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1. **INTRODUCTION**

The purpose of this program is to establish the policies and procedures to be used at the University of North Carolina at Greensboro in the management of building materials containing greater than one percent (>1%) asbestos by composition.

2. **SCOPE**

This program applies to all university employees, contractors, and subcontractors who work in or around asbestos containing materials (ACM). The information provided will follow the NC Dept. of Administration, State Construction Policy on ACM found in state buildings:

*If asbestos containing material is in good condition and will not be disturbed during renovation, the material may be left in place and the owner will continue upkeep and maintenance of the material. If ACM is to be disturbed during renovation and/or demolition activities, then it shall be removed. The ACM removal shall be designed and abated by accredited individuals.*

The basis for these policies is that intact and undisturbed ACM does not pose a health risk to building occupants. The proper management of ACM minimizes the potential release of fibers into the air, and the risk of asbestos related health problems is minimized.

3. **APPLICABLE REGULATIONS**

- 29 CFR 1926.1101: OSHA- Asbestos Standard for the Construction Industry
- 40 CFR Part 763: EPA, Subpart E, Asbestos
  - Appendix B: Work Practices and Engineering Controls
  - Appendix C: Asbestos Model Accreditation Plan
  - Appendix D: Transport and Disposal of Asbestos Waste
- 49 CFR 173.1090 – NC DOT
4. RESPONSIBILITIES

Designated individuals shall serve as coordinators and be responsible for ensuring that their respective portions of this plan are implemented. Three positions shall be designated as follows:

- Asbestos Information Coordinator (Environmental Health and Safety)
- Asbestos Project Managers (Facilities Design and Construction, Facilities Operations, and Residence Life)

Responsibilities shall be designed or shared as follows:

4.1 Asbestos Information Coordinator (Environmental Health and Safety)

1. Assist Asbestos Project Managers (APMs) in the identification, conditional review, and risk assessment of ACM and/or PACM in campus buildings. Assist (APMs) in informing building occupants of the presence and locations of all ACM or PACM in the facility. This assistance shall include references to this management program.

2. Establishing and maintaining a medical surveillance program when required for compliance.

3. Establishing and maintaining a respiratory protection program when required for compliance.

4. Collect and file Asbestos Inventory Control Reports and Transmittal Forms from (APMs) to ensure update of survey.

5. Maintain Campus-Wide Asbestos Survey in both paper and electronic forms, by updating using data provided by Asbestos Inventory Control Forms.

4.2 Asbestos Project Managers (APMs) (Facilities Design and Construction, Residence Life, and Facility Operations)

1. Ensure that construction and renovation projects are completed in accordance with all applicable OSHA, EPA, and NC Asbestos Hazard Management Branch rules and regulations.

2. Ensure that all abatement activities are designed, conducted and completed by persons accredited by North Carolina Asbestos Hazard Management Branch.

3. Asbestos Project Managers will oversee O&M activity with ACM or PACM according to these guidelines:
   a) Restrict entry during the life of the project by persons other than those necessary to perform the work, either by physically isolating the area or through scheduling.
   b) Verify or Post signs to prevent entry by unauthorized persons into the regulated area.
   c) Coordinate or Shut off or temporarily modify the air handling system and restrict other sources of air movement.
d) Verify or Use work practices, or other controls, such as wet methods, protective clothing, HEPA vacuums, mini enclosures, and glove bags to inhibit the spread of any released fibers.

e) Verify Cleaning of all fixtures or other components in the immediate work area.
f) Verify Place the asbestos debris and other cleaning materials in a labeled, sealed, and leak-tight containers. Ensure legal disposal of these materials.
g) Ensure that clearance testing has been conducted prior to removing any containment.

4. Ensure legal and proper disposal facilities are available to any asbestos removed, prior to project start.

5. Ensure that Asbestos Inventory Control Report and Transmittal Forms are completed and forwarded to the Department of Environmental Health and Safety within fourteen days of completion of any asbestos testing, abatement, or encapsulation.

6. Attend required training to fulfill their responsibilities.

4.3 Contractors

Contractors performing work that will disturb or remove ACM or PACM must be licensed abatement contractors as specified by applicable regulations and will be managed by designated UNCG Asbestos Project Managers. The contractor shall perform all work in compliance with current applicable federal, state, and local regulations, including U.S. EPA, OSHA and any other accepted industry standards. The most recent edition of relevant regulations shall be in effect throughout the project. In the case of conflict or overlap between federal, state, and local regulations, the more stringent regulation or standard shall apply.

5. LEVELS AND LIMITS OF OPERATIONS

5.1 Public Areas

Public Area is defined as any area other than areas to which access by the general public is usually prohibited, or is usually limited to access by escort only. Individually permitted asbestos removal activities conducted in public areas are required to be designed and conducted by persons accredited by the Department of Health and Human Services (DHHS). When asbestos work activity is performed on Thermal System Insulation (TSI), Surfacing Material or other friable material in a public area, the area shall be monitored by a licensed and accredited air monitor in accordance with 15A NCAC 19C.0605. This includes nonfriable material that will be sanded, abraded, cut or otherwise made friable. If asbestos work activity is performed on nonfriable material and monitoring of the worker performing the work reveals that Permissible Exposure Limit (PEL) has been exceeded, clearance air sampling shall be performed by a licensed and accredited air monitor to insure the work area is not contaminated.

For individually permitted asbestos removals, ambient air sampling shall be conducted in public areas adjacent to the work area. Clearance air sampling shall be conducted by a licensed and accredited air monitor.
5.2 Limitations/Campus-Wide Asbestos Survey

Only employees specifically trained and accredited as asbestos workers will perform operations which are likely to disturb ACM or PACM. Before any work begins that will disturb building materials, the employee must know whether the building material contains asbestos. A Campus-Wide Asbestos Survey and assessment of buildings constructed prior to 1991 has been conducted to identify materials that contain asbestos. This survey should be utilized as a starting point to determine the likelihood or presence of building materials containing asbestos.

In addition, building materials containing asbestos are periodically assessed for overall condition. In order to limit exposure to asbestos during work activities which may disturb building materials the following steps should be implemented:

1. Prior to the commencement of work which may disturb building materials, the employee or supervisor will check with the Campus-Wide Asbestos Survey to verify the presence or absence of ACM or PACM in the worksite. If the work involves the likely disturbance of ACM or PACM, then the work must be performed by trained and accredited workers or qualified contractor under the management of a UNCG Project Manager.

2. If the employee or supervisor is unable to determine whether or not asbestos is present, then they must contact the applicable UNCG Project Manager and/or Asbestos Information Coordinator (EH&S) to make a determination before proceeding. If the Campus-Wide Asbestos Survey is unclear about the presence of asbestos, then the material shall be tested or presumed to contain asbestos. If a material to be disturbed contains asbestos, or if it is presumed, then the work shall only be performed by trained and accredited asbestos workers or qualified contractor under the management of a UNCG Project Manager.

Only employees specifically trained as Asbestos Project Managers will manage the contracting of work to disturb or remove asbestos containing building materials.

It is very important that all personnel, especially those involved in maintenance, repair, and custodial activities understand that certain activities normally performed are prohibited where ACM or PACM is present. With the exception of Class III Activity Workers, the following is a list of prohibited activities for university employees.

- Not to drill holes in presumed asbestos containing materials (PACM) or asbestos containing materials (ACM)
- Not to hang plants or pictures on structures covered with PACM or ACM
- Not to sand asbestos containing floor tile
- Not to damage asbestos containing floor tile
- Not to install curtains, drapes or dividers in such a way that they damage PACM or ACM
- Not to dust floors, ceilings, moldings, or other surfaces in asbestos contaminated environment with a dry brush or sweep with a dry broom
- Not to remove lock or other hardware in asbestos containing doors
- Not to use an ordinary vacuum to clean up asbestos containing debris
- Not to remove ceiling tiles below asbestos containing materials without wearing the proper respiratory protection, clearing the area of the people, and observing asbestos removal and waste disposal procedures
5.3 Work Classifications

The following classification of work with asbestos containing building materials is to be used in accordance with this program.

Class I -- Activities involving the removal of TSI and asbestos containing surfacing materials, where the primary reason for the project is to remove the material from the facility. This includes removal of ACM in quantities greater than 260 linear feet, 160 square feet, or 35 cubic feet, requiring a permit from the DHHS. No UNCG employees will conduct Class I activities.

Class II -- Activities involving the removal of asbestos containing materials (ACM) which is not TSI or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding materials, and construction mastics. The primary purpose of this class of project is to remove the material from the facility. This includes removal of ACM in quantities greater than 260 linear feet, 160 square feet, or 35 cubic feet, requiring a permit from the DEHNR. No UNCG employees will conduct Class II activities.

Class III -- Activities involving repair and maintenance where asbestos containing material, including TSI and surfacing material, is likely to be disturbed. Class III work will only be performed by employees who are accredited to at least the worker level in accordance with DHHS requirements (twenty-four hour training). UNCG employees are not currently authorized to perform Class III activities.

Class IV -- Maintenance and custodial activities during which employees contact asbestos containing material and activities to clean up waste and debris containing suspect or asbestos containing materials.

Examples include, but are limited to:

- Sweeping, mopping, cleaning, and vacuuming of asbestos containing material
- Stripping and buffing of asbestos containing resilient flooring
- Cleanup of waste or debris after a Class I, II, or III operation

NOTE: UNCG employees will not be expected to participate in the clean-up of waste and debris containing suspect or asbestos containing materials after a Class I, II, or III operation; however, employees who perform maintenance and custodial activities will receive Asbestos Awareness Training annually due to the nature of their work.

5.4 Asbestos Management

The current protocol for managing asbestos response and Operations and Maintenance (O&M) activities involves the use of independent off campus contractors. If mission driven initiatives change this protocol, then the applicable work classifications and training requirements must be revisited prior to proceeding.
6. RECORDKEEPING

All applicable records associated with asbestos projects are to be maintained, and a copy forwarded to EH&S. Departments such as Facilities Operations, Facilities Design and Construction, Residence Life, Computing and Information Services, or any other Department which may perform maintenance and construction activities involving asbestos is to maintain documentation associated with asbestos materials/projects. Specific examples of asbestos records include: medical surveillance, project air monitoring/clearance, training records, asbestos inventory records, class I, II, III, and IV activities documents.

<table>
<thead>
<tr>
<th>Example Record</th>
<th>Primary Location</th>
<th>Secondary Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical Surveillance</td>
<td>Gove Health and/or Medical Provider</td>
<td>Approval Copy to EH&amp;S</td>
</tr>
<tr>
<td>Dusty Trades Program</td>
<td>Applicable UNCG Dept.</td>
<td>Copy to EH&amp;S</td>
</tr>
<tr>
<td>Respiratory Protection Program</td>
<td>EH&amp;S</td>
<td>Applicable UNCG Dept.</td>
</tr>
<tr>
<td>Asbestos Training (Awareness)</td>
<td>EH&amp;S</td>
<td>Applicable UNCG Department</td>
</tr>
<tr>
<td>Asbestos Certification/Accreditation</td>
<td>Facilities Operations/Facilities Design and Construction</td>
<td>Copy to EH&amp;S</td>
</tr>
<tr>
<td>Project Managers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asbestos Inventory Control Forms</td>
<td>Applicable UNCG Project Manager</td>
<td>Copy to EH&amp;S</td>
</tr>
<tr>
<td>Class I, II, III, and IV Abatement</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Activities Documents</td>
<td>Applicable UNCG Project Manager</td>
<td>Copy to EH&amp;S</td>
</tr>
</tbody>
</table>

7. TRAINING AND ACCREDITATION

7.1 Asbestos Project Managers

Asbestos Project Managers role shall receive asbestos project management training by an accredited course provider.
7.2 Class III Activity Workers

Any workers conducting Class III activities shall receive training annually. This training will be at a minimum, equivalent to a DHHS worker level training a (twenty-four hour accredited training course) and accreditation at this level maintained. UNCG employees are not currently authorized to perform Class III activities. If mission driven initiatives change this protocol, then the applicable work classifications and training requirements must be revisited prior to proceeding.

7.3 Maintenance and Custodial Employees

UNCG employees will not be expected to participate in the clean-up of waste and debris containing suspect or asbestos containing materials after a Class I, II, or III operation; however, employees who perform maintenance and custodial activities will receive Asbestos Awareness Training annually due to the nature of their work.

7.4 Other University Employees

All other university employees will receive training to inform them about the presence of ACM or PACM within their building. This training will include the possible location of the ACM or PACM, prohibited activities, steps necessary to prevent disturbance, and procedures regarding fiber release episodes. This shall be completed during new employee orientation.
APPENDIX A: ASBESTOS INVENTORY CONTROL REPORT
## UNC GREENSBORO
### ASBESTOS INVENTORY CONTROL REPORT

| Prepared by: ____________________________ | Action Date: ____________ |

**Action Taken:**  
- [ ] Additional Testing  
- [ ] Abatement/Removal  
- [ ] Encapsulation  
- [ ] Other (describe)

<table>
<thead>
<tr>
<th>Building Name/Building Number:</th>
<th>Room/Area:</th>
<th>Work Description:</th>
</tr>
</thead>
</table>

**Reason for Action:**  

<table>
<thead>
<tr>
<th>Quantity Removed:</th>
<th>Monitor: Name: ____________________________</th>
<th>Address: ____________________________</th>
</tr>
</thead>
</table>

| Abatement Contractor: Name: ____________________________ | Address: ____________________________ |

| Landfill: Name: ____________________________ | Address: ____________________________ |

**DEHNR Permit #**  
Fee: $________

**Attachments (as applicable):**  
- [ ] Permit  
- [ ] Final Report  
- [ ] Waste Manifest  
- [ ] Photographs  
- [ ] Other (describe)  
- [ ] Design

**Routing:**  
Received EHS Initial: ____________ Date: ____________

Received Inventory Manager: Initial: ____________ Date: ____________

Entered in Inventory System: Initial: ____________ Date: ____________

Returned to EHS Initial: ____________ Date: ____________

Archived by EHS Initial: ____________ Date: ____________