Administrative Procedure

Number:	419
Effective:	05/12/2025
Supersedes:	10/26/2007
Page:	Page 1 of 10

Subject: ASBESTOS MANAGEMENT PLAN

1.0. PURPOSE

To establish the policy and procedure for identifying and safely managing asbestos-containing materials (ACM). The Asbestos Management Plan (hereinafter Plan) applies to all University buildings where the presence of asbestos has been confirmed through testing, ensuring compliance with Cal/OSHA, the Federal Clean Air Act, the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), and other applicable regulations.

2.0. ORGANIZATIONS AFFECTED

All University employees and organizational units, including auxiliary organizations, contractors, and personnel involved in demolition, renovation, maintenance, and repair activities that could disturb ACM.

3.0. REFERENCES

3.1. HSC Section 25915: Asbestos Notification, ACM
3.2. CCR Title 8 Section 1529: Construction Safety Orders, Asbestos
3.3. CCR Title 8 Section 341.6: Asbestos-Related Work, Registration Requirements
3.4. CCR Title 8 Section 5208: Control of Hazardous Substances, Asbestos
3.5. CFR 19 Section 1926.1101: Subpart Z: Safety and Health Regulations for Construction
3.6. CFR 40, Subpart E, Appendix C: EPA Asbestos Model Accreditation Plan (MAP)
3.7. CFR 40, Subchapter R, Section 763: NESHAP, ACM in Schools
3.8. CFR 40, Subpart M, Sections 61.140 to 61.156: NESHAP, National Emission Standards
3.9. EPA Pink Book: Simplified Sampling Scheme for Friable Surfacing Materials
3.10. EPA Brown Book: Guidance for Service and Maintenance Personnel
3.11. EPA Purple Book: Guidance for ACM in Buildings
3.12. EPA Green Book: Guide to Operations and Maintenance Programs for ACM
3.13. South Coast AQMD Rule 1403: Asbestos Emissions from Demolition/Renovation Activities

4.0. POLICY

4.1. Prior to any construction, renovation, or demolition activities, the University shall perform asbestos sampling and testing.

4.2. All asbestos-related work shall be conducted under the oversight of a qualified environmental professional to ensure compliance with applicable health and safety regulations. Only trained and certified personnel equipped with appropriate personnel protective equipment (PPE) are permitted to handle or disturb asbestos-containing materials (ACM).

4.3. Contractors must provide proof of asbestos certification for all personnel handling ACM.

4.4. A pre-job safety meeting shall be held for all asbestos removal projects.

4.5. Employee medical monitoring records shall be retained for 30 years.

4.6. Regulations and Standards

All work shall be performed in strict compliance with federal, state, and local regulations governing ACM. The most recent regulatory editions shall be followed, and where conflicts exist, the most stringent requirements shall apply.

4.6.1. Asbestos Work Classifications (CFR 1926.1101)

4.6.1.1. Class I: Removal of thermal system insulation (TSI) and surfacing ACM or presumed ACM (PACM) (friable materials). This is the most hazardous type of asbestos work and requires full containment, negative air pressure, and strict decontamination procedures.

4.6.1.2. Class II: Removal of ACM that is not TSI or surfacing ACM, including wallboard, floor tile, roofing, and mastics (non-friable materials). Special handling techniques such as wet methods and minimal breakage must be used.

4.6.1.3. Class III: Repair and maintenance where ACM may be disturbed but generates less than a single disposal bag of waste. Workers must be trained in asbestos awareness and wear proper protective equipment (PPE).

4.6.1.4. Class IV: Maintenance and custodial work where employees come in contact with but do not disturb ACM or PACM. Workers must be trained on proper cleaning and containment of asbestos dust and debris.

4.6.2. Department of Toxic Substances Control (DTSC) Requirements

4.6.2.1. Asbestos waste over 50 pounds must be transported using a registered hazardous waste transporter and disposed of at a permitted facility.

4.6.2.2. Friable ACM (one percent (1%) or more asbestos content) is classified as hazardous waste.

4.6.2.3. Non-friable bulk asbestos waste is considered non-hazardous under California law.

4.6.2.4. All asbestos waste shipments require a completed Hazardous Waste Manifest, which must be kept on file for at least three years

4.6.3. South Coast AQMD Rule 1403

4.6.3.1. Renovations removing 100 square feet or more of Regulated ACM (RACM) require a 10-day prior notification.

4.6.3.2. Demolitions involving the removal of load-bearing structural members require notification, regardless of asbestos presence.

4.6.4. Cal/OSHA Notifications

4.6.4.1. Cal/OSHA must be notified if asbestos quantities exceed 100 square feet during renovations or demolitions.

5.0. DEFINITIONS

5.1. Abatement - Procedures beyond a special operations and maintenance program to control fiber release from asbestos-containing materials. Includes removal, encapsulation, enclosure, and repair.

5.2. Asbestos - Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered.

5.3. Asbestos-Containing Construction Material (ACCM) - Any manufactured construction material that contains more than one-tenth of one percent (>0.1%) asbestos by weight.

5.4. Asbestos-Containing Material (ACM) - Material composed of asbestos of any type and in an amount greater than one-tenth of one percent (>0.1%) either alone or mixed with fibrous or non-fibrous materials.

5.5. Authorized Person - Any person authorized by the employer and required by work duties to be present in regulated areas. This includes any representative of a regulatory or other agency having jurisdiction over the work being performed.

5.6. Category I Non-friable ACM - Asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than one percent (>1%) asbestos.

5.7. Category II Non-friable ACM - Any material, excluding Category I non-friable ACM, containing more than one percent (>1%) asbestos, which is non-friable.

5.8. Competent Person - includes the following:

5.8.1. One who is capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure and who has the authority to take prompt corrective measures to eliminate them; in addition,

5.8.2. For Class I and Class II work, one who is specially trained in a training course which meets the criteria of EPA's Asbestos Model Accreditation Plan for supervisors (40 CFR Part 763, Subpart E), or its equivalent, and

5.8.3. For Class III and Class IV work, one who is trained in a manner consistent with EPA requirements for training of local education agency maintenance and custodial staff (40 CFR 763.92(a)(2)).

5.9. Containment - Isolation of the work area from the rest of the building to prevent escape of asbestos fibers.

5.10. Disturbance - Activities that disrupt the matrix of Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM), crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM. In no event shall the amount of ACM or PACM so disturbed exceed that which can be contained in one glove bag or waste bag which shall not exceed sixty (60) inches in length and width.

5.11. Dust or Debris - When present either in a contained or regulated area, or in the vicinity of damaged asbestos-containing materials shall be considered asbestos-containing residue.

5.12. Encapsulation - Asbestos containing material coated with a penetrating or bridging sealant to prevent release of asbestos fibers into the air.

5.13. Enclosure - Asbestos containing material physically separated from the building environment by means of erecting permanent airtight barriers.

5.14. Friable - Any material that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

5.15. Hazardous Waste Manifest - A federally required tracking form used to document the generation, transportation, and disposal of hazardous waste. It ensures accountability from the point of creation to final disposal (“cradle-to-grave”) and is part of the EPA’s regulatory system under RCRA.

5.16. Non-friable - A material which, when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure.

5.17. Operations and Maintenance Plan (O&M) - Specific procedures and practices developed for the interim control of asbestos containing materials in buildings until they are removed.

5.18. Permissible Exposure Limit (PEL) - The Cal/OSHA limit of 0.1 fiber per cubic centimeter of air (0.1 f/cc) as an eight-hour time-weighted average (TWA). Additionally, Cal/OSHA has established the Excursion Limit as 1.0 fiber per cubic centimeter of air averaged over a period of 30 minutes.

5.19. Presumed Asbestos-Containing Material (PACM) - Thermal system insulation and surfacing material found in buildings constructed no later than 1980.

5.20. Regulated Area - An area established by the employer to demarcate areas where Class I, II, and III asbestos work is conducted, and any adjoining area where debris and waste from such asbestos work accumulate; and a work area within which airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the permissible exposure limit.

5.21. Regulated Asbestos-Containing Material (RACM) - Includes friable asbestos material; non-friable material that is subjected to sanding, grinding, cutting, or abrading (EPA Category I); and material containing >1% asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand (EPA Category II).

5.22. Removal - All operations where ACM and/or PACM is taken out or stripped from structures or substrates and includes demolition operations.

5.23. Renovation - Modifying of any existing structure, or portion thereof. Operations in which load-supporting structural members are wrecked or taken out are excluded.

5.24. Repair - Overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates, including encapsulation or other repair of ACM or PACM attached to structures or substrates.

5.25. Senior Management - Managers reporting directly to the President or Vice Presidents.

5.26. Suspect Asbestos-Containing Material - Material that has not yet been analyzed by an EPA-accredited laboratory to determine whether it is ACM.

5.27. Thermal System Insulation (TSI) - ACM applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain.

5.28. Transite - Asbestos-containing cementitious material that may be found in a number of products including, but not limited to, fiber board, siding, roof gutters, cement wallboard, furnace flues, roof shingles, piping, fume hood panels, ceiling tiles, and counter tops.

6.0. RESPONSIBILITIES

6.1. Senior Management will:

6.1.1. Approve and support the implementation of the Asbestos Management Plan.

6.1.2. Allocate adequate resources for asbestos management, including training, equipment, and personnel.

6.2. The Executive Director of RMEHS (or designee) will:

6.2.1. Oversee the development and implementation of the Asbestos Management Plan.

6.2.2. Review and update University policies, procedures, and training related to ACM.

6.2.3. Coordinate asbestos-related matters not directly associated with abatement projects. This includes employee notification efforts and handling inquiries from employees on potential exposure in the workplace or classroom.

6.2.4. Verify from the Director of Facilities Management that all required regulatory notifications from contractors have been submitted to the appropriate agencies (e.g., SCAQMD, Cal/OSHA, EPA), ensuring documentation is complete and aligned with compliance obligations.

6.2.5. Represent the University on matters of regulatory compliance and serve as liaison to agencies with jurisdiction over asbestos-related matters.

6.3. The Associate Vice President/Director of Facilities Management will:

6.3.1. Establish and maintain an Operations & Maintenance (O&M) Program to manage asbestos-containing materials (ACM) on campus per the EPA Green Book and Cal/OSHA 8 CCR 1529(l). This includes identifying areas with damaged ACM, reviewing and monitoring proposed work in locations where ACM is present, preventing activities that could disturb or damage ACM, and conducting ongoing assessments to ensure the continued integrity of ACM.

6.3.2. Notify RMEHS as soon as it is determined that activities might occur which meet the criteria in section 4.1. Such notifications must include any work that is in the planning or development stage.

6.3.3. Ensure that the final air clearance results following asbestos abatement activities are communicated to all affected building occupants and to personnel in adjacent and nearby areas who may have been impacted by the work.

6.4. Facilities Management will:

6.4.1. Develop asbestos removal project specifications in coordination with RMEHS.

6.4.2. Manage asbestos abatement contracts and monitor contractor compliance.

6.4.3. Maintain a trained workforce for Class III asbestos work, as necessary.

6.4.4. Ensure that asbestos training and annual awareness training for applicable employees is provided.

6.4.5. Maintain a database of campus locations that contain asbestos and update it regularly.

6.4.6. Ensure that asbestos contractors submit all required regulatory notifications to external agencies, including the South Coast Air Quality Management District (SCAQMD), Cal/OSHA, and the Environmental Protection Agency (EPA), in compliance with federal, state, and local requirements.

6.4.7. Ensure that all required internal postings, warnings, and stakeholder notifications are completed before and during asbestos-related activities. This includes informing building occupants, contractors, and other relevant parties in accordance with University policy and applicable safety regulations.

6.4.8. Consult with RMEHS to ensure postings and notifications align with applicable asbestos safety regulations.

6.4.9. Maintain documentation of postings and notifications for asbestos-related work.

6.4.10. Transmit records of laboratory results, including airborne asbestos surveys and sample analyses, to RMEHS for evaluation and retention for at least 30 years.

6.4.11. Ensure that Administrative Procedure 419 (AP 419) is reviewed with all new employees and periodically with all continuing employees.

6.5. Employees will:

6.5.1. Report to Facilities Management or RMEHS any suspected ACM damage or disturbance.

6.5.2. Follow university protocols when working in areas where ACM may be present.

6.5.3. Report any suspected ACM before performing work that may disturb it.

6.5.4. Complete annual asbestos awareness training and follow all related safety protocols.

6.5.5. Not engage in asbestos-related work without proper certification.

6.5.6. Follow posted asbestos hazard warnings and restricted access areas.

6.6. Risk Management and Environmental Health & Safety (RMEHS) will:

6.6.1. Ensure that Administrative Procedure 419, Asbestos Management Plan, is updated as needed in accordance with regulatory requirements.

6.6.2. Maintain records of ACM sampling, analysis, and worker medical surveillance.

6.6.3. When applicable, coordinate required medical surveillance for workers involved in asbestos-related tasks and ensure medical records are securely maintained in compliance with applicable regulations and security standards.

6.6.4. Provide guidance on regulatory requirements for asbestos-related postings, warnings, and notifications.

6.6.5. Ensure that all required postings, warnings, and notifications are properly displayed and communicated in accordance with applicable regulations and institutional requirements during asbestos-related work.

6.6.6. Coordinate with Facilities Management and/or contractors to ensure the Hazardous Waste Manifest is signed before asbestos-containing materials (ACM) leave the campus for disposal.

6.7. Asbestos Abatement Contractors and Vendors will:

6.7.1. Comply with all University policies and regulatory requirements when conducting asbestos-related work.

6.7.2. Be properly licensed and certified for asbestos-related work.

6.7.3. Follow all asbestos abatement procedures and safety protocols.

6.7.4. Be aware that all work will be monitored and inspected by a third-party consultant and University representatives.

6.7.5. Provide required notifications and documentation to the University before commencing work.

6.7.6. Ensure that their personnel are certified, trained, and equipped with personal protective equipment (PPE).

6.7.7. Coordinate asbestos waste disposal with RMEHS to ensure proper handling, transportation, and disposal in compliance with hazardous waste regulations, including obtaining the required Hazardous Waste Manifest signature.

7.0. PROCEDURES

7.1. Pre-Work Approval and Notification

7.1.1. Facilities Management must notify RMEHS in advance of any planned work that may disturb asbestos-containing materials (ACM) or involve asbestos-related activities.

7.1.2. Contractors must submit required notifications to South Coast AQMD and Cal/OSHA.

7.2. Renovation and Demolition

7.2.1. A pre-work asbestos survey shall be conducted by a certified asbestos inspector for all renovation and demolition activities.

7.2.2. All renovations and demolitions will comply with South Coast AQMD Rule 1403, the asbestos NESHAP, and California Title 8 Section 5208.

7.2.3. Suspect ACM must be treated as asbestos-containing unless tested and confirmed otherwise.

7.3. Inspections and Sampling

7.3.1. Only certified inspectors shall conduct asbestos inspections.

7.3.2. Bulk sampling and air monitoring procedures must follow industry best practices and EPA guidelines.

7.3.3. Inspection reports must be maintained by RMEHS for regulatory compliance.

7.4. Asbestos Disposal

7.4.1. All ACM must be disposed of at an approved asbestos waste facility.

7.4.2. A Hazardous Waste Manifest must be completed for each shipment and retained per regulatory requirements.

7.5. Compliance and Training Requirements

7.5.1. University employees are not permitted to perform Class I or Class II asbestos abatement work. However, trained Facilities Management personnel may perform Class III and IV work, when necessary, provided they have completed all required training and, if applicable, medical surveillance.

7.5.2. Employees must attend asbestos training sessions assigned to them and must not engage in any activity that may disturb ACM without proper certification.

7.5.3. Exposure monitoring shall be conducted before, during, and after Class I, II, and III asbestos work.

7.5.4. A written exposure control plan must be developed by the contractor performing the abatement for Class I, II, and III work, in accordance with OSHA 29 CFR 1926.1101(g).

7.5.5. Employees exposed above the permissible exposure limit (PEL) must undergo periodic medical examinations per Cal/OSHA 8 CCR 5208(j).

7.5.6. All contractors must be certified in asbestos removal and provide proof of training before beginning work.

7.6. Emergency Response and Recordkeeping

7.6.1. Minor Fiber Release - less than three (3) square feet:

7.6.1.1. RMEHS must be notified immediately.

7.6.1.2. Facilities Management personnel trained in asbestos handling shall assess minor releases.

7.6.1.3. Facilities Management staff trained in asbestos handling may clean up minor fiber releases using wet methods and HEPA vacuums.

7.6.2. Major Fiber Release - more than three (3) square feet:

7.6.2.1. All work must stop immediately.

7.6.2.2. Access to the area must be restricted immediately.

7.6.2.3. RMEHS must be contacted immediately at (323) 343-3531.

7.6.2.4. Only certified asbestos contractors shall perform cleanup.

7.6.3. Recordkeeping

7.6.3.1. Facilities Management shall provide asbestos surveys, test results, and abatement records to RMEHS.

7.6.3.2. RMEHS will retain asbestos records for a period of 30 years.

7.6.3.3. Hazardous Waste Manifests shall be retained for compliance verification.

7.6.3.4. Employee asbestos training records shall be maintained and retained by RMEHS in accordance with regulatory requirements.

7.7. Communication and Notifications

7.7.1. Internal Notifications

7.7.1.1. The University shall notify employees annually about the presence of asbestos-containing material (ACM), per California's Connelly Act (Assembly Bill 3713), which implemented HSC Section 25915.

7.7.1.2. Controlled areas containing ACM shall have warning labels at entrances.

7.7.2. External Notifications

7.7.2.1. All notifications must comply with federal, state, and local regulations.

8.0. APPENDICES

N/A