Hampshire College

Asbestos Management Policy

**September 2016**

**Background**

Asbestos is a naturally occurring fibrous mineral that is found in many products. Initially, it was thought to be a remarkable product because it is fireproof, very strong, and could be used in many applications ranging from plaster and other building materials to being woven into fabrics. Asbestos is known to cause serious adverse health effects including asbestosis, mesothelioma, and lung cancer.

**Purpose**

Hampshire College personnel are not expected or authorized to perform asbestos abatement, cleanup work or any task that will disturb asbestos. The purpose of this plan is to ensure that Hampshire College employees understand the hazards of asbestos exposure and are aware of the proper procedures that must be followed when cleaning, maintenance, repair, or any type of work that may potentially disturb asbestos must be performed. Additionally, Facilities & Grounds must be certain that renovation and new construction materials installed either by Hampshire College personnel or outside contractors do not contain asbestos. The ultimate goal of this plan is to protect the environment and the health of the entire college community.

**Important Definitions**

Asbestos: includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that has been chemically treated and/or altered.   
  
Asbestos-containing material (ACM):any material containing one percent or more of asbestos.

Presumed Asbestos Containing Material: thermal system insulation (TSI) and surfacing material found in buildings constructed no later than 1980.

**Regulatory Compliance**

Asbestos is regulated in Massachusetts by the Department of Environmental Protection (DEP) and the Department of Labor Standards (DLS). Federally, Asbestos is regulated by the Occupational Safety and Health Administration (OSHA), and the Environmental Protection Agency (EPA).

Asbestos is still mined and asbestos-containing products continue to be manufactured. EPA does not monitor distribution and processing of asbestos containing products; therefore, it is of the utmost importance that Facilities & Grounds read all product literature, including Safety Data Sheets, before purchasing and installing any building materials.

**Asbestos Coordinator**

The Facilities & Grounds Carpenter Foreman will serve as the Hampshire College Asbestos Coordinator. The Asbestos Coordinator is responsible for ensuring that affected Hampshire College personnel are trained. The Asbestos Coordinator provides all records of asbestos abatement and sampling results to the Office of Environmental Health & Safety so they can be recorded in the Hazardous Materials Database. Prior to any renovation work that may disturb asbestos, asbestos removal, repair, cleanup, or other asbestos-related activity, the Asbestos Coordinator must be notified. The Asbestos Coordinator must inform building occupants and Campus Police when asbestos abatement will be conducted in areas of occupied buildings. The Asbestos Coordinator must assess the condition of asbestos, investigate reported concerns, and take appropriate action if asbestos is found to be in a damaged or deteriorating condition.

**Training**

Hampshire College employees that may come into contact with asbestos will receive Asbestos Hazard Awareness Training. This training will consist of:

* Health effects of asbestos exposure.
* Locations of Asbestos-Containing Materials (ACM) and Presumed Asbestos-Containing Materials (PACM).
* Recognition of ACM and PACM damage and deterioration.
* Housekeeping requirements.
* Proper response to fiber release episodes.

Training will be conducted initially for new employees and reviewed annually for all affected employees during safety training refreshers.

**Suspect Asbestos-Containing Materials**

All building materials will be assumed to contain asbestos if they were purchased or installed prior to 1980. These materials will be assumed to contain asbestos unless the College has records indicating the materials in that specific location were sampled and results indicate that they are negative for asbestos. Suspect materials can only be removed or disturbed by a licensed asbestos contractor, unless samples taken by an Asbestos Inspector prove the material does not contain asbestos.

**Procedures**

Hampshire College employees are not, at any time, permitted to remove or otherwise disturb asbestos. The main responsibility of our employees is to recognize asbestos or the potential that a material may contain asbestos, and to contact their Supervisor with any questions or concerns involving asbestos. Supervisors will contact the Asbestos Coordinator for evaluation.

Repair/Renovation Work: All scheduled repair and renovation work must first be cleared by the Asbestos Coordinator to ensure that asbestos-containing materials will not be disturbed. Examples of activities that cannot be performed by Hampshire College personnel are listed below. If renovation and repair work cannot be accomplished without disturbing asbestos-containing materials, the Asbestos Coordinator will arrange for an Asbestos Contractor to perform the work, or otherwise abate the asbestos so that Hampshire College personnel can safely perform the repair or renovation work.

Emergency Asbestos Work: An Asbestos Contractor will be immediately called in the event of an asbestos emergency. Any incident that causes the release of asbestos fibers when proper containment measures are not in place will be considered an emergency. Examples of emergencies are the discovery of asbestos debris on the floor, flooding or water damage that causes asbestos floor tile to pop up and break, or a leak in a pipe insulated with asbestos. An Asbestos Contractor will be immediately called in the event of an asbestos emergency. Facilities & Grounds must shut down the HVAC system to prevent asbestos fibers from contaminating other areas and, if possible, shut off the steam or water lines, if the emergency involves a leak. While waiting for the Asbestos Contractor, Facilities & Grounds personnel must ensure their safety and that of others by staying out of, and preventing people from entering, the asbestos emergency area.

*Prohibited Activities*

* Removing, sanding, cutting, hammering, or drilling through asbestos-containing flooring, wall, fire door, and ceiling materials.
* Work that will disturb pipe and other mechanical or thermal systems insulation.
* Dry-sweeping mechanical rooms or areas that may contain asbestos materials.
* Dry-buffing or dry-stripping asbestos-containing flooring materials; (only wet stripping methods can be done using low abrasion pads at speeds below 300 rpm).

**Classes of Asbestos Work**

Class I asbestos work: activities involving the removal of TSI and surfacing (sprayed-on, troweled-on, or otherwise applied) ACM and PACM.   
  
Class II asbestos work: activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.   
  
Class III asbestos work: repair and maintenance operations, where ACM, including TSI and surfacing ACM and PACM, is likely to be disturbed.   
  
Class IV asbestos work: maintenance and custodial activities during which employees contact, but do not disturb, ACM or PACM.

An Asbestos Contractor will perform all Class I, II, and III work. Hampshire College employees are only allowed to perform Class IV work that does not involve disturbing asbestos or cleaning asbestos contamination.

**Asbestos Contractor**

Hampshire College will contract the services of a licensed Asbestos Contractor for all asbestos removal, clean up and emergency abatement work. The Asbestos Contractor must comply with all applicable regulations pertaining to asbestos and must provide the College with a detailed documentation report, including waste disposal records, and post abatement inspection and air clearance testing, if applicable, for all asbestos work done. All Contractors must work in a manner that protects the environment and all members of the Hampshire College community.

**Asbestos Consultants**

A licensed Asbestos Inspector will take samples, when required, to determine whether or not materials contain asbestos. Samples will be analyzed by an accredited laboratory. A certified Asbestos Management Planner may be contracted to develop asbestos removal specifications or project designs for large-scale or other projects. A certified Asbestos Project Monitor will be on site to conduct a post abatement visual inspection and, when required, final air clearance sampling after an abatement project and will provide the Asbestos Coordinator with the original, complete report, including project log and results from the certified laboratory. The Asbestos Consultant is responsible for all aspects of regulatory compliance pertaining to their services and, when contracted as a full time, on-site monitor, must ensure that the Asbestos Contractor is in compliance with all applicable regulations.

**Program Review**

This program will be reviewed periodically by the Asbestos Coordinator and the Office of Environmental Health & Safety to ensure compliance with applicable regulations. Additionally, annual training sessions with affected employees create the opportunity to evaluate our program to determine if procedures outlined are being adhered to and if there is new information or guidelines that can be implemented to improve this policy and our overall safety efforts.

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