



Policy Title:	Asbestos
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Policies Superseded:	FINA-706; HREO-1854
Policy Management Area(s):	Environmental Health and Safety

SUMMARY:

This policy outlines the University's policy and procedures for the discovery and handling of asbestos-containing materials located in campus buildings.

POLICY:

I. ASBESTOS INFORMATION

- A. Asbestos is the name of a group of silicate minerals that occur naturally in the environment. Asbestos fibers tend to possess good strength properties: flexibility; excellent thermal properties; adsorption capacity; and resistance to chemical, thermal and biological degradation. For these reasons, asbestos was used in the past in many building materials including floor tile, ceiling tile, plumbing and HVAC insulation, acoustical and decorative coatings, and roofing material. These types of building materials are presumed to contain asbestos if installed before 1980, unless testing has proven otherwise.
- B. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is a potential for exposure only when the material becomes damaged to the extent that asbestos fibers become airborne and are inhaled. Asbestos is more likely to release fibers when it is friable, meaning that the material can be easily crumbled. If powdered or friable forms of asbestos are disturbed and become airborne, an inhalation hazard may result. In non-friable materials like floor tile, ceiling tile, laboratory cabinet tops and caulks, the asbestos fibers are tightly bound in a matrix that prevents the release of fibers into the environment unless the material is abraded, sanded or sawed.
- C. For those exposed to asbestos, several factors may influence whether harmful health effects will occur. These factors include the dose (how much); the duration (how long); and whether the exposed individual smokes. Generally, adverse health effects from asbestos are the result of chronic (long-term) exposure to high concentrations of airborne asbestos fibers. According to the Environmental Protection Agency (EPA), airborne asbestos levels in buildings are typically much

lower than those identified in industrial workplaces.

- D. The following points summarize the asbestos risk assessment as determined and presented in congressional testimony by the EPA.
1. Although asbestos is hazardous, the risk to humans of asbestos-related disease depends upon exposure.
 2. Based on available data from across the nation, prevailing asbestos levels in buildings appear to be very low. Accordingly, the health risk faced by building occupants also appears to be very low.
 3. Removal is often not a building owner's best course of action to reduce asbestos exposure. In fact, improper removal can create a dangerous situation where one did not previously exist.
 4. The EPA only requires asbestos removal in order to prevent significant public exposure to asbestos such as might be present during building renovation or demolition.
 5. The EPA does recommend in-place management whenever asbestos is discovered. Instead of removal, a conscientious in-place management program will usually control fiber releases, particularly when the materials are not significantly damaged and are not likely to be disturbed.

II. ASBESTOS ADVISEMENTS

- A. When intact and undisturbed, asbestos building materials do not pose a health risk for building occupants.
- B. Damaged asbestos-containing materials should be reported to Environmental Health and Safety (EHS); never attempt to handle damaged asbestos. Specially trained personnel are needed to visit the area, determine if a suspect material contains asbestos and perform a hazard assessment.
- C. All work involving removal will be performed by licensed and certified workers in accordance with federal, state and local regulations. A permit from the South Carolina Department of Health and Environmental Control (SCDHEC) is required for asbestos removal operations. The contractor will conduct repair, maintenance or cleanup of asbestos-containing material.
- D. Adherence to applicable regulations is important to assure protection of workers, building occupants and the environment.

III. ASBESTOS MANAGEMENT PLAN

- A. In compliance with the Environmental Protection Agency (EPA), South Carolina Department of Health and Environmental Control (SCDHEC), and Occupational Safety and Health Administration (OSHA), the University has developed an Asbestos Management Plan (AMP) and documents the locations of asbestos on campus, the recommendations of asbestos corrective action, and any actions taken to repair or remove the material. The AMP also includes the following.
1. The name and address of each campus building, notation of whether the building holds asbestos-containing material, and if so, the type thereof.
 2. The date of the original building survey and inspection.
 3. Future plans for re-inspection.
 4. A blueprint or map that displays the area(s) where asbestos-containing materials are located in the building.
 5. A description of any corrective action or preventive measures taken to reduce asbestos exposure.
 6. Any analytical or sampling reports associated with asbestos identification and surveillance.
 7. The name, address and telephone number of the “designated person” or contact that ensures the mandates of the AMP are carried out.
 8. The method(s) used to inform students, employees and the public of inspections, re-inspections, corrective measures and periodic surveillance of asbestos-containing areas.
- B. The EPA’s Asbestos Hazard Emergency Response Act (AHERA) requires secondary and elementary schools to develop an Asbestos Management Plan (AMP) and to carry out the following actions. An institution of higher education would not normally be required to comply with AHERA; however, because the Scholars Academy High School is on CCU’s campus, we are required to follow the standards in AHERA with respect to “school buildings” associated with the high school. Accordingly, EHS, whose responsibilities include management of hazardous waste, and investigation and resolution of environmental concerns, will ensure compliance.
1. Perform an original inspection of buildings where high school student classes or activities may occur for asbestos-containing building material, implement appropriate action, and designate the affected buildings.
 2. Perform periodic building surveillance of known or suspected asbestos-containing building material areas every six months and implement appropriate action.
 3. Perform a thorough re-inspection of the asbestos-containing materials where present every three years and implement appropriate action.
 4. Develop an Asbestos Management Plan (AMP) to prevent or reduce asbestos hazards for the affected buildings. Update the AMP as needed due

to subsequent surveillance, inspection and/or asbestos-related actions taken, and to stay current with EPA modifications to AHERA. Maintain the AMP such that is easily accessible.

5. Submit a copy of the plan and details of any asbestos-related actions taken to the Horry County School District upon inception and after each triennial inspection.
 5. Provide annual notification to relevant students and employees of the University's AMP and any asbestos-related actions taken.
 6. Ensure that personnel working on asbestos-related projects are trained and accredited in accordance with the EPA's Asbestos Model Accreditation Plan.
 7. Ensure that employees whose work duties could potentially require them to operate in areas where asbestos-containing building material is present are trained in asbestos awareness.
- C. These requirements are founded on the principle of "in-place" management of asbestos-containing material. Removal of these materials is not necessary unless the material is severely damaged or will be disturbed by building demolition or renovation projects.
- D. If removal of asbestos during renovation is needed or if school buildings will be demolished, the University must comply with the Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP).