

# UNIVERSITY OF DENVER POLICY MANUAL ASBESTOS

Safety	3 16.10.010	5/31/2022
Recommended By: Senior Vice Chancellor for Business and Financial Affairs, Director of Environmental Risk Management, Associate Vice Chancellor for Facilities Management & Planning Approved By: Chancellor	7 10.10.010	G/G I/2G22

#### I. INTRODUCTION

Asbestos is a confirmed human carcinogen that previously was used in many different types of building materials. 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 establish the means to minimize risk of personal asbestos exposure to University employees, students, contracted workers, and the general public by managing and controlling suspected asbestos containing materials (ACM) and by establishing abatement requirements for contractors.

## II. POLICY OVERVIEW

- **A.** The Department of Environmental Health and Safety ("EHS") is responsible for administrative decisions regarding asbestos control and abatement activities at the University.
- **B.** EHS shall write and maintain an Asbestos Operations and Maintenance Plan (an "Asbestos O&M Plan") which establishes an asbestos operations and maintenance program for the University that complies with regulations issued by the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Colorado Department of Public Health and Environment (CDPHE).
- **C.** EHS is responsible for the management and implementation of the Asbestos O&M Plan.
- **D.** All activities involving asbestos containing materials require prior approval from the EHS.

**E.** EHS will serve as the University liaison with regulatory agencies and serve as the clearinghouse for the dissemination of information, as well as regulatory and University requirements, for asbestos related activities.

## III. PROCESS OVERVIEW

# **A.** EHS Responsibilities

- **1.** Maintain annual state certification as an asbestos inspector/project manager;
- 2. Provide bulk asbestos sampling when available;
- 3. Investigate potential asbestos exposure incidents;
- **4.** Review documents for proposed asbestos activities including inspection reports, statements of work, and air monitoring results to ensure compliance with applicable government regulations; and
- **5.** Provide or arrange for asbestos awareness training for University employees.

## B. Facilities Management & Planning Responsibilities

- 1. Obtain the services of qualified asbestos inspectors to perform asbestos inspections, abatement contractors to perform abatement work, and air monitoring specialists to perform air monitoring as needed;
- 2. Barricade areas where suspect or confirmed friable ACM has been disturbed;
- **3.** Maintain records of confirmed ACM in buildings including material description, location, and condition;
- 4. Label confirmed ACM:
- 5. Maintain documents of contractor abatement activities;
- **6.** Verify that any asbestos contractor performing work onsite has adequate training;
- **7.** Notify EHS of proposed construction activities in which a potential asbestos hazard exists:
- **8.** Provide EHS with contractor documents including statements of work, asbestos monitoring reports, and any other relevant documents concerning construction activities in which asbestos is involved; and
- **9.** Verify University community members are adequately notified of and protected from asbestos abatement activities.

#### **C.** Other Requirements

 Asbestos Survey(s). 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.

2. Disturbance Response. In the event of a disturbance of confirmed or suspected ACM the area will be isolated or otherwise protected from additional disturbance or personnel access. This may include evacuating personnel and/or isolating the building ventilation system. EHS should be notified immediately and will provide recommended response actions to Facilities Management Department.

## **3.** Training.

- a. University personnel involved in the removal of asbestos-containing materials must have training appropriate to their assigned job duties. No University employee shall perform any Permit-Required Abatement (as defined below). Permit-Required Abatement of asbestos-containing materials (ACM) shall be performed under controlled conditions by asbestos abatement workers trained via the EPA Model Accreditation Plan and licensed by CDPHE.
- **b.** 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 EHS.

# 4. Recordkeeping.

- a. Copies of all documentation related to asbestos activities including the consultant and contractor final reports and waste disposal manifests must be provided to EHS within 45 days of the completion of an abatement project.
- **b.** EHS shall be responsible for maintaining and archiving all asbestos related documentation for the time mandated by federal regulatory requirements.

#### IV. DEFINITIONS

- A. "Asbestos Containing Material (ACM)" means material containing 1% or more of asbestos.
- **B.** "Disturbance" means activities that disrupt the matrix of ACM or presumed ACM, crumble or pulverize ACM or presumed ACM, or generate visible debris from ACM.
- **C.** "Friable" means material, when dry that may be crumbled or pulverized or reduced to powder by hand pressure.
- D. "Permit Required Abatement" means any abatement of ACM in excess of 160

square feet of surfacing material or 260 linear feet of pipe insulation.

## V. RESOURCES

- **A.** Occupational Safety and Health Administration (OSHA) Hazard Communication regulation, 29 CFR 1910.1001 Asbestos.
- **B.** Colorado Department of Public Health and Environment (CDPHE) Air Quality Control Commission's Regulation No. 8 Part B, Asbestos Control.
- C. Environmental Protection Agency Asbestos.

Revision Effective Date	Purpose