

Wellesley College Asbestos Management Program

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Policy

It is the policy of Wellesley College to maintain a safe and healthy work environment for students, staff, contractors and visitors. In recognition of the potential health problems associated with asbestos, and due to the widespread use in buildings constructed prior to 1980, the College is committed to the management procedures set forth in this Plan.

Buildings on campus contain various amounts and types of asbestos-containing material (ACM). The College will manage asbestos in place where appropriate, repair damaged asbestos if removal is not possible, remove it when damaged, or is part of a renovation/construction project, or is deemed a potential risk by Physical Plant and Environmental Health and Safety (EHS) staff.

This program applies to all individuals on the Wellesley College campus who may work around or near ACM and who may oversee construction and renovation projects that may impact ACM. This plan outlines guidelines regarding the day-to-day maintenance of asbestos and the planned or accidental disturbance of asbestos.

No Wellesley College employee will engage in the removal of ACM or any activities associated with OSHA's and or EPA's definition of Class I, II, or III workers. Only licensed contractors will be utilized for asbestos removal and repair activities. Employee will only engage in Class IV activities, which is where employees may come into contact with ACM but cannot disturb or clean-up ACM.

Impacts of Asbestos Containing Materials

Impacts to campus can be environmental, health, regulatory or financial. Other impacts may apply depending on the situation and or condition of ACM involved.

1. No ACM	No impacts
2. ACM in Good Shape	No environmental impact
Train employee	Evaluated on periodic basis to ensure integrity of material
Signage in place	Maintained in database
3. ACM Removal & or Repair	Recordkeeping Responsibilities
Contact agencies	Proper Disposal to ACM landfill
Communicate to building occupants	Hire licensed contractors
4. Release of Fibers	Report to Agencies
Potential human exposure	Medical Evaluation
Potential bad publicity	Clean up (taking into account removal issues noted above)

Compliance

The following regulatory standards can apply to the management of asbestos on campus.

- OSHA 29 CFR 1910.1001 – Toxic and Hazardous Substances - Asbestos
- OSHA 29 CFR 1910.120 – Hazard Communications
- OSHA 29 CFR 1926.1101: Construction Standard - Asbestos
- OSHA 29 CFR 1910.134: Respiratory Protection Standard
- US DOT Hazardous Material Regulation - 49 CFR Part 171
- MA DLWD 453 CMR 6.0
- MA DEP 310 CMR 7.09 & 7.15
 - Filing of BWP AQ04 – Asbestos Notification
 - Filing of BWP AQ06 (as needed) Construction/Demolition
- MA DEP 310 CMR 19.061 – Special Waste Disposal
- Policy # BWP-96-012: Non-Friable Asbestos Containing Material – For VAT and asphalt based roofing and siding products
- MA DEP 310 CMR 40.00 – Mass Contingency Plan (in the event of a release of fibers to the environment)
- MA DPH – State Sanitary Code
- EPA 40 CFR 61: National Emissions Standards for Hazardous Air Pollutants
- EPA 40 CFR 763: Asbestos Hazard Emergency Response Act
- Town of Wellesley Health Department – recommend notification of abatement
- Town of Wellesley Fire Department – recommend notification of abatement

OSHA – Occupational Safety & Health Administration; DOT – Department of Transportation; DLWD – Department of Labor & Workforce Development; DEP – Department of Environmental Protection; DPH – Department of Public Health; EPA – Environmental Protection Agency.

Objectives

In meeting the policy discussed in this Plan, the College will develop, implement and maintain programs in the management of ACM to:

- Identify, assess, and periodically monitor the condition of ACM
- Minimize exposure to students, staff and visitors
- Manage ACM in compliance with applicable regulations
- Ensure abatement projects are designed & conducted properly
- Remove ACM on a planned and ongoing basis.

Operational Controls – Standard Operating Procedures (SOPs)

The SOPs outlined will enable the College to meeting the objectives and policy outlined in this Plan.

Abatement Procedures – General Steps

1. Identify and secure funds.
2. Determine general scope of building project. Include re-insulation as needed.
3. Contact EHS Office.
4. Check database/building surveys to see if ACM is present
5. If confirmed that ACM is *not* present, no further action needed. If ACM is present, or PACM, continue with the steps below.
6. Determine project scope for ACM removal.
7. Bulk samples will be taken as needed.
8. Select project monitor.
9. Complete project design.
10. Contact ACM abatement contractors – conduct walk through of site.
11. Collect bids – select contractor.
12. Confirm time frame and project schedule.
13. Contractor to send in State notifications – copies to College.
14. Project Manager, or designee, to notify building occupants.
15. Project Manager, Project Monitor and EHS to work collectively to monitor project from initiation to final clearance samples.
16. Ensure that waste is managed properly.
17. Collect all necessary documentation.

Building Surveys (Step 4)

See Database below.

Limited asbestos surveys were done from 1983 to present. All available information on these surveys can be found in the EHS files on the first floor of the Physical Plant building. Access to these files can be obtained by contacting EHS.

Database (Step 4)

The EHS Office coordinated a comprehensive building survey for buildings on campus. The survey was conducted by LFR of Braintree, MA between July 2000

and September 2002. Information on the results of this survey can be found on line at: <http://www.wellesley.edu/Safety/facinfo.html>. User name is Wellesley, password is EHS1.

EHS will update and maintain the database based upon records received. While the database is extensive, it is not exhaustive. Good practices must be maintained to meet the objectives of this program.

Appendix III contains a list of known materials on campus that contain asbestos.

Project Designs (*Steps 6 & 9*)

Complex asbestos abatement projects warrant the development of a comprehensive Asbestos Abatement Specification or Scope of Work by a Massachusetts Certified Project Designer. These documents can then be used as part of the bid process.

The determination to prepare a formal Specification or Scope of Work will be made on a case by case basis after joint consultation between the Project Manager and EH&S. Factors which will be taken into consideration in this decision will include:

- The type of material(s) involved: ranging in a scale of hazard severity from most to least: (1) amosite and sprayed-on fire proofing, (2) chrysotile and thermal system components, and (3) asphaltic bound materials like floor tile
- The size and total cost of the project
- The variety of types of materials involved and their condition
- The number of locations involved
- The need to conduct demolition to access ACM
- The complexity of containment and difficulties maintaining negative pressure in the regulated area
- The need to work adjacent to occupied areas, shared HVAC systems and the concerns of the occupants

A small project with a clear project description, such as "remove 10 linear feet of pipe as identified in the mechanical room by glovebag method" would not need a project design.

Copies of written project designs should be forwarded to EH&S.

Refer to Appendix I for Definitions and Appendix II for asbestos certification and licensing requirements.

Bulk Samples (*Step 7*)

Small pieces of suspect material may need to be tested to determine if asbestos is present. EHS will coordinate bulk samples as needed and send it out for analysis. Results can usually be obtained within one week.

Only individuals holding a valid Massachusetts Department of Labor and Workforce Development Asbestos Inspector Certification can collect samples. Samples will be sent to a certified lab and results forwarded to EHS. Results will be distributed as needed and filed in the EHS Office.

In the absence of lab results, building materials installed prior to 1981 known to contain asbestos shall be considered PACM.

Bid Process (*Steps 8 and 10*)

Refer to approved bidders list in Appendix IV and college policies on obtaining bids for abatement contractors and project monitors.

External Notifications

Once contractors have been selected to perform an asbestos abatement, and a project schedule has been determined, external notifications must be filed. Copies of all notifications must be sent to EH&S. Sample forms are included.

For All Work Involving Asbestos:

MA Department of Environmental Protection – Form ANF-001

- Filed by asbestos contractor
- File 10 working days in advance of project start date
- Contractor to pay fee for decal to attach to form
- The DEP is responsible for sending this form to the MA DLWD

For Project Changes:

If the start date will be moved later, contractor must telephone the DEP at least 24 hours prior to the original start date, followed by a fax and mailing a hard copy of the revised notice to both DEP and DLWD

If start date will be moved earlier, and the 10 day advance period is still intact, follow the same phone, fax and mailing of the revised notification procedure

For All Emergency Asbestos Responses:

Emergency asbestos responses may be arranged in response to unexpected incidents and uncontrolled events. Notification procedures are slightly different when there will be less than a 10 day advance notification period between the request and the abatement.

- Notify EH&S of the emergency situation
- EH&S will contact the DEP by phone to request an Emergency Waiver Number to proceed with the project prior to a 10 day notice period (978) 661-7600
- Provide EH&S with the following information:
 - the building name, address, and specific location for the abatement
 - the nature of the emergency
 - the amount of asbestos to be removed

- the name of the asbestos abatement contractor
- the names of any other contractors performing work at this site
- the BWPAQ06 Construction / Demolition notification number pertinent to work at this site, if applicable
- the desired start date of the project

If an Emergency Waiver Number is issued, it will be communicated to the abatement contractor along with the name of the Inspector who issued it. (During weekends and late night periods, the DEP on-call representative may be notified via the Massachusetts State Police. It is also generally considered acceptable to leave a voice message at the DEP, proceed with the emergency response, and file the necessary paperwork on the next business day (888) 304-1133).

The abatement contractor will phone the DLWD, provide them with the DEP Waiver number, and request a DLWD Emergency Waiver number.

The contractor will fill out Form ANF-001, fax it to both the DEP and DLWD, and then mail hard copies with the required fees.

For Any Construction or Demolition Work:

MA Department of Environmental Protection / Construction or Demolition Notification / Form BWPAQ06

- Filed by the owner or the contractor conducting the construction or demolition
- Filed 10 working days in advance of the project start date
- Pay fee for decal to attach to form

Hazard Communication Process (Step 14)

Project Managers are responsible for effective hazard communication relating to an asbestos abatement project. The internal hazard communication process should coincide with the external notification filing, providing College personnel with the same 10 work day warning prior to the start date of the abatement. Hazard communication must be done in writing, with a copy sent to the EH&S Office for record keeping. A brief project description, including abatement locations, contractor information, and start and end dates should be included. See Appendix VI for an example.

Air Monitoring (Step 15)

A Massachusetts certified Project Monitor who is not an employee or subcontractor of the Asbestos Abatement contractor will be hired to supervise the project, conduct visual inspections and perform clearance air monitoring as required by State regulations.

The services of a Project Monitor will be employed for all projects except those abatements involving small-scale removal, conducted solely by the glovebag method, and performed in non-occupied areas such as mechanical rooms. Larger

scale abatements, involving multiple glovebag set-ups, will require project monitoring. In order to waive the requirement for project monitoring, the Project Manager must seek the approval of the EH&S Office.

A “clean” area will be considered clean if it meets the MA Clearance Air Requirements of less than or equal to 0.010 fibers per cubic centimeter of air.

Waste Disposal (*Step 16*)

The Mass DEP lists “asbestos” as a “special waste”. This means that a solid waste management facility receiving asbestos must be permitted by the DEP. The waste will not be accepted by a permitted facility unless it has been properly wetted, containerized and labeled. Exempt from the special waste rules are VAT and asphalt asbestos containing materials.

EPA standards require that waste be sent as soon as practical to a waste disposal site and that waste shipment records, a manifest, be maintained. The owner or operator must sign the waste shipment papers on the day of disposal and receive a copy back within 35 days or the owner must contact the transporter or owner of the disposal site. If within 45 days, the copy of waste shipment is not received, a letter must be sent to responsible officials administering the program.

All manifests must be forwarded to EHS.

Asbestos Fire Doors

College employees are prohibited from engaging in any fiber generating activities on asbestos fire doors (such as drilling or cutting into the door, or exposing the friable insulation). Removal of intact doors and performing tasks that have achieved a negative exposure assessment (such as lock core replacement) may be conducted safely.

Fire doors were not included in any building surveys up to July 2006. If employees are aware of the building and location of fire doors, contact EHS so the database of known material can be updated.

Removal and disposal of asbestos fire doors must be classified as an asbestos abatement project, utilizing a licensed contractor and filing the 10 day advance notification. Contact EH&S for additional guidance as exclusions can apply.

Asphalt Roofing and Siding

Refer to DEP Policy in the section ‘Web Resources’.

Regulated Areas

Periodically, the Environmental Health and Safety Office may determine that an area is unsafe due to asbestos contamination. These areas will become regulated areas and access to the space will be restricted through the use of signage and

changing locks whenever feasible. These areas will remain locked until a response action has been coordinated to abate the hazard present. A report listing all lockout areas will be updated and redistributed to appropriate personnel each time an area is added to or deleted from the listing. See Appendix V.

Employees seeking entry into lockout spaces must request approval from the Environmental Health and Safety Office. Access will be granted only to those employees whose level of training and use of personal protective equipment qualify them as individuals authorized to deal with the hazards present. Safety lockout keys will be available at the Lock Shop and EH&S Office during normal business hours, and at the Campus Police Department during off-hours.

A list of the lockout areas is in Appendix V.

Maintenance of ACM

The purpose of the O&M Program is to set a course of action to safeguard the health of employees, students, and visitors by maintaining ACM in a stable condition. To accomplish this objective, Wellesley College will:

- A. Monitor the condition of ACM on campus
- B. Maintain ACM in good condition
- C. Ensure proper cleanup of releases of asbestos fibers
- D. Prevent further release of fibers

Physical Plant personnel will perform regular surveillance to note, assess, and report any changes in the condition of know ACM or PACM. EHS will coordinate and or perform building reviews on a periodic basis. These reviews will be documented and kept on file in the EHS Office, ACM building files.

EHS must be contacted if any debris is noted during the surveillance. Debris will be cleaned up as soon as possible and affected areas “locked-out” until safe conditions exist.

Activities that may disturb ACM must be coordinated with EH&S. Work orders that have the potential for disturbing ACM due to proximity of the material or the nature of work performed should be evaluated. EHS will provide technical assistance as needed. Physical Plant personnel involved in completing work orders will receive 2-hour asbestos training. EH&S will perform necessary sampling of suspect ACM.

Negative Exposure Assessments

Wellesley College will hire outside abatement contractors and consultants to perform asbestos abatement and other activities which require special licenses, certifications, and that may result in exposure to asbestos above the OSHA permissible exposure limit (PEL) and short-term exposure limit (STEL).

Where work practices are conducted ‘near’ asbestos containing materials and there is a concern for a potential disturbance of asbestos fibers, EHS will arrange for exposure monitoring data to assess employee exposures.

The assessment will determine either 1) employee exposure is below regulated levels and therefore tasks performed have achieved a Negative Exposure Assessment and work practices can continue as a non-regulated activity, OR 2) employee exposure has exceeded regulated levels and work activities must either cease, be changed, or an outside contractor must be used to complete tasks.

Exposure monitoring results will be communicated to all affected employees in writing as soon as possible and in no case later than within 15 work days after the receipt of the results. Results may be individually distributed or centrally posted for review.

Regulatory Agency Visits

EHS will serve as the liaison with applicable regulatory agencies. If an unannounced (or announced) inspection takes place, contact EHS immediately. Regulators should be escorted to a “safe area”, until EHS arrives on-site.

Respiratory Protection Program

Employees must be enlisted in the Wellesley College Respiratory Protection Program to wear a respirator. This involves annual training, medical approval and follow up, and fit testing. Contact EHS for further information.

Signage

Warning Signs for Regulated Areas

Warning signs are required for all regulated areas. [A regulated area is a zone in which the airborne asbestos fiber levels are likely to exceed the permissible exposure limit (PEL) of 0.1 fiber per cubic centimeter of air as an 8 hour time weighted average, or the excursion limit of 1.0 fibers per cubic centimeter of air as a 30 minute period, as established by OSHA.] All active asbestos abatement projects would be classified as regulated areas. A space with significantly damaged ACM might also be restricted and deemed a regulated area.

All regulated area signs will read:

**DANGER
ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY**

If the regulated area also requires respiratory protection and protective clothing, the sign will also state:

**RESPIRATORS AND PROTECTIVE CLOTHING
ARE REQUIRED IN THIS AREA**

Mechanical Rooms Signage

Mechanical rooms and other areas where employees may be expected to routinely enter, and to come into contact with, ACM or PACM will be posted with warning signs. These signs must be placed at every entrance, and be clearly visible so that an entrant would be immediately warned of the materials located in the room. The signs will contain the following language:

**DANGER
ASBESTOS
DO NOT DISTURB-AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY**

Mechanical room signage must be maintained in place. Promptly report missing signage to EH&S. Project Managers conducting abatement and / or construction activities in mechanical rooms must ensure the integrity of these signs and have them updated to reflect any changes in information subsequent to project activities.

Warning Labels Affixed to Material

Warning labels will be affixed to representative samples of friable ACM in areas where employees may reasonably be expected to contact or disturb it, whenever feasible. This supplemental notification will be used mainly in mechanical areas and the like, in order to ensure that employees are adequately warned. Labels may also be installed on materials that are accessible and have a history of damage wherever necessary.

Asbestos Free Labels

Newly installed materials, such as thermal system insulation, should be identified by the application of a label reading:

ASBESTOS FREE INSULATION

This will increase employee awareness of the content of building materials in newer buildings as well as in situations where a space contains a mixture of materials. Project managers should consider instructing the installer to label materials at the time of application.

Surface Wipe Samples

Certified project monitors and or inspectors will take surface wipe samples as needed. EHS will coordinate and work with Project Monitors to complete the sampling.

Vinyl Asbestos Floor Tile

Refer to DEP Policy in the section 'Web Resources'.

Roles & Responsibilities

The responsibilities defined below are required in order to implement an effective campus asbestos management program.

Ad-hoc Asbestos Committee

The committee will meet once a year to assist in setting priorities in conducting major asbestos abatement projects not associated with a building renovation. The committee will review this Plan to ensure it continues to meet the objectives set forth. Members are:

1. Director of EHS, Suzanne Howard
2. Asst.Dir./Phy.Plant Facilities, Michael Dawley
3. Business Mgr. of Operations, Traci Robie
4. Manager, Maintenance Services, Ed Byrne
5. Head of Shop – TBD

Physical Plant

Project Managers:

1. Follow procedures outlined in this Plan.
2. Transmit records of laboratory results related to airborne asbestos surveys, including those performed during abatement projects, to Environmental Health and Safety for evaluation and retention
3. Develop re-insulation specifications as needed.
4. Ensure project timeline takes into account asbestos testing, abatement and filing requirements
5. Ensuring that asbestos contractors notify the appropriate regulatory agencies.

Employees & Supervisors

1. Comply with this Plan and coordinate with EHS to maintain a comprehensive operations and maintenance program that provides for locating, identifying, maintaining and/or abating friable and non-friable asbestos-containing material
2. Recognize ACM and PACM and avoid disturbance of these materials
3. Report incidents involving asbestos (ie. damaged material, potential exposures) to EHS promptly.

Information Technology - Networking

1. Follow procedures outlined in this Plan.
2. Ensure project timeline takes into account asbestos testing, abatement and filing requirements
3. As applicable, ensure contractors and or personnel are able to recognize ACM and PACM and avoid disturbance of these materials.
4. Report incidents involving asbestos (ie. damaged material, potential exposures) to EHS promptly.

Environmental Health & Safety

1. Coordinate recordkeeping responsibilities
2. Coordinate bulk samples, air sampling and monitoring. Evaluate results and provide necessary follow up.
3. Liaison with regulatory agencies
4. Coordinate asbestos-related matters not directly associated with abatement projects. This may include handling inquiries from employees on potential exposure in the workplace or classroom.
5. Maintaining an inventory of known locations of ACM in campus buildings.
6. Provide technical assistance to Physical Plant in planning asbestos projects and developing and implementing site monitoring activities before, during, and after abatement operations.
7. Work with project monitor on providing initial inspection of asbestos abatement project set-up, including the containment barrier, airlock assembly, decontamination facilities, worker protection program, and visual clearances.
8. Provide training to project managers, supervisors and employees.
9. Maintain knowledge of regulatory programs and how to apply these programs to the College.
10. Recommend actions to members of the College community that should be taken to ensure compliance with this Plan.

Contractors

Contractors whose work may involve disturbing or coming into contact with asbestos-containing materials must be notified of the conditions that may be encountered before any such work is started. This may be done by the hiring department/area or by referring the contractor to Environmental Health and Safety for consultation.

Communication

Policies and Procedures	EHS will inform managers of policies, procedures and guidelines via email and or information will be posted on the EHS website. Managers are then responsible to inform employees
Database	EHS will maintain database. Project managers must utilize this information for planning purposes.
Regulatory Agencies	EHS will serve as liaison with regulatory agencies
Notifications	Forms sent to DEP will be the responsibility of the abatement contractor who in turn will provide a copy to the EHS Office
Internal HazCom Notifications	The project manager will be responsible for alerting building occupants via email. Campus Police should be copied.
Signage	Has been placed around campus. Employees must alert EHS if signage is no longer in place. Signage should also be checked during material reviews by Physical Plant.
Emergencies	Any individual who notes an asbestos related emergency must

	contact EHS and or Campus Police who will alert EHS if not already notified.
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Contacts:

EHS: Suzanne Howard or Justin Finne
Office phone x3882
Email: showard@wellesley.edu or jfinne@wellesley.edu

Campus Police: x2121 or 5555 in an emergency.

Physical Plant Operator: x2767

Training

Asbestos Awareness

The goal of the annual training program is to inform employees about the potential hazards associated with the presence of Asbestos Containing Material (ACM) in a building. The major objectives of the program are to provide employees with the ability to identify the presence and location of ACM; recognize potentially hazardous situations involving ACM; avoid and minimize disturbance of ACM through proper methods and work practices; contact appropriate personnel and follow established procedures when asbestos related concerns or emergencies arise.

During training, employees will be made aware of no-smoking programs and information. See Appendix VII.

Project Manager Awareness Training

In addition to the Awareness Training all project managers involved in construction projects should attend an awareness session to further detail important information and college-specific procedures for construction, demolition and O&M projects. EHS will provide training to all applicable employees.

Hazard Communication

All applicable personnel are informed of the locations of asbestos and the presence of asbestos hazards on campus through above stated training or notifications for an abatement project.

Who Should be Trained:

All Physical Plant employees should receive annual training. This includes all maintenance services and custodial services employees. Employees in the power plant, motor pool and grounds should attend as determined by their supervisor and EHS.

How Often:

Training is required on an annual basis.

Who Will Provide the Training:

The EHS Office will coordinate trainings on an annual basis.

New Employees

Employees who are hired and have “missed” the annual training should inform EHS and or the supervisor who can provide an initial training. All materials for training are available in the EHS Office.

Recordkeeping:

Project Documents	Project managers must ensure that appropriate documentation for filing is forwarded to the EHS Office to include: scope, notifications, air sampling data and disposal manifests. Other documents such as bids/scope, invoices, etc should be kept with project manager.
Asbestos Water Samples	Maintenance Service Manager to ensure this is conducted as required under the Water Management Act Permit as long as asbestos piping is in place
Asbestos Mgmt Plan	Distributed by EHS Office who will maintain Plan
Training Records	Maintained by EHS
Asbestos Database – Building Survey	Maintained by EHS and LFR. Controlled access by password.
List of Regulated Areas	Maintained by EHS
Negative Exposure Assessments	Maintained by EHS and shared with employees involved in the testing
Medical	Abbreviated documents may be kept by EHS and or HR. Confidential records will be kept by the occupational medicine group currently used by the College.
Bulk, Air, Wipe Samples	Maintained by EHS
Incidents involving ACM	Maintained by EHS, employee’s department, HR, others as needed.
Building Reviews	Maintained by EHS

Emergency Response & Preparedness

Notify EHS immediately of any of the following:

- Damaged asbestos,
- Release of fibers,
- Accidental damage due to roof leaks, broken water lines, etc.,
- Other asbestos related event of concern to students, faculty, staff or visitors.

When leaving an area where asbestos is damaged and or fibers are released, secure the area to prevent any potential exposure or further releases to the environment. Isolate the area, shut off ventilation systems, and notify other affected personnel.

If maintenance workers must enter the area, appropriate PPE must be donned to include respirators and protective clothing.

If work is needed prior to emergency response personnel coming on site, ensure that the asbestos is wetted. Keep track of all associated events and personnel involved.

EHS will coordinate on-site response and determine if notification to the regulators is needed. Contact with DEP is required if over one pound of material is released into the environment.

We ask all employees to come forward and report situations of concern to EHS either in person, email, phone, or mail.

Nonconformance & Corrective Actions

If employees do not follow procedures and policies outlined in this Plan, employees will receive a warning by their Supervisor. If nonconformance continues, the employee will be required to attend Asbestos Training, the incident will be documented and reported to the next administrative level.

When corrective actions are needed, follow through is required in a timely fashion and in accordance with this Plan.

Audits

On-site reviews of asbestos projects should be conducted by the project managers to ensure compliance with this Plan. EHS will also conduct on-site spot reviews to ensure compliance.

Recordkeeping reviews will be performed on a continuous basis to ensure documents are maintained in compliance with this Plan.

Administrative Review

This plan will be reviewed on a periodic basis to ensure it is kept up to date and in accordance with College policy, industry practices, and regulatory standards.

Web Resources

MA DEP Asbestos Page

<http://www.mass.gov/dep/air/asbhom01.htm>

Includes regulations, polices, forms, etc.

DEP Asbestos Air Guide

<http://www.mass.gov/dep/air/asbguid.htm>

DEP Forms for ACM Removal

<http://www.mass.gov/dep/air/approvals/aqforms.htm#asbestos>

Division of Occupational Safety Asbestos Page

<http://www.mass.gov/dos/asbestos/index.htm>

DLWD: THE REMOVAL, CONTAINMENT OR ENCAPSULATION OF ASBESTOS
Regulations

http://www.mass.gov/dos/asbestos/asb_regs_453cmr6.pdf

Policy Concerning Non-Friable Asbestos Containing Materials

<http://mass.gov/dep/air/laws/96-012.htm>

for vinyl asbestos floor tile (VAT) and asphalt based roofing and siding products

EPA's Asbestos Web Site

<http://www.epa.gov/asbestos/>