

ADELPHI UNIVERSITY

ASBESTOS MANAGEMENT PROGRAM

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1.0 Program Administration

1.1 Introduction

The Adelphi University Asbestos Management Plan has been established to meet the requirements of the Occupational Safety and Health Administration (OSHA) Asbestos Standards for General Industry 29 CFR 1910.1001 and Construction 29 CFR 1926.1101, the Environmental Protection Agency (EPA) Title 40 Parts 61 and 763 and the New York State Department of Labor regulations found at code rule 56.

It is the policy of Adelphi University to maintain a safe and healthy work environment for employees, faculty, students, contractors and visitors. In recognition of the potential health problems associated with asbestos, and due to the minerals' widespread use in buildings constructed prior to 1980, the University is committed to its Asbestos Management Program. The objectives of the program include identification of asbestos materials, hazard communication, training, maintenance, and repair or removal of ACM in University facilities. The program ensures that employees and others will not be exposed to significant levels of asbestos fibers, and that asbestos will be handled in full compliance with all applicable regulations.

This policy applies to all employees who must work around or near ACM, such as Maintenance and Custodial employees, and to Project Managers who will oversee construction and renovation work that may impact asbestos materials.

Adelphi University does not authorize its employees to engage in Class I, Class II, or Class III asbestos removal activities but instead utilizes licensed and certified outside contractors for these services.

1.2 Definitions

Asbestos: includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that has been chemically treated or altered.

Asbestos-Containing Material (ACM): any material containing more than one percent asbestos.

Class I Asbestos Work: the removal of thermal system insulation and/or surfacing material (ACM or PACM).

Class II Asbestos Work: removal of any ACM which is not Class I, such as wallboard, floor tile, ceiling tile, linoleum, transite board, roofing materials and mastics.

Class III Asbestos Work: Repair and maintenance operations where ACM is likely to be disturbed.

Class IV Asbestos Work: maintenance and custodial activities during which employees contact but do not disturb ACM, and activities to clean up dust and debris which may be generated by Class I, II, or III work.

Clearance Air Monitoring: Air monitoring conducted by a licensed Asbestos Project Monitor at the conclusion of an asbestos project. Clearance air monitoring includes the successful completion of a final visual inspection for work area debris and the collection and analysis of air samples in accordance with New York State DOL Regulation Code Rule 56. The abatement project is considered complete when clearance air samples are analyzed.

Friable Asbestos Containing Material: any material containing more than one percent asbestos, which when dry, may be crumbled, pulverized or reduced to powder by hand pressure.

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.

Negative Exposure Assessment (NEA): a demonstration by the employer, which complies with the criteria in OSHA 29 (CFR) 1926.1101 paragraph (f) (2) (iii), that the employee exposure during the monitored operation is expected to be consistently below the PELs.

Non-Friable Asbestos Containing Material: materials in which asbestos is bound in a matrix which cannot, when dry, be crumbled, pulverized or reduced to powder by hand pressure (such as floor tile and asphaltic building materials).

Permissible Exposure Limits (PELs): (1) Time Weighted Average (TWA): the employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter as an eight (8) hour time weighted average.

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Permissible Exposure Limits (PELs): (2) Excursion Limit (EL): the employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air as averaged over a sampling period of thirty (30) minutes.

Presumed Asbestos Containing Material (PACM): thermal system insulation and surfacing material in buildings constructed no later than 1980 are assumed to contain asbestos until it has been analyzed to verify or negate its asbestos content.

Regulated Area: means an area established by the employer to distinguish areas where airborne concentrations of asbestos exceed or there is a reasonable possibility that they may exceed the permissible exposure limits.

Vinyl Asbestos Floor Tile (VAT): vinyl floor tile and in some cases its mastic which contain more than one percent asbestos and must be handled as ACM.

1.3 Administration of Responsibilities

1.3.1 Responsibility of Employees and Supervisors

Individual employees and their supervisors are responsible for Complying with the Asbestos Management Program, including:

- a. Attending required Asbestos Awareness training sessions
- b. Recognizing ACM and PACM and avoiding disturbance of those materials
- c. Following all prescribed safe work practices
- d. Reporting promptly areas with damage to supervisors and to EH&S

1.3.2 Responsibility of Asbestos Project Managers

It is the responsibility of the Facilities Management Department Project Manager or Facilities Supervisor overseeing an asbestos abatement activity to comply with the Asbestos Management Program, including:

- a. Reviewing existing building surveys during project planning stages with EH&S.
- b. Commissioning spot surveys for areas impacted by the project if information is deficient by Contacting the EHS Office.
- c. Developing a Scope of Work
- d. Obtaining bids from contractors listed on the Purchasing Department's "Approved Bidders" list.
- e. Ensuring timely filing of required notifications by the contractor (Asbestos and Construction / Demolition as appropriate).
- f. Deferring all communication with outside Regulatory agencies to EH&S.
- g. Communicating Hazards to all Adelphi University personnel and outside contractors who may encounter the project.
- h. Collecting all necessary documentation associated with the project (such as quotes, notifications, air sampling reports, disposal manifests, and invoices) and forwarding to EH&S promptly.
- i. Certifying that the project has been completed in compliance with all Adelphi University policies and procedures.

1.3.3 Responsibility of Environmental Health and Safety

1. The Environmental Health and Safety office is responsible for the development, implementation and administration of the Asbestos. Management Program, including:

- a. Developing and Implementing the University's Asbestos Management Program
- b. Developing and Implementing the University's Asbestos Awareness Training Program
- c. Reviewing of all asbestos building surveys and inspections
- d. Reviewing all asbestos abatement projects for compliance
- e. Overseeing the activities of the Asbestos consultants supervising asbestos projects and reviewing inspection reports and abatement plans for compliance and completeness
- f. Assisting, when necessary Facilities Managers in coordinating inspections, abatement project design, phasing and bidding and contract administration.

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2.0 Hazard Identification

2.1 Building Surveys

Environmental Health and Safety Office will coordinate the completion of a comprehensive building survey for suspect asbestos-containing materials for each building on campus. This project will occur in phases based upon building classification and the following priority schedule:

- Residence Halls
- Academic / Administrative Buildings
- Houses (perimeter properties)
- Miscellaneous
- New Acquisitions

A qualified individual holding a valid and current NYS Department of Labor Asbestos Inspector License will conduct building surveys. All contractors should consult Environmental Health and Safety Office records during project planning stages to determine whether or not a completed survey is available prior to any building renovation and /or demolition activity. Where no previous survey has been conducted or incomplete bulk sampling of existing suspect ACMs which may be impacted during renovations, it will be the responsibility of the Contractors to conduct a survey (asbestos inspection) as a component of the project. This survey may be a comprehensive building survey or a survey limited in scope to the sections of the building where asbestos disturbance may occur.

Alternately, the Contractor may presume that the material is ACM.

All surveys will be conducted with the oversight of the Environmental Health and Safety Office and the Department of Facilities Management and will include:

- Mechanical Room Signage and Labeling (see section 3.0)
- Bulk sampling and analysis by polarized light microscopy in accordance with method EPA/600/R-93/116 of all homogeneous areas
- Floor plans identifying material locations
- Tables identifying room locations, classes of materials and estimated quantities
- Abatement Cost estimates
- Recommendations regarding conditions of materials

Each time a significant asbestos abatement project is conducted, records must be maintained such as:

- A letter of addendum to be attached to the building survey indicating amounts and locations where asbestos was removed.
- A modified building floor plan identifying areas where asbestos containing materials remain.

Asbestos building surveys shall be accessible to all University Faculty, Staff, and Students during normal business hours at the Office of Environmental Health and Safety.

2.2 Bulk Samples

Bulk samples may be collected at any time there is a question regarding the asbestos content of a building component. An individual holding a valid NYS Department of Labor Licensed Asbestos Inspector certification must collect bulk samples. The Environmental Health and Safety Office will contact a Licensed Asbestos Inspector to collect bulk samples upon request and arrange for laboratory analysis of the material.

In the absence of a laboratory analysis, building materials such as surfacing materials, thermal system insulation, and miscellaneous materials installed prior to 1981 must be presumed to contain asbestos (PACM).

Results of analyses will be maintained in the Facilities Management and EH&S files and will be communicated to employees via their supervisors.

2.3 Air samples

Air samples may be collected as clearance criteria for completing asbestos abatement response action. Refer to Section 7.0 for information. Air samples may be collected as environmental or area samples as a component of an Operations and Maintenance Program, or to assess the extent of environmental contamination after a disturbance. Air samples collected for these purposes will be analyzed following NIOSH Method 7400 for phase contrast microscopy. A “clean”

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area for reoccupancy will be considered one meeting the Massachusetts Clearance Air Requirement of less than or equal to 0.010 fibers per cubic centimeter of air. All air samples must be collected by a NYS certified Asbestos Project Monitor and analyzed by a NYS certified and approved Asbestos Analytical Service.

3.0 Signage

3.1 Warning Signs for Regulated Areas

Warning signs are required for all regulated areas. A regulated area is a zone in which the airborne asbestos fiber levels are likely to exceed the permissible exposure limit (PEL) of 0.10 fiber per cubic centimeter of air as an 8 hour time weighted average, or the excursion limit of 1.0 fibers per cubic centimeter of air as a 30 minute period, as established by OSHA. All active asbestos abatement projects will be classified as regulated areas. A space with significantly damaged ACM might also be restricted and deemed a regulated area.

All regulated area signs must read:

**DANGER ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY**

If the regulated area also requires respiratory protection and protective clothing, the sign must also state:

RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA

Use of bilingual signs with graphics will be required when warranted to ensure that the employee population in the immediate area fully understands the warning. This will be determined on a case by case basis by the contractor.

3.2 Warning Signs for Mechanical Rooms

Mechanical rooms and other areas where employees may be expected to routinely enter, and to come into contact with, ACM or PACM must be posted with warning signs. These signs must be placed at every entrance to each such room, and be clearly visible so that an entrant would be immediately warned of the materials located in the room. Typically, these signs will be hanging overhead and in the field of vision of an individual opening the door to the space. The signs will contain the following language:

**DANGER ASBESTOS
DO NOT DISTURB-AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY**

In addition, there will be a checklist of materials located in the space, which contain asbestos. Entrants will be directed by the sign to contact their Supervisors or the Environmental Health and Safety Office if there are any questions prior to disturbing the ACM.

Mechanical room signage must be maintained in place. Promptly report missing signage to the Facilities Management department. Contractors conducting abatement and/or construction activities in mechanical rooms must ensure the integrity of these signs and must have these signs updated to reflect any changes in information content subsequent to project activities.

3.3 Warning Labels/Mechanical Rooms

Warning labels will be affixed to representative samples of friable ACM in areas where employees may reasonably be expected to contact or disturb it, whenever feasible. This supplemental notification will be used mainly in mechanical areas and the like, in order to ensure that employees are adequately warned. Labels may also be installed on materials that are accessible and have a history of damage wherever necessary.

Labels will conform to the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

They will be printed in large bold letters on a contrasting background and will read:

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DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
DO NOT BREATHE ASBESTOS FIBERS

3.4 Asbestos Free Labels

Newly installed materials, such as thermal system insulation, should be identified by the application of a label reading:

ASBESTOS FREE INSULATION

This will increase employee awareness of the content of building materials in newer buildings as well as in situations where a space contains a mixture of materials.

4.0 Confined spaces/permit Areas

Periodically, the Environmental Health and Safety Office may determine that an area is unsafe due to asbestos contamination including debris and or significantly damaged ACM. These areas will become regulated areas and access to the space will be restricted through the use of signage and changing locks whenever feasible. These areas will remain locked until a response action has been coordinated to abate the hazard present. A report listing all confined asbestos space areas will be updated and redistributed to appropriate personnel each time an area is added to or deleted from the listing.

Employees seeking entry into these spaces must request approval from the Environmental Health and Safety Office. Access will be granted only to those employees whose level of training and use of personal protective equipment qualify them as individuals authorized to deal with the hazards present. Safety lockout keys will be available at the Facilities department during normal business and off-hours. As of January 2010 no Facilities personnel are trained to enter these spaces. All emergency work and repairs are performed by an outside company with proper respirator training.

5.0 Training

5.1 Training Overview

Adelphi University will provide employees with the information and training necessary to perform their work safely. Training provided will be commensurate with the class of asbestos operations as defined by the OSHA regulation. Training will be provided at no cost to the employee, during regular working hours, and in an easily understandable format.

Training programs will be provided at the time of the initial assignment. ***At the present time, Adelphi University employees are not authorized to perform any of the following asbestos removals:***

Class I (removal of thermal system and surfacing ACM),

Class II (removal of miscellaneous ACM such as wall board, floor tile and sheeting, roofing, siding and construction mastics),

Class III (repair and maintenance of thermal system and surfacing ACM likely to involve disturbance) operations. Exceptions to this directive would include only those small-scale tasks for which a negative exposure assessment has been achieved, such as spot replacement of individual vinyl asbestos tiles (See Section 6.0).

Class IV asbestos work involves maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste, and debris resulting from Class I, II, and III activities.

5.2 Asbestos Awareness

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Currently no Adelphi University employees have been trained to remove asbestos. Employees only receive basic asbestos awareness training

The frequency of the Awareness Training will be determined by the EH&S Office. Supervisors will be responsible for notifying the EH&S Office of newly hired employees requiring training. Training will be equivalent in curriculum to the EPA Awareness training program found at 40 CFR 763.92 (a) (1) and will be 1.5-2 hours in length. At least one Supervising Facilities Management Supervisor will be present at the training sessions conducted for his/her staff.

Project Managers/ contractors who manage asbestos abatement, oversee the work of abatement contractors and environmental consulting firms, and plan for future abatement activities, should also attend awareness training in Asbestos awareness or another designated training program to address those specific needs.

Training attendance shall be recorded and maintained on file in the EH&S and Human Resource Office. Employees may review and obtain copies of written training materials and regulatory text at the Office of Environmental Health and Safety during normal business hours.

6.0 Negative Exposure Assessments

Adelphi University will hire outside abatement contractors and consultants to perform asbestos abatement and other activities which require special licenses, certifications, and may result in exposure to asbestos above the OSHA permissible exposure limit (PEL) and short-term exposure limit (STEL). Adelphi University will ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 f/cc as an 8-hour time weighted average (PEL).

Adelphi University will ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 f/cc as an averaged over a sampling period of 30 minutes (STEL). Where work practices are conducted near asbestos containing materials and there is a concern for a potential disturbance of asbestos fibers, the EH&S Office will arrange for exposure monitoring data to assess employee exposures.

For any one specific task that will be performed by employees who have been trained in compliance with the OSHA regulation, the employer may demonstrate that the employee exposures will be below the OSHA allowable exposure limits. This assessment will include a review of objective data, work practices, training, and exposure monitoring, as defined in the OSHA regulations. Employees and their designated representatives will be allowed to observe exposure monitoring.

When this assessment process concludes that performance of the task following the specified work practices is expected to consistently result in employee exposure below the PELs, that task may be classified as having achieved a Negative Exposure Assessment. Performance of that task under the conditions defined will be allowed as a non-regulated activity. Exposure monitoring results will be communicated to all affected employees in writing as soon as possible and in no case later than within 15 work days after the receipt of the results. Results may be individually distributed or centrally posted in a location, such as the Facilities Technical Services bulletin board, for review.

Tasks and associated work practices for which negative exposure assessments have been achieved are listed below. Specific work practices are described in the established work practices which might result in new exposures to the facilities workers for review by the Environmental Health and Safety Officer.

- Buffing VAT flooring
- Lock core replacement on asbestos fire doors
- Routine work in the Central Heating Plant
- Painting of previously painted acoustical plaster ceilings containing ACM
- Knife cutting of small holes in VAT to allow for drilling beneath for cable work
- Routine work in mechanical rooms
- Routine plumbing work in mechanical rooms
- Routine work above ceilings near ACM
- Repainting of ACM paint on Modular Apartment ceilings.

7.0 Asbestos Abatement

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Asbestos abatement is any activity which has as its principle purpose, the removal, enclosure, or encapsulation of an asbestos containing material. This would include, but not be limited to, renovation, demolition or repair of facility components that would involve disturbance of thermal system, surfacing and any miscellaneous asbestos-containing materials. Prior to conducting an asbestos abatement response action, the following steps are to be implemented:

7.1 Building Survey

Prior to the initiation of any major renovation, construction or demolition activity that may impact asbestos or suspect asbestos materials, the building owner is responsible for conducting an inspection, or building survey, of the affected portion of the building. Consult EH&S for a copy of the existing building survey. Where no survey or an incomplete bulk sampling data of suspect materials exists, the university must arrange for a survey of the affected area to be completed by a NYS DOL certified Asbestos Inspector as outlined in Section 2.0.

7.2 Project Design

Certain asbestos abatement activities are complicated enough in scope to warrant development of a comprehensive Asbestos Abatement Specification or Scope of Work (mini-specification or Work Plan) by a NYS DOL certified Asbestos manager. The type and size of the written design will vary according to the complexity of the project. These documents can then be used as part of the bid process. Most projects are small enough in scale, and straightforward enough in concept, that no formal specification is required. However, the EH&S Office recommends that a written work plan be developed for all projects that are complete bid or last more than one work shift. The determination to prepare a formal Specification or Scope of Work will be made on a case by case basis after joint consultation between the Project Manager and EH&S. Factors which will be taken into consideration in this decision will include:

- The type of material(s) involved: ranging in a scale of hazard severity from most to least: (1) amosite and sprayed on fire proofing, (2) chrysotile and thermal system components, and (3) asphaltic bound materials like floor tile
- The size and total cost of the project
- The variety of types of materials involved
- The number of locations involved, including phasing and scheduling issues
- The need to conduct demolition to access ACM
- The complexity of containment and difficulties maintaining negative pressure in the regulated area
- The need to work adjacent to occupied areas and the concerns of the building occupants

A comprehensive Asbestos Abatement Specification is a large detailed document with legal language on performance and laws and very specific work methods. This type of document has been used for most large scale complex renovation projects on campus. An Abatement Work Plan (Scope of Work) is site specific and outlines more general work procedures, highlighting complicated intricacies of a particular project. There may be some demolition or work in confined areas involved. Scope of Work Plans have been developed for larger abatement projects conducted in occupied buildings, and complete abatements of new, unoccupied properties purchased by the University.

A small project with a clear project description, such as "remove 10 linear feet of pipe as identified in the mechanical room by glovebag method" would not need a project design.

Contractor's Project Managers may submit draft copies to the EH&S and Facilities Management offices for review and compliance in accordance with applicable asbestos regulations, documentation and University requirements. Alternately, the contractor's project Manager may instruct the consultant to copy EH&S on all correspondence.

7.3 Project Bid Process

The Facilities Management Department will follow standard Adelphi University Purchasing Department Protocol utilizing the Approved Bidder's listing to obtain quotes for an asbestos abatement project. Abatement companies subcontracted by General Contractors to perform work in campus buildings shall be preapproved by the Purchasing Department. Asbestos Abatement Companies shall not sub-contract any abatement processes.

7.4 External Notification

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Once contractors have been selected to perform an asbestos abatement, and a project schedule has been determined, external notifications must be filed. Copies of all notifications must be faxed to the attention of the EH&S Department at (516) 877-3242 at the time of filing.

7.4.1 For All Work Involving Asbestos:

1. NYS Department of Labor and NYS Department Environmental Conservation
 - File for all properties
 - Filed by asbestos contractor
 - File 10 working days in advance of project start date
 - Timely notification to NYSDOL satisfies the requirement to notify the U.S. Environmental Protection Agency

2. In case of Project Changes:
 - If start date will be moved later, contractor must telephone the NYS DOL at least 24 hours prior to the original start date, followed by a fax and mailing a hard copy of the revised notice to both NYS DOL and The University;
 - If start date will be moved earlier, and the 10 day advance period is still intact, follow the same phone, fax and mailing of the revised notification procedure.

7.4.2 For All Emergency Asbestos Responses: (Medium & Large Jobs)

Emergency asbestos responses may be arranged in response to unexpected incidents and uncontrolled events (see Section 7.6). Notification procedures are slightly different when there will be less than a 10 day advance notification period between the request and the abatement. The facilities management Department will:

- Notify EH&S of the emergency situation and contact an Asbestos remediation company to perform the following duties:
- The contractor will then contact the NYSDOL by phone to request an Emergency Waiver to proceed with the project prior to a 10 day notice period M-F, 8:45 am to 5pm
- Provide EH&S and the abatement contractor with the following information:
 - a. the building name, address, and specific location for the abatement
 - b. the nature of the emergency and reason for waiver
 - c. the type and quantity of asbestos to be removed
 - d. the name of the asbestos abatement contractor
 - e. the name of the environmental consultant (if necessary)
 - f. the names of any other contractors performing work at this site

7.5 Internal Hazard Communication Process

The Facilities Management Managers are responsible for effective hazard communication relating to an asbestos abatement project. The internal hazard communication process should coincide with the external notification filing, providing Adelphi University personnel with the same 10 work day warning prior to the start date of the abatement. The Facilities office will submit the **Notice of Asbestos Abatement** to the following personnel and departments:

- Campus Public Safety Department
- Coordinator of Environmental Health and Safety
- Facilities Supervisors (as appropriate)
- Facilities Housekeeping Services
- Project Monitor (if construction area)

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***The University must ensure that all outside contractors performing work in the building are aware of the presence, location and quantity of asbestos containing materials in areas that they will be expected to work near, and of the activities of asbestos abatement contractors whose work will coincide with their own.** This will be accomplished in part by the posting of signage in mechanical rooms and outside of regulated areas. Contractors and subcontractors who will work near ACM must be informed of this in writing and provided with building survey information as appropriate. (* As per NYS Department of Labor Code Rule 56 and Occupational Safety and Health Administration CFR 1910.1200 Hazard Communication Standards)

7.6 Emergency Asbestos Response

There are certain situations that may arise for which a quick asbestos response is required. In these instances, the 10-day advance notification period becomes a hardship. Emergency situations are defined as unexpected events in which asbestos becomes damaged, or crucial building component repairs are needed and cannot be conducted without disturbing asbestos. The type and quantity of asbestos to be removed will typically be limited to that quantity which must be removed to return to a non-emergency situation. Examples of emergency situations might include:

- A burst pipe which is leaking
- A building with no heat
- An unexpected disturbance of ACM during construction work
- ACM damaged by a fire, flood, or roof leak

Time constraints, project deadlines, and cost considerations do not factor into the classification of an incident as an emergency.

7.7 Air Monitoring & Project Oversight

A New York State Licensed Project Air Monitor who is not an employee or subcontractor of the Asbestos Abatement contractor will be hired to monitor the project, conduct visual inspections and perform clearance air monitoring in compliance with NYS DOL. The Project Monitor will maintain close communication with the Environmental Health and Safety Office.

The services of a Project Air Monitor will be employed for all projects involving the removal or repair of ACM except those abatements involving small-scale remedial cleaning (removal of loose floor tile or debris) or removal/repair of less than three linear or three square feet of ACM. Part-time oversight may be performed in occupied areas such as mechanical rooms or vacant buildings. Larger scale abatements, involving multiple glovebag set-ups, will require project monitoring. In order to waive the requirement for project monitoring, the Project Manager must seek the approval of the EH&S Office.

7.8 Waste Disposal and Manifest

Any ACM removed from a the University must be wetted, containerized, labeled and disposed of as an asbestos waste in conformance with EPA Regulations at 40 CFR Part 61. ACM waste must be properly transported to an approved facility, maintaining waste shipment records during transport, and a final copy of the waste shipment record will be forwarded to the EH&S Office in a timely manner (within 45 days) for recordkeeping.

7.9 Vinyl Asbestos Floor Tile (VAT) Policy (Non Friable material)

When projects may impact resilient flooring materials containing asbestos the materials might have to be removed. Removal of asbestos containing linoleum and sheet flooring must always be conducted as an asbestos abatement. Removal of individual intact asbestos tiles may be conducted safely following prescribed work practices. Removal of large quantities of tile, and any removal project that involves breaking tiles (such as lifting carpet over VAT) must be conducted as an asbestos abatement after the appropriate notification period. Removal of carpeting that disturbs VAT will typically not meet the DEP criterion for an emergency waiver of the notification period.

7.10 Asphalt Roofing and Siding Policy

When projects involve the disturbance of roofing materials the materials might also have to be removed. Removal of roofing and siding, regardless of the asbestos content, requires filing of the materials with NYS DOL. Removal of asbestos containing asphalt roofing may be conducted as a non-asbestos project when prescribed work practices are followed.

7.11 Asbestos Fire Door Policy

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Consult building surveys prior to removal or service to fire doors as certain doors on Campus do contain asbestos (interior white thermal block material). Adelphi University employees are prohibited from engaging in any fiber generating activities on asbestos fire doors (such as drilling or cutting into the door, or exposing the friable insulation). Removal of intact doors and performing tasks that have achieved a negative exposure assessment (such as lock core replacement) may be conducted safely. Removal and disposal of asbestos fire doors must be classified as an asbestos abatement project, utilizing a licensed contractor and filing. Contact EH&S for additional guidance.

8.0 Regulatory Agency Visits

When a regulatory agency comes on campus, Public Safety or administration are the first areas to be notified. They will contact the Coordinator of Environmental Health and Safety. Public Safety will then inform contractors, consultants, and affected building occupants of the possibility of a site inspection by a representative of a regulatory agency such as the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), NYS Department of Environmental Conservation (DEC), the NYS Department of Labor (DOL), the Nassau County Department of Public Health (NCPH), and the Garden City Fire Department (GCFD). Contractors and consultants should be prepared to present evidence of all appropriate licenses, certifications, notifications, and other pertinent records. The Contractor Project Manager in construction sites shall inform contractors, consultants, and affected building occupants of the potential survey by a regulatory agency.

Inspectors should be accommodated in a comfortable location to await the arrival of the Coordinator of Environmental Health and Safety to accompany them on the inspection. In the absence of the Coordinator of EH&S as an escort, the Facilities Management Department Executive Director and the Director of Business Affairs will be contacted to accompany the inspector. Do not begin the inspection without an escort. If a regulatory official collects any samples (bulk or air) during their walk through the location, Adelphi University personnel shall also collect split samples for independent analysis. Similarly, duplicates of any photographs taken shall be collected.

9.0 Record-keeping

9.1 Documentation

The Facilities Management and Environmental Health and Safety departments will serve as the repository for all asbestos related documentation. Promptly forward all project documents to both departments including:

- Inspection and bulk sample reports
- Specification or Work Plan copies
- State and other regulatory notifications and permits
- Project oversight/air monitoring reports
- Contractor OSHA air sampling results
- Contractor license and worker documentation
- Waste Shipments Records (Waste Manifests)

9.2 Building Surveys

Written reports documenting the findings of asbestos building inspections and surveys shall be maintained on file in the EH&S Office. The University must maintain records of these and other miscellaneous bulk sampling data for as long as the data must be relied upon. Written notification on the identification, location, and quantity of any asbestos containing or presumed asbestos containing material must be maintained by Adelphi University for the duration of ownership and records must be transferred to successive owners. Individuals wishing to review these documents may do so during regular business hours.

9.3 Training Records

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ASBESTOS MANAGEMENT PROGRAM

The Human Resource Department will maintain records of all employees training. OSHA requires that documentation of all training be maintained for one year beyond the last date of employment. NYS DOL requires that documentation of individual training programs be maintained for a minimum of 15 years. Document retention of asbestos training will be for at least 5 years after the employee has retired; been fired or leaves due to any other issue.

9.4 Personal Exposure Monitoring

The EH&S Office will maintain records of all personal air samples collected to evaluate employee exposure to asbestos. Documents must include:

- The date of measurement
- The operation involving asbestos exposure that was monitored
- The sampling and analytical methods used and evidence of their accuracy
- The number, duration and results of samples taken
- The type of protective devices worn, if any
- The name, social security number and exposures of the employees represented

Records will be maintained for at least 30 years and will be made available for review by affected employees, former employees, designated representatives, and regulatory officials. Air sampling data will be compared to the OSHA permissible exposure limits.

Employees meeting the exposure criteria established in the OSHA standards will be enrolled in a medical surveillance program. Personal sampling results will be communicated to affected individuals by:

- A written report provided to the employee participants in the monitoring
- A written copy posted on a bulletin board, centrally located, for all affected employees to review
- And discussion as appropriate at department/shop meetings.

9.5 Medical Surveillance

If medical surveillance of an employee is required or conducted, the Health Services Department will maintain all confidential medical surveillance records for the duration of the employee's employment plus 30 years. The Environmental Health and Safety Office may retain abbreviated documents, such as a brief physician's written opinion about whether or not an employee may wear respiratory protection. Records maintained by health Services shall include:

- The employee's name and social security number
- The employee's medical exam results, including the medical history, questionnaires, responses, test results, and physician's recommendations
- The physician's written opinions
- Any/all employee medical complaints related to asbestos exposure
- A copy of any information provided to the examining physician

Employee medical surveillance records will be made available to the subject employee, and anyone having the specific written consent of this employee.

9.6 Asbestos Project Documents

The Facilities Management and Environmental Health and Safety Office shall maintain all appropriate documentation related to asbestos abatement projects. Documents will be maintained for a minimum of 30 years. The Coordinator of EH&S will ensure that all pertinent documents, including but not limited to those listed below are received and stored in a timely fashion:

- Survey and bulk sampling analysis reports
- Project Design / Scope of Work
- Bids / Quotes

