

MONMOUTH UNIVERSITY POLICIES AND PROCEDURES

Policy: Asbestos Management Plan

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I. GENERAL PROVISIONS OF THE MANAGEMENT PLAN

A. INTRODUCTION

1. This Asbestos Management Plan was developed in accordance with the United States Department of Labor, Occupational Safety and Health Administration's (OSHA) Asbestos Standards, as set forth in 29 CFR 1910.1001 and 29 CFR 1926.1101.
 - a. These regulations place the burden of asbestos management on the owners and operators of facilities that may contain asbestos-containing materials (ACMs), as well as employers whose employees may be expected to work near or with ACMs.
 - b. As the University is both a facility owner and an employer, it has responsibilities in both aspects of these standards.
 - c. These responsibilities include;
 - i. identification of potential asbestos exposure hazard;
 - ii. notification of employees and occupants of the presence of ACM;
 - iii. employee awareness and operational training;
 - iv. recordkeeping; and
 - v. management of renovations and maintenance operations.
2. In general, the management plan development process consists of:
 - a. A review of available documents, such as blueprints and construction specifications documents;

- b. A visual inspection of building areas and elements to locate suspect ACM; sampling of suspect ACM as required; and assessment of the physical condition of the ACM;
 - c. Analysis of the collected samples to confirm the suspected material as ACM;
 - d. Meetings with the designated representatives of University to discuss prioritization of confirmed ACM areas relative to the asbestos management philosophy for the subject facility, resources, schedule, and building specific issues;
 - e. Assignment of required and appropriate response actions for all ACM identified; and
 - f. Development of an Operations and Maintenance Program to institute appropriate controls for the management of ACM remaining in-place.
- 3. This plan is based on inspections conducted on the dates indicated. Condition assessments and subsequent assigned response actions of ACM identified are based on the conditions at the time of the inspection.
 - 4. This plan is divided into two parts:
 - a. Part I provides general provisions of the plan;
 - b. Part II is the Operations and Maintenance Program.

B. PURPOSE AND POLICY

- 1. The objective of this Management Plan is to allow the continuation of normal building maintenance and service activities while limiting the potential exposure of building occupants, maintenance workers, and outside service personnel to airborne asbestos fibers. The program's policies and work procedures have been specifically designed to meet the needs of both the University and the community at-large.
- 2. This Management Plan is guided by four (4) specific policy statements:
 - a. Asbestos-containing materials identified at the University's facilities are to be maintained under an Operations and Maintenance program to be instituted by the Manager. Members of the University community are expected to comply with this Management Plan relative to operations that they may undertake;
 - b. Under this Management Plan, to the extent that the objective of the Management Plan is not compromised,

intact ACM will not be removed until a condition arises pursuant to Policy Statement (c) below;

- c. Instances and conditions which would motivate removal of some portion of the ACM in the facility include:
 - i. When it is determined that ACM will be disturbed by repair, renovation or demolition activity; or
 - ii. Where a response to damaged ACM is necessary, and it is determined that removal is either the only acceptable response or the most cost effective response relative to all factors considered; and
 - d. Repair is the minimally necessary response action to damaged ACM if removal is not pursued.
3. Locations and approximate amounts of all identified ACM are detailed in the Asbestos Identification Survey Reports.
- a. Copies of these reports can be located in Campus Planning and the Office of Compliance.

C. DEFINITIONS

- 1. “Accredited Inspector” means a person who has completed a course at an EPA approved training facility in the inspection of buildings for Asbestos-Containing Materials, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).
- 2. “Accredited Management Planner” means a person who has completed a course at an EPA approved training facility in the management of Asbestos-Containing Materials in buildings, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).
- 3. “Accredited Asbestos Abatement Project Designer” means a person who has completed a course at an EPA approved training facility in the design of asbestos abatement projects, pursuant to the current regulations promulgated in response to the Asbestos Hazard Emergency Response Act (AHERA).
- 4. “ACM” means Asbestos-Containing Material.
- 5. “CMU” means concrete masonry unit.
- 6. “EPA” means the United States Environmental Protection Agency.
- 7. “HEPA filter” means High Efficiency Particulate Absolute filter.
- 8. “NIOSH” means the National Institute of Occupational Safety and Health.

9. “N.J.A.C.” means the New Jersey Administrative Code.
10. “NJDOL” means the New Jersey Department of Labor.
11. “NJDCA” means the New Jersey Department of Community Affairs.
12. “N.J.S.A.” means New Jersey Statutes Annotated.
13. “O & M” means Operations and Maintenance.
14. “OSHA” means the United States Department of Labor Occupational Safety and Health Administration.
15. “Subcode” refers to the New Jersey Asbestos Hazard Abatement Subcode, a part of the New Jersey Uniform Construction Code.
16. Federal and State Regulations referenced in this Management Plan
 - a. OSHA Standards for Asbestos - 29 CFR 1910.1001 and 29 CFR 1910.1101
 - b. OSHA Respiratory Protection Standard - 29 CFR 1910.134
 - c. EPA National Emission Standards for Hazardous Air Pollutants – 40 CFR Part 61.
 - d. EPA Asbestos-Containing Materials in Schools Rule - 40 CFR 763, Subpart E.
 - e. New Jersey Asbestos Hazard Abatement Subcode - N.J.A.C. 5:23-8.
 - f. New Jersey Solid Waste Management Regulations - N.J.A.C. 7:26, et seq.
 - g. New Jersey Asbestos Control and Licensing Act - N.J.S.A. 34:5A-32, et seq.

D. GENERAL SCOPE

1. Management Structure
 - a. Program Management
 - i. Program Management shall originate from the Manager, which shall be the Director of Compliance/Risk Manager. In the absence of the Director of Compliance/Risk Manager, the Construction Manager shall assume the Managers responsibilities. The Manager shall delegate, as necessary, oversight and review of the Plan to appropriate personnel and consultants.
 - ii. The Manager may delineate specific buildings with no identified ACM or suspected ACM. Such

buildings may be exempt from this Management plan.

- a) A copy of the exemption must be included in the Management Plan.

2. Initial Notification of University Community

- a. Notification of the development of this Plan shall be made in writing to management representatives in different departments of the University community.
 - i. The departments of Campus Planning and Construction, Facilities Management, Information Systems and University Police shall be required to designate a Plan contact person (or persons) whom the Manager may approach regarding Plan implementation issues.
- b. The Manager shall meet with these contact persons to discuss the elements of this Plan, especially relative to the “Notification of Employee or Contracted Labor” requirement.

3. Notification of Employee or Contracted Labor

- a. Anytime anyone other than the University’s employees are required to conduct custodial or maintenance type activities in this building (such as outside contractors, telephone workers, etc.):
 - i. They shall be notified of the location of the ACM in the building and any special precautions required; and
 - ii. A person designated by the Manager shall be notified of their presence in the building and their intended activities.
- b. Notification to the workers may be in the form of reading this Management Plan, or by other written information that, at a minimum, includes the type and/or location of ACM in the building, and any special precautions required.
- c. Notification to the designated person of the presence and intended activities of the outside workers shall be made by appropriate building personnel prior to the workers beginning their activities so that a determination of whether the activities will disturb ACM can be made.
 - i. The designated person shall then release the workers to proceed, and document the release, any

specific instructions, and evidence of the worker's notification.

- ii. The Manager shall maintain such documentation.
 - d. University employees who may come in contact with ACM as part of their regularly assigned duties shall participate in an in-house awareness training program.
4. Emergency Situations
- a. In the event that emergency responses are required, a person designated by the Manager (usually the Supervisor of Electrical and Fire and Safety) shall be contacted by telephone, and may direct responses by telephone.
 - b. Written documentation of the emergency and response must be completed within 24 hours of the initial telephone contact, and forwarded to the Manager.
5. Occupant Awareness
- a. The Plan shall be available from the Manager's on-site office in Facilities Management during normal business hours.
 - b. University employees, as appropriate, shall receive awareness training pursuant to the OSHA Standard.
 - c. Reinspection and assessment of the subject building shall be performed periodically to review the condition of ACM being maintained in-place.
6. Labeling of ACM
- a. The location of any ACM in routine maintenance areas (such as boiler rooms), shall be marked with warning labels affixed immediately adjacent to, or directly upon, the ACM, in accordance with the requirements set forth in OSHA 29 CFR 1910.1001.

II. OPERATIONS AND MAINTENANCE PROGRAM

A. GENERAL SCOPE

- 1. The following procedures shall be utilized if an O & M program is established for maintenance personnel or work performed by any contractors.

2. Program Management
 - a. Program Management shall originate from the Manager, with oversight and review of work locations and procedures being performed by the person(s) designated by the Manager.
3. Scope
 - a. This Plan shall apply to all spaces and building elements containing ACM and shall not apply to areas where ACM is not present.
4. Definitions
 - a. Words, terms and abbreviations used in this Plan shall have the meanings described in the Definitions section of this Management Plan.
5. Engineering Controls
 - a. Engineering controls such as, but not limited to, isolation, enclosure, local exhaust ventilation and dust collection shall be used during response action activities.
 - b. Local exhaust and dust collection systems shall utilize High Efficiency Particulate Absolute (HEPA) filters manufactured for use with asbestos particles.
 - c. All hand-operated and power-operated tools, which may produce or release fibers, shall be equipped with local HEPA filtered exhaust systems.

B. CLEANING AND MAINTENANCE PROCEDURES

1. General Work Practices
 - a. General work practices, shall be in accordance with the standards as set forth in 29 CFR 1910.1001, including but not limited to:
 - i. Handling of asbestos;
 - ii. Cleaning of adjacent surfaces and materials;
 - iii. Personal protection and hygiene; and
 - iv. Isolation of work areas.
 - b. Specific instructions and work practices shall be in accordance with the Specific Instructions and Work Practices Section of this Program.

2. Equipment and Supplies
 - a. Specialized equipment and supplies shall meet the requirements and standards as set forth in 29 CFR 1910.1001.
3. Specific Instructions and Work Practices – Non-friable ACM
 - a. Routine Work Practices – Non-friable ACM
 - i. All non-friable ACM (resilient asbestos floor tiles, floor tile mastic) is to be cleaned by non-abrasive cleaning agents and methods only.
 - ii. Mild detergents applied by soft mops and/or rags is an acceptable practice.
 - iii. No special personal protective equipment is required for this work.
 - iv. ACM is never to be sanded, chipped, gouged, broken, or otherwise made to break down and become friable.
 - b. Removal of Loose, Broken, or Intact ACM – Non-friable ACM
 - i. Removal of the ACM in any amount shall be accomplished by an asbestos abatement contractor licensed pursuant to N.J.S.A. 34:5A-32 et seq., in a manner specified by an accredited abatement project designer, and in accordance with Section I of this O & M Program and N.J.A.C. 5:23-8, as required.
4. Specific Instructions and Work Practices – Friable ACM
 - a. Scheduled Removal, Repair, or Emergency Removal – Friable ACM
 - i. Removal of the ACM in any amount shall be accomplished by an asbestos abatement contractor licensed pursuant to N.J.S.A. 34:5A-32 et seq., in a manner specified by an accredited abatement project designer, and in accordance with Section I of this O & M Program and N.J.A.C. 5:23-8, as required.
 - b. Renovation Projects
 - i. Renovation and/or demolition projects may motivate reinspection of certain building spaces and/or invasive inspection of such spaces as enclosed bathroom cores and columns at the

Manager's discretion. The owner shall utilize the services of an accredited inspector to perform these invasive inspections.

C. FIBER RELEASE EPISODE

1. Major (disturbance of greater than three linear or three square feet) or minor (disturbance of equal to or less than three linear or three square feet) fiber release episodes, shall be handled in accordance with the Emergency Procedures detailed in the Management Plan (Part I, Section D, Paragraph 4).
2. In addition, the following information shall be recorded by the person(s) designated by the Manager and maintained by the Manager:
 - a. Date of episode;
 - b. Location of episode;
 - c. Method of repair;
 - d. Preventive measures or response actions taken;
 - e. Name, address, telephone number, and affiliation of each person performing the work; and
 - f. If ACM is removed, the name and location of the storage or disposal site for ACM.

D. RESPIRATORY AND PERSONAL PROTECTION

1. Personal Protective Controls
 - a. No special protective equipment is required for employees or other authorized party who may perform work involving non-damaged non-friable ACM.
 - b. Personnel involved in work with friable, or damaged non-friable ACM, shall use, as a minimum, the following personal protective equipment and procedure:
 - i. An appropriate respirator; and
 - ii. Disposable protective clothing.
 - iii. Personal decontamination.
2. Respiratory Protection Program
 - a. Should any of employees be trained to complete short duration response actions, the Manager shall establish a Respirator Program pursuant to the OSHA Respiratory

Protection Standard 29 CFR 1019.134 and N.J.A.C. 12:100.

3. Other Health and Safety Hazards
 - a. The owner shall comply with all standards involving other health and safety hazards, which may require consideration including, but not limited to;
 - i. ladders;
 - ii. scaffolding;
 - iii. electrical equipment; and
 - iv. chemical solvents.

E. TRAINING PROGRAMS

1. All employees whose work requires them to come in contact with ACM or perform housekeeping operations in an area which contains ACM shall be provided an asbestos awareness training course, which shall at a minimum contain the following elements:
 - a. health effects of asbestos;
 - b. locations of ACM in the building;
 - c. recognition of ACM damage and deterioration; and
 - d. proper response to fiber release episodes.
2. Training shall be provided prior to or at the time of initial assignment and at least annually thereafter.
3. Employees in the following positions are required to complete Initial and Refresher Asbestos Awareness training:
 - a. Administrative Services
 - i. Director of Compliance/Risk Manager
 - b. Campus Planning
 - i. Associate Vice President
 - ii. Construction Manager
 - c. Facilities Management
 - i. Directors (Operations, Special Events)
 - ii. Auto Mechanics
 - iii. Carpenters
 - iv. Custodians
 - v. Electricians

- vi. Fire & Safety Personnel
- vii. General Maintenance Mechanics
- viii. HVAC
- ix. Locksmiths
- x. Plumbers
- xi. Service Response Team Members
- d. Information Operations
 - i. Manager, Telecommunications
 - ii. Hardware Technicians
 - iii. Technician Supervisor
 - iv. Director of Media Operations
 - v. Network Analysts
 - vi. Multi-media Specialists
- e. University Police
 - i. Chief
 - ii. Captain
 - iii. Sergeant
 - iv. Corporal
 - v. Patrol Officers
 - vi. Safety Officers
- 4. All outside contractors working in an area of a building where ACM is located shall be notified of the presence of ACM and shall be required and responsible for the appropriate level of training for their employees.
 - a. Contractors must be able to provide verification that their workers have been trained regarding the proper handling of ACM.
- 5. The Manager may choose to supplement its O & M capabilities at any time with qualified contracted parties.

F. RULES, NOTIFICATIONS, AND PERMITS

- 1. EPA and OSHA Compliance
 - a. All O & M work shall be performed in compliance with all applicable Federal and State regulations.

- b. Compliance with these standards shall be overseen by the Manager.

G. WASTE DISPOSAL

1. Bagging and Handling

- a. Any asbestos-containing materials which are not in use, or in place on ceilings, walls, floors, or mechanical system components shall be stored in such a way so as to prevent the release of fibers.
- b. A lockable metal drum shall be maintained in a designated area for temporary storage of O & M generated waste. This designated area shall be in a secured area.
- c. Disposal of asbestos-containing waste shall be in strict accordance with N.J.A.C. 7:26 Solid Waste Regulations.
 - i. The owner shall utilize contractor/haulers as necessary to effect this disposal.

2. Labeling

- a. The bags shall be labeled in accordance with applicable regulations.

F. PERIODIC INSPECTIONS

- 1. At least periodically, beginning with the implementation of this Management Plan, all areas where ACM has been identified shall be reinspected for changes in condition.
- 2. The re-inspection shall be conducted by a person with adequate training. Results of the periodic surveillance shall be forwarded to the Manager for inclusion into this Management Plan.
- 3. Inspection Control
 - a. The Manager is responsible for maintaining records sufficient to indicate when re-inspections are required, and for making the necessary arrangements for the re-inspections to be conducted by accredited inspectors.
- 4. Management Plan Updates
 - a. Should re-inspections result in changes of any kind to be made to this Management Plan, those changes shall be made by the Manager and the updated Management Plan made available online to all employees.

5. Special Inspections
 - a. Renovation and/or demolition projects shall motivate reinspection of certain building spaces and/or invasive inspection of such spaces as enclosed bathroom cores and columns. The Manager shall utilize the services of an accredited inspector for all inspections.

G. ABATEMENT ACTIVITIES

1. Abatement Defined
 - a. The word abatement as used in this O & M Program is a generic term that means any of several procedures to control fiber release from ACM.
 - b. This includes:
 - i. Removal;
 - ii. Encapsulation;
 - iii. Enclosure; and
 - iv. Repair.
2. Chain of Command
 - a. The Manager shall implement the abatement projects through the use of a professional asbestos consultant.
 - b. This consultant shall be licensed as an Asbestos Safety Control Monitor (ACSM) and shall consider all aspects and policies of this Management Plan when developing and executing an abatement project.
3. Use of Licensed Contractors
 - a. Except as noted directly below, only contractors licensed by the New Jersey Department of Labor (NJDOL) to perform asbestos abatement activities shall be used.
 - i. The asbestos abatement contractors shall use workers licensed with the NJDOL.
 - b. As allowed by the applicable New Jersey Asbestos Licenses and Permits Code (N.J.A.C. 8:60/12:120), a contractor that is not a New Jersey-licensed asbestos abatement contractor may undertake removal of asbestos-containing floor tile and/or floor tile mastic utilizing an “excursion method” process approved by the New Jersey State Department of Health.

8. Policy Deviation
 - a. Deviation by any employee, worker, or contractor from these established policies shall be investigated and acted on accordingly.
 - b. The Manager shall not tolerate any intentional deviation from these requirements.
9. Notifications
 - a. Written notice of the intent to perform asbestos abatement activities in the building shall be transmitted by the contractor to the appropriate Federal, State and local agencies, as required.
 - b. The notices shall include:
 - i. The name of the contractor;
 - ii. The location of the abatement project;
 - iii. The scheduled start and finish dates;
 - iv. General procedures to be used during the project; and
 - v. Procedures for waste disposal.
10. Fire and Emergency Notification
 - a. Local fire and emergency personnel must be notified of the abatement project and of any special precautions to be used in case of emergency.
 - b. Telephone numbers of the local authorities must be prominently displayed at the job site.
11. Waste and Water Disposal
 - a. All required ACM and ACM-contaminated wastes shall be properly enclosed and manifested for hauling and disposal in accordance with all Federal, State, and local regulations.