

**ASBESTOS POLICY**  
**Physical Plant**  
**Augusta State University**

OBJECTIVE

Asbestos is a recognized health hazard, and Federal and State criteria regulate activities involving asbestos containing materials. To ensure compliance with these regulations and to minimize the potential exposure of students, employees and the public the following University Asbestos Policy is promulgated.

DEFINITIONS

ACM: Asbestos Containing Material.

Assistant Director: Assistant Director, Physical Plant (Dave Freeman; Tel: 706-667-4046; Fax: 706-731-7970; email: [drfeema4@aug.edu](mailto:drfeema4@aug.edu)).

BOR: Board of Regents of the University System of Georgia.

Director: Physical Plant Director or designated representative (Therese Rosier; Tel: 706-667-4042; email: [trosier@aug.edu](mailto:trosier@aug.edu)).

DNR: Georgia Department of Natural Resources.

EHSC: Environmental Health and Safety Coordinator (Jim Smith; Tel: 706-731-7934; Fax: 706-731-7934; email: [jsmith@aug.edu](mailto:jsmith@aug.edu)).

EPD: Environmental Protection Division.

Friable: Friable asbestos is an asbestos containing material that can be crushed by hand pressure and release asbestos fibers into the air.

O & M: Operations and Management procedures for “managing” ACM in place.

OSHA: Occupational Health and Safety Administration.

Shop: This term applies to every entity of the university’s administration, faculty and staff that has the authority of scheduling, coordinating, etc, asbestos related projects (surveys and abatement).

TSI: Thermal System Insulation.

University: Augusta State University.

USEPA: United States Environmental Protection Agency.

## AUTHORITY

USEPA Worker Protection Rule (40 CFR Part 763); OSHA Asbestos Standard (29 CFR 1915.1001); OSHA Construction Standard (29 CFR 1926); Georgia Asbestos Safety Act (OCGA 12-12-1); Georgia DNR, EPD Rules of Asbestos Removal and Encapsulation (Chapter 391-3-14); and BOR Guidelines for Asbestos Abatement Projects are the primary regulatory guidelines used for the University's Asbestos Policy.

## POLICY

Asbestos Abatement work must be conducted pursuant to approved procedures and requirements of appropriate regulating agencies, and in full compliance with the laws and regulations of the USEPA (federal), the State of Georgia (DNR-EPD) and the BOR.

## RESPONSIBILITIES

**Director:** The Director shall be designated as the management level "Asbestos Coordinator" for the University (including Physical Plant Shops and Departmental Maintenance Organizations). The Director shall coordinate and make recommendations regarding all construction, maintenance and renovation activities involving asbestos activities.

**Assistant Director:** The Assistant Director has the responsibility of coordinating shop work orders with the EHSC to ensure that University shop personnel are not exposed to ACM during normal maintenance operations using the "Recommended Guidelines for Asbestos Exposure" (see Annex 1).

**Environmental Health and Safety Coordinator (EHSC):** The EHSC has the responsibility for recommending administrative decisions regarding asbestos control and abatement at the Augusta State University. All activities involving asbestos require prior approval from the Director. The EHSC will provide recommended consultative and technical assistance to the Director and campus organizations involved in activities related to asbestos.

The EHSC shall act as liaison between the university and licensed asbestos consultants and licensed asbestos contractors and shall be responsible for all asbestos activities including: identification of projects involving asbestos, informing all contractors of the presence of asbestos within their work areas and implementation of asbestos abatement projects to comply with all federal and state asbestos laws and regulation and University policy. Also, the EHSC shall serve as University liaison with regulatory agencies and serve as the "clearinghouse" for asbestos related records.

**Licensed Asbestos Consultant:** Each asbestos removal project shall be conducted under the direction of a Georgia licensed asbestos consultant who shall be responsible for (1) preparing asbestos surveys, O&M Plans, and bid documents, (2) evaluating the bidders' qualifications and bid prices, and (3) air monitoring and inspecting performed work.

## PROCEDURES

**Asbestos Surveys:** Asbestos surveys meeting current State of Georgia and federal requirements shall be conducted prior to any building renovation, remodeling or demolition project. The Director or Georgia licensed asbestos consultant may recommend abbreviated sampling of suspect material for projects of less than 160 square feet of non-friable ACM or all friable ACM response actions related to O & M activities. Partial or limited surveys prior to renovation projects may be approved with the concurrence of the EHSC and the project's licensed asbestos consultant.

**Asbestos Operations and Maintenance (O & M) Plans:** The University shall enter into a contract with a licensed asbestos consultant to develop and periodically update the University's O & M plan. The University shall implement and maintain the asbestos O & M plan for ACM known or assumed to exist in the buildings as indicated by the asbestos survey. The asbestos operations and maintenance plan will apply to all facilities identified as having or assumed to have asbestos containing material and shall be kept current and documented in accordance with state and federal requirements.

**Abatement Procedures:** University shop personnel are **NOT** permitted to remove any ACM. The University shall enter into a contract with a licensed consultant (design and monitoring) and licensed asbestos abatement contractor (abatement) for any asbestos abatement work.

All asbestos abatement projects shall adhere to the laws and regulations of the United States Environmental Protection Agency (USEPA); the Georgia DNR Environmental Protection Division (Chapter 391-3-14); and the BOR Guidelines for Asbestos Abatement Projects (Website), March 2000 ([http://www.usg.edu/ehs/guidelines/asbestos\\_abate.phtml](http://www.usg.edu/ehs/guidelines/asbestos_abate.phtml)).

In some cases, removal of asbestos containing materials may not be the best response action. In instances where the risk of exposure is low and costs of complete removal are prohibitive, the university shall enter into a contract with a licensed asbestos consultant to design an O & M procedure and present the findings to the Director, who shall determine what action is to be taken.

Given sufficient justification, the Director may recommend exceeding the requirements of state and federal laws and regulations for any project based on the location of the project or the impact on the university community.

All suspect ACM shall be sampled for asbestos content prior to disturbance or removal of the material. This includes, but not limited to, suspect roofing materials, thermal insulation, fire proofing insulation and floor tiles (and associated adhesive), etc., from the "Sample List of Suspect Asbestos Containing Materials, USEPA, Region 6 (see Annex 2).

**Insurance:** All asbestos abatement contractors are required to provide proof of insurance (current insurance certificate) to the Director prior to entering into any asbestos abatement contract with Augusta State University.

**Training:** All university shops shall identify individuals whose job activities require contacting asbestos containing materials, or working in asbestos contaminated areas. The Director shall provide appropriate asbestos awareness training to these individuals as required. The employee training records are maintained in the employees personnel file in the Physical Plant Office and the EHSC's Office.

**Notification:** All activities involving the removal of ACM require the submittal of an Asbestos Notification Form (including emergency project notifications). All university shops shall coordinate emergency notifications with the Director as soon as possible and stop all work until the ACM is properly abated (by a licensed asbestos abatement contractor) and prior to resuming any demolition or renovation project activities. The Georgia Department of Natural Resources (EPD) requires notification (including emergency notifications) for the removal of regulated asbestos containing materials, renovation, and demolition projects. The information required in this notification varies depending on the type of work, and the amounts of regulated asbestos containing materials involved (see DNR Rules and Regulations, Chapter 391-3-14).

**Licensed Asbestos Abatement Contractor:** The University shall employ only experienced, certified and licensed (state of Georgia) asbestos abatement contractors for all abatement projects.

**Licensed Asbestos Consultant and Abatement Project Design and Monitoring:** The University shall employ only experienced, certified and licensed (state of Georgia) environmental consultant shall perform project abatement design and monitoring. Project design shall comply with all state and federal laws and regulations and due diligence for the abatement of ACM. Contract specifications shall be written by the licensed asbestos consultant, and based on due diligence of the industry criteria and state and federal laws and regulations. Monitoring shall include, but not limited to: daily inspection, air sampling inside and outside containment, and clearance air sampling as specified in the abatement contract.

**Record Keeping:** Each university shop shall provide the EHSC with complete records for all asbestos related projects conducted. These records shall include any and all asbestos surveys, abatement, testing, and disposal manifests. The EHSC shall publish a copy of each project as part of the University's "Environmental Report". The copies of the Environmental Report are maintained in the Reference section of the Reese Library and the EHSC's office. The EHSC is responsible for updating the Environmental Report upon receipt of each of the project "closeout documents".

**Control:** Access to areas that contain known friable asbestos will be "controlled" by the posting of "Asbestos Warning Signs" at the entrance to the area to notify personnel of the hazard. Areas that contain known non-friable asbestos (typically minimal health hazard) will be "controlled" by drawings maintained in the Environmental Report, Physical Plant and EHSC's office.

## **ANNEX 1: RECOMMENDED GUIDELINES FOR ASBESTOS EXPOSURE**

### **COORDINATION**

The Assistant Director shall review work orders with the EHSC to determine appropriate response actions (asbestos survey or abatement) for normal maintenance operations in buildings with confirmed (Annex 3: ASU Buildings with ACM) or suspect ACM as required.

### **PROCEDURES**

1. All University personnel should contact the EHSC for sampling of suspect ACM. If the suspect material test results are negative for asbestos, then normal maintenance operations may continue. If the suspect material test results are positive for asbestos, then the EHSC shall recommend a discontinuance of the work until the ACM is abated and clearance is obtained.
2. If damage occurs to a confirmed (positive) ACM (friable or non-friable), all personnel must stop all work and immediately leave the area and immediately contact the EHSC and Assistant Director.
3. The EHSC shall assess the situation and coordinate with the Director and/or Assistant Director for the affected area(s) to be evacuated (minimize personnel exposure), “locked out” and/or sealed off (minimize contamination to other areas), and have required notification “signs” posted (minimize re-entry to the contaminated area).
4. The EHSC shall arrange for sampling of any “suspect” materials (if not previously identified) and/or obtain estimates from Georgia Licensed Asbestos Abatement Contractor(s) for abatement of the ACM and coordinate the asbestos work if required.
5. The area(s) shall remain closed (and “locked out”) until the area(s) is abated and the EHSC has received the appropriate project “closeout documents” (including Final Clearance Results) from the selected Georgia Licensed Asbestos Abatement Contractor.

## ANNEX 2: USEPA (REGION 6) SAMPLE LIST OF SUSPECT ASBESTOS CONTAINING MATERIALS

The following list does not include every product or material that may contain asbestos. It is intended as a general guide to show which types of materials may contain asbestos. Asbestos was commonly used as an acoustic insulator, thermal insulator, fire proofing and in other building materials. Asbestos fibers are incredibly strong and have properties that make them resistant to heat. Many products are in use today that contain asbestos. Most of these are materials used in heat and acoustic insulation, fire proofing, roofing and flooring. Some of the more common products that may contain asbestos include:

Acoustical Plaster BMS	Electrical Cloth ELEC	HVAC Duct Insulation HVAC
Adhesives BMS	Electrical Panel Partitions ELEC	Laboratory Hoods and Table Tops BMS
Asphalt Floor Tile BMS	Electrical Wiring Insulation ELEC	Packing Materials (Wall and Floor Penetrations) BMS / ELEC / HVAC
Base Flashing BMS	Elevator Brake Shoes AUTO	Roofing Felt BMS
Blown-in Insulation BMS / ELEC / HVAC	Elevator Equipment Panels ELEC	Roofing Shingles BMS
Boiler Insulation HVAC	Fire Blankets BMS	Spackling Compounds BMS
Breaching Insulation HVAC	Fire Curtains BMS	Spray-Applied Insulation BMS / ELEC / HVAC
Caulking and Putties BMS / ELEC / HVAC	Fire Doors BMS	Taping Compounds (Thermal) HVAC
Ceiling Tiles and Lay-in Panels BMS / ELEC / HVAC	Fireproofing Materials BMS / ELEC / HVAC	Textured Paints and Coatings BMS
Cement Pipes HVAC	Flooring Backing BMS	Thermal Paper Products ELEC / HVAC
Cement Siding BMS	Heating and Electrical Ducts ELEC / HVAC	Vinyl Floor Tile BMS
Cement Wallboard and Roofing BMS	High Temperature Gaskets ELEC / HVAC	Vinyl Sheet Flooring BMS
Chalkboards BMS	Joint Compounds BMS / HVAC	Vinyl Wall Coverings BMS
Construction Mastics (Floor Tile, Carpet, Ceiling Tile, etc.) BMS	Laboratory Gloves	Wallboard BMS
Cooling Towers HVAC	HVAC Pipe Insulation (Corrugated Air-Cell, Block, etc.) HVAC	
Decorative Plaster BMS	HVAC Ductwork Flexible Fabric Connections HVAC	

AUTO – Automotive Shop  
BMS – Building Maintenance Shop

ELEC – Electrical Shop  
HVAC – HVAC Shop

### ANNEX 3: ASU BUILDINGS WITH KNOWN ACM

1. Boykin-Wright Hall. This building has asbestos contaminated soil from the “original” HVAC duct insulation in the basement crawlspace area under the main part of the building (approximately 1/3 of the basement area). ACM thermal system insulation (TSI) is found on the joints of the metal HVAC ductwork. Also, this TSI is suspected on the joints of the metal ductwork within the walls of the building.

2. Galloway Hall. This building has ACM within the walls of the building that are remnants of several abatement projects to renovate the HVAC system (it is “sealed in place”).

3. Maintenance Building - #51. This building has ACM roofing panels (Transite ©) on the exterior of the “original” roof. Access to the roof is limited to ASU Physical Plant personnel only. Two previous limited surveys revealed negative test results for ACM (garage interior and the attached mechanical room).

4. Maxwell-Alumni House. This building has ACM on the metal ductwork within the walls in the form of TSI.

5. Maxwell Performing Arts Theater. This building has ACM in the Ceiling Tiles on the second floor (Mezzanine Area). There have been several limited scope surveys and abatement projects in the building (basement area and front lobby area).

6. Payne Hall. This building has ACM on the HVAC system piping in the attic of the building. Also, there is ACM floor tile and adhesive in the building’s interior, which is encapsulated by carpet.

7. Public Safety Building. This building has ACM roofing panels (Transite ©) on the exterior of the “original” roof. Access to the roof is limited to ASU Physical Plant personnel only.

8. Warehouse Buildings (Grounds - #201, Automotive/Ceramics - #202, COS - #203 and Biology Field Lab/Recycling - #204). These buildings have ACM roofing panels (Transite ©) on the exterior of the “original” roof. Access to the roof is limited to ASU Physical Plant personnel only.

9. Washington Hall. This building has ACM in the ceiling tiles and floor tiles within the building on the second floor of the buildings interior. These include the topic rooms, ping-pong game room, classroom and offices of the “original” building (this does not include the Towers). Also, it has ACM roofing panels (Transite ©) on the exterior of the “original” roof encapsulated by the existing shingle roof.