

UNIVERSITY OF WISCONSIN – STEVENS POINT



ASBESTOS MANAGEMENT POLICY

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UW-STEVENS POINT ASBESTOS MANAGEMENT PROGRAM

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UW-STEVENS POINT ASBESTOS MANAGEMENT PROGRAM

1.0 PURPOSE & AUTHORITY

The purpose of this program is to provide guidance for the appropriate methods of managing Asbestos Containing Material (ACM) on-campus. All campus employees and facilities are covered by this policy, including university staff temporary employees (USTEs) and student employees. It is essential that occupants be notified whenever asbestos abatement activities are undertaken in their buildings (see section 5.0).

UW-Stevens Point work involving asbestos shall comply with applicable state and federal laws and contracted vendors are required to follow these. Some key regulations are emphasized in this program but not all the requirements of these laws will be repeated in this program. Laws that are to be a reference and followed related to asbestos abatement include:

- The State of Wisconsin Department of Health Services (HFS 159).
- OSHA General Industry [1910.1001] standards and OSHA Construction [1926.1101] Standards when applicable) via Wisconsin Department of Safety & Professional Services.
- EPA (applicable NESHAP, AHERA, Model Accreditation, Worker protection requirements)
- Applicable Wisconsin DNR (NR 447)

2.0 QUALIFICATIONS

UW- Stevens Point will contract all asbestos abatement and regulated repair activities to qualified companies that are certified by the Wisconsin Department of Health Services (DHS) and meet DHS's, OSHA, EPA, and Wisconsin Department of Natural Resources requirements. The State of Wisconsin Division of Facilities Development (DFD) maintains a listing of abatement contractors under the State of Wisconsin contract that may be utilized. See Appendix A for the listing of abatement contractors. An updated list is sent out each year by DHS to facility maintenance personnel. In addition, for small, non-DFD-related jobs the listed local qualified abatement contractor(s) may be used. Further, all WI DHS qualified abatement contractors are listed and also maintained on the DHS website.

Asbestos abatement contractors will be responsible for adhering to all legal standards.

EHS Officer and Facility Services Engineering Specialists will attend Asbestos Inspector Training from a qualified trainer.

All UW- Stevens Point applicable maintenance and custodial personnel (including management and supervisors) will receive, at least, 2-hour Asbestos Awareness Class IV Training with annual refresher training. Other training will be conducted as deemed necessary.

Facility maintenance supervisors will also attend UW- Stevens Point Asbestos Management Program focus training.

3.0 SCOPE OF ASBESTOS REMOVAL ACTIVITY & RESPONSIBILITIES

UW-Stevens Point will contract all asbestos abatement and regulated repair activities to qualified companies that are certified by the Wisconsin Department of Health Services (DHS) and/or meet DHS's, OSHA, EPA, and Wisconsin Department of Natural Resources requirements.

3.1 RESPONSIBILITIES

Various groups have responsibilities and the below provides guidance on these:

1. WI DFD is responsible for asbestos project management of DFD related projects.
2. UW- Stevens Point maintenance departments (Facility Services, Residential Living, Centers Maintenance). Each UW- Stevens Point applicable maintenance department is responsible for:
 - Serve as UW- Stevens Point Project contact on DFD projects to comply with applicable UW- Stevens Point Asbestos Management Plan requirements. In the particular posting of the notification requirements of Section 5.1 within their area of responsibilities.
 - Serve as UW-Stevens Point Project Manager and coordination of asbestos repairs and abatement for non-DFD projects including all requirements of this program.
 - Inspection of the condition of Asbestos-Containing Material (ACM) in their areas and securing proper repairs as necessary.
 - Reasonably determine the presence of any ACM prior to any maintenance, repair, remodeling, or other activities that may disturb the ACM.
 - Coordinating abatement, inspection, repair, and disposal of ACM in their areas.
 - Ensuring their employees receive proper asbestos training and follow the requirements of this program.
 - Seeking assistance as necessary.
3. UW- Stevens Point EHS Department:
 - Provide inspection and related consulting services.
 - Answer questions and concerns.
 - Provide or coordinate related training.
 - Review and update the program.

4.0 COMMUNICATION OF HAZARDS

The campus strives to not subject employees, students, and visitors to asbestos exposures beyond the current permissible exposure level or excursion level, with the goal of being extremely below those levels.

The UW- Stevens Point Facility Services possesses an inventory of ACM on campus through the Wisconsin Asbestos Lead Management System (WALMS). WALMS is maintained by the DFD. If the content of a particular material is unknown, sampling of the material should be arranged by contacting Facility Services or the EHS Office. WALMS inventory is available for all individuals to review.

UWSP asbestos signage will be posted in applicable mechanical rooms to alert campus staff and contractors of asbestos concerns in these areas.

5.0 ABATEMENT

Any asbestos-containing materials that may be disturbed or need to be removed during maintenance, remodel, or repair activity will need to be abated following all legal requirements referenced. UW- Stevens Point will contract out asbestos abatement to qualified contractors as discussed in Section 2.0.

UW- Stevens Point personnel assigned to manage the applicable project will be responsible for the administration of this asbestos management plan. Projects managed by the Wisconsin DFD will have oversight and direction by DFD personnel with campus contacts implementing UW- Stevens Point notification requirements and providing contact resources as necessary.

Never require individuals to walk through abatement containments. Help ensure signs are posted. Any concerns regarding the abatement job shall be brought to the attention of the listed Project Manager.

5.1 Abatement Notification

An abatement contractor shall make necessary notifications to regulatory agencies before work begins. Before an abatement project begins, Facility Services, Residential Living, Centers, or other applicable maintenance areas shall notify building occupants of the dates of removal, type of removal to be performed, any possible hazards, relevant safety information, and contact information for any questions or concerns. The Asbestos Notification template letter in Appendix #B or other proper notification shall be used by departments for this purpose. Departments receiving these notifications are responsible for conveying the information to their staff and/or other applicable building occupants. The notification shall be made before the job begins. Notification may be posted in a logical location outside of the abatement location and may also be sent via email if feasible.

6.0 GENERAL MAINTENANCE OF ACM

UW- Stevens Point follows a practice endorsed by the U.S. EPA known as *management of asbestos in place*. The goal is to maintain existing asbestos-containing material (ACM) in a stable condition rather than remove of asbestos for the sake of removing asbestos. The mere presence of asbestos does not constitute a hazard. If the ACM is maintained and undisturbed there is no exposure or risk to a building's occupants. Exposure can occur when the ACM is abraded or otherwise disturbed during maintenance operations, remodeling, abuse, or some other activity.

6.1 Inspection and Repair

ACM materials shall be reviewed for damage by applicable facility maintenance departments (for the building and areas of their responsibility). *Areas requiring repairs or abatement shall contract a qualified contractor* to complete the necessary work as discussed previously in this program.

6.2 Specific Prohibited Actions

The following activities related to Asbestos Containing Materials are prohibited:

- High-speed abrasive disc saws not equipped with a point-of-cut ventilator or enclosure with HEPA-filtered exhaust air;
- Compressed air to remove asbestos or ACM unless the compressed air is used with an enclosed ventilation system which effectively captures the dust cloud created by the compressed air;

- Dry sweeping, shoveling, or other dry clean-up of ACM dust and debris; and
- Employee rotation to reduce asbestos exposure.

Additionally, *smoking, drinking, and eating are prohibited in or near controlled asbestos work areas.*

6.3 Floor & General Surface Maintenance in Affected ACM Areas.

Floor or general surface maintenance in mechanical rooms or other rooms with damaged friable ACM should be performed using only wet methods such as mopping or HEPA vacuum and conducted by individuals who have completed the Class IV (maintenance and custodial activities that employees contact but do not disturb ACM or PACM and activities to clean up dust, waste, and debris which result from repair and removal of ACM) training (see below). Dry sweeping or dusting shall not be done in areas with damaged asbestos-containing Thermal System Insulation (TSI), spray on ACM or other friable ACM. Vacuuming should be accomplished using a HEPA vacuum (see Section 9). **Any damage ACM must be repaired by a qualified contractor.** A qualified Contractor shall be called in as necessary to clean up any debris.

Local exhaust ventilation and dust collection systems shall be designed, constructed, installed, and maintained in accordance with good practices such as those found in the American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems, ANSI Z9.2-1979. Additionally, all hand-operated and power-operated tools which would produce or release fibers of asbestos shall be provided with local exhaust ventilation systems.

ACM Floor Tile Specific Requirements. ACM Flooring material must be maintained according to the following conditions:

- Sanding flooring and its backing are prohibited.
- Employees stripping finishes must use wet methods and low abrasion pads at speeds lower than 300 revolutions per minute.
- Burnishing or dry buffing may be done only on flooring with sufficient finish that the pad cannot contact the flooring material.

The engineering controls and work practices shall be instituted to reduce and maintain employee exposure to or below the TWA and/or excursion limit [0.1 fiber per cubic centimeter of air (as an eight-hour time-weighted average) or 1.0 fibers/cc for 30 minutes (short-term exposure)]. Wherever the feasible engineering controls and work practices that can be instituted are not sufficient to reduce employee exposure to these levels, then respiratory protection equipment that complies with the requirements shall be used.

6.4 Discovery of Damaged Material

If damaged material is observed that may be asbestos-containing, this must immediately report one's supervisor. All damaged items shall be immediately reported to the appropriate facility maintenance unit.

Isolate the area with warning tape, pylons, signs, or other barricades, etc. Do not touch or disturb the material. The applicable facility department supervisor will contract a certified asbestos abatement contractor for clean-up or repair.

In the event of large releases or releases to air plenums, immediately contact the Facility Services to have the air handling system shut down. The Facility Services and/or EHS Office will make a decision regarding evacuation needs and the need for shielding vents and air handlers.

6.5 ACM Floor Tile Damages

UW-Stevens Point will provide employees who are required to use respirators with an appropriate respirator that complies with the OSHA standard. Respirators must be used during:

- Class I asbestos work.
- Class II asbestos work when ACM is not removed in a substantially intact state
- Class IV asbestos work performed within regulated areas where employees who are performing other work are required to use respirators.

Where small sections of loose non-friable ACM floor tile (2 or 3) are observed to be chipped or loose, duct tape can be used to hold the tile in place until abatement can occur. Notify your supervisor of the damaged tile and wear rubber or latex gloves while taping the tile. Complete pieces that are loose and broken free and cannot be taped may be wetted and placed in a double plastic bag. Wear disposable gloves and dispose of a glove in a bag. Wash hands after removing gloves. Contact EHS or Facility Services for disposal. Use a HEPA vacuum for any vacuuming needs.

Based on exposure evaluations of floor tile work procedures similar to those described above, the Resilient Floor Covering Institute has demonstrated these procedures will not result in an exposure. UW-STEVENS POINT sampling results have been consistent with the Resilient Floor Covering Institute conclusions.

7.0 TRAINING

All custodial and maintenance employees who may encounter disturbed ACM must receive the two-hour Class IV OSHA-specified awareness initial training (See [OSHA 1926.1101\(k\)\(9\)\(vi\) & 40 CFR 763.92\(a\)\(2\)](#)). This includes custodians who may encounter fallen material and will need instruction on proper methods of managing it.

Employees, are not to perform small-scale removal or corrective action response related to maintenance or repair needs (Class III works), unless they have successfully completed an OSHA-specified 16-hour Operations and Maintenance “hands-on” training course. UW-Stevens Point currently contracts all of this workout. Any future plans to change this procedure shall be reviewed with the EHS office.

Refresher training courses must be completed on an annual basis and shall review necessary removal activity procedures and current hazard information regarding asbestos. Contact EHS for scheduling training and further details.

8.0 PERSONAL PROTECTIVE EQUIPMENT

Impervious gloves such as rubber or latex should be used when working with ACM and should be discarded with removed material when finished. Respirator use must be consistent with the University’s respiratory protection policy. Users must pass a respiratory health screening, training, and fit testing. When disposable protective clothing is worn, it should be discarded with removed material for proper disposal. Contact EHS for proper selection of respirators and other PPE compliance.

9.0 MAINTENANCE, REPAIR, AND CLEANING OF HEPA VACUUMS

HEPA vacuums used to clean up ACM debris shall be maintained according to the manufacturer’s directions and should generally be serviced within a mini-enclosure under negative pressure by another HEPA vacuum. Where possible, service could be done by asbestos abatement contractors while on campus for other jobs. See the Waste Disposal section for the proper disposal of waste materials from the HEPA vacuums used for ACM debris.

10.0 EXPOSURE MONITORING AND BULK SAMPLING

The EHS Office, Facility Services, WI DFD, or qualified contractor will coordinate the sampling of bulk materials and/or air monitoring as requested or when necessary. Wisconsin Asbestos and Lead Abatement Management System ([WALMS](#)) system is used to track bulk sample analysis records for ACM in the State of WI Buildings. WALMS is administered by DFD. WALMS may be used to look up materials in questions to determine whether they are ACM or not. Any materials not in WALMS or in question may be bulk sampled and sent to a lab for analysis.

Air monitoring of abatement jobs may also be performed. Contact EHS Office to arrange. Past air monitoring results may be obtained via EHS as well. See Appendix C.

11.0 MEDICAL SURVEILLANCE

Medical surveillance is provided to employees involved in asbestos work, however, it is not currently in use at UW-Stevens Point. Medical surveillance under the OSHA standard consists of baseline and annual exams. The physical exams include medical and work history, the examination of pulmonary and gastrointestinal systems, pulmonary function testing, and another testing that the physician deems necessary. Medical surveillance must be offered to employees who are exposed above the permissible exposure limit and/or excursion limit (regardless of respiratory protection), or perform operations and maintenance work 30 or more days a year. A separate medical program is also required for those that wear a negative pressure respirator (see respiratory protection program). UW-Stevens Point currently has no individual required to be in a medical surveillance program and does not foresee this to become needed but will respond if necessary.

12.0 WASTE DISPOSAL

ACM is regulated waste (including contaminated protective devices or work clothing); it must not be placed in dumpsters or disposed of as regular trash. All removed ACM shall be double-bagged in 6 mil bags, sealed and labeled with an asbestos warning label. The EHS Office shall be notified of the material location and will make arrangements for disposal.

Appendix A
ABATEMENT CONTRACTORS

Wisconsin Department of Administration Contractors:
<https://www.dhs.wisconsin.gov/asbestos/asbestoscompany.pdf>

Appendix B

UW-STEVENS POINT Asbestos Notification Template.

*Below shall be used by UW-STEVENS POINT Project Managers/ Coordinators to provide UW-STEVENS POINT building occupants notification of asbestos abatement occurring in their respective buildings. UW-STEVENS POINT Project Managers or Coordinators shall fill in **Red** areas with the appropriate information.*

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“TO UW-STEVENS POINT BUILDING OCCUPANTS:

Asbestos abatement is scheduled for **YOUR** building on **DATE** in **ROOM/AREA**. The contractors will be removing **LIST ITEM BEING ABATED**. The job is expected to be completed on **DATE**.

Asbestos is a naturally occurring mineral and was frequently used in building materials during the period when many UW-STEVENS POINT buildings were constructed. Asbestos has very good insulating properties and is extremely durable. Therefore, asbestos fibers were used in thousands of materials in varying concentrations such as in floor tile, thermal system insulation (steam system), fireproofing, roofing materials, home siding, fire doors, and many other applications in schools, institutions, factories, utilities, apartments, residential homes, and other buildings. It was also used in applications such as brake pads, gaskets, wire insulation, transit board, protective clothing, theater drapes, etc. These materials have varying levels of actual asbestos in them (some as little as 1%) and are referred to as asbestos-containing materials (ACM).

However, as you are likely aware, asbestos is hazardous to human health and is known to be a human carcinogen with chronic exposures. The highest concern being those friable (e.g. crush in your hand) asbestos-containing materials (i.e. pipe insulation) verse non-friable ACM such as floor tile. See the [Asbestos Fact Sheet from the Agency for Toxic Substances and Disease Registry](#) for additional information on asbestos.

According to the Environmental Protection Agency, ACMs in good condition and properly maintained do not pose a threat to building occupants. However, during building remodeling, demolition, or repair asbestos is often required to be removed from the area or properly encapsulated. Many times the asbestos must be removed due to the logistics of the job. Further, the university and State of Wisconsin may choose to remove (rather than encapsulate) the asbestos in order to improve the long-term safety of the building and minimize future problems that may occur. UW-Stevens Point and WI Department of State Facilities have conducted many samples for ACM in our building and utilize the [WALMS](#) database to track results. UW-Stevens Point EHS or DFD will also sample additional materials as necessary.

Asbestos is removed from a building following federal and state regulations by licensed contractors procured by the State of Wisconsin DFD or by UW-Stevens Point Facility Services (for smaller jobs). The type of asbestos-containing material will dictate the process used and the safety equipment required. Removal of friable ACM requires more safety measures and different techniques than removal of non-friable ACM. Never enter a marked abatement area.

Please forward or post this notification to all applicable individuals in your areas of responsibility.

For any questions please contact **PROJECT MANAGER/Coordinator** for details on the abatement job or UW--Stevens Point EHS with other safety and health questions.

Thank you.”

Appendix C

RESOURCE LISTING

UW-STEVENS POINT Campus Contacts:

UW-STEVENS POINT EHS Specialist	UW-STEVENS POINT Risk Management Specialist
UW-STEVENS POINT Campus Engineering Specialist	UW-STEVENS POINT Campus Engineer

Vendors available to perform asbestos-related consultation, bulk-sampling, and air monitoring:

<p>NorthStar Environmental Testing, LLC 1006 Western Avenue Mosinee, WI 54455 Phone (715) 693-6112 Fax (715) 693-1225 info@northstartesting.com info@northstartesting.com</p>	<p>Environmental Management Consulting W7748 County Road V Lake Mills, WI 53551 Office: 920 648 6343</p>
<p>EAGLE ENVIRONMENTAL TESTING LLC W6674 GREEN WILLOW COURT GREENVILLE, WI 54942 Office: 920 915 2821</p>	

State of Wisconsin & UWSA Resources Available for asbestos consultation include:

<p>Hazardous Materials Abatement Manager Division of State Facilities WI Dept. of Administration 101 East Wilson Street, 7th Floor Madison, WI 53707-7866 Office: 608 266 2731 FAX: 608 267 2710</p>	<p>Wisconsin Department of Administration Division of State Facilities 608-261-4348</p>