

Environmental Health & Safety Asbestos Management Policy



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I. Purpose

To protect employees, students, contractors and/or visitors from exposure to asbestos containing materials (ACM). To serve as the university's Asbestos Operations and Maintenance (O&M) Plan.

II. Scope

This policy establishes protocol to be followed by Environmental Health & Safety (EHS), Facilities Planning and Development, Engineering and Construction, and Physical Plant to ensure no employee, student, contractor and/or visitor is exposed to or performs any type of asbestos removal at Wright State University or satellite locations. All removal or disturbance of ACM shall be performed under controlled conditions by outside contractors whose employees have been properly trained and licensed by the Ohio Department of Health (ODH).

III. Responsibilities

A. Environmental Health and Safety (EHS)

1. Determine the presence and location of ACM as well as need for bulk or air sampling.
2. Conduct training to inform and provide knowledge and basic awareness on asbestos issues.
3. Maintain a list of locations of all known ACM and areas where it is known that ACM does not exist.
4. Provide sampling on behalf of WSU of any potential ACM as needed.
5. Employ at least one individual certified by the Ohio Department of Health as an Asbestos Hazard Abatement Specialist or Asbestos Hazard Evaluation Specialist.

B. Engineering & Construction, Facilities Planning and Development, and/or Physical Plant

1. Notify EHS of projects that have potential to disturb suspect ACM so the scope of the project can be evaluated and testing can be performed on suspect ACM not previously identified.
2. Disclose the presence of ACM to any outside service contractors.
3. Provide outside service contractors a copy of Wright State University's Asbestos Policy.
4. Notify building occupants of abatement activities.
5. Procure services of a re-insulation company.
6. Cover costs associated with abatement and reinstallation of materials.
7. Identify employees within their department that require asbestos training and ensure training is attended.

C. Managers, Project Managers and/or Supervisors

1. Notify EHS when work activities may disturb suspect ACM so the scope of the project can be evaluated and testing can be performed on suspect ACM not previously identified.
2. Notify EHS in the case of an emergency where there is the potential for fiber release from damaged ACM.
3. Oversee the re-insulation of materials.
4. Provide outside service contractors a copy of WSU's Asbestos Policy.
5. Identify employees within their department that require asbestos training and ensure training is attended.

D. Outside Service Contractors

1. Provide general awareness training for their employees so that employees are able to identify suspect ACM if found during work activities. EHS may provide this training upon request.
2. Notify EHS and Project Manager of suspect ACM that may be disturbed during work activities.
3. Notify EHS and Project Manager of suspect ACM that is discovered during work activities.

IV. Training and Recordkeeping

EHS offers all employees and supervisors initial general asbestos awareness training as well as annual refresher training. This training will include asbestos identification, uses of asbestos, asbestos related diseases, and proper work practices. Personnel that have the potential to come into contact with asbestos, such as custodial or maintenance personnel will require this training. EHS will maintain all training records.

V. Information

A. Asbestos Disturbing Activities

Examples of activities that may result in the disturbance of suspect asbestos-containing materials include, but are not limited to:

1. Removing or repairing floor tile.
2. Removing or repairing ceiling tiles.
3. Removing pipe insulation or pipe joint compound to access pipes.
4. Knocking holes in plaster ceilings or walls.
5. Removing carpet that has floor tile underneath it.
6. Work above ceiling at Kettering Center.
7. Improper stripping and/or buffing of floor tile. Stripping shall be conducted using low abrasion pads at speeds lower than 300 rpm and wet methods. Burnishing or dry buffing may be performed only on asbestos containing flooring which has sufficient finish (at least two layers) so that the pad cannot contact the asbestos containing material.

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Prior to beginning any potential asbestos disturbing activity EHS shall be notified to identify the presence or absence of ACM. All removal or disturbance of ACM shall be performed under controlled conditions by outside contractors whose employees have been properly trained and licensed by the Ohio Department of Health (ODH).

B. Asbestos Emergencies

A licensed asbestos abatement contractor shall conduct all emergency asbestos work. Emergencies include situations where a rapid response is necessary to mitigate damage or prevent further serious damage to the building or its occupants in which ACM or suspect ACM has become damaged and has the potential to become airborne. Examples include:

1. **Malfunction in equipment that if not addressed immediately could cause damage to the building; or**
2. **Ruptured steam or pipe lines; or**
3. **The discovery of ACM during renovation or demolition activities.**

In the event of an emergency, immediately contact EHS@ 2215. After hours, contact WSU Police dispatch at ext. 2111. Outside contractors shall notify their University contact.

C. Notification

Notifications to the Regional Air Pollution Control Agency (RAPCA) and ODH are required for asbestos abatement projects involving the removal of more than 260 linear feet or 160 square feet of asbestos-containing material and must be submitted ten (10) working days prior to the start of removal. The asbestos abatement contractor will make all notifications prior to commencement of work.

VI. References

- [29 CFR 1910.1001, Asbestos, General Industry](#)
- [29 CFR 1926.1101, Asbestos, Construction](#)
- [EPA 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos](#)
- [Ohio Administrative Code 3701-34, Asbestos Hazard Abatement](#)
- [WSU Asbestos Location Inventory and Known Campus Locations](#)

VII. Approval

Implementation Date: 4-7-10	Approval:	Signature:
Last Reviewed:	Stephen Farrell Director, EHS	<i>(Signature on File)</i>
Last Revision Date:		Stephen Farrell