

# Asbestos Management

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SAFETY POLICY MANUAL - SECTION 3.0 - POLICY NO. HM 2.5



SAFETY DEPARTMENT | 6001 UNIVERSITY BOULEVARD MOON TOWNSHIP, PA 15108

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**I. PURPOSE:**

The purpose of this policy is to ensure that employees are provided general information regarding the presence of asbestos-containing building materials (ACBM) located within Robert Morris University facilities and to establish more detailed information and training for those employees who may come in contact with ACBM. Ultimately, this policy outlines Robert Morris University's compliance with federal, state, and local regulatory agencies and ensures that employee exposures to airborne asbestos fibers are controlled.

**II. SCOPE & APPLICABILITY:**

This policy applies to all Robert Morris University employees who work in RMU facilities which may contain asbestos-containing building material and to those employees who perform maintenance and housekeeping activities in areas which may contain ACBM.

**III. REFERENCES:**

- A. OSHA 29 CFR 1910.1001; Asbestos
- B. OSHA 29 CFR 1926, 1101; Asbestos
- C. EPA 40 CFR 763.92
- D. Pennsylvania Department of Labor and Industry
- E. Allegheny County Health Department; Article XXI

**IV. DEFINITIONS:**

- A. **Asbestos:** The asbestiform varieties of a group of naturally occurring minerals that readily separate into fibers, including serpentinite (chrysotile), amosite, riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite.
- B. **Asbestos Containing Material (ACM):** Any material that contains more than one (1) percent asbestos by weight.
- C. **Class I Asbestos Work:** Activities involving the removal of Thermal System Insulation (TSI), surfacing ACM, and presumed ACM.
- D. **Class II Asbestos Work:** Activities involving the removal of ACM which is not TSI or surfacing material. This includes, but is not limited to, asbestos containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
- E. **Class III Asbestos Work:** Repair and maintenance operations, where ACM, including TSI and surfacing material, is likely to be disturbed.
- F. **Class IV Asbestos Work:** Maintenance, custodial and similar activities during which employees may contact but do not disturb ACM and presumed ACM and activities to clean-up waste and debris resulting from Class I, II, and III activities.
- G. **Employee Exposure:** Exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment.
- H. **Excursion Limit:** Established by OSHA, it is an airborne concentration averaged over a thirty (30) minute period that may not be exceeded.

**The Excursion Limit for Asbestos is 1.0 fibers per cubic centimeter (1.0 f/cc).**

- I. **High Efficiency Particulate Air (HEPA) Filter:** A filter capable of trapping and retaining at least 99.97 percent of all mono-dispersed particles of 0.3 micrometers in diameter or length.
- J. **OSHA Permissible Exposure Limit (PEL):** Established by the Occupational Safety and Health Administration, it is an eight (8) hour time weighted average (TWA) exposure that may not be exceeded.

**The OSHA PEL for Asbestos is 0.1 fibers per cubic centimeter of air (0.1 f/ft<sup>3</sup>).**

- K. **Regulated Area:** An area established by the employer or abatement contractor to demarcate areas where Class I, II and III asbestos work is conducted, and an adjoining area where debris and waste from such asbestos work accumulate.

## V. PROCEDURE:

### A. GENERAL

- 1. No Robert Morris University employee is permitted to conduct Class I, II, or III activities as defined in Section IV of this program. Essentially, this means employees shall not conduct asbestos removal or repair and maintenance work during which asbestos-containing material is likely to be disturbed.
- 2. Class IV work activities, as defined in Section IV, can be performed only by Robert Morris University employees who have received "asbestos awareness training".

### B. EXPOSURE ASSESSMENT

- 1. Robert Morris University conducts "initial" exposure monitoring during work activities where employees may be exposed to airborne asbestos concentrations above the permissible exposure limits. Exposure monitoring may be conducted during Class IV work activities including buffing/stripping floor tile, painting previously encapsulated surfaces, and working in areas (mechanical rooms and crawl spaces) containing ACM.
- 2. Results of all exposure monitoring data of asbestos will be transmitted to the affected employee(s) within fifteen (15) days of Safety Services receiving the results. Air monitoring will be conducted using established OSHA or NIOSH sample methodology.

### C. REGULATED AREAS

- 1. As defined in Section IV.K above, regulated areas will be established where Class I, II, or III work activities are being conducted or where airborne concentrations are likely to exceed the permissible exposure limit. Other than Class I, II, III abatement areas, no space within a Robert Morris University facility has been identified and demarcated as posing this condition.
- 2. All Class I, II, and III asbestos abatement work shall be conducted by a licensed contractor retained by Robert Morris University. All asbestos work shall be conducted inside containment barriers/regulated area which is posted with "DANGER - Asbestos, Cancer, and Lung Disease Hazard Authorized Personnel Only". No RMU personnel, unless properly trained and protected, are permitted to enter such a regulated space.

- a) The Safety Officer is qualified and has the appropriate personal protective equipment necessary to enter a regulated area. He may enter a regulated area to evaluate conditions within the space.
  - b) The Safety Officer may authorize entry into a regulated area if a condition within the space poses an emergency or imminent danger to the facility and/or employees of the facility.
3. In case of an incident resulting in damage to asbestos containing building materials, Safety Services may close access to an area by establishing a regulated area.

#### D. PERSONAL PROTECTIVE EQUIPMENT

##### 1. RESPIRATORY PROTECTION

- a) Respiratory protection must be used by all authorized personnel entering a regulated area.
- b) Respirators equipped with HEPA filters must be NIOSH approved per 30 CFR Part 11.
- c) Respirators are used in accordance with an approved Respiratory Protection Program.

##### 2. PROTECTIVE CLOTHING:

- a) Authorized employees are outfitted with protective clothing and equipment in the event that a regulated area must be entered. The following protective clothing, in addition to respiratory protection, must be worn:
  - (1) Coveralls
  - (2) Gloves, head, and foot coverings
  - (3) Face shield or goggles as necessary

#### E. HOUSEKEEPING

1. Robert Morris University employees do not conduct housekeeping tasks related to asbestos abatement projects. This means that RMU employees do not clean up debris resulting from asbestos abatement projects or respond to incidents where clean-up of debris would likely disturb asbestos containing materials.
2. Environmental Services employees do conduct Class IV activities including maintenance of asbestos containing floor tile. This type of floor maintenance is conducted utilizing the following precautions as a minimum.
  - a) No sanding of asbestos containing floor material is permitted.
  - b) Stripping finishes from asbestos containing floor material is conducted using low abrasion pads run at speeds of less than 300 rpm.
  - c) Burnishing and buffing is conducted on finished surfaces only.
  - d) Dusting and sweeping in areas containing ACBM is conducted utilizing wet methods and HEPA vacuums, respectively.

#### F. LOCATON OF ASBESTOS CONTAINING MATERIALS:

A comprehensive asbestos assessment was conducted to identify all facilities and building materials containing asbestos. Where possible, labels are used to notify building occupants where asbestos containing building materials are present, however, Attachment A provides an overview of University facilities which contain ACBM.

**G. RESPONSE TO AN INCIDENT OR DISTURBANCE:**

1. RMU personnel are not permitted to conduct work which will disturb ACBM or as outlined in V.E.2 above.
2. In the event that ACBM becomes damaged and/or a possible fire release episode is identified:
  - a) The incident shall be reported immediately to the department manager/supervisor and Safety Services.
  - b) The area shall be isolated to prevent possible exposure to building occupants.
  - c) The extent of the incident will be reviewed by the department and Safety Services to determine appropriated corrective/response actions.

**VI. RESPONSIBILITIES:**

**A. DEPARTMENT MANAGER:**

1. Identify all employees who complete Class IV work in areas where asbestos-containing material has been identified and ensure they are provided "asbestos awareness training" as outlined in section VI I of this program.
2. Inform RMU Safety Services of any incidents resulting in damage to ACBM and complete the "Report of Incident" form found in the Safety Management Program Manual.

**B. DEPARTMENT EMPLOYEE:**

1. Employees shall attend "initial" and "refresher" training provided by the department regarding the Asbestos Management Program.
2. Report any identified incidents involving ACBM to the Department Manager.

**C. SAFETY DEPARTMENT:**

1. Develop the Asbestos Management Policy and assist in the training of department employees.
2. Evaluating building activities and review incidents/reports regarding asbestos containing materials and initiating responsive/corrective action as necessary.
3. Retain the services of a licensed asbestos contractor to conduct Class I, 11, or III asbestos work or to provide emergency response services.

**VII. TRAINING AND EDUCATION:**

**A. All employees conducting Class IV asbestos activities are provided "Asbestos Awareness Training". The content of this training includes the information/procedures of this program and the following:**

1. Background information on asbestos.
2. Health Effects.
3. Location of ACM within the facility
4. Recognition of damage & deterioration.
5. Requirements of the OSHA Standard related to housekeeping.
6. Response to fiber release episodes.
7. Frequency of training.



**VIII. DOCUMENTATION & RECORDKEEPING:**

- A. This program is available for review by all RMU personnel and employee representatives.
- B. This program will be reviewed and updated as determined necessary.
- C. All records relating to employee training are maintained by the Department Manager.
- D. Incident reports, incident investigation forms, and exposure monitoring data are maintained by Safety Services.
- E. Documentation regarding all Asbestos Assessments and Asbestos Abatement Projects is maintained by the Facilities and/or Safety Department. This information is available for review upon request.

Implementation Date: March 2006

Last Review/Revision(s): March 2023

Attachments: Attachment A – Facilities Containing ACBM



## **Attachment A**

### **Facilities Containing ACBM**

Attachment A

Facilities With Identified Asbestos Containing Building Materials (ACBM)

BUILDING	ASBESTOS-CONTAINING MATERIAL / LOCATION
Adams Hall	<i>Abatement of Identified ACBM Completed in 2009</i>
Barry Center	<i>No Visible Asbestos Containing Building Materials Identified</i>
Benjamin Rush	<i>Abatement of Identified ACBM Completed in 2007</i>
Concord Hall	<i>Newer Construction - 2006</i>
Facilities Service Ctr.	<i>Abatement of Identified ACBM Completed in 2011</i>
Franklin Center	<i>No Visible Asbestos Containing Building Materials Identified</i>
Gallatin Hall	<i>Abatement of Identified ACBM Completed in 2009</i>
Hale Center	<b>Asbestos containing textured ceiling material (enclosed above drywall ceiling) throughout.</b> See Facilities Management
Hamilton Hall	<i>Abatement of Identified ACBM Completed in 2009</i>
Hancock Hall	<i>Abatement of Identified ACBM Completed in 2009</i>
ISC Ice Arena	<i>Newer Construction - 1999</i>
ISC Golf Dome	<i>Newer Construction - 1999</i>
ISC Boat Storage	<i>Newer Construction - 2016</i>
ISC House/Garage	<ul style="list-style-type: none"> <li><b>a) Kitchen linoleum, drywall joint compound throughout.</b></li> <li><b>b) Duct seam tape in basement.</b></li> <li><b>c) Window caulking throughout.</b></li> <li><b>d) Block insulation in basement.</b></li> <li><b>e) Tarpaper on garage roof.</b> See Facilities Management</li> </ul>
Jefferson Center	<ul style="list-style-type: none"> <li><b>a) Asbestos Containing Ceiling Finish (rough) throughout 2<sup>nd</sup> floor &amp; limited on 1<sup>st</sup> floor.</b></li> <li><b>b) Asbestos Containing Boiler Insulation.</b></li> <li><b>c) Asbestos Containing Floor Tile throughout areas of 2<sup>nd</sup> floor &amp; limited on 1<sup>st</sup> floor.</b> See Facilities Management</li> </ul>
Joe Walton Stadium / Athletic Building	<i>Newer Construction - 2005</i>
John Jay Center	<b>Asbestos Containing Floor Tile and Mastic throughout 1<sup>st</sup> Floor/Eng. Dept.</b> See Facilities Management
Lafayette Center	<ul style="list-style-type: none"> <li><b>a) Asbestos Containing Floor Tile – 1<sup>st</sup> floor bottom of stairs.</b></li> <li><b>b) Asbestos Containing Ceiling Tile – 2<sup>nd</sup> floor stairwell.</b></li> </ul> See Facilities Management
Lexington Hall	<i>Newer Construction - 2001</i>
Madison Hall	<i>Abatement of Identified ACBM Completed in 2008</i>





Marshall Hall	<i>Abatement of Identified ACBM Completed in 2007</i>
Massey Hall	<i>No Visible Asbestos Containing Building Materials Identified</i>
Media Arts Facility	<i>Newer Construction - 2010</i>
Melvin Teetz Alumni House	<i>Newer Construction - 2004</i>
Monroe Hall	<i>Abatement of Identified ACBM Completed in 2008</i>
Nicholson Center	<i>Newer Construction - 1999</i>
Patrick Henry Center	<b>a) Asbestos Containing Floor Tile Mastic in various hallways and rooms. b) Roof Flashing Material on 3<sup>rd</sup> Floor Roof. See Facilities Management c) Elevator Door Gaskets “Assumed”</b>
Revere Center	<i>No Visible Asbestos Containing Building Materials Identified</i>
Rockwell School of Business	<i>Newer Construction - 2011</i>
Rogal Chapel	<i>Newer Construction - 2002</i>
Rooney House	<i>Newer Construction - 2004</i>
Ross Hall	<i>Abatement of Identified ACBM Completed in 2007</i>
Salem Hall	<i>Newer Construction - 2011</i>
Scaife Hall	<i>Newer Construction - 2015</i>
Student Rec Center	<i>Newer Construction - 2017</i>
UPMC Events Center	<i>Newer Construction - 2019</i>
Washington Hall	<b>a) Asbestos Containing Floor Tile and Mastic throughout. b) Asbestos Containing Pipe Insulation in Generator Building. See Facilities Management</b>
Wheatley Center	<i>Newer Construction - 2012</i>
Yorktown Hall	<b>Suspect Asbestos Containing Building Materials Throughout</b> See Facilities Management