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Standard:
CMS:

MESSIAH COLLEGE
Asbestos Operations and Management Program
Policy and Procedure

Policy It is the policy of Messiah College to facilitate the management of asbestos-containing materials (ACM) in a manner consistent with the Occupational Safety and Health Administration (OSHA) Standard 29CFR1910.1001 regarding work practices, and the Environmental Protection Agency (EPA) rules (40CFR763.114) governing exposure to and the handling and disposal of asbestos, in order to ensure the safety of employees, visitors, and residents.

Objectives 1. To control, and properly handle and dispose of ACM.
2. To provide appropriate communication to employees, visitors, and residents regarding asbestos related issues.
3. To continue this program until all ACM is removed from the campus.

BACKGROUND

Facility Maintenance A campus-wide assessment designed to identify the location and condition of ACM was conducted by Environmental Hazard Consultants in 2006. The facility assessment included an onsite physical inspection of all facilities owned by Messiah College at that time. It included locating materials suspect ACM. A complete copy of this report is located in the Lenhart Resource Room.

Some sampling of suspect ACM was gathered and compiled in sufficient detail to differentiate between materials containing asbestos as opposed to those which did not (i.e., containing less than 1% asbestos). The intent of the facility assessment was to provide information that will facilitate an effective operations and maintenance program. In addition to this documentation, Comprehensive Safety Compliance provided narrative detailing the physical condition of the materials identified for each facility.

As a continuation of the initial campus-wide ACM survey, whenever Messiah College purchases an existing structure, or

as a result of operations exposing heretofore unknown possible ACM in buildings previously surveyed, the acquired structure or the exposed material is surveyed. Any suspect ACM that may be found is documented as to type of material, condition (i.e., friability), and location.

Suspect and known ACM is treated the same way in regard to the operations and maintenance functions. When abatement is considered, suspect ACM is treated as known ACM or tested and treated in a manner consistent with the results of such tests.

Operations and Maintenance of Asbestos

Improper removal can create a dangerous situation where none previously existed. In this regard, the operations and maintenance program is designed to reduce exposure to ACM by performing abatement activities by employing only licensed and Pennsylvania Department of Environmental Protection (PaDEP) certified Asbestos Removal Contractors. In addition, the operations and maintenance program will help to ensure that exposure to asbestos-containing materials is below the regulatory safety guidelines established by OSHA.

Work Practices

The fact that employees will not be directly involved in abatement activities significantly reduces the need for special work practices. Further, the operations and maintenance program will help to ensure that the work environment does not present the risk of exposure to asbestos-containing materials at a level that exceeds OSHA guidelines. To complement these efforts, specific work practices will be developed to control the disturbance or damage of asbestos-containing materials. The Facility Maintenance Service Manager is a licensed asbestos abatement employee of the college.

Emergency Response

Emergency actions will be implemented when exposure levels exceed the action level prescribed by OSHA. Where such exposure is suspected, access to the area will be restricted until air monitoring can be conducted by an independent environmental testing lab in order to determine the actual hazard level. Depending upon location, the immediate shut-down of air handling systems might be required to assist with controlling any release. Immediate abatement will be considered where measures to control release and limit exposure restrict business activities or where such measures do not ensure the continued safety of employees, visitors, and residents.

Call Emergency Response Telephone Number on Shipping Paper first. If Shipping Paper not available or no answer, refer to appropriate telephone number listed on the inside back cover

(e.g., CHEMTREC 800-424-9300, DEFENSE LOGISTIC AGENCY 800-851-8061). National Response Center (1-800-424-8802), PA Emergency Management Agency (1-800-424-7362) and 3E Company (1-800-451-8346).

Abatement

Abatement activities will be considered when there is reason to suspect that asbestos-containing materials will be, or have been, damaged or disturbed in such a way as to create potential exposures greater than the OSHA prescribed limits. Further, abatement will be considered wherever significant renovation or construction work is planned.

Abatement work will be conducted only by outside firms licensed and PaDEP certified to perform asbestos abatement or the Facility Maintenance Service Manager who is a licensed abatement service provider. Depending on the purpose and scope of abatement work to be conducted, outside abatement contractors will be chosen by Messiah College and may be managed by a general contractor in conjunction with an independent environmental testing lab, also of Messiah College's choice.

The Project Manager will oversee work required in order to prepare utilities for maintenance and abatement procedures. The Campus Events Manager will oversee the removal of any furniture or other objects that may be in the way of planned work or may become contaminated by the abatement process. Regardless of who oversees the abatement work, the following steps shall be followed:

1. A qualified abatement contractor will be selected in accordance with Messiah College's policy and the following guidelines:
 - a. Check references.
 - b. Conduct interviews.
 - c. Review insurance coverage.
 - d. Have the contractor write precise specifications, and then review them with the contractor.
 - e. Select the "best" contractor, not necessarily the lowest bidder.
2. The Project Manager will inspect the work site frequently throughout the day to ensure compliance with all prescribed work practices and worker protection measures, including:
 - a. Construction of a totally effective containment barrier around the entire work area, or the use of containment bags for wrapped insulation.
 - b. Providing reliable sources of electricity and water to the site by Facility Services personnel.

- c. Making sure the abatement contractor has provided proper worker change and decontamination facilities.
 - d. Seeing to it that all job specifications are being followed -- variations from them must be discussed with/approved in advance by the Messiah College representative overseeing the project or by higher level administrative personnel depending on any possible effect the changes may have on college operations/personnel.
 - e. Obtaining background air samples both inside and outside of containment by an independent environmental testing lab.
 - f. Obtaining personal air monitoring samples from workers in containment, either by the abatement contractor as part of the contract terms, or by an independent environmental testing lab.
 - g. Posting of asbestos hazard warning signs in appropriate locations during abatement.
 - h. Posting on site of all required permits and certifications as required by state and federal regulations.
 - i. Proper use of personal protective equipment (PPE), specifically respirators and Tyvek coveralls, by all workers inside containment.
 - j. Maintaining negative air pressure for the duration of operations until air clearances are obtained.
 - k. Properly bagging and labeling abated material with originator's (Messiah College's) address.
3. Abatement work will be stopped immediately if any condition of the worksite appears to be hazardous.
 4. The contractor should be released only after:
 - a. The work site has been thoroughly cleaned at least twice.
 - b. A visual inspection reveals the work specified was done and the site passes a visual test for abatement completion and cleanliness.
 - c. Air testing conducted has determined that the quantity of airborne fibers present in the air is within prescribed safe levels.
 5. The Project Manager will see that:
 - a. Disposal records received from the abatement contractor are reviewed to assure the ACM was disposed of properly ("cradle-to-grave" documentation will be included).
 - b. Complete records of all abatement activities are sent to his/her office to ensure that facility assessment information is updated. All records are to be kept on file forever, per PaDEP instructions.

- c. All related project documents are filed in the asbestos master file in the Facility Services building.

RESPONSIBILITY

Vice President for
Operations

The Vice President for Operations is responsible for:

1. Seeing to it that an assessment of the facility to identify the location and potential hazards of ACM has been completed and is on file in the Lenhert Resource Room.
2. For developing and consistently enforcing an operations and maintenance program designed to minimize the exposure of building occupants to asbestos materials by monitoring the condition of ACM and taking action as necessary.
3. Providing for effective and safe abatement of ACM where necessary.
4. Ensuring that staff members receive appropriate levels of training consistent with their roles in the Asbestos O & M Program.

Environmental Health
And Safety Manager

The Environmental Health and Safety Manager is responsible for:

1. Coordinating activities of key departments required to work with or near ACM to ensure safety and to maintain the effectiveness of the Asbestos O & M Program.
2. Seeing to it that staff working in areas containing ACM shall receive awareness level training. Such training will prepare these individuals for their responsibilities in the Asbestos O & M Program. Awareness level training will involve training on a variety of topics, including the following:
 - a. Asbestos health hazards.
 - b. Identifying asbestos-containing materials.
 - c. Safety guidelines for exposure.
 - d. Recognition of asbestos exposure risks.
 - e. Asbestos related regulatory requirements.
 - f. Work protection methods.
 - g. Emergency response procedures.

Environmental Health
And Safety Manager
And Project Manager

The Environmental Health and Safety Manager, in conjunction with the Project Manager must:

1. Contact an independent environmental testing lab to have any suspect ACM tested for any possible asbestos properties.
2. Maintain complete records of all abatement activities -- these are to be sent to the Facility Service office to ensure that facility assessment information is kept up-to-date. All records and related project documents are to be kept on file forever, per PaDEP instructions, in the asbestos master file in the Lenhert Resource Room.

Manager of
Facility Maintenance,
Project Manager,
and Campus Events

The Facility Maintenance Service Manager, Project Manager, and Campus Events, are responsible for:

1. Reviewing work assignments to determine if such assignments are likely to damage or disturb ACM. Managers are responsible for ensuring that workers under their direction are not exposed to asbestos at or above the permissible exposure levels established by OSHA. In order to minimize the risk of staff member exposure due to the likelihood of damage or disturbance, the Project Manager will contact a qualified abatement contractor and a certified, independent environmental testing lab to arrange for the proper removal of the ACM before such work assignments are permitted to begin. The Managers, in conjunction with the Project Manager, will also hold outside contractors/vendors to the same safety standards by reviewing the scope of their work before construction or demolition may begin.
2. Information gathered from this Asbestos Operations and Maintenance Program (Asbestos O & M Program) -- it will be used to update the facility assessment to ensure current, accurate information on the location and condition of asbestos-containing materials. This information will be maintained in the Lenhert Resource Room.
3. Providing training for all of their staff members in order to facilitate the implementation of this program with the goal of significantly reducing the likelihood of the unnecessary disturbance of ACM. The Facility Service Manager is to consider if work is likely or unlikely to cause disturbance of ACM -- all work likely to cause such a disturbance must be preceded by appropriate abatement activities. If a material is suspected to be ACM, that material must be sampled and tested for asbestos content (if any), and then be required to

Project Manager

The Project Manager is responsible for:

1. Continuing the initial campus-wide asbestos assessment. Whenever Messiah College purchases an existing structure, or as a result of operations exposing heretofore unknown possible ACM in buildings previously surveyed, the acquired structure or the exposed material is initially surveyed by the Fire and Safety Systems Coordinator, and then if necessary, by an independent environmental testing lab. Any suspect or actual ACM that may be found is documented as to its form, condition, and the type of ACM and its location.
2. Arranging for abatement and removal of any ACM in areas where it may become disturbed or damaged, and thereby presents a significant risk of exposure at or above the safety exposure guidelines.
3. Arranging for an independent environmental testing lab for purposes of positive identification of ACM through bulk sampling and air samples, and documentation of such. The Project Manager will also arrange for such a lab to serve as the college's representative and environmental hygienist to monitor safety operations of any asbestos abatement project, as well as perform all necessary air monitoring and other regulated activities related to such a project.

NOTE: Air monitoring represents an important part of the overall surveillance program. An independent environmental testing lab will conduct air monitoring wherever staff members might receive significant exposure to asbestos fibers. In general, air monitoring will be used to ensure that staff exposure is below regulatory safety guidelines. Where exposure levels are at or above those safety guidelines, immediate actions will be taken to eliminate the risk of such exposure.

Director of Human Resources

Beyond the information gathered to update the facility assessment, the Director of Human Resources is responsible for maintaining other records according to regulatory requirements. Copies of these records are to be kept on file in the Lenhert Resource Room in the asbestos master file room.

1. Personal air sampling records will be maintained for at least thirty (30) years.

2. Medical records for staff members subject to the medical surveillance program will be maintained for one year beyond the last date of each workers employment.
3. Data used to qualify for exemptions from initial monitoring requirements of the OSHA will be maintained for the duration of the exemption.
4. Staff members' training records will be maintained for one year beyond the last date of each workers' employment.

Approved Reviewed Revised Kathrynne Shafer
 Date 5/5/10 Kathrynne Shafer, Vice President for Operations

Approved Reviewed Revised Amanda Coffey
 Date _____ Amanda Coffey, Director of Human Resources

Approved Reviewed Revised Bradley A. Markley
 Date _____ Brad Markley, Director of Facility Services

Approved Reviewed Revised Cindy Burger
 Date 5-4-10 Cindy Burger, Director of Safety

Approved Reviewed Revised Dan Smith
 Date 4-28-10 Dan Smith, Facility Maintenance Service Manager

Approved Reviewed Revised Russell J Ehrich
 Date _____ Russ Ehrich, Project Manager

Approved Reviewed Revised Scott Zeigler
 Date 4/29/10 Scott Zeigler, Manager of Campus Events

Approved Reviewed Revised Hilary Kreider
 Date 4/28/10 Hilary Kreider, Environmental Health and Safety Manager

"Note - The signed copy of this procedure is filed in the Facility Service Department. By signing this policy you have agreed to enforce the contents and adhere to standards".

Appendix A

All individuals involved in building inspections, developing management plans, designing projects, and/or individuals that may come into contact with Asbestos shall attend an initial training within thirty days of hire and shall attend an annual ACM training program.

List of Individuals that Require annual training		
Work Center	Name/Title	Type of Training
Operations	V.P. of Operations	ACM Training
Human Resources	Director of Human Resources	ACM Training
Building and Property Services	All Employees	ACM Training
Campus Events	All Employees	ACM Training
Department of Safety	All Employees	ACM Training

