

Asbestos Policy

Description

OBJECTIVE

Asbestos is a confirmed human carcinogen that was previously used in many different types of building materials. It is important to note that asbestos in an undisturbed state is not considered hazardous. 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. The purpose of this policy is to ensure compliance with these regulations and to minimize any risk of exposure for students, staff and the general public at the University of Florida.

POLICY

All asbestos related activities must 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.

Medical monitoring may be required for staff involved in the removal or disturbance of asbestos containing materials. When required, medical clearance shall be obtained through the Student Health Care Center – Occupational Medicine Office.

AUTHORITY

By authority delegated from the University President, the Vice-President for Business Affairs is responsible for the safety of all University facilities. Under this authority, policies are developed to provide a safe teaching, research, service, housing and recreational environment.

[su_spoiler style="fancy" icon="chevron" title=" Reference "] 40CFR Part 763 (EPA Worker Protection Rule); 29CFR1910.1001, 29CFR1926.1101 (OSHA Asbestos Standards); FS 255 & 469 (State of Florida Asbestos Regulations)

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" Notification "] All activities involving the removal of asbestos containing materials require the submission of an Asbestos Project Notification Form (APNF) to Environmental Health and Safety at least ten days prior to the start of an asbestos project.

The asbestos contractor, demolition contractor or in-house abatement team actually performing the work is responsible for submitting an additional notification to the designated regulatory authority, typically either the Florida Department of Environmental Protection or the Florida Department of Business and Professional Regulation.

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RESPONSIBILITIES

[su_spoiler style="fancy" icon="chevron" title=" Environmental Health and Safety "] Environmental Health and Safety is responsible for administrative decisions regarding asbestos control and abatement activities at the University of Florida. All activities involving asbestos containing materials require prior approval from Environmental Health and Safety.

Environmental Health and Safety shall provide consultative and technical assistance to campus organizations involved in activities related to asbestos. AHERA accredited inspectors in Environmental Health and Safety shall conduct annual inspections of known asbestos containing materials for the purposes of assessing any changes in the materials' condition.

Environmental Health and 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.

Environmental Health and 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 where the unauthorized removal of asbestos or suspected asbestos containing materials is observed.

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" Facilities Services Division and Other Division Maintenance and Facilities Departments "] Each department shall appoint a management level staff member to serve as an Asbestos Coordinator.

The coordinator will act as liaison between his or her division and Environmental Health and 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 and the University policy for addressing asbestos within their work areas and the implementation of asbestos surveys and abatement projects within their 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.

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" Project Managers "] Project managers are responsible for obtaining asbestos information either through completion of a formal survey or through contact with the EH&S Asbestos Program office prior to the start of a project.

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PROCEDURES

[su_spoiler style="fancy" icon="chevron" title=" Asbestos Operations and Maintenance Plan "] The Environmental Health and 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.

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" 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 a Florida 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 Environmental Health and Safety. All surveys are required to be submitted to Environmental Health and 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 methods may be required in the event that 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 in close proximity to 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. [\[su_spoiler\] \[su_spoiler style="fancy" icon="chevron" title=" Abatement Procedures "\] 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 EH&S must be obtained for any in-house abatement activities. Based on the type and amount of asbestos containing material being removed, EH&S 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 a Florida 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 onsite 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 EH&S before job commencement.

Environmental Health and Safety reserves the right to require that additional protective measures be instituted beyond those required by regulation on any asbestos abatement project.

University personnel removing asbestos containing floor tile and mastic must comply with the training and notification requirements stated in the OSHA Asbestos Construction Standard (29CFR1926.1101) and in FS 469. All removal must be conducted in strict accordance with the procedural requirements of the Resilient Floor Covering Institute (RFCI). An updated negative exposure assessment (NEA) shall be conducted at least annually by each group conducting floor covering removal using the RFCI methods. Air sampling for the NEA must be conducted by a Licensed Asbestos Consultant and a copy

of the final NEA report must be submitted to EH&S for approval.

Environmental Health and Safety shall be notified at least ten days prior to the commencement of an asbestos abatement project.

Project work plans or full project specifications may be required depending on the scope of the abatement project. A Licensed Asbestos Consultant shall be responsible for developing work plans and specifications related to an abatement project when needed.

Project monitoring including work area inspection and routine and final clearance air sampling shall be required on all asbestos abatement projects except for floor tile removal conducted according to the RFCI methods.

Environmental Health and Safety shall be the final decision making authority involving questions related to project monitoring requirements.

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" Insurance "] Prior to the university entering into any asbestos abatement contract, project managers shall ensure compliance with the insurance requirements of Florida Statute 255.56.

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" 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 (29CFR1926.1101) and FS 469.

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 Environmental Health and Safety.

[/su_spoiler] [su_spoiler style="fancy" icon="chevron" title=" Recordkeeping "] Copies of all documentation related to asbestos activities including the consultant and contractor final reports and waste disposal manifests must be provided to Environmental Health and Safety within 45 days of the completion of an abatement project.

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

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