



Asbestos Management Plan (Operations and Maintenance Plan)

**Office of Environmental
Health & Safety**

Revised February 2012

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Introduction

The Cleveland State University Asbestos Management Program has been developed to comply with the requirements of the Occupational Safety and Health Administration (OSHA) Asbestos Standards for General Industry (29 CFR 1910.1001) and Construction (29 CFR 1926.1101), the Environmental Protection Agency (EPA) Title 40 Parts 61 and 763, and the Ohio Department of Health (ODH) found in the Ohio Administrative Code's Final Rule 3701-34.

Cleveland State University is committed to the health and safety of the entire campus community (employees, students and visitors). The presence of asbestos-containing material (ACM) in some University Buildings has been established through survey and inspection procedures. The objectives of this asbestos management program include, but are not limited to, the inspection and identification of asbestos-containing materials (ACM), hazard communication, training, and maintenance and repair or removal of ACM in University-owned facilities. This program is intended protect employees, students and visitors from potential health hazards associated with asbestos, and to ensure ACM will be handled in compliance with all applicable federal, state and local regulations.

Scope

The Cleveland State University Asbestos Management Program is administered by the Office of Environmental Health & Safety. The Departmental Director, in the capacity of EHS Compliance Officer, serves as the University Asbestos Coordinator. Program requirements apply to all University-owned buildings and employees (including contracted employees) performing maintenance, repair and housekeeping services. In addition, all capital planning, construction, renovation and demolition projects are subject to the provisions of this program. Facilities Management Staff and Project Managers shall contact the Office of Environmental Health & Safety early in the planning stages of a project to reduce the potential for regulatory liability and to ensure an adequate source of funding in the project budget to address asbestos issues. The University Asbestos Coordinator shall be consulted and/or notified prior to physically disturbing any building material, structure or other potentially ACM.

I. Program Administration

The Office of Environmental Health & Safety shall be responsible for administration of the University Asbestos Management Program. Various departments across campus may be affected by the provisions of this program, including but not limited to:

Facilities Management (Building Maintenance, Building Services, Environmental Operations), Utilities, Office of University Architects, Fire Prevention and Security, Informational Service and Technology (IS & T) and University Police Department.

A. Environmental Health & Safety – Asbestos Management

The Office of Environmental Health & Safety is responsible for the development, implementation and administration of the University Asbestos Management Program, including but not limited to:

- Asbestos Management Program development, direction and implementation
- Developing, implementing, and conducting and/or facilitating appropriate asbestos training programs
- Coordinating response to all emergencies on campus involving ACM
- Conducting and/or supervising all asbestos building surveys and inspections
- Reviewing all asbestos abatement projects for compliance
- Management and Oversight of activities performed by asbestos consultants
- Maintaining all records and documentation pertaining to asbestos compliance

The Program Administrator is Bob Grindley, B.A., CHCM, CHS, CHSP, Director of Environmental Health & Safety and University EHS Compliance Officer. The Program Administrator maintains certification in the State of Ohio as an Asbestos Hazard Evaluation Specialist (AHES) and Asbestos Project Designer (APD).

Assistance in asbestos program management is provided by Robert Howerton, B.S., AHES, CHMM, Environmental Health and Safety Officer. Robert maintains certification in the State of Ohio as an Asbestos Hazard Evaluation Specialist (AHES).

Additional assistance in asbestos program management is provided by Juliet Cooper, M.S., PE, CHMM, CSP, AHES, Environmental Health and Safety Officer. Juliet maintains certification in the State of Ohio as an Asbestos Hazard Evaluation Specialist (AHES).

II. Permissible Exposure Limit (PEL)

OSHA has established the permissible exposure limit for airborne concentration of asbestos above which no employee may be exposed at 0.1 fibers per cubic centimeter (f/cc) as an eight (8) hour time-weighted average.

In addition, a short-term exposure limit (STEL) for asbestos as averaged over a sampling period of thirty (30) minutes at 1.0 f/cc.

III. Location of Asbestos-Containing Material (ACM) on Campus

The University has conducted a survey and inspection of its buildings for ACM. Evidence has been documented that the following University Buildings contain ACM:

Advanced Manufacturing Center	Main Classroom
Advanced Manufacturing Annex	Mather Mansion
Art Building	Physical Education
Baker's Union	Plant Services
CAMP Building	Rhodes Tower
Chester Building/Annex	Science Building
Cole Center (Campus International)	Science Research Building
Corlett Building	Stilwell Hall (Fenn Hall)
Doan Electric	Student Center
Field Locker Building	University Bookstore
Law Building	

IV. Classification of Asbestos Work

The Occupational Safety and Health Administration (OSHA) classifies' work involving ACM into four classes:

Class I Asbestos Work – activities involving the removal of thermal system insulation (TSI) and surfacing asbestos containing material (ACM) and presumed asbestos containing material (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 thermal system insulation 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 and PACM and activities to clean up dust, waste and debris resulting from Class I, II and II activities

V. Class I, II, and III Asbestos Work

A. Environmental Operations (Facilities Management)

Environmental Operations (Facilities Management) conducts maintenance in areas known to contain ACM, repairs ACM that may become damaged during maintenance, and performs minor abatement. Designated individuals assigned to these tasks possess appropriate certification, hold state licensure and receive training applicable to the specific asbestos-related tasks performed. Persons are qualified to perform Class I, II and III work as defined by the Occupational Safety & Health Administration (OSHA). Team members are provided medical exams, training and licensing on an annual basis, and participate in the University Respiratory Protection Program. Designated members:

- *Perform maintenance and repair of all material known to contain ACM
- *Obtain and maintain equipment necessary for asbestos-related projects
- *Respond to emergencies involving ACM and potential fiber releases
- *May abate ACM if amounts are determined to be less than 260 linear, or 160 square feet. Abatement activities referenced are to be considered those that involve routine maintenance activities. Asbestos abatement related to renovations and capital improvement projects may be performed based on staff availability, with the cost of such abatement to be assessed to the project budget
- *May supervise the maintenance, repair and abatement of ACM if work is performed by a licensed outside contractor
- *May provide consultation and advisement for campus asbestos projects within scope of training
- *Coordinate removal and disposal of all asbestos-containing material with the Office of Environmental Health & Safety

Environmental Operations (Facilities Management) reserves the right to assess charges to departments and/or projects for any asbestos abatement or clean up costs associated with their failure to adhere to the policies and provisions of the University Asbestos Management Program.

Environmental Operations (Facilities Management) personnel involved in the Asbestos Management

Program possesses training as Class I Workers (except the Director):

Shehadeh Abdelkarim.....	Director of Facilities Management
Mark Cunningham.....	Asst. Director of Facilities Management
Karl Bassett.....	Crew Leader
Gary Ciomek.....	Air Quality Technician 2
Neal Johnson.....	Air Quality Technician 2
Andrew Pankuch.....	Air Quality Technician 2
Mike Gilligan.....	Air Quality Technician 3
Thomas Herman.....	Air Quality Technician 3
Robert Kendrick.....	Air Quality Technician 3
Lisa Milota.....	Air Quality Technician 3

B. Building Maintenance (Facilities Management)

Building Maintenance has opted to address all work with asbestos containing material for which they are responsible, including repairs and maintenance by contracting the work out to a licensed asbestos abatement firm whose employees possess the appropriate training and certification under OSHA.

No university employee assigned to this Department shall disturb any asbestos containing building material as part of their duties

C. Utilities

Utilities has opted to address all work with asbestos containing material for which they are responsible, including repairs and maintenance by contracting the work out to a licensed asbestos abatement firm whose employees possess the appropriate training and certification under OSHA.

No university employee assigned to this Department shall disturb any asbestos containing building material as part of their duties

D. Outside Management Firms

Certain Buildings are managed by outside firms under contract with CSU. Currently the buildings and respective management firms are:

University Bookstore.....	Nebraska Book Company
Fenn Tower.....	American Campus Community
Student Center.....	Chartwell
Euclid Commons/Heritage Hall.....	American Campus Community
Wolstein.....	Global Spectrum

E. Outside Contractors

Many University departments may facilitate work that is performed by outside contracted employees. All University departments, including those identified in this management plan are responsible for notifying all outside contracted employees in writing of the presence and location of asbestos containing materials in their respective buildings. University representatives shall facilitate the outside contractor's signature on an Acknowledgement of Receipt Form (Appendix B) when providing asbestos documents to outside contracted companies. These departments may obtain information about asbestos in their buildings by contacting the Office of Environmental Health and Safety.

VI. Class IV Asbestos Work

There are certain departments where designated employees are not required to handle, but may work around, contact, and subsequently be impacted by the presence of ACM (defined as Class IV Work by OSHA). Employees of these departments receive two (2) hour Asbestos Awareness Training on an annual basis.

Should any activities managed by these departments be assigned to outside contractors, and the proposed project involves work in areas known to have ACM, departmental personnel are responsible for providing information to these contractors regarding the presence of ACM, and for notifying the Office of Environmental Health & Safety in prior to any work being performed.

These departments include, but are not limited to:

A. Building Maintenance (Facilities Management)

Building Maintenance (Facilities Management) has responsibility for the installation, operation and maintenance of plumbing systems, lighting and fixtures, glass replacement, signage, painting and keys. Such duties can result in employees entering and performing work in areas known to have ACM.

B. Building Services (Facilities Management)

Housekeeping, janitorial and moving activities are provided by Building Services (Facilities Management) on a daily basis. Employees clean all areas of campus, polish and wax floors, remove trash and move equipment across campus. Employee activities may involve cleaning areas known to have ACM.

C. Office of the University Architect

The Office of the University Architect is comprised of Architects and related staff that facilitate and manage building construction and renovation projects on campus. Personnel serve as Project Managers and may frequently perform site visits to oversee and ensure work progress.

D. Fire Prevention & Security

Fire Prevention & Security, through maintenance, repair and inspection, ensures proper functioning of life safety systems including, but not limited to sprinklers, fire extinguishers and other suppression equipment, fire alarms, and security surveillance and alarm systems. Such building systems may be located in areas that contain ACM.

E. Information Services & Technology (IS & T)

The Department of Information Services and Technology (IS & T) is responsible for ensuring the availability of technology resource systems (computers, telephones, wireless campus, etc...) to the campus including installation, maintenance and repair, and security for those systems. As part of these activities, employees may be required to work in areas where ACM are present.

F. University Police

The University Police Department is charged with the responsibility for providing a safe and secure environment for the entire campus community. Their routine patrol of, and emergency response to, campus buildings covering over five million square feet may result in officers being required to be present in areas where ACM are present.

G. Utilities

Utilities maintains and distributes energy services to campus buildings including, but not limited to steam, electricity, domestic water, gas, and storm water and sanitary waste removal. Utility distribution systems may be located in areas that contain ACM.

VII. Building Inspection and Surveillance of Asbestos Containing Material on Campus

A. Existing Buildings

A survey identifying the location of ACM in existing campus facilities has been performed. Survey reports (one for each campus building) also includes a list of homogenous materials, lab reports, assessment of condition and hazard potential of ACM, and approximate square or linear footage. Written reports also include photographs and a floor plan of every building that illustrates the location of ACM.

Copies of building inspection reports have been provided to the following campus offices:

- Environmental Health and Safety
- Environmental Operations (Facilities Management)
- Building Maintenance (Facilities Management)
- University Architect
- University Police
- Utilities

In addition, copies of asbestos building inspections have been provided to outside contracted management firms for the buildings they are assigned to manage:

- Viking Hall
- Student Center
- University Bookstore
- Identified Areas of:
 - Business College
 - Law Building
 - Rhodes Tower
 - Stilwell Hall (Fenn Hall)

IMPORTANT: University representatives shall facilitate the outside contractors signature on an Acknowledgement of Receipt Form (Appendix B) when providing asbestos documents to outside contracted companies.

Campus buildings shall be subject to re-inspection every three years by an accredited building inspector.

B. New Construction

It is recommended that new construction/remodeling projects include costs for sampling of building material to be used in the project prior to installation, eliminating the need for a full building/area survey upon completion.

VIII. Work Practices

Work Practices are established as being performed by two major groups:

- CSU Employees
- Contracted Employees

CSU Employees

Building construction and/or renovation activities physically performed by CSU Employees are to take the following actions prior to beginning any construction and/or renovation activities:

1. Upon receipt of a Service Request and/or Work Order, responsible department shall review the Building Inspection Report for that building room/area to verify the presence or absence of ACM. This is done by the Foreman/Supervisor/Project Manager.
2. If the building area/room is indicated as not having any ACM, work may then proceed.
3. If the building area/room is slated for abatement of ACM (Class I and II Work), the employees shall:
 - a. Follow procedures as set forth by OSHA for Class I and II Work including but not limited to use of wet methods, flame resistant polyethylene film six (6.0) mil in thickness, glove bagging, erecting critical barriers, modification/isolation of building ventilation system to that area, air filtration devices (AFDs), providing for a minimum of four (4) air exchanges per hour, maintaining a negative pressure differential of at least or in excess of 0.02 inches of water
 - b. Coordinate such activity with the Office of Environmental Health and Safety
 - c. Provide notification to regulatory agency of jurisdiction at least ten (10) days prior to performing the work where applicable
 - d. Provide a qualified "competent person" as defined by OSHA is present and supervises the work
 - e. Establish a regulated area where airborne asbestos is likely to exceed the PEL and post warning signs bearing the following information:

**DANGER
ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY
RESPIRATORY AND PROTECTIVE CLOTHING
ARE
REQUIRED IN THIS AREA**

- f. Wear appropriate disposable personal protective clothing that may include coveralls or similar whole-body clothing, head coverings, gloves and foot coverings, and adhere to decontamination procedures set forth by OSHA.
 - g. Wear respiratory protection, in conjunction with the University's Respiratory Protection Program, unless a negative exposure assessment has been performed or air monitoring has demonstrated the permissible exposure limit for asbestos has not been exceeded.
 - h. Perform daily air monitoring for employees working in a regulated area
 - i. Facilitate clearance monitoring before returning the room/area to use
 - j. Report any other damaged ACM in the area immediately to Environmental Health and Safety
4. If the building area/room is indicated as having ACM, and the work activity and/or repair involves disturbing existing ACM (Class III Work), then the employees shall:
- a. Follow procedures set forth by OSHA for Class III Work which includes but is not limited to wet methods and local exhaust ventilation, when feasible. If necessary, isolate the area from the building HVAC system
 - b. Wear appropriate disposable personal protective clothing that may include coveralls or similar whole-body clothing, head coverings, gloves and foot coverings, and adhere to decontamination procedures set forth by OSHA.
 - c. Where drilling, cutting abrading, sanding, chipping, breaking or sawing thermal system insulation takes place, employees shall employ the use of impermeable drop cloths, glove bag systems, small enclosures or other effective means of isolation and techniques that will reduce fiber release
 - d. Wear respiratory protection, in conjunction with the University's Respiratory Protection Program, unless a negative exposure assessment has been performed or air monitoring has demonstrated the permissible exposure limit for asbestos has not been exceeded.
 - e. Report any other ACM that is observed to be damaged in the area immediately to Environmental Health and Safety.
5. If the building area/room is indicated as having ACM and the work activity involves custodial activities (housekeeping, etc...), then employees shall:
- a. Exercise care when cleaning, buffing stripping, floor tiles that are known to have ACM
 - b. Do not sand or physically abrade ACM Floor Tile
 - c. Use wet methods, low abrasions pads at speeds less than three-hundred (300) RPMs

d. Report any additional ACM material that is observed to be damaged immediately to the Office of Environmental Health and Safety.

6. Floor tile shall be addressed in conjunction with the recommended procedures of the Resilient Floor Covering Institute (RCFI) – see Appendix C. Report any additional ACM material that is observed to be damaged immediately to the Office of Environmental Health and Safety

Contracted Employees

Contractors performing work in areas where asbestos-containing materials are present shall comply with all federal, state and local legislation pertaining to safely and compliantly working with asbestos containing material, including but not limited to the procedures set forth above. See CSU's Contractor Awareness Guide Section on Asbestos

IX. Disposal of Asbestos Containing Waste

All asbestos-containing waste material is to be wetted and placed in polyethylene bags (double-bagged) at least six (6.0) mil in thickness bearing the following information/labels:

First Label: In accordance with 29 CFR 1910.1200 (f) of OSHA's Hazard Communication Standard:

**DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
BREATHING AIRBORNE ASBESTOS, TREMOLITE,
ANTHOPHYLLITE, OR ACTINOLITE FIBERS IS
HAZARDOUS TO YOUR HEALTH**

Second Label: Provide in accordance with the U.S. Department of Transportation regulation on hazardous waste marking, 49 CFR parts 171 and 172, Hazardous Substances: Final Rule. Published November 21, 1986 and revised February 17, 1987:

**RQ (ASBESTOS)
CLASS 9
NA 2212
P.G.III**

University employees trained to work with and disturb asbestos containing material as part of their duties shall contact the Office of Environmental Health and Safety to manage the removal. All asbestos waste material shall be stored in secured area and disposed of using licensed transporters and disposal facilities.

Outside contracted employees shall be responsible for appropriate and compliant removal of asbestos containing material off campus. Waste manifests shall be provided to the contracting University department and copies to Environmental Health and Safety.

X. Employee Notification

Employees will be notified whenever applicable and prior to any work with asbestos containing material in their immediate or adjacent area.

XI. Labeling

Signage identifying the presence and location of asbestos containing materials shall be posted at the entrance to mechanical rooms or areas that contain thermal system insulation and surface asbestos-containing materials. Specific work practices to ensure the material is not disturbed shall also be present.

XII. Medical Surveillance

Designated individuals who possess certifications to perform Class I, II and III Asbestos Work participate in a medical surveillance program. Prior to performing asbestos work, individuals undergo a medical examination. Medical evaluations are performed by:

St. Vincent Charity Hospital
Occupational Medicine Center
2475 East 22nd Street Ste. 310
Cleveland, Ohio 44115

XIII. Respiratory Protection

Designated individuals who are required to wear respiratory protection are enrolled in the University's Respiratory Protection Program. Initially before assignment, and annually thereafter, workers undergo a qualitative fit test. All fit testing is performed by:

St. Vincent Charity Hospital
Occupational Medicine Center
2475 East 22nd Street Ste. 310
Cleveland, Ohio 44115

XIV. Training

Employees are provided required training based on the particular class of work they may perform:

Class I and II Asbestos Work – employees complete a 32-hour course addressing the performance of asbestos abatement activities. Course content includes background information pertaining to asbestos, health effects, personal protective equipment, respiratory protection, safe work practices, and regulatory requirements. Hands-on training in the use of protective equipment, asbestos removal techniques and preparation of an area for abatement work is also included. Class I and II Asbestos Workers may also perform Class III and IV asbestos activities.

Some employees are provided specialized training on removal of Class II flooring. These employees may remove and replace cracked/damaged floor tile that is non-friable only. Any floor tile that has become friable will be handled by other Class I and II Asbestos Workers.

Class III Asbestos Work (Operations and Maintenance) – employees complete a 16-hour course addressing asbestos activities which disturbs asbestos containing materials for the purpose of accessing building components and equipment. Course content includes background information pertaining to asbestos, health effects, legal issues, respiratory protection, work practices, supervisory skills, and regulatory requirements. Hands-on training in the use of protective equipment, asbestos removal techniques, and preparation of small work areas for abatement is also included. Class III Asbestos Workers may act as competent persons for Class III and IV asbestos activities.

Class IV Asbestos Work – employees complete a 2-hour awareness course

XV. Contractor Awareness

Contractors employed by the University shall be informed in writing by the University Representative for the project/repair of the location of suspect and known ACM in the area they are to perform work. University representatives shall facilitate the outside contractors signature on an Acknowledgement of Receipt Form (Appendix B) when providing asbestos documents to outside contracted companies. Contractors shall not disturb any suspect or known ACM unless their employees have received the appropriate training specified for the work, and if applicable hold the appropriate state license.

XVI. Emergency Response Procedures

Any campus building containing ACM is potentially subject to a fiber release episode. Employees are to adhere to the following protocol when reporting a potential fiber release in an area known to contain ACM:

1. Leave and secure the area in such a manner that prevents entry by unauthorized personnel.
2. Notify an immediate supervisor of the incident.
3. If in the area of fiber release, seek medical attention (be sure to fill out an accident/incident report)
4. Contact the Office of Environmental Health and Safety via the CSU Public Safety Answering Point (PSAP) – Campus Safety Dispatch by dialing 9-1-1 or 8, 9-1-1 from any campus phone. Cell phone users may also dial 9-1-1 and ask operator to be connected with CSU Police. The CSU Dispatcher will in turn contact the Asbestos Coordinator.
5. The Asbestos Coordinator will ensure area(s) have been properly secured, and facilitate a response by an external abatement contractor, or assign a trained in-house team to make repairs and clean up any debris in a timely fashion.
6. A post-incident review will be held to evaluate the response with applicable University Departments.

XVII. Recordkeeping

All documentation records pertaining to elements identified in this Asbestos Management Plan (Operations and Maintenance Plan) are maintained by the Office of Environmental Health and Safety that include, but are not limited to:

- Written Operations and Maintenance Plan
- Survey data, including building plans and drawings
- Notifications and labels
- Training Programs
- Written Respiratory Protection Program
- Any permits and information pertaining to maintenance and renovations performed, including emergency response
- Abatement Records

Appendix A

CSU Campus List of Buildings Surveyed for ACM

CSU Building	Address	ACM Present	Supervisor To Review Service Request/Work Order
Advanced Manufacturing Center	1751 East 23 rd	Yes	Yes
AMC Annex	1751 East 23 rd	Yes	Yes
AM Extension	East 25 th	Yes	Yes
Art Building	2301 Chester	Yes	Yes
Baker's Union Building	1870 East 19th	Yes	Yes
Chester Building	2300 Chester	Yes	Yes
Cole Center	3100 Chester	Yes	Yes
College of Business	1860 East 18 th Street	NO	NO
College of Urban Affairs	1717 Euclid	NO	NO
Convocation Center	2000 Prospect	NO	NO
Corlett Building	1935 Euclid	Yes	Yes
Doan Electric	1807 East 22 nd	Yes	Yes
Fenn Tower	1983 East 24 th	NO; ABATED WINTER 2004	Yes
Field Locker Building	1842 Payne	Yes	Yes
Field Services Building	1848 Payne	NO	NO
Health Sciences	2501 Euclid	NO	NO
Howe Mansion	2258 Euclid	NO; ABATED SPRING 2004	NO
Intramural Sports Center	1881 East 24 th	NO; ABATED WINTER 2004	NO
Kinko's	2112 Euclid	Yes	Yes
Law Building	1801 Euclid	Yes	Yes
Law Library	1801 Euclid	NO	NO
Main Classroom	1899 Euclid	Yes	Yes
Music & Communication	2001 Euclid	NO	NO
Physical Education	2451 Euclid	Yes	Yes
Plant Services	1802 East 25 th	Yes	Yes
Plant Annex	East 25 th	NO ABATED 2006	NO
Rhodes Tower	1860 East 22 nd	Yes	Yes
Science & Research	2351 Euclid	Yes	Yes
Science Building	2399 Euclid	Yes	Yes
Stilwell Hall	1960 East 24 th	Yes	Yes
Theater Arts	1833 East 23 rd	Yes	Yes
University Bookstore	2400 Euclid	Yes	Yes
Student Center	2121 Euclid	Yes	Yes
University Hall (Mather Mansion)	2605 Euclid	Yes	Yes
University Parking	1880 East 21 st	NO ABATED 2006	NO
Viking Hall	2130 Euclid	Yes	Yes
West Garage	1851 East 17 th	NO	NO

Appendix B

Acknowledgement of Receipt of Asbestos Documents



**Office of Environmental Health and Safety
Asbestos Management Program**

Acknowledgement of Receipt of Asbestos Documents

Date	Company	Representative	CSU Building	# of Copies

I acknowledge receipt of the following asbestos documents as identified above from Cleveland State University.

Company Representative Signature

Date

University Representative Name (Print)

Date

University Representative Signature

cc: Environmental Health and Safety Director

Appendix C

Recommended Work Practices for the Removal of Resilient Floor Coverings

Insert Document