



Intent:

The purpose of this policy is to establish methods for management of asbestos containing material (ACM) on campus as well as provide safety training and promote awareness. The asbestos protocol covers the identification, maintenance, and removal of regulated asbestos containing material in University facilities. This policy is intended to comply with state and federal asbestos regulations, including the standards of EPA and OSHA.

Scope:

This Asbestos Safety Policy has been developed to actively manage all identified asbestos-containing materials (ACM) in University owned facilities and those occupied or operated by the University, and includes activities which may disturb ACM including maintenance, renovation, demolition, or repair activities.

Definitions:

Abatement - Any act is intended to reduce, eliminate, or encapsulate asbestos or materials containing asbestos.

Asbestos Containing Materials (ACM) - Any material that contains more than 1% asbestos.

Asbestos Operations and Maintenance (O&M) - Specific procedures and practices developed for the interim control of asbestos containing materials in buildings until they are removed.

Competent Person - A person meeting the requirements for competent person as specified in 29 CFR 1926.1101. The competent person shall be a supervisor licensed by the Enforcement Section in accordance with NAC 618.

Demolition - The wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

Employee Exposure - Exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment.

Enclosure - An airtight, impermeable, barrier around ACM to prevent the release of asbestos fibers into the air

Friable Asbestos - Material containing at least one percent asbestos which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.



Asbestos Safety Policy

HEPA Filter Equipment - High Efficiency Particulate Air (HEPA) filtered vacuum and/or exhaust ventilation equipment with a filter system capable of collecting and retaining asbestos fibers. Filters shall retain 99.97 percent of particles 0.3 microns or larger as indicates in UL 586.

Permissible Exposure Limit (PEL) - The maximum allowable exposure to asbestos at 0.1 fibers per cubic centimeter of air as an (8) hour time-weighted average.

Presumed Asbestos Containing Material (PACM) - Any materials that may contain asbestos but have not yet been tested.

Table of Contents:

- 1. [Responsibilities](#)
- 2. [Asbestos Risk Register](#)
- 3. [Asbestos Identification](#)
- 4. [House Keeping](#)
- 5. [Miscellaneous Tasks](#)
- 6. [Asbestos Work Classification](#)
- 7. [Hierarchy of Asbestos Controls](#)
- 8. [Communication of Hazrds](#)
- 9. [Respirators & Medical Surveillance](#)
- 10. [Training Program](#)
- 11. [Related Information](#)

Procedures

To increase the effectiveness of this asbestos safety policy, the following responsibilities are specifically designated:

Responsibilities

Risk Management, Safety and Sustainability (RMSS)

- 1. Responsible for the development and implementation of this policy.
- 2. Provide necessary resources to carry out the program.
- 3. Develop and implement this Asbestos Safety Policy.
- 4. Conduct required annual Asbestos Awareness training.
- 5. Coordinate with supervisors for asbestos abatement and information.

Supervisors

- 1. Identify employees within their department that require asbestos training and ensure completion of the annual training.
- 2. Ensure a risk assessment has been completed before the commencement of any work activities with asbestos.
- 3. Ensure that appropriate safe working practices are followed by shop employees.
- 4. Ensure all appropriate personal protective equipment/clothing is provided and maintained within safety requirements.



Asbestos Safety Policy

Facilities Construction Project Coordinator

1. Ensuring that projects which need to disturb Asbestos Containing Materials (ACM) identify this within the project plan.
2. Carrying out more detailed survey work as necessary, where intrusive work is planned at any property.
3. Employing, as necessary, a professional individual for coordinating and arranging removal and remediation work where there is insufficient in-house expertise, resources knowledge.

Employees

1. Attend annual Asbestos Awareness training.
2. Avoid disturbing asbestos containing building materials during performance of duties.
3. Do not store materials against asbestos containing materials or damage asbestos while moving furniture or other objects.
4. Report to their immediate supervisors if materials are suspected of containing asbestos where the materials has become disturbed and/or damaged.
5. Do not sweep or use conventional vacuum cleaners to clean up asbestos containing materials.
6. Do not eat, drink, smoke or store food in areas containing friable asbestos containing materials.
7. Follow all requirements of this policy that apply to them.

Asbestos Risk Register

1. Information regarding ACM, based on building surveys completed by a competent person and past projects in campus buildings, is available for reference in room MCS 120 (Plan Room).
 - 1.1 Information is specific to room locations and indicates the presence or absence of Asbestos and whether it is friable.
 - 1.2 Ask the Risk Management, Safety and Sustainability or Planning Office Staff for assistance if necessary
2. Information provided by the Wisconsin Asbestos and Lead Abatement Management System is also available at <http://walms.doa.state.wi.us/> (A password is needed to access this website, contact RMSS if you need assistance).

Asbestos Identification

The following Safety Precautions are to be followed when any suspicious loose friable materials are seen.



Asbestos Safety Policy

1. Employees who observe suspicious material should immediately notify their supervisor of the location and general nature of the material.
2. DO NOT attempt to clean the material up or in contact with the materials.
3. Supervisor shall call 836-4412 to contact the Heating Plant's supervisor and/or the employee at the Heating Plant who is certified to:
 - 3.1 Analyze the material and determine the appropriate method for control or abatement.
4. If the material is confirmed as containing no asbestos, no action need be taken other than timely repair and clean up.

House Keeping

Custodial staff should use the following safe work practices to clean floors and other horizontal surfaces in areas that may contain asbestos (i.e., buildings built before 1980), unless the asbestos containing material has been removed.

1. Use Wet Methods of cleaning floors made of vinyl asbestos tile
 - 1.1 Dry sweeping & dry buffing of unsealed floors & scraping of all floors should be avoided.
 - 1.2 Use low abrasion pads (**speed below 300RPM**) & wet methods to strip finish.
2. Wet cleaning and/or HEPA vacuums should be used to clean mechanical room floors. If HEPA vacuums are used, they must be used and emptied in a manner that minimizes re-entry of asbestos fibers into the workplace

Miscellaneous Tasks

1. Repair tasks such as pounding a nail or installing a molly anchor into wall materials containing asbestos to hang a picture, bulletin board or clock, etc. that are easy or simple enough to not require that construction workers, maintenance persons, or repair persons perform the work is covered by the general industry standard instead of the construction asbestos standard. See more information: [OSHA Standard Interpretation](#)
2. Appropriate work practices such as use of wetting agents (shaving cream) should be used to prevent release of fibers into the air, and debris should be cleaned up promptly.

NOTE: *If repair tasks are difficult or complex enough to require a construction worker, maintenance person, or repair person to perform the work, the work is Class III Asbestos work and covered by the construction asbestos standard. See more information: Work Practice Controls for Class III and IV Asbestos Work*



Asbestos Safety Policy

Asbestos Work Classification

1. Class I Asbestos Work

- 1.1 Activities involving the removal of Thermal System Insulation (TSI) and surfacing Asbestos Containing Material (ACM) and Presumed Asbestos Containing Material (PACM).

2. Class II Asbestos Work

- 2.1 Activities involving the removal of ACM which is not TSI or surfacing material. This includes, but is not limited to, removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles and construction mastics.

Note: *Class I and Class II asbestos work is contracted to competent and licensed contractors. It is not being performed by FM employees.*

3. Class III Asbestos Work – Activities involving repair and maintenance operations, where ACM, including TSI and surfacing PACM, is likely to be disturbed, for example:

- 3.1 TSI with asbestos containing material applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain.
- 3.2 Surfacing ACM that has been sprayed troweled-on or otherwise applied to surfaces such as:
 - a. Acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes.

Note: *Only qualified FM employees, or qualified asbestos contractors, are permitted to perform Class III Asbestos Work on campus.*

Hierarchy of Asbestos Controls

Controlling exposures to occupational hazards is the fundamental method of protecting workers. Traditionally, a hierarchy of controls has been used as a means of determining how to implement feasible and effective control solutions.

Engineering Controls

1. Ventilation of the regulated area to move air from the employee's breathing zone toward HEPA filtered collection device or exhaust.
2. Enclosure or isolation of processes producing asbestos dust.
3. If the above is not sufficient to reduce employee exposure to or below the PELs, they shall still be used and supplemented with respiratory protection



Asbestos Safety Policy

Work Practice Controls for Class III and IV Asbestos Work

1. Drilling, cutting, abrading, sanding, chipping, breaking of ACM should be performed using drop cloths and mini-enclosures or glove bag systems.
2. Use wet methods and HEPA vacuums to promptly clean asbestos-containing or presumed asbestos-containing debris.
3. When cleaning debris and waste in regulated areas, employees must wear respirators and other appropriate PPE
 - 3.1 Prompt disposal of wastes contaminated with asbestos in leak-tight containers
4. **Prohibited Methods or Procedures**
 - 4.1 High-speed abrasive disc saws that are not equipped with point of cut ventilator or enclosures with HEPA filtered exhaust air.
 - 4.2 Compressed air to remove asbestos or ACM except (except by a qualified contractor in conjunction with an enclosed ventilation system).
 - 4.3 Dry sweeping, shoveling, or other cleanup of ACM or PACM dust & debris

Communication of Hazards

Before work begins, the presence, location, and quantity of ACM/PACM must be identified (See Asbestos Risk Register), including all TSI & sprayed on/troweled on surfacing materials in buildings, & resilient flooring material installed before 1981.

1. The following persons must be notified before work begins at worksites:
 - 1.1 Employees who work in or adjacent to areas containing asbestos.
 - 1.2 Contractors who work in or adjacent to areas containing such materials.
 - 1.3 Employees who will be performing housekeeping activities at locations where ACM and/or PACM may have contaminated the area
2. **Warning Signs and Labels** - The signs shall be posted at an appropriate distance from regulated area. (See [1910.1001\(j\)\(4\)\(ii\)\(A\)](#) for more information).
 - 2.1 Post at all approaches to regulated areas so that employee may read the signs and take necessary protective steps before entering the area.
 - 2.2 Post at entrance to mechanical rooms/areas that contain ACM and/or PACM to inform employees of which materials are affected.
 - 2.3 Posted warning signs demarcating the area must be easily readable and understandable. The signs must bear the following information:

DANGER
ASBESTOS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY

Asbestos Safety Policy

Respirators and Medical Surveillance

1. Respirator Program

1.1 Use of respirator during work activities (Class I & II for contractors, Class III & IV for qualified FM employees) must follow a Respiratory Protection Program in compliance with OSHA requirements.

2. **Medical Surveillance** - Must be instituted for employees who for a combined total of **30 or more days** per year are exposed at or above a permissible exposure limit.

2.1 Any day in which a worker engages in Class II or III operations or a combination thereof on intact material for one hour or less on the removal operation and/or cleanup, while using appropriate work practices, shall not be counted.

(See [1926.1101\(m\)\(1\)\(i\)\(A\)\(B\)](#) for more information)

Training Program

All employees such as custodians, electricians, mechanics, plumbers, locksmiths, etc. who may work in a building that contains “Asbestos Containing Building Material” (ACBM) must receive the following asbestos awareness training.

1. **Asbestos Awareness training** requirement include:

1.1 Training shall be provided prior to or at the time of initial assignment and at least annually thereafter.

1.2 New custodial and maintenance employees shall be trained within 60 days after commencement of employment to ensure that they understand the following:

a. The background information on asbestos and uses of asbestos.

b. The health effects associated with asbestos exposure.

c. Methods of recognizing asbestos & employee protection programs.

d. Recognition of damaged, deteriorated, and delaminated ACBM.

e. Appropriate work practices to minimize exposure to asbestos and the location of ACM/PACM in the building.

f. Proper cleaning methods and techniques.

2. **Operations and Maintenance (O&M) training** - A special (O&M) training is required for qualified FM employees who perform Class III asbestos work should receive **14 hours** training necessary for them to perform their tasks safely from the off-site contractor.

2.1 The relationship between smoking and exposure to asbestos producing lung cancer.

2.2 The quantity, location, manner of use, release, and storage of asbestos, and the specific nature of operations which could result in exposure to asbestos.

Asbestos Safety Policy

- 2.3 Descriptions of the proper methods of handling ACM, including:
 - a. Appropriate and proper worker decontamination procedures.
 - b. Waste handling and disposal.
 - c. The engineering controls and proper asbestos-related work practices.
 - d. Protective clothing donning, use, and handling.
- 2.4 Regulatory requirements such as federal, state, and local asbestos regulations.
- 2.5 Requirements concerning signs and labels.
- 2.6 Class III work must include “hands-on” training such as glove bag work and HEPA vacuum use and maintenance.

Related Information:

Occupational Safety and Health Administration (OSHA), [Standard Interpretations \(OSHA\), 29 CFR 1910.1001: Asbestos](#) for more information

(OSHA), [29 CFR 1926.1101: Asbestos](#) for more information

Environmental Protection Agency (EPA), [Asbestos and School Buildings](#)

Environmental Protection Agency (EPA), [Asbestos Laws and Regulations](#)

Administration:

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