

ASBESTOS MANAGEMENT PLAN

UNO Campus Safety Policy

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POLICY

1.01 An Asbestos Management Plan (AMP) has been established for properly addressing asbestos containing material (ACM) and presumed asbestos containing material (PACM) in UNO facilities. Two essential purposes for this AMP are (1) to help minimize asbestos exposure to the campus community, and (2) to comply with applicable federal, state, and local regulations. The AMP provides management direction through procedural guidelines, and also provides information on the maintenance and/or removal of asbestos containing material. UNO personnel will only engage in Class IV asbestos work, defined as maintenance and custodial activities during which employees come in contact with ACM and PACM during clean up of waste and debris. All other asbestos work will be performed by outside contractors.

A glossary of asbestos related terms can be found in Appendix A.

RESPONSIBILITY

2.01 There are two (2) campus units responsible for the activities of the AMP. These units and their respective responsibilities follow:

2.02 Environmental Health & Safety (EHS):

EHS supports the University community by providing regulatory interpretation, monitoring regulatory compliance, assessing training requirements, conducting training, personal protection criteria, respirator fit testing, and other related health and safety issues. EHS is the focal point for the AMP, including ACM survey records, condition status, abatement estimates, and all other AMP activities. The Asbestos Program Manager will review ACM/PACM Area Work Permits prior to the issuance of a work order or contract to proceed in an area containing ACM/PACM (Appendix B). This permit system is a simple yet effective way of controlling disturbance of ACM during maintenance/renovation activities.

2.03 Implementation of all or part(s) of the AMP can be delegated by EHS to UNO units that possess the qualified staff and procedures to comply with the AMP.

2.04 Maintenance and Utilities Services (MUS):

MUS will contract with a licensed vendor for emergency response, abatement and material testing. MUS will initiate ACM/PACM Area Work Permits for review by the Asbestos Program Manager. Prior to renovation of a building, Facilities Management and Planning, or MUS, will contact the Asbestos Program Manager for pre-renovation planning, including a discussion of the need for abatement or repair of existing ACM/PACM. All abatement and repair work will be conducted by outside contractors. The bidding process for the work will be conducted by MUS. Facilities Management and Planning will have control over the entire renovation project, with the Asbestos Program Manager acting in an advisory role for regulatory compliance purposes.

PROGRAM ELEMENTS

3.01. Notification: The following situations will require notification:

1. Abatement Project Notification:

Building occupants will be notified by EHS of the dates and locations of asbestos removal by various means, which may include campus e-mail, flyers, departmental notices and the UNOmaha Notes.

2. Short Term Contractor Notification:

UNO contractors and their employees, who may come into contact with asbestos in UNO facilities, will be provided information regarding the presence and location of ACM and PACM by Maintenance Utilities Services or Facilities Management and Planning, dependent upon which entity contracts the work. Documentation of completion of notification will be included in the ACM/PACM Area Work Permits.

3.02 Surveillance:

A visual inspection will be conducted annually in each UNO facility by trained UNO personnel. Written reports will address the following:

1. Current condition of ACM.

2. Recommendation of any response action, if necessary, (i.e., clean up of degrading ACM, repair or removal).

3. Inspection results will be maintained by EHS with the AMP and forwarded to MUS for any necessary action.

3.03 Work Controls:

The AMP is managed by EHS using the following guidelines:

1. EHS will determine what action will be taken and if this work is to be performed by trained UNO personnel or by outside contractors.

2. All ACM work will be done in accordance with specific procedures developed by UNO to ensure compliance with federal, state, and local regulations.

3. EHS will liaison with the Certified Asbestos Supervisor monitoring the ACM abatement work. This supervisor will be an outside contractor.

4. All individual project documentation will be forwarded to and maintained by EHS.

3.04 Emergency Response:

If there is an accidental release of ACM contact EHS at 4-2239. EHS will determine if the release is minor or major.

1. Minor Fiber Release: Dislodging of three (3) square or three (3) linear feet **or less** of friable ACM is addressed as follows:

a. EHS will notify Maintenance and Utilities Services at 4-3600.

b. The Maintenance and Utilities Services or Environmental Services supervisor on duty will ensure that the procedures listed below will be followed. If the release requires clean up only, Environmental Services will ensure that the following procedures are followed. If repair of the ACM is required, Maintenance and Utilities Services will ensure that the procedures listed below are followed.

1) Access to the area will be immediately and properly restricted.

2) Workers will don respiratory protection.

3) All debris will be saturated with amended water (water with a low sudsing surfactant to aid in absorption into the material).

4) All debris will be placed in six (6) ml. or thicker polyethylene asbestos disposal bags, which will be properly labeled. The filled disposal bags must be stored in a locked area until EHS picks up the material.

5) All areas beneath the point of release will be HEPA vacuumed.

6) EHS will arrange for appropriate disposal of all regulated materials.

7) The damaged ACM will be repaired.

8) A Fiber Release Episode Report (Appendix C) will be completed and kept on file by EHS.

2. Major Fiber Release:

Dislodging of more than three (3) square or three (3) linear feet of friable ACM is addressed as follows:

a. EHS will notify Maintenance and Utilities Services at 4-3600 and ask for the zone supervisor.

b. The Maintenance and Utilities supervisor on duty will ensure that the procedures listed below will be followed.

- 1) Access to the area will be immediately and properly restricted.
- 2) The air handling system will be shut down or modified to restrict air movement through the affected area(s).
- 3) The appropriate response action will be initiated, which may include contracting for ACM removal, repair, encapsulation or encasement.
- 4) A Fiber Release Episode Report will be completed by EHS.

3.05 Specific Work Practices:

Specific work practices and procedures have been developed in addition to this AMP and will be incorporated into building specific Asbestos Operations and Maintenance Programs (AOMP). AOMP's include building maps identifying where ACM may be located, personal protective equipment requirements, labeling requirements, specific work practices, emergency response, ACM surveillance and recordkeeping. They are separate documents and will be available in EHS and each specific building. Other asbestos related documents are as follows:

1. Air Monitoring
2. Training
3. Record keeping
4. Respiratory Protection Plan

3.06 Labeling and Signage

Warning signs compliant with state and federal safety and environmental regulations will be posted at each regulated area and the approaches to regulated areas. Regulated areas are those where the airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the permissible exposure limits. A regulated area normally occurs only where there is scheduled large scale abatement or repair.

Labels compliant with state and federal safety and environmental regulations will be installed to notify employees of the presence and location of ACM and presumed asbestos containing materials (PACM).

3.07 Information:

Information related to ACM condition status, abatement projects, personal protective equipment, regulatory requirements, or health and safety matters can be obtained from the following sources.

1. Environmental Health & Safety, 4-2239

2. Maintenance Utilities Services, 4-3600

3.08 Training Requirements

UNO personnel engaged in Class IV asbestos work, maintenance and custodial activities in which employees may come into contact with ACM and PACM, are required to have initial Asbestos Awareness training and annual refreshers. This also applies to Computing and Data Communications, and Telecommunications staff that install equipment in ACM/PACM areas. The initial Asbestos Awareness training will be conducted by EHS staff. Annual refresher training will be provided by the individual department supervision or training coordinator.

Specific asbestos area work practices contained in the individual building Asbestos Operations and Maintenance Programs will be implemented and require initial training and continued performance evaluation. This training and continued evaluation will be conducted by area Supervisors with technical advice and assistance available from EHS. These work practices include the use of specialized asbestos equipment (HEPA vacuums, disposal bags, etc.), and specialized work practices (wet cleaning, low speed buffing, etc.).

APPENDIX A - Glossary of Terms

ACM - Any material containing more than one percent asbestos.

AMP - Asbestos Management Plan

AOMP - Asbestos Operations and Maintenance Program

Asbestos - Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered.

EHS - UNO Environmental Health & Safety

Friable asbestos - Any material that contains greater than one percent asbestos, and which can be crumbled, pulverized, or reduced to powder by hand pressure. This may also include previously non-friable material that becomes broken or damaged.

HEPA - High Efficiency Particulate Air

MUS - Maintenance Utilities Services

PACM - Presumed asbestos containing material.

APPENDIX B - Permit for Performing Maintenance/Renovation Work in ACM/PACM areas

ACM/PACM Area Work Permit

1. Exact location of area involved (include building name, room number, location within room, etc.) _____
2. Description of work involved _____

3. Starting Date _____ Anticipated Completion Date _____
4. Name and telephone number of proposed work supervisor _____
5. Name and telephone number of person applying for permit _____
6. If applicable, date contractor notified of ACM/PACM in proposed work area _____
7. *Approximate amount of asbestos present (linear feet, square feet), type and accessibility of material) _____

8. *Recommended work practices to reduce the possibility of ACM disturbance _____

9. *Protective equipment to be used (respirator, coveralls, etc.) _____

TO BE FILLED OUT BY EHS

Permit Number _____ Accepted _____ Rejected _____

Printed Name _____ Signature _____

Please submit this form to:

Asbestos Program Manager
Environmental Health & Safety
Eppley 100, Extension 4-2239

*Note: These items to be completed by EHS.

APPENDIX C - *Fiber Release Episode Report*

1. Building and room number(s) (or description of area) where episode occurred: _____

2. The release episode was reported by _____
on _____ (date)

3. Describe the episode: _____

4. The ACM was ____/was not ____ cleaned up according to approved procedures. Describe the cleanup: _____

5. Describe any further action needed: _____

6. Disposal of material: _____

Signed: _____ Date: _____

Asbestos Program Manager