

## **ENVIRONMENTAL HEALTH AND SAFETY**

### **Environmental Programs: Asbestos**

#### **Purpose/General Discussion:**

Several diseases have been linked with industrial exposure to airborne asbestos, and the extensive use of asbestos products in buildings has raised concerns about asbestos in non-industrial settings. Due to these concerns, regulations have been developed that govern the handling and removal of asbestos-containing materials. OSHA regulations cover worker protection in the work place. Several EPA regulations cover asbestos. The Colorado Department of Public Health and Environment (CDPHE) enforces the EPA regulations along with their own regulations. CDPHE has the legal authority to enforce these regulations on the Mines campus.

Two major classes of activities regarding asbestos on the Mines campus are routine maintenance and renovation/demolition. In order to manage maintenance activities that may impact asbestos, the School has developed this program as an Operations and Maintenance program (O&M). In addition, Mines has established procedures to prevent asbestos exposure during renovation and demolition activities.

#### **Authoritative References:**

Regulation Number 8, Colorado Department of Public Health and Environment, The Control of Hazardous Air Pollutants, Part B, Emission Standards for Asbestos.

Title 40 Code of Federal Regulations 61, Subpart M, Environmental Protection Agency, National Emission Standards for Hazardous Air Pollutants; Asbestos NESHAP Revision; Final Rule.

Title 40 Code of Federal Regulations 763, Subpart E, Appendix C, Environmental Protection Agency, Asbestos Model Accreditation Plan; Interim Final Rule, Page 60.

Title 40 Code of Federal Regulations 763, Subpart G, Environmental Protection Agency, Worker Protection Rule, page 92.

Title 40 Code of Federal Regulations 763, Environmental Protection Agency, Asbestos-Containing Materials in Schools; Final Rule and Notice.

Title 29 Code of Federal Regulations 1926.1101, Occupational Safety and Health Administration, Asbestos in Construction.

## **Organizational Assignments/Responsibilities:**

### Environmental Health and Safety Department (EHS)

The Asbestos Coordinator/Program Manager (ACPM) is responsible for the development and implementation of the Operations and Maintenance Plan and for ensuring that requirements of Regulation 8 are properly implemented. The Mines Environmental Health Manager is the designated ACPM.

The ACPM is responsible for developing asbestos management plans and procedures.

Costs of training and medical surveillance for asbestos works will be the responsibility of the EHS Department.

### Facilities Management Department

The Director of Facilities Management is responsible for insuring that maintenance workers properly carry out management plans and procedures.

Facilities Management develops and maintains the Asbestos Abatement Team. The purpose of the Team is to respond to emergency asbestos situations. The Team consists of the ACPM, an asbestos trained supervisor, and three asbestos workers.

Costs of all Asbestos Abatement Team equipment, including personal protective equipment, will be the responsibility of Facilities Management.

Prior to building renovations, an inspection to identify asbestos containing materials must be performed on the areas affected by the renovation project. Inspectors certified by the Colorado Department of Public Health and Environment must be used to perform asbestos inspections.

### Capital Planning and Construction Department

Prior to building renovation and demolition projects, The Director of Capital Planning and Construction is responsible for identifying asbestos containing materials in the areas affected by the renovation or demolition project. Inspectors certified by the Colorado Department of Public Health and Environment must be used to perform asbestos inspections.

## **Discussion/Description:**

Operations and Maintenance (O&M) Program: The purpose of this O&M program is to cleanup asbestos fibers previously released, prevent future releases of asbestos fibers by minimizing Asbestos-Containing Materials (ACM) disturbance or damage, and monitor the condition of ACM.

Abatement Operations: Asbestos abatement operations are performed by the School's Asbestos Abatement Team and by outside contractors.

Mines Asbestos Abatement Team: The Mines Asbestos Abatement Team consists of the ACPM, an asbestos trained supervisor, and three asbestos workers. Plant Facilities workers staffs all positions but the ACPM. The EHS office staffs the ACPM position.

Asbestos Abatement Team members receive asbestos worker or worker/supervisor training. All Team members receive annual refresher training, respirator fit testing, and medical monitoring. The Environmental Health and Safety Department provides for training, fit testing, and medical monitoring.

The Mines Asbestos Abatement Team performs asbestos abatement operations under the supervision of the ACPM. The Mines Asbestos Abatement Team is limited to the performance of emergency asbestos-related jobs. Licensed asbestos abatement contractors perform asbestos abatement related to routine maintenance, remodeling, and renovation work.

Outside Contractors: Asbestos abatement operations performed by outside contractors are coordinated and approved by the ACPM before authorization is given to commence work.

Remodeling: Prior to conducting remodeling that would involve the removal of more than 260 linear feet of insulating material on pipes, 160 square feet of other surfaces, or the volume equivalent of a 55-gallon drum of building material, an asbestos inspection will be performed. The asbestos inspection will fulfill all of the criteria in Section V.C.- V.H of Regulation 8.

Prior to the start of remodeling or demolition work, a licensed asbestos abatement contractor will abate those asbestos-containing materials that will be impacted.