

# **Asbestos Management Program Manual**

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Environmental Health, Safety and Risk Management Department

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## **I. Introduction**

Stephen F. Austin State University (SFA) takes asbestos containing materials on campus very seriously and is committed to properly managing asbestos to ensure the safety of our faculty, staff, students, and visitors. In an effort to educate the campus community, maintain regulatory compliance, and properly manage asbestos containing materials we have created this manual. The SFA Environmental Health, Safety, and Risk Management (EHSRM) Department is charged with managing the University's Asbestos Management Program. EHSRM is committed to a proactive approach to identifying and removing asbestos from university buildings based on the following three factors: physical integrity of the material, potential for disturbance, and potential for exposure.

## **II. Background**

The U.S. Environmental Protection Agency has provided the following background information on asbestos:

Asbestos is a group of naturally occurring minerals that have a very high fiber strength and are resistant to fire, heat, and corrosion. Because of its fiber strength and heat resistance, asbestos has been used in a variety of building construction materials for insulation and as a fire retardant. Asbestos has also been used in a wide range of manufactured goods, mostly in building materials (roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products), friction products (automobile clutch, brake, and transmission parts), heat-resistant fabrics, packaging, gaskets, and coatings. Although asbestos makes an excellent building material, adverse health effects led to strict regulations. After 1980, all asbestos materials were banned for use in public buildings.

When left intact and undisturbed, asbestos containing materials do not pose a health risk to building occupants. There is a potential for exposure only when the material becomes damaged to the extent that asbestos fibers become airborne and are inhaled. Asbestos fibers may be released into the air by the disturbance of asbestos-containing material during demolition work, building maintenance, repair, and remodeling. In general, exposure may occur only when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air.

Exposure to asbestos increases your risk of developing lung disease. The risk to people who smoke is greatly increased. In general, the greater the exposure to asbestos, the greater the chance of developing harmful health effects. Symptoms of asbestos related disease may take many years to develop following exposure.

Asbestos-related conditions can be difficult to identify. Healthcare providers usually identify the possibility of asbestos exposure and related health conditions like lung disease by taking a thorough medical history. This includes looking at the person's medical, work, cultural and environmental history.

After a doctor suspects an asbestos-related health condition, he or she can use a number of tools to help make the actual diagnosis. Some of these tools are physical examination, chest x-ray, and pulmonary function tests.

Three of the major health effects associated with asbestos exposure are:

- lung cancer
- mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest and the abdomen and heart
- asbestosis, a serious progressive, long-term, non-cancer disease of the lungs

### **III. Purpose**

The purpose of this manual is to ensure asbestos containing materials in SFA facilities are managed in accordance with current applicable regulations and to aid in protecting human health in the presence of asbestos within the university. To help achieve this goal, the EHSRM Department has developed the procedures described in this manual for the proper management of asbestos. This includes inspections to identify the presence of asbestos in university buildings, proper management and removal of asbestos materials, and training for affected personnel.

SFA is committed to complying with applicable federal and state regulations promulgated by the U.S. Environmental Protection Agency (EPA), U.S. Occupational Safety and Health Administration (OSHA), The University of Texas System, and the Texas Department of State Health Services (TDSHS) related to asbestos awareness, licensing, management, and removal. These regulations include:

- 40 CFR 763, Subpart E – EPA Asbestos Containing Materials in Schools
- 40 CFR 763, Subpart G – EPA Worker Protection Rule
- 40 CFR 61, Subpart M – National Emissions Standards for Hazardous Air Pollutants (NESHAP)
- 29 CFR 1910.1001 – OSHA General Industry Standard for Asbestos
- 25 TAC 295, Subchapter C – TDSHS Occupational Health, Texas Asbestos Health Protection

SFA has adopted a proactive approach to identifying and removing asbestos through routine building inspections and removal of asbestos containing materials that have a high potential for disturbance, a high potential for human exposure, or found to be in a deteriorated physical condition. EHSRM employs an Asbestos Program Manager and other individuals licensed by the Texas Department of State Health Services as Asbestos Inspectors to conduct inspections and recommend response actions as needed.

## IV. Scope

The SFA Asbestos Management Program applies to all University property on and off-campus. All SFA employees and contractors employed by the university must follow the procedures outlined in this manual without exception.

## V. Identification

The only way to know for sure if a building material or product contains asbestos is to have it tested by an approved laboratory. The following is a list of materials provided by the EPA of some (but not all) products/materials that may contain asbestos:

- Pipe Insulation (corrugated air-cell, block, etc.)
- Boiler Insulation
- HVAC Duct Insulation
- Ductwork Flexible Fabric Connections
- Heating and Electrical Ducts
- Taping Compounds (thermal)
- Thermal Paper Products
- High Temperature Gaskets
- Cooling Towers
- Breaching Insulation
- Spray-Applied Insulation
- Blown-in Insulation
- Fireproofing Materials
- Moisture Barrier Materials
- Base Flashing
- Roofing Felt
- Roofing Shingles
- Ceiling Tiles and Lay-in Panels
- Acoustical Plaster
- Decorative Plaster
- Textured Paints/Coatings
- Caulking/Putties
- Wallboard
- Joint Compounds
- Spackling Compounds
- Vinyl Wall Coverings
- Packing Materials (for wall/floor penetrations)
- Fire Doors
- Vinyl Floor Tile
- Vinyl Sheet Flooring
- Flooring Backing
- Construction Mastics (floor tile, carpet, ceiling tile, etc.)
- Electric Wiring Insulation
- Electrical Panel Partitions

- Electrical Cloth
- Laboratory Hoods/Table Tops
- Fire Blankets
- Fire Curtains
- Chalkboards
- Elevator Equipment Panels
- Elevator Brake Shoes

## **VI. Roles and Responsibilities**

### **A. Asbestos Program Manager:**

The SFA Asbestos Program Manager (APM) is the EHSRM employee who is licensed by the State of Texas to inspect for asbestos and recommend response actions for identified asbestos containing materials in university facilities. The responsibilities of the APM include:

1. Maintain a current license issued by the Texas Department of State Health Services as an asbestos inspector and management planner by satisfactorily completing the appropriate training and examination administered by the Texas Department of State Health Services. The APM will stay abreast of all pertinent regulations regarding asbestos.
2. Establish university policies and procedures for the proper management and removal of asbestos materials in accordance with above referenced regulations.
3. Establish an asbestos awareness training program to be completed by university employees who might reasonably be expected to come into contact with asbestos material during the performance of their university employment.
4. Survey university buildings for the presence of asbestos prior to any renovation or demolition activities by collecting samples for analysis by an accredited laboratory and reviewing building records.
5. Recommend response actions to maintenance personnel, contractors, and consultants based on the identification of asbestos in university facilities.
6. Schedule and manage asbestos abatement projects conducted by licensed abatement and consultant contractors.
7. Maintain a current file, located and backed up daily on the university server, on all university buildings and facilities previously identified as containing any form of asbestos at 1% or above.
8. Obtain asbestos free certificates from contractors and engineers for all newly constructed facilities on campus.

### **B. University Deans, Chairs, Directors, and Supervisors:**

1. Ensure compliance with all current applicable regulations referenced above.
2. Ensure that employees who are reasonably expected to work in areas containing asbestos receive asbestos awareness training upon initial work assignment and

- refresher training annually.
3. Consult with EHSRM and the APM prior to conducting any maintenance, renovation, or demolition work which will disturb building materials. These materials must be inspected for the presence of asbestos prior to initiating the work activities.
  4. Report to EHSRM or the APM any deteriorating building materials that are suspect for containing asbestos.
  5. Stop work activities when any suspected asbestos containing materials are discovered which were not previously inspected by the APM.

**C. University Employees:**

1. Comply with all current applicable regulations referenced in this program.
2. Attend all required trainings upon initial job assignment and refresher training annually.
3. Notify his/her supervisor and stop work any time a question arises relating to work which may involve contact with suspected asbestos materials, and when the work requirements listed below are anticipated:
  - a. a wall, ceiling, floor, or partition is to be penetrated, scored, drilled, refinished, or otherwise altered
  - b. pipe insulation is removed, damaged, or altered
  - c. boilers, chillers, hot water tanks, heat exchangers, valves, and piping are repaired, changed, or altered in a way that may affect the insulation
  - d. paint removal is done to a surface that could possibly contain asbestos

**D. Contractors:**

1. Contractors working on university property must comply with the same guidelines listed above. In addition, contractors must secure approval from the APM prior to beginning work and must consult with the APM when any question or potential problem arises.
2. Contractors must also provide an asbestos-free certification for all newly constructed facilities on campus.

## **VII. Training**

Asbestos awareness training is a vital part of the SFA Asbestos Management Program, and is required by federal law. Any SFA employee who is reasonably expected to observe, contact, or disturb asbestos containing building materials during the course of their regular job duties are required to receive asbestos awareness training upon initial job assignment. Refresher asbestos awareness training is required annually. The EHSRM Department provides this training annually, and other department managers and supervisors are responsible for ensuring their employees attend this training. Contact the EHSRM Department for more information or to schedule a training at 468-6034 or [safety@sfasu.edu](mailto:safety@sfasu.edu).

## **VIII. Record Keeping**

Asbestos awareness training must be documented and retained by the EHSRM Department. EHSRM will also maintain all official documents associated with asbestos management, including but not limited to: building inspections, training and licensing documents, and all asbestos abatement activity reports. Asbestos files will be maintained by EHSRM for a minimum of 30 years.

## **IX. Procedures**

The following sections describe procedures for various campus activities which may involve disturbance of asbestos containing materials. The procedures outlined below must be strictly followed by all SFA faculty, staff, and contractors to prevent harmful exposure to asbestos and maintain compliance with applicable regulations.

### **A. Asbestos Inspections**

The SFA EHSRM Department has taken a proactive approach to periodically inspecting university facilities to identify and document asbestos containing materials. Additionally, and in accordance with state and federal asbestos regulations, each building material scheduled for renovation, demolition, or in response to an identified concern or suspicious material, is researched, inspected, and/or tested for asbestos containing materials (ACM) by a state licensed SFA or contracted asbestos inspector. Any building material that may potentially contain asbestos is sampled and analyzed by an accredited laboratory. Building materials containing greater than 1% asbestos are classified as ACM and require abatement or encapsulation. The EHSRM Department maintains custody of the asbestos building surveys, and is responsible for providing accurate advice and appropriate response actions on projects involving ACM.

These building inspection reports and laboratory test results are available for review, upon request. To submit a request to review the asbestos building surveys, contact the EHSRM Department at 468-6034 or [safety@sfasu.edu](mailto:safety@sfasu.edu).

### **B. Maintenance Work Orders**

Departments desiring to have work performed should submit a work order to the Physical Plant Department who will then notify EHSRM of any work that may involve penetrating, damage, or removal of a building material. The EHSRM Department will review the scope of work and provide information regarding potential asbestos involvement.

Departments planning to perform work themselves, or plan to hire a contractor directly to perform any work that may involve a task or activity that may penetrate, damage, or remove a building material are still responsible to submit their plans to the EHSRM Department for review. All faculty, staff, and students have a responsibility to assist the University in maintaining regulatory compliance and a safe work and learning environment at SFA.



### **C. Space Modifications, Construction, and Renovation Projects**

Any request that involves the potential for disturbing building materials will be thoroughly investigated by the EHSRM Asbestos Program Manager. Appropriate response actions will be taken, when ACM is identified, prior to any work being performed.

Construction Project Coordinators will notify the EHSRM of each new construction project, and provide a detailed scope of work for review at the earliest possible opportunity. If asbestos containing materials are involved in the project, the options for appropriately addressing the asbestos will be discussed by the Asbestos Program Manager with the Construction Project Coordinator, and a legal course of action will be approved.

Departments planning to perform construction or renovation work themselves, or plan to hire a contractor directly to perform any work that may involve a task or activity that may penetrate, damage, or remove a building material, are still responsible to submit their plans to the EHSRM Department for review. All faculty, staff, and students have a responsibility to assist the University in maintaining regulatory compliance and a safe work and learning environment at SFA.

### **D. Performance of Asbestos Related Activities**

All tasks that may potentially disturb an asbestos-containing material must be performed by personnel trained and licensed in accordance with the Texas Regulations.

Independent, third-party contractors licensed as asbestos abatement contractors and/or asbestos consultants will be hired to perform asbestos abatement tasks and air monitoring when deemed necessary, and/or when determined to be in the best interest of the University.

All asbestos-related tasks performed must be documented. The documentation of work performed by third-party vendors (asbestos abatement contractors and consultants) is provided to the University by the vendor upon completion of the asbestos-related project.

### **E. Emergency Procedures & Contacts**

If an asbestos-containing material (ACM) is disturbed (via cutting, sawing, drilling, prying, etc.), the EHSRM Department must be notified immediately. The affected area must be closed and restricted to prevent further contamination of the indoor environment and personnel exposure. The dust and debris from this ACM must be cleaned up by a licensed asbestos abatement contractor with oversight from a licensed asbestos consultant.

The EHSRM Department along with the contracted construction project manager will be responsible for contacting the proper abatement and consultant contractors to perform the clean-up.

To report a possible asbestos-related incident, OR if you have any questions or concerns regarding asbestos at SFA, please contact the EHSRM Department. The contact information is provided on the following page.

Asbestos management contact information:

NAME	TITLE	PHONE	EMAIL
Dr. Jeremy Higgins	Director, EHSRM	936.468.4532	<a href="mailto:higginsjk@sfasu.edu">higginsjk@sfasu.edu</a>
Greg Moore	Asbestos Program Manager	936.468.6034	<a href="mailto:gregory.moore@sfasu.edu">gregory.moore@sfasu.edu</a>

**F. Employee Exposure Protocol**

If a SFA employee is exposed to an asbestos material while conducting university business, the following employee exposure protocol will be followed:

Asbestos exposure medical treatment is different from other injuries and some illnesses:

1. Symptoms of asbestos related diseases may not show up for 20 years.
2. Doctor's need to establish a health baseline to compare as time passes.
3. Chest X-Rays and a pulmonary test are the two most critical immediate tests that will be needed.
4. There are several questionnaires the employee will be required to fill out. This helps the physician understand the employee's exposure.

Employee Exposure to Asbestos Procedures:

1. Tell your supervisor immediately!
2. Enter the exposure information on the Safety website 24 hour quick-link at: <https://forms.sfasu.edu/safety/injury.asp>
3. Call the Safety Department (EHSRM) at 468-6034 right away so the site can be assessed, sampled and blocked off from further traffic.
4. The employee and their supervisor will come to the EHSRM Department to fill out the necessary paperwork to start a claim and get instructions for medical treatment.
5. The employee will be sent to UrgentDoc for a chest X-ray then referred to a pulmonary specialist for analysis and complete OSHA required testing and/or treatment.
6. Retraining to recognize asbestos may be necessary. The Asbestos Project Manager or department supervisor will determine this.
7. The affected employee must fill out the asbestos exposure report on page 11 and submit the completed form to the EHSRM Department.

**X. SFA Charter School Asbestos Management Plan**

In accordance with the Asbestos Hazard Emergency Response Act (AHERA), SFA has developed an Asbestos Management Plan for the Early Childhood Research Center including the SFA Charter School. This regulation requires the University to inspect K-12 school buildings for asbestos containing materials and prepare management plans to prevent or reduce asbestos hazards. The current facility has been certified by the construction engineer to have been constructed using NO asbestos containing building materials. Any and all future renovations to

the building will be done only with materials that contain NO asbestos. A copy of the Asbestos Management Plan is available upon request at the EHSRM Department located at 430 East Austin St. Nacogdoches, TX 75965, or by calling 468-6034.

**Stephen F. Austin State University**

**Asbestos Exposure Report**

Employee and Job duty information:

1. Job duties as they relate to asbestos exposure (what caused the exposure?):

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2. Level of exposure:

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3. Description of any Personal Protective and Respiratory equipment used at the time of exposure:

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4. Any previous medical exams related to asbestos exposure:

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