safety Department (EHS). The EHS Department Chief Officer, serves as the University Asbestos Coordinator. Program requirements apply to all University properties and employees performing maintenance, repair and housekeeping services. In addition, all capital planning, construction, renovation and demolition projects are subject to the provisions of this program. Facilities Operations Staff and Project Managers must contact the EHS Department early in the planning stages of a project to reduce the potential for regulatory liability and to

ensure an adequate source of funding in the project budget to address asbestos issues.

The University Asbestos Coordinator must be consulted and/or notified prior to physically disturbing any building material, structure or other potentially ACM.

The EHS Department shall be responsible for administration of the University Asbestos Management Program. Various departments across campus may be affected by the provisions of this program, including but not limited to: Facilities Services Maintenance & Operations (Building Maintenance, Custodial Services, Environmental Operations, Utilities, Fire Prevention), Major Projects (MP), Campus Technology Services (CTS), and University Police Department (UP).

1. **DEFINITIONS**

ACM team member: A highly trained and skilled individual who is certified to recognize and handle ACM. Who has agreed to accomplish a minimum of 100 hours of service a year in order to keep their skills proficient.

Asbestos: name given to a group of naturally occurring minerals that are resistant to heat and corrosion.

Asbestos Containing Material: (ACM) More than 1%

Department of Labor, New York State: (NYS DOL)

DOL is to protect workers, its regulations are compiled in title 12 of the New York Codes, Rules and Regulations. Code Rule 56 governs ACM.

Environmental Protection Agency: (EPA) Provides requirements for asbestos inspectors and workers.

Permissible Exposure Limit: (PEL) Regulatory limit on the amount or concentration of a substance in the air.

Presumed asbestos Containing Material: (PACM) is limited to thermal system insulation and sprayed or troweled on, or otherwise applied surfacing material in buildings constructed no later than 1980

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

2. REGULATORY REQUIREMENTS

This Program has been developed to comply with the requirements of the Occupational Safety and Health Administration (OSHA) Asbestos Standards for General Industry (29 CFR 1910.1001) and Construction (29 CFR 1926.1101), the Environmental Protection Agency (EPA) Title 40 Parts 61 and 763, and the New York State Department of Labor (NYSDOL) Code Rule 56.

3. RESPONSIBILITIES

The EHS Department is responsible for the development, implementation and administration of the University Asbestos O & M Program, including but not limited to:

- Asbestos O & M Program development, direction and implementation,
- Developing, implementing, and conducting and/or facilitating appropriate asbestos training programs,
- Coordinating response to all emergencies on campus involving ACM,
- Conducting and/or supervising all asbestos building surveys and inspections,
- Reviewing all asbestos abatement projects for compliance,
- Management and oversight of activities performed by asbestos consultants, and
- Maintaining all records and documentation pertaining to asbestos compliance.

Name	NYS Certifications
Chief Officer of EHS (Coordinator),	Asbestos Project Supervisor Asbestos Building Inspector
(Alternate Coordinator) – Designee	Asbestos Project Manager Asbestos Building Inspector
Team members names on file in EHS	Asbestos Supervisor and or Asbestos Handler

Employees and or contractors must stop their work and report any disturbance of PACM to EHS.

4. PROCEDURES/IMPLEMENTATION

The University has conducted a comprehensive survey and inspection of its buildings for ACM. Evidence has been documented that the following University Buildings contain ACM: See Appendix A

4.1 Classification of Asbestos Work

The Occupational Safety and Health Administration classifies' work involving ACM into four classes:

Class 1 Asbestos Work – activities involving the removal of thermal system insulation (TSI) and surfacing asbestos containing material (ACM) and presumed asbestos containing material (PACM)

Class II Asbestos Work – activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics

Class III Asbestos Work – repair and maintenance operations where ACM, including thermal system insulation and surfacing ACM and PACM is likely to be disturbed

Class IV Asbestos Work – maintenance and custodial activities during which employees contact but do not disturb ACM and PACM and activities to clean up dust, waste and debris resulting from Class I, II and III activities.

4.2 Class I, II, and III Asbestos Work

A. Asbestos Handlers and O&M Team

The asbestos team conducts maintenance in areas known to contain ACM, repairs ACM that may become damaged during maintenance, and performs minor abatement. Designated individuals (referred to as the asbestos team) assigned to these tasks possess appropriate certification, hold state license and receive training applicable to the specific asbestos-related tasks performed. Team members are provided medical exams, training and licensing on an annual basis, and participate in the University Respiratory Protection Program.

Designated members:

*Perform maintenance and repair of all material known to contain ACM

- *Obtain and maintain equipment necessary for asbestos-related projects
- *Respond to emergencies involving ACM and potential fiber releases
- *May abate ACM if amounts are determined to be less than 25 linear, or 10 square feet. Abatement activities referenced are to be considered those that involve routine maintenance activities. Asbestos abatement related to renovations and capital improvement projects may be performed based on staff availability, with the cost of such abatement to be assessed to the project budget
- *May supervise the maintenance, repair and abatement of ACM if work is performed by a licensed outside contractor
- *May provide consultation and advisement for campus asbestos projects within scope of training
- *Coordinate removal and disposal of all asbestos-containing material with the EHS Department
- *Agreed to at least 100 hours of work time a year on order to keep proficient with the skills needed for the job

B. Class IV Asbestos Work

There are certain departments where designated employees are not required to handle, but may work around, contact, and subsequently be impacted by the presence of ACM (defined as Class IV Work by OSHA). Employees of these departments receive two (2) hour Asbestos Awareness Training on an annual basis.

Should any activities managed by these departments be assigned to outside contractors, and the proposed project involves work in areas known to have ACM, departmental personnel are responsible for providing information to these contractors regarding the presence of ACM, and for notifying the Department of Environmental Health & Safety in prior to any work being performed. These departments include, but are not limited to:

C. Building Maintenance (Facilities)

Building Maintenance has responsibility for the installation, operation and maintenance of plumbing systems, lighting and fixtures, glass replacement, signage, painting and keys. Such duties can result in employees entering and performing work in areas known to have ACM.

D. Custodial

Housekeeping, janitorial and moving activities may also involve work around asbestos material. Employees clean all areas of campus, polish and wax floors, remove trash and move equipment across campus. Employee activities may involve cleaning areas known to have ACM.

E. Major Projects

The Major Projects (MP) department is comprised of staff that facilitate and manage building construction and renovation projects on campus. Personnel serve as Project Managers and may frequently perform site visits to oversee and ensure work progress.

F. Campus Technology Services

The Campus Technology Service (CTS) is responsible for ensuring the availability of technology resource systems (computers, telephones, wireless campus, etc...) to the campus including installation, maintenance and repair, and security for those systems. As part of these activities, employees may be required to work in areas where ACM are present.

G. University Police

The University Police Department is charged with the responsibility for providing a safe and secure environment for the entire campus community. Their routine patrol of, and emergency response to, campus buildings covering over four million square feet may result in officers being required to be present in areas where ACM are present.

H. Utilities (Facilities)

The Utilities Department maintains and distributes energy services to campus buildings including, but not limited to steam, electricity, domestic water, gas, and storm water and sanitary waste removal. Utility distribution systems may be located in areas that contain ACM.

4.2 Building Inspection and Surveillance of Asbestos Containing Material on Campus

A comprehensive survey identifying the location of ACM in campus facilities has been performed. In 1987 Hall Kimbrell completed a campus –wide survey that identified and quantified all asbestos on campus. Additionally, the campus maintains an ongoing

survey program for all renovations, operations, or maintenance activities. The campus asbestos inspectors will take a sample of all material to be disturbed in renovation projects involving suspect material.

4.3 Work Practices

Work Practices are established as being performed by two major groups:

- SUNY Oswego Employees
- Contracted Employees

Building construction and/or renovation activities physically performed by SUNY Oswego Employees are to take the following actions prior to beginning any construction and/or renovation activities:

4.4 PROCEDURES

1. **Know you Suspect Materials** (see below). Upon receipt of a Work Order, the responsible department shall review the work to be completed and determine if suspect materials may have the potential to be disturbed within that building room/area
2. Never sand, grind, drill, hammer, cut, saw, break, damage, move or otherwise disturb a suspect or known asbestos material
3. Never sand or dry buff asbestos floor tile
4. If you need to do any of the above items, stop and tell you supervisor who will contact the EHS department for further guidance
5. Never proceed with a job that involves Suspect Materials until you have clearance from EHS through either a work order or e-mail notification.
6. Never collect a sample of the material yourself.
7. Notify your supervisor if you come across damaged suspect materials.

SUSPECT MATERIALS

Floor tiles	Equipment insulations
Mudded joints on pipe elbows or fittings	Brakes and clutches
Wall plasters	Putties and caulks

Ceiling plasters	Mastic (glue)
Decorative plasters	Transite Panels
Interior of fire doors	Cove base molding
Sprayed in building insulation	Roofing materials
Ceiling tiles	Laboratory countertops and fume hoods

PROHIBITED ACTIVITIES ON SUSPECT MATERIALS

Sanding	Cutting	Moving
Grinding	Sawing	Disposing
Drilling	Breaking	
Hammering	Damaging	

Asbestos Team

If minor work has to be completed involving asbestos material, the Asbestos Team will conduct the work following all OSHA and NYSDOL regulations as summarized below:

- a. Follow procedures as set forth by OSHA including but not limited to use of wet methods, flame resistant polyethylene film six (6.0) mil in thickness, glove bagging, erecting critical barriers, modification/isolation of building ventilation system to that area, air filtration devices (AFDs), providing for a minimum of four (4) air exchanges per hour, maintaining a negative pressure differential of at least or in excess of 0.02 inches of water
- b. Coordinate such activity with the Department of Environmental Health and Safety

Provide notification to regulatory agency of jurisdiction at least three (3) days prior to performing the work where applicable d. Provide a qualified "competent person" as defined by OSHA is present and supervises the work
- e. Establish a regulated area where airborne asbestos is likely to exceed the PEL and post warning signs.

- f. Wear appropriate disposable personal protective clothing that may include coveralls or similar whole-body clothing, head coverings, gloves and foot coverings, and adhere to decontamination procedures set forth by OSHA.
- g. Wear respiratory protection, in conjunction with the University's Respiratory Protection Program, unless a negative exposure assessment has been performed or air monitoring has demonstrated the permissible exposure limit for asbestos has not been exceeded.
- h. Perform daily air monitoring for employees working in a regulated area
- i. Facilitate clearance monitoring before returning the room/area to use
- j. Report any other damaged ACM in the area immediately to Environmental Health and Safety
- k. Proper procedures for completing minor work
 - Tent enclosures
 - PPE donned before entering
 - Negative pressure exhaust
 - Amended water
 - All materials sealed in plastic bags before exiting tent
 - All edges must be sealed
 - Clean-up – (1) gross materials bagged and sealed and removed, (2) HEPA vac surfaces after gross removal, (3) equipment removed, (4) wet clean all surfaces with rags mops or sponges (5) bag and remove rags, mops and sponges, (6) run 20 min of neg pressure HEPA following wet clean
 - Disposable PPE removed and containerized in tent
 - After exiting tent, workers seal the exit and put on new PPE clothing
 - Visual inspection by Supervisor
 - Once inspected by supervisor,
 - Collapse tent from top to bottom, turn off HEPA, bag up the tent.
 - Proceed immediately to a shower
 - Glove bags only for linear removals
 - Only for pipe or duct insulation
 - Must be performed within a tent enclosure
 - Size – diameter not to exceed ½ bag working length
 - Proper duct tape sealing required
 - Seal test with smoke
 - Seal pipe ends
 - Collapse with HEPA
 - Failure requirements
 - Personal air sampling, periodically

- Label all bags with building name and type/quantities of material
- Complete abatement project form (recordkeeping)
- Ventilation for Power Tools
- Tent enclosure of glovebag failure procedures to be followed:
 - Stop immediately
 - Construct isolation and critical barrier
 - Shut down HVAC system
 - Isolate uncontaminated areas
 - Critical barriers within 25 feet
 - Contact 3rd party air sampling firm
 - Begin cleanup using HEPA on all surfaces around the compromised tent and within the critical barriers
 - First wet cleaning of all surfaces with sponges, mops rags
 - Wait at least 12 hours
 - Conduct second cleaning – HEPA first then wet procedures
 - Bag all disposable cleaning equipment, remove bags and equipment
 - 3rd party clearance sampling
 - Remove barriers

4.5 Disposal of Asbestos Containing Waste

All asbestos-containing waste material is to be wetted and placed in polyethylene bags (double-bagged) at least six (6.0) mil in thickness bearing the following information/labels:

First Label: In accordance with 29 CFR 1910.1200 (f) of OSHA's Hazard Communication Standard:

**DANGER CONTAINS ASBESTOS FIBERS AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD BREATHING AIRBORNE ASBESTOS, TREMOLITE,
ANTHOPHYLLITE, OR ACTINOLITE FIBERS IS HAZARDOUS TO YOUR HEALTH**

Second Label: Provide in accordance with the U.S. Department of Transportation regulation on hazardous waste marking, 49 CFR parts 171 and 172, Hazardous

Substances: Final Rule. Published November 21, 1986 and revised February 17, 1987:

RQ (ASBESTOS), NA2212

CLASS 9, P.G.III

Contact the EHS Department to manage the removal. All asbestos waste material shall be stored in secured area and disposed of using licensed transporters and disposal facilities

5. Employee Notification

Employees will be notified whenever applicable and prior to any work with asbestos containing material in their immediate or adjacent area.

6. Labeling

Signage identifying the presence and location of asbestos containing materials shall be posted at the entrance to mechanical rooms or areas that contain thermal system insulation and surface asbestos-containing materials. Specific work practices to ensure the material is not disturbed shall also be present.

7. Medical Surveillance

Designated individuals who possess certifications to perform Class I, II and III Asbestos Work participate in a medical surveillance program. Prior to performing asbestos work, individuals undergo a medical examination. Medical evaluations are performed by:

Oswego Occupational Health
140 West 6th Street
Suite G-70
Oswego, NY 13126
(315) 349-5676

8. Respiratory Protection

Designated individuals who are required to wear respiratory protection are enrolled in the University's Respiratory Protection Program. Initially before assignment, and annually thereafter, workers undergo a qualitative fit test. Fit testing is performed by the SUNY Oswego EHS Department and or Oswego Occupational Health

9. Contractor Awareness

Contractors employed by the University shall be informed by the University Representative for the project/repair of the location of suspect and known ACM in the area they are to perform work. Contractors shall not disturb any suspect or known ACM

unless their employees have received the training specified for the work, hold the appropriate state license.

It is the responsibility of the Contractor to provide their own asbestos awareness, and any other required training programs for their employees.

10. Emergency Response Procedures

Any campus building containing ACM is potentially subject to a fiber release episode. Employees are to adhere to the following protocol when reporting a potential fiber release in an area known to contain ACM:

1. Leave and secure the area in such a manner that prevents entry by unauthorized personnel.
2. During normal work hours (8:00 am – 5:00 pm), notify an immediate supervisor of the incident.
3. Contact the EHS Department via the Facilities Services Maintenance & Operations Dispatch Office at extension 3200.
4. At times other than normal work hours, contact the University Police at extension 5555, who will contact the Asbestos Coordinator.
5. The Asbestos Manager will facilitate a response by an external abatement contractor, or assign a trained in-house team to make repairs and clean up any debris in a timely fashion.

5. TRAINING

EHS will give employees awareness training. ACM team members will receive training from a qualified company.

6. RECORD KEEPING

All documentation records pertaining to elements identified in this Asbestos Management Plan (Operations and Maintenance Plan) are maintained by the EHS Department that include, but are not limited to:

- Written Operations and Maintenance Plan
- Survey data, including building plans and drawings
- Notifications and labels
- Training Programs
- Written Respiratory Protection Program
- Any permits and information pertaining to maintenance and renovations performed, including emergency response
- Abatement Records

7. REFERENCES

N/A

8. APPENDICIES/FORMS

Appendix A:

Asbestos Survey Data

Refer to 1987 Hall Kimbrell Report

All survey data taken since the completion of the 1987 Hall Kimbrell Report.

Data is located in the EHS Department and can be viewed upon request Monday – Friday
from 7:30 -4:30.

