

UConn

ASBESTOS

MANAGEMENT PLAN

Environmental Health and Safety

3102 Horsebarn Hill Road, U-4097

Storrs, CT 06269

860-486-3613

ehs@uconn.edu

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Contact:	EHS Occupational Health and Safety 860-486-3613 ehs@uconn.edu

Table of Contents

1 PURPOSE	1
2 APPLIES TO	1
3 DEFINITIONS	1
4 POLICY STATEMENT	4
5 ENFORCEMENT	5
6 LIST OF ABBREVIATIONS	5
7 RESPONSIBILITIES	5
7.1 ENVIRONMENTAL HEALTH AND SAFETY	5
7.2 DEANS, DIRECTORS, AND DEPARTMENT HEADS	6
7.3 ASBESTOS COORDINATORS	6
7.4 COMPETENT PERSONS	7
7.5 PROJECT MANAGERS	8
7.6 DEPARTMENT EMPLOYING MAINTENANCE AND CUSTODIAL PERSONNEL	9
7.7 UNIVERSITY MAINTENANCE AND CUSTODIAL EMPLOYEES	9
7.8 PROCUREMENT SERVICES	10
7.9 UNIVERSITY SAFETY EMERGENCY COMMUNICATIONS/FIRE DEPARTMENT	10
7.10 UCONN EMPLOYEES AND STUDENTS UNAFFILIATED WITH ASBESTOS MANAGEMENT	11
8 TRAINING	11
8.1 UCONN EMPLOYEES	11
8.2 CUSTODIAL CONTRACTORS	11
8.3 ASBESTOS COORDINATORS, PROJECT MANAGERS AND COMPETENT PERSONS	12
9 ASBESTOS IDENTIFICATION AND INSPECTIONS	12
10 NEWLY INSTALLED MATERIALS	14
11 MATERIALS CONTAINING LESS THAN ONE PERCENT (<1%) ASBESTOS	14
12 ABATEMENT REQUIREMENTS	15
13 ADMINISTRATIVE PROCEDURES	16
13.1 MECHANICAL SPACE POSTINGS	16
13.2 CONTRACTED WORK – CLASS I OR II ACTIVITIES	16
13.3 NOTIFICATION TO OCCUPANTS PRIOR TO ASBESTOS REMOVAL ACTIVITIES	17
13.4 CONTRACTOR NOTIFICATIONS	17
14 MAINTENANCE OF ASBESTOS CONTAINING MATERIALS	17
14.1 PROHIBITED ACTIVITIES	17
14.2 ROUTINE MAINTENANCE AND CLEANING	18
14.3 SURVEILLANCE OF ASBESTOS CONTAINING MATERIALS	18
14.3.1 Maintenance of Asbestos-Containing Floor Material	18

14.3.2 Maintenance/Repair of Floor Tiles	19
15 ASBESTOS WASTE	20
15.1 ASBESTOS WASTE MANAGEMENT	20
15.2 HEPA VACUUMS	21
16 ASBESTOS FIBER RELEASES AND CRITICAL EVENTS	21
16.1 FIBER RELEASES	21
16.2 ASBESTOS REMOVAL AFTER-HOURS DURING CRITICAL EVENTS	22
17 APPENDICES	23
17.1 ASBESTOS INFORMATION SHEET	23
17.2 ASBESTOS PROJECT NOTIFICATION FORM	23
17.3 MECHANICAL SPACE POSTING	23

Asbestos Management Plan

1 PURPOSE

To protect workforce members from the hazards associated with asbestos and properly manage asbestos-containing materials during maintenance, repair, renovation, demolition, and other asbestos-related activities to comply with regulations from the United States Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), State of Connecticut Department of Public Health (CT DPH), and the Connecticut Department of Energy and Environmental Protection (DEEP).

2 APPLIES TO

This plan applies to workforce members and others at the Storrs campus, regional campuses, School of Social Work, School of Law, and extension centers at the University of Connecticut. It does not apply to UConn Health.

3 DEFINITIONS

Airtight Barrier: an engineering control that prevents dust generated by an asbestos abatement operation from escaping into the surrounding environment. These can be made of polyethylene sheeting, a manufactured glovebag, or some other fixture or material that achieves the goal of capturing dust at the point of disturbance or preventing its release to the surrounding environment. Connecticut abatement standards require airtight barriers for spot repairs.

Asbestos: a generic name for a family of naturally occurring fibrous silicate minerals. They differ from other minerals because the crystals form long, thin fibers. Presently there are six recognized minerals that fall under this category: chrysotile, amosite, crocidolite, tremolite, actinolite, and anthophyllite. They represent two groups of mineral structure: serpentine and amphiboles. Chrysotile is the only member of the serpentine group. There is no complete ban on materials containing asbestos fibers within the U.S.

Asbestos Abatement: any activities intended to prevent the uncontrolled release of asbestos from building material, including removal, repair, enclosure, or encapsulation.

Asbestos Abatement Project: the abatement of ACM or PACM in Connecticut in amounts greater than 3 square feet or 3 linear feet.

Asbestos-Containing Material (ACM): any material containing more than one percent (>1%) asbestos. In Connecticut, ACM is defined as any material containing equal to or greater than one percent (>1%) asbestos. EPA classifies ACM into 3 broad categories:

1. Thermal system insulation (TSI) which includes pipe and boiler insulation, HVAC components, and other similar material that inhibits heat transfer and prevents condensation;
2. Surfacing Materials, those that are sprayed-on or troweled on which include fireproofing, decorative or acoustical plasters and textured acoustical materials (i.e., 'popcorn' ceilings); and
3. Miscellaneous materials which incorporate any other material that is not TSI or surfacing materials and include materials like floor and ceiling tiles, mastics, gaskets, electrical wire, Transite® materials, etc.

Asbestos Coordinator: designated University staff that serve as a departmental asbestos contact and abatement project coordinator who have been charged by their department and authorized by EHS to conduct the asbestos-related duties described in the AMP. Asbestos Coordinators may or may not oversee Class IV employees. The Facilities Operations (Facilities) Asbestos Coordinator has the additional duty of maintaining historical files of all inspections, bulk sampling and abatement projects for all University buildings and integrating this data into the University's [Asbestos Database](#). The Facilities Asbestos Coordinator also serves as the coordinator for the campus at large, other than UPDC.

Class I Asbestos Work: the removal of thermal system insulation and/or surfacing material (ACM or PACM). No UConn faculty, staff or student is trained and licensed to conduct this work.

Class II Asbestos Work: the removal of any ACM which is not Class I. Examples include, but are not limited to, floor tiles, ceiling tiles, glues/mastics, wallboard and joint compounds, gaskets, linoleum, and Transite® board. No UConn faculty, staff or student is trained and licensed to conduct this work.

Class III Asbestos Work: repair and maintenance operations where asbestos is likely to be disturbed (See [Disturbance](#)), typically small amounts, less than 3 square or 3 linear feet. This includes, but is not limited to, removal of a few damaged floor tiles, drilling through asbestos walls, gasket removal, etc. UConn faculty, staff or students are not allowed to conduct this work unless they have received annual Class III training through an asbestos consultant and are working in collaboration with EHS to meet all necessary state and federal regulations.

Class IV Asbestos Work: maintenance and custodial construction activities during which employees contact but do not disturb ACM or PACM, and activities to clean up dust, waste and

debris resulting from Class I, II, or III activities. UConn faculty and staff can conduct this work when current with annual EHS Asbestos Awareness training requirements.

Competent Person: In addition to the definition in OSHA's Construction Standard, 1926.32 (f), 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. For Class IV work, training of competent persons must be in a manner consistent with EPA requirements for training of local education agency maintenance and custodial staff as set forth at 40 CFR 763.92 (a)(2).

Contractor: Any person, business entity or organization that provides goods, materials or services commissioned and under contract for the University, other than under a contract of employment – for example construction/renovation work, building/maintenance work, custodial services, equipment service and installation, and technology and telecom work.

Contractor EHS Manual: the [document](#) that stipulates the University of Connecticut Environmental, Health, and Safety (EHS) Requirements for construction, service, and maintenance contractors.

Disturbance: any activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM.

Excursion Limit (EL): A level of airborne fibers specified by OSHA as a short-term excursion level. It is currently 1.0 fiber per centimeter (f/cc) of air, 30-minute time-weighted average, as measured by phase contrast microscopy.

Friable Asbestos-Containing Material: Any material that contains equal to 1% or greater asbestos and can be crumbled, pulverized, or reduced to powder by hand pressure when dry. Connecticut asbestos regulations also include materials that were non-friable at the time of manufacture but that have deteriorated or delaminated in place to the extent that they can release asbestos fibers when physically contacted or eroded by air or water.

Glovebag: an impervious plastic bag-like enclosure, not more than 60 x 60-inches, affixed around an asbestos-containing material, with glove-like appendages through which material and tools may be handled.

HEPA Vacuum: a vacuum cleaner which has been designed with a high-efficiency particulate air (HEPA) filter as the last stage of filtration that is capable of capturing particles of 0.3 microns with 99.97% efficiency. The vacuum cleaner must be designed so that all the air drawn into the machine is expelled through the HEPA filter with none of the air leaking past it.

High Efficiency Particulate Air (HEPA): A type of filter which is 99.97% efficient at filtering particles of 0.3 microns in diameter.

Intact: ACM that has not crumbled, been pulverized, or otherwise deteriorated so that the asbestos is no longer likely to be bound with its matrix.

Non-friable Asbestos Containing Material: materials in which asbestos is bound in a matrix which cannot, when dry, be crumbled, pulverized or reduced to powder by hand pressure (such as floor tile and asphaltic building materials). However, when the bond fails, or is disturbed, the materials can become friable.

Permissible Exposure Limit (PEL): A level of airborne fibers specified by OSHA as an occupational exposure standard for asbestos. It is currently 0.1 fibers per cubic centimeter of air, 8-hour time-weighted average, as measured by phase contrast microscopy.

Presumed Asbestos Containing Material (PACM): Thermal system insulation and surfacing material found in buildings constructed no later than 1980, as well as asphalt and vinyl floor materials installed not later than 1980, until proven otherwise as prescribed by OSHA. Beyond this OSHA definition, most “best practices” refer to PACM as any material or product that has a history of being made with asbestos at some point in time and which in a particular application has not yet been sampled and analyzed for asbestos identification.

Regulated Area: an area established by the employer to distinguish areas where airborne concentrations of asbestos exceed or have the potential to exceed the permissible exposure limits.

Spot Repair: the abatement of ACM or PACM in Connecticut in amounts less than 3 linear feet or 3 square feet. This is comparable to OSHA’s Class III Work but restricts the amounts of material to even less than OSHA allows. UConn faculty, staff or students are not approved to conduct this work unless they have received annual Class III training through an asbestos consultant and are working in collaboration with EHS to meet all necessary state and federal requirements.

4 POLICY STATEMENT

As stated in the University’s [Health and Safety Policy](#), the University of Connecticut is committed to providing a healthful and safe environment for all activities under its jurisdiction and complying with federal and state health and safety standards. As such, UConn implements this plan to minimize exposures to asbestos and to comply with asbestos regulations.

5 ENFORCEMENT

Violations of this program may result in appropriate disciplinary measures in accordance with University Laws and By-Laws, General Rules of Conduct for All University Employees, applicable collective bargaining agreements, and the University of Connecticut Student Conduct Code.

6 LIST OF ABBREVIATIONS

ACM: Asbestos-Containing Materials

AMP: Asbestos Management Plan

APN: Asbestos Project Notification

BEC: Building And Emergency Contact

DEEP: Connecticut Department of Energy and Environmental Protection

DPH: Connecticut Department of Public Health

EHS: Environmental Health and Safety

EPA: U.S. Environmental Protection Agency

HEPA: High-Efficiency Particulate Air

OSHA: U.S. Occupational Safety and Health Administration

PACM: Presumed Asbestos-Containing Material

PEL: Permissible Exposure Limits

PPE: Personal Protective Equipment

TSI: Thermal System Insulation

UPDC: University Planning, Design and Construction

7 RESPONSIBILITIES

7.1 ENVIRONMENTAL HEALTH AND SAFETY

- Provides information to the University administration to support decisions on the Asbestos Management Plan.
- Conducts Asbestos Awareness (Class IV) training.
- Conducts Asbestos Coordinator/Competent Person training.
- Provides expertise and guidance on asbestos to maintain compliance with regulatory requirements and University requirements.
- Recommends appropriate response actions to eliminate or control potential asbestos hazards.
- Coordinates with the Facilities Asbestos Coordinator to initiate asbestos abatement projects arising from health and safety hazards and emergencies.

- Ensures the EHS Title V Coordinator reviews and approves the Storrs campus Title V Asbestos Demolition/Renovation Notifications for abatement projects.
- Maintains procedures for after-hours asbestos emergencies, in collaboration with the Facilities Asbestos Coordinator.
- Audits asbestos abatement projects and consultant activities, as necessary.
- Along with Facilities Asbestos Coordinator, maintains historical files of all asbestos inspections, bulk sampling, and abatement projects for University buildings.
- Communicates with regulatory agencies, University Communications, and the University community, as needed, to address asbestos related emergencies and activities.
- Audits programs managed by asbestos coordinators.
- Develops and maintains the University's Asbestos Management Plan.
- Coordinates proper disposal of limited amounts of asbestos waste generated from minor Class IV maintenance and custodial activities by trained UConn staff.

7.2 DEANS, DIRECTORS, AND DEPARTMENT HEADS

- Ensure compliance with the University's Asbestos Management Plan.
- Identify staff to act as asbestos coordinators or competent persons, as necessary.
- Identify maintenance and custodial staff that may come in contact with asbestos building materials during their work activities and require asbestos awareness training.
- Ensure the following criteria are met when procuring services of outside contractors directly (e.g., a Purchase Order) for building related activities:
 - Ensure UConn staff procuring the services attend Asbestos Awareness training annually.
 - Notify contractors of ACM or PACM present and provide written documentation of the testing results.
 - Ensure contractors have received the [Contractor EHS Manual](#) prior to the start of any work.
 - Request asbestos inspections and/or asbestos abatements through the designated asbestos coordinator prior to projects or other work conducted by department personnel or outside contractors (e.g., carpet removal, painting, and other renovations).
 - Circulate communications received from EHS and asbestos coordinators via the departmental [Building and Emergency Contact List](#) to all affected occupants within the building.

7.3 ASBESTOS COORDINATORS

- Determine the presence and location of ACM prior to initiating activities that could disturb building materials. This begins with reviewing existing inspection data in the [Asbestos Database](#).

- Procure aid from outside licensed asbestos inspectors when additional sampling/inspection is needed.
- Procure the services of licensed asbestos abatement contractors and consultants for activities involving disturbance/removal of ACM or PACM, as necessary.
- Send asbestos sampling results and project completion reports to the Facilities Asbestos Coordinator and EHS.
- Ensure abatement projects and contractors' activities are properly monitored by third party consultants.
- Provide written disclosure of the presence of ACM and PACM to outside contractors.
- Ensure contractors receive the [Contractor EHS Manual](#) prior to the start of the project.
- Notify EHS of all asbestos abatement projects by completing the Asbestos Project Notification (APN) form ([Section 17.2](#)). See [Contracted Work – Class I Or II Activities](#) section for additional information
- Notify each departmental Building and Emergency Contact (BEC) within an affected building of the impending asbestos abatement using the Asbestos Abatement Information Sheet ([Section 17.1](#)).
- Arrange waste pickups through [EHS](#) or an asbestos abatement contractor for all Class IV work conducted by UConn maintenance and custodial staff.
- Notify EHS (860-486-3613) of asbestos-related emergencies during normal business hours (i.e., Monday- Friday 8:00am-4:30pm).
- Contact the Facilities Operations Center (860-486-3113) if ACM/PACM needs to be removed during nights or weekends due to an emergency repair (e.g., loss of power to a residence hall).
- Notify University Safety Emergency Communications (860-486-4925) during emergencies involving asbestos fiber releases during nights or weekends. Follows-up with EHS on the next business day.
- Oversee employee training through [HuskySMS](#), as appropriate.
- Facilities Asbestos Coordinator: Oversees asbestos activities within Facilities Operations and campus departments without their own asbestos coordinators.
- Facilities Asbestos Coordinator: Ensures the integration of up-to-date asbestos data into the Asbestos Database.
- Facilities Asbestos Coordinator: Works with EHS to maintain historical files of all inspections, bulk sampling, and abatement projects for University Buildings.

7.4 COMPETENT PERSONS

- Attend the annual Asbestos Coordinator/Competent Persons training.
- Ensure staff are current with annual Asbestos Awareness training (Class IV).

- Supervise work activities of employees conducting Class IV work, as appropriate.
- Conduct regular onsite inspections to assess changes in conditions, respond to employee requests/concerns, and confirm that employees have the appropriate level of training, are following applicable state and federal regulations and UConn procedures, and are using appropriate engineering and work practice controls to prevent asbestos exposure.
- Provide employees with documentation of inspection results or access to the [Asbestos Database](#) to verify asbestos content in affected building materials prior to conducting the work activity.
- Reinforce with staff the need to stop work activities when suspect materials are identified that require further testing or review; Requests any additional testing through the asbestos coordinator.
- Notify the appropriate asbestos coordinator when work activities that may disturb ACM and PACM are necessary, to arrange for proper removal.
- Ensure employees monitor the condition of ACM/PACM.
- Request repairs or removal through the appropriate asbestos coordinator when notified of damaged or deteriorated asbestos-containing building material.
- Secure, manage, and store asbestos waste materials from minor Class IV cleanup and submits waste pickup requests through the [EHS Regulated Waste Management](#) webpage. See the [Asbestos Waste](#) section for further details.

7.5 PROJECT MANAGERS

- Ensure compliance with the University's Asbestos Management Plan.
- Complete annual Asbestos Coordinator/Competent Person training.
- Notify contractors of ACM or PACM present and provides written documentation of testing results when procuring the services of outside contractors.
- Provide the [Contractor EHS Manual](#) to contractors prior to the start of any work.
- Request asbestos inspections and/or asbestos abatements through the appropriate asbestos coordinator prior to projects or other work conducted by outside contractors (e.g., carpet removal, painting, and other renovations).
- Send asbestos sampling results and project completion reports to the Facilities Asbestos Coordinator and EHS.
- Circulate information received from EHS and asbestos coordinators to all affected occupants within a building through the [Building and Emergency Contact List](#).

7.6 DEPARTMENT EMPLOYING MAINTENANCE AND CUSTODIAL PERSONNEL

- Select a competent person and ensure the individual remains current with the annual Asbestos Coordinator/Competent Person training requirements.
- Ensure that the supervisor(s) and staff(s) remain current with their Asbestos Awareness (Class IV.). Select appropriate job activity in HuskySMS and ensure training completion annually.
- Provide employees with documentation of inspection results or access to the [Asbestos Database](#) to verify asbestos content in affected building materials prior to conducting the work activity.
- Notify the appropriate asbestos coordinator to arrange for proper removal/disposal when work activities may disturb ACM and PACM.
- Notify EHS of asbestos emergencies during normal business hours (i.e., Monday- Friday 8:00am-4:30pm).
- Notify [University Safety Emergency Communications](#) (860-486-4925) for asbestos emergencies on nights or weekends. Follows-up with EHS on the next business day.
- Contact the Facilities Operations Center (860-486-3113) when ACM/PACM needs to be removed during nights or weekends due to an emergency critical repair (e.g., loss of power to a residence hall). In this situation, there is no fiber release, but asbestos must be removed to complete the critical repair.
- Disclose the presence of ACM and PACM to contractors not affiliated with UPDC or Facilities and provides them with written documentation of testing results as well as a copy of the [Contractor EHS Manual](#).
- Monitor the condition of ACM/PACM and notifies the asbestos coordinator when repairs are necessary due to damage or deterioration.
- Secure, manage, and store asbestos waste materials from minor Class IV cleanup and submits waste pickup requests through the [EHS Regulated Waste Management](#) webpage. See the [Asbestos Waste](#) section for further details.

7.7 UNIVERSITY MAINTENANCE AND CUSTODIAL EMPLOYEES

- Complete Asbestos Awareness training through HuskySMS annually.
- Comply with federal and state regulations and UConn policies regarding asbestos, as advised by EHS.
- Examine the building materials that may be disturbed in the work area prior to starting work. Reviews the [Asbestos Database](#) or contacts the supervisor to review the Asbestos Database to assess any suspect materials.

- Contact the Facilities Asbestos Coordinator or EHS with questions on the Asbestos Database information or how it pertains to the planned work activity.
- Stop work and requests further testing from the appropriate asbestos coordinator when suspect materials are identified without test data.
- Maintain documentation of written inspection results or access to the [Asbestos Database](#) on the jobsite.
- Stop work, secure the area, and call the supervisor and EHS if asbestos or a material suspected to be asbestos has been damaged.
- Monitor the condition of ACM/PACM and notify the Asbestos Coordinator when repairs are necessary due to damage or deterioration.
- Conduct work activities in a manner which prevents the disturbance of ACM or PACM and the uncontrolled release of asbestos fibers.
- Secure, manage, and store asbestos waste materials from minor Class IV cleanup and submits waste pickup requests through the [EHS Regulated Waste Management](#) webpage. See the Asbestos Waste section for further details.

7.8 PROCUREMENT SERVICES

- Prior to approving a purchase request, require University departments requesting renovation or installation services from contractors to provide confirmation from an asbestos coordinator that an asbestos inspection has been conducted in the affected location(s) and that any ACM/PACM will either not be disturbed during the project or a licensed asbestos abatement contractor has been retained to remove the ACM/PACM prior to start of the project.
- Develop and maintain language in specifications and contracts that notify contractors of the presence of asbestos in University buildings and the requirements pertaining to the disturbance and/or replacement of building materials, as found in the section on Newly Installed Materials.
- Provide the [Contractor EHS Manual](#) to contractors prior to the start of any work.

7.9 UNIVERSITY SAFETY EMERGENCY COMMUNICATIONS/FIRE DEPARTMENT

- Ensure staff are trained in Asbestos Awareness.
- Respond to asbestos emergencies/fibers releases, as necessary.
 - Isolate areas of fiber release to prevent public access.
 - Arrange for the shutdown of the ventilation system, as necessary.
 - Contact an approved asbestos abatement contractor from the emergency list provided by EHS and Facilities.

- Communicate with EHS and the Facilities Asbestos Coordinator on actions taken.

7.10 UConn EMPLOYEES AND STUDENTS UNAFFILIATED WITH ASBESTOS MANAGEMENT

- Submit a work order to Facilities Operations prior to disturbing any building materials. Facilities will determine whether any impacted building materials contain asbestos.
- Contact EHS if work activities include impacting building materials (e.g., drilling, sawing, grinding, cutting, moving suspended ceiling tiles, etc.). If so, employees and students must complete the annual Asbestos Awareness training through EHS.
- Ensure no building materials are disturbed without prior approval from Facilities Operations or EHS.

8 TRAINING

8.1 UConn EMPLOYEES

UConn employees involved with renovations, demolitions, and other related activities or perform maintenance on University buildings, including buffing or stripping floor tiles, must complete Asbestos Awareness Training required by OSHA. The annual training is also mandated for UConn custodial employees prior to being assigned to a building containing ACM or PACM. The training covers OSHA Class IV activities and housekeeping activities and applies to employees who may come in contact with asbestos-containing materials during their daily activities, but do not disturb the materials. Training is provided in person by EHS or online through [HuskySMS](#). Topics in the training include, but are not limited to:

- History of asbestos use
- Health effects
- Locations and recognition of asbestos-containing materials
- UConn policies and procedures
- Work practice controls
- Use of the [Asbestos Database](#)
- Emergency Procedures

8.2 CUSTODIAL CONTRACTORS

Custodial contractors must train their employees each year and supply proof of each employee's Asbestos Awareness Training to Facilities Operations. Employees of custodial contractors who fail to provide proof of the training to Facilities are not allowed to work in areas where they may encounter asbestos-containing materials.

8.3 ASBESTOS COORDINATORS, PROJECT MANAGERS AND COMPETENT PERSONS

Asbestos coordinators, project managers, and competent persons that oversee projects, maintenance, and custodial activities involving asbestos must understand the applicable federal and state asbestos regulations, control strategies, and testing protocols. In addition, they must follow the University-specific procedures to properly manage asbestos and inform contractors, consultants, and staff of the UConn requirements covered by this plan. All asbestos coordinators, project managers, and competent persons must complete Asbestos Coordinator/Competent Person training each year through EHS, a mandatory course that covers the topics of the Asbestos Awareness training program and expands upon aspects of asbestos removal and handling including:

- Federal and state regulations
- Asbestos inspection process
- Asbestos notification procedures
- Abatement methods, requirements and limitations
- Practices for reducing hazards
- Recordkeeping

9 ASBESTOS IDENTIFICATION AND INSPECTIONS

The EPA, OSHA, and the State of Connecticut require an asbestos inspection prior to any installation, repair, renovation, demolition, or other related activity that may impact building materials, regardless of the size of the job activity or the age of the building. Supervisors must either provide written documentation of the inspection results or access to the [Asbestos Database](#) at the jobsite. If ACM is to be disturbed during the job activity, it must be removed by a licensed abatement company prior to the commencement of the job. If ACM is not intended to be disturbed, it must be identified and protected from accidental or incidental damage during all work activities.

While many manufacturers stopped or reduced the use of asbestos, other manufacturers continue to use asbestos today in many products. Therefore, unless data exists that proves asbestos products were not used, new buildings must be included in the inspection process for any activity that impacts building materials. UConn has collected and entered data on asbestos-containing materials for University buildings into an Asbestos Database. EHS provides access to the database to personnel who have completed and remained current with their asbestos

awareness training requirements. To request access, qualified workforce members must contact [EHS](#). The Facilities Asbestos Coordinator and EHS maintain the original hard copies of the inspection reports with sampling and laboratory data.

The Asbestos Database includes asbestos sampling data of accessible interior building materials. The database does not include materials exposed through destructive testing since exposing those materials may cause significant physical or structural damage. Exterior building materials are also not listed in the database. Thus, for most projects, review of the database is the starting point, but additional testing will likely be necessary. It is also important to realize that some asbestos-containing materials could exist that have not been identified or sampled. Examples of materials that were likely not sampled, include but are not limited to:

- Thermal system insulation within wall cavities.
- Construction mastics for weatherproofing or vapor barriers interior to walls or on foundations, especially below grade.
- Leveling compounds.
- Multiple layers of flooring or wall or ceiling systems.
- Adhesives behind mirrors, chalkboards and whiteboards.
- Ceramic tile setting compound and grout.
- Joint expansion sealants.
- Fire door and door frame insulation.
- Gaskets, elevator brakes, and parts of other electrical, mechanical, and HVACR systems.
- Exterior building materials

Lack of data in the database does not signify there are no asbestos concerns. If a material will be impacted that is not found in the database, it must be considered a Presumed Asbestos Containing Material (PACM) and undergo an inspection and testing prior to commencing work.

Individuals with access to the database must initially review the information to identify sources of ACM prior to the beginning any project or activity. Inspection results or access to the database must always be available on the job site. If access to the database on the job site is unavailable, printing copies of the necessary information from this database can serve as a written documentation of the inspection. If a new material is discovered or a known material that will be disturbed is not listed in the database or available inspection reports, **work must stop** until the appropriate asbestos coordinator coordinates an additional inspection and sampling.

To request an asbestos inspection for renovation or demolition purposes, contact the appropriate asbestos coordinator in the department or division or submit a work order through the [Facilities](#). Requests will be forwarded through the Facilities Asbestos Coordinator to a consultant to conduct the inspection. UConn uses appropriately trained and licensed consultants to conduct asbestos inspections, comply with state and federal regulations, and determine the scope and materials involved in the inspection.

10 NEWLY INSTALLED MATERIALS

All replacement building materials shall be asbestos free unless written approval is received from EHS. It is up to the departments employing maintenance staff and project managers to review and ensure replacement materials do not contain asbestos. UConn [Design Guidelines and Performance Standards](#) stipulate that no asbestos or vermiculite shall be used in exterior or interior building materials. Due to EPA's air emissions standards for asbestos and the lack of a complete ban on asbestos, all building materials must be inspected for asbestos prior to any maintenance, repair, renovation, demolition or other related activity regardless of the age of the building material or date of installment, including newly installed materials.

11 MATERIALS CONTAINING LESS THAN ONE PERCENT (<1%) ASBESTOS

EPA and CT DPH regulate materials containing equal to or greater than 1% asbestos. OSHA defines asbestos containing materials as containing more than 1% asbestos, however OSHA also stipulates that any amount of asbestos in a building material could potentially produce airborne employee exposures depending on the task. It is UConn's responsibility to make sure that employees are not being exposed above OSHA's [Permissible Exposure Limit](#) (PEL) or [Excursion Limit](#) (EL) for asbestos, even for building materials that contain less than 1% asbestos.

Employers are required to conduct Negative Exposure Assessments (NEA) for work on friable materials containing <1% asbestos. The goal of the assessment is to document, through employee personal exposure monitoring, that employees are not exposed to asbestos above OSHA exposure limits by using engineering controls and work practices (e.g., HEPA-shrouded power equipment, wet methods, etc.).

If a NEA does not exist for a typical operation or building material, regulated areas must be set up, and work must be conducted by licensed abatement workers. This would include materials such as wallboard systems where joint compounds may be <1%, or plasters where the skim or base coats are found to contain <1% asbestos and would affect even routine activities such as

drilling to attach shelves, scraping and sanding for refinishing, and attaching wire molds or outlets.

If work is necessary on non-friable materials containing <1% asbestos, employees must use work practices that collect dust generated at the point of operation and wet methods. The recognized work practices for protection from [respirable crystalline silica](#) activities must be used when conducting activities on non-friable materials containing <1% asbestos. If this is not feasible, employees must follow work practices for friable <1% materials.

12 ABATEMENT REQUIREMENTS

According to federal regulations, removal or maintenance of ACM falls under one of four categories:

- **Class I & II** – Removal of TSI or Surfacing materials (Class I) and Miscellaneous materials (Class II), greater than 3 square feet or 3 linear feet.
- **Class III** – Repair and maintenance that could disturb a small amount of ACM (less than 3 square or linear feet) – examples include but are not limited to: splicing asbestos electrical wire, removing an old gasket from a flange, removing less than 3 feet of tile, removing or repairing less than 3 feet of pipe insulation, taking asbestos samples, and drilling a hole in an asbestos-containing wall.
- **Class IV** – Maintenance and custodial activities that contact but do not disturb ACM, such as stripping floor finish from asbestos-containing floor tile.

Class I and II activities at the University require licensed asbestos abatement workers. State and federal regulations require individuals involved in these projects to be properly trained and use negative pressure enclosures, decontamination chambers, respirators and other personal protective equipment (PPE), and engineering and work practice controls. In addition, asbestos project monitors are hired separately by the University to provide air monitoring services, ensure projects comply with regulations, and ensure workers use proper engineering controls and safe work practices. A description of the asbestos abatement process can be found in the [Asbestos Abatement Information Sheet \(Section 17.1\)](#).

Prior to beginning any asbestos abatement project involving greater than 10 linear feet or 25 square feet, the asbestos abatement company must provide a 10-day advance notification to CT DPH. Since the Storrs campus holds a Title V air permit, the asbestos abatement company must also provide a 10-day notification to the CT DEEP and CT DPH for any asbestos projects that exceed 260 linear feet or 160 square feet. For the regional campuses and other UConn

properties, the asbestos abatement company, in addition to contacting CT DPH, must also provide a 10-working day notification to the EPA for any asbestos projects that exceed 260 linear feet or 160 square feet. The notification requirements are outlined in the table below.

Abatement Notification Requirements

UConn Location(s)	Project Size	Regulatory Agency Notification
All locations excluding UConn Health	<10 ft or <25 ft ²	No notifications required
All locations excluding UConn Health	>10 ft or >25 ft ² but <260 ft or <160 ft ²	CT DPH
Storrs Campus	>260 ft or >160 ft ²	CT DPH and CT DEEP EHS Title V Specialist must sign
All other locations Excluding Storrs Campus and UConn Health	>260 ft or >160 ft ²	CT DPH and EPA

13 ADMINISTRATIVE PROCEDURES

13.1 MECHANICAL SPACE POSTINGS

In accordance with OSHA regulations, all mechanical spaces in pre-1980 buildings must be posted with information on the ACM and PACM that are found within the location. Facilities will oversee maintaining these postings. An example of a typical mechanical space posting can be found in [Section 17.3](#).

13.2 CONTRACTED WORK – CLASS I OR II ACTIVITIES

To initiate a project, the asbestos coordinator of the department must select an approved Connecticut Department of Public Health (CT DPH) licensed asbestos abatement contractor, an approved state licensed consultant, and complete an [Asbestos Project Notification](#) (APN) for all Class I or II activities. The completed APN must be emailed or faxed to EHS. Estimates are acceptable for dates and may be corrected at the completion of the project.

If projects require a notification(s) to CT DPH, CT DEEP, or EPA, the selected contractor must provide the notification(s) to each regulatory agency no less than ten days (10 working days for

EPA) prior to the start of the project. The contractor must also provide a copy of each notification to the asbestos coordinator. The asbestos coordinator, in turn, will attach a copy of the notification(s) to the APN and send it to EHS no less than five (5) days prior to the start of the project, unless an emergency occurs, in which case the notification shall be sent to EHS upon receipt from the abatement company.

The asbestos coordinator must obtain project reports from the abatement contractor and consultant and provide them to EHS within 30 days of completion of asbestos activities. An amended APN shall be sent if corrections have been made to the original information and must be accompanied by copies of the selected contractor's revised notifications which are required to be sent to the CT DPH.

13.3 NOTIFICATION TO OCCUPANTS PRIOR TO ASBESTOS REMOVAL ACTIVITIES

The Building and Emergency Coordinator must notify occupants in areas adjacent to planned asbestos removal projects prior to the commencement of abatement activities. The notification must include information pertaining to the type of material(s) being removed and the control measures being implemented to prevent exposure to asbestos fibers. For abatement projects in which containments are constructed (e.g., work conducted by state licensed asbestos abatement contractors), the Asbestos Abatement Information Sheet, [Section 17.1](#) must be used.

13.4 CONTRACTOR NOTIFICATIONS

1. Prior to beginning a specific work activity or project, contractors will be notified of presence of ACM and/or PACM through their contract documents, and the plan for removal if necessary.
2. Prior to arrival on campus, contractors must ensure that their employees and subcontractors are aware of any asbestos containing materials and the procedures to follow when PACM are identified.
3. Contractors must comply with all federal and state regulations as well as the information pertaining to asbestos, training, and other requirements provided in the [Contractor EHS Manual](#).

14 MAINTENANCE OF ASBESTOS CONTAINING MATERIALS

14.1 PROHIBITED ACTIVITIES

The following work practices shall not be used for any work that may disturb ACM, PACM, or materials that contain <1% asbestos, regardless of the measured exposure level to the employee:

- High-speed abrasive disc saws without point of cut ventilation to HEPA filtered vacuums or HEPA shrouded equipment
- Compressed air
- Dry sweeping, shoveling, or other dry-cleaning methods of ACM or dust and debris containing ACM and PACM
- Use of employee rotations to reduce employee exposure to asbestos.

14.2 ROUTINE MAINTENANCE AND CLEANING

Workforce members must keep all surfaces free from asbestos dust and debris to the greatest extent possible. Workers must ensure that no dusting, dry sweeping, or vacuuming (unless using a HEPA vacuum) occurs in any area containing visibly deteriorated ACM, including mechanical spaces. Employees trained in Class IV (asbestos awareness) requirements can only clean up small amounts of dust and debris using a HEPA vacuum or one wet paper towel. They can also pick up loose floor tile for proper packaging and disposal as asbestos waste, but only if the tile has completely disassociated from the substrate and no mastic effectively holds the tile to the substrate. Workforce members must not disturb any mastic remaining on the floor. All other asbestos cleanups, beyond the management of minor dust and debris, must be conducted by licensed asbestos abatement contractors.

14.3 SURVEILLANCE OF ASBESTOS CONTAINING MATERIALS

Departments with maintenance and custodial employees must ensure they provide periodic surveillance of asbestos containing materials in University buildings during their work activities. Maintenance and custodial employees must document and report signs of deterioration or disturbance to the appropriate asbestos coordinator, competent person, or EHS for necessary repairs or abatement.

14.3.1 Maintenance of Asbestos-Containing Floor Material

- Sanding of flooring material is prohibited.
- Stripping of finishes shall be conducted using:
 - Low abrasion pads,
 - Speeds lower than 300 revolutions per minute (rpm), and
 - Utilizing wet methods.

- Burnishing or dry buffing shall only be conducted on floors with a sufficient coat of floor finishes, and only on floors where tiles and adhesives will remain intact throughout the process.
- Floor care includes:
 - Regular sweeping and wet mopping to maintain tile in good condition.
 - Regular applications of floor finish.
 - Use of mats in high traffic areas.

14.3.2 Maintenance/Repair of Floor Tiles

Maintenance and repair of floor tiles must comply with state and federal regulatory requirements. The regulatory limit for maintenance and repair activities by an asbestos contractor is three 3 linear feet or 3 square feet in any one location, which equates to approximately three 12x12 inch or five 9x9 inch floor tiles. Beyond those quantities, full-scale abatement is required, involving the construction of full containments, project monitoring, and air sampling. University staff have only a few options to maintain floor tile in place: sealing of the floors with floor finish, void filling, and spot repair.

- Floor finishes can be applied to prevent damage to the raw tile. Floor finishes are recommended in offices where chair casters scratch floor tiles and in locations where sand and salt in the winter months abrade the tiles. Departments should purchase mats to be placed underneath chairs with casters to prevent damage to floor tiles.
- Void filling involves the application of a cement feathering compound in small ‘holes’ in the tiles, usually at edges where tiles meet. It is used to stabilize floor tiles and prevent further chipping.
- Spot repair involves the repair or removal of less than 3 square feet of tile by licensed asbestos abatement personnel followed by immediate replacement with new tile. Replacement of the tiles must be prioritized or adjacent tiles and exposed mastic become susceptible to disturbance.

These methods remain the most effective options for maintaining floor tile in place. Trained maintenance staff must assess the tile for necessary repairs and place work orders through Facilities Operations for any broken and loose tiles.

15 ASBESTOS WASTE

15.1 ASBESTOS WASTE MANAGEMENT

University workforce members should not generate asbestos waste in the course of their work, however there may be instances when small amounts of loose floor tile containing asbestos or wet paper towels with a small amount of asbestos debris require proper management. Asbestos waste cannot be discarded in the regular trash and requires proper disposal to comply with state and federal regulations. University staff must follow the procedures below to dispose of asbestos containing waste:

1. Don appropriate personal protective equipment indicated in the Workplace Hazard Assessment form.
2. Place and seal the ACM seal in 6-mil plastic bag or closed container.
3. Label the waste container with the label below. Check off the hazard(s), building where the waste was generated, and name of the contact person.

REGULATED BUILDING
MATERIAL WASTE

Contents (check all that apply):

<input type="checkbox"/> ASBESTOS	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> <div style="background-color: red; color: white; border-radius: 15px; padding: 2px 10px; font-weight: bold; font-size: 1.1em;">DANGER</div> <p style="font-size: 0.8em; margin: 0;">CONTAINS ASBESTOS FIBERS MAY CAUSE CANCER CAUSES DAMAGE TO LUNGS DO NOT BREATHE DUST AVOID CREATING DUST</p> </div>
<input type="checkbox"/> Assumed LEAD	
<input type="checkbox"/> Assumed PCB	
<input type="checkbox"/> Other: _____	

Building where generated: _____

Contact person: _____

4. Submit a [chemical waste pick-up form](#) through EHS.
5. Store the container in a secure location until the EHS removes the waste.

If contractors find or generate a small amount of ACM waste, they must properly manage and arrange for pickup and transport through a licensed asbestos contractor/hauler to a regulated disposal facility. Tracking must be completed through Waste Shipment Records (WSRs) and copies of shipments must be submitted to the Facilities Asbestos Coordinator and EHS to document completion.

15.2 HEPA VACUUMS

If HEPA vacuums are used to clean asbestos containing materials or debris, workforce members must **NEVER OPEN THE VACUUM TO EMPTY THE CONTENTS**. Vacuums used for asbestos clean up must be labeled with the following information in an area that is clearly visible:

DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST

Once the vacuum is full, workforce members must either submit a work order to Facilities or contact the appropriate asbestos coordinator who must request the on-call asbestos abatement contractor to empty, clean, and return the vacuum for future use.

16 ASBESTOS FIBER RELEASES AND CRITICAL EVENTS

16.1 FIBER RELEASES

A major fiber release is defined as the unintentional or uncontrolled disturbance of more than 3 feet of friable asbestos containing building material. A minor fiber release is defined as the unintentional or uncontrolled disturbance of less than 3 feet of friable ACM. Non-friable asbestos-containing materials can still be rendered friable and result in a fiber release episode. In the event of a major or minor release:

1. Isolate and secure the area.
2. Post warning signs on door(s) or at the entrance(s) to the area.
3. If possible, turn off fans, shut windows, and/or shut down the ventilation system to prevent migration of fibers.
4. During normal business hours, contact the supervisor, the asbestos coordinator, and/or EHS (860-486-3613) as soon as possible.

5. For after-hours and on weekends, contact [University Safety Emergency Communications](#) (860-486-4925) and identify that there is an asbestos fiber release. Only properly trained and qualified asbestos contractors are allowed to respond and commence abatement activities during fiber releases.
6. Regional campus personnel must contact their Facilities manager who has the contact information for the asbestos abatement contractors. Asbestos contractors are authorized to contact an on-call air monitoring consultant during emergencies.

16.2 ASBESTOS REMOVAL AFTER-HOURS DURING CRITICAL EVENTS

In the event that asbestos abatement must be removed after hours or on weekends due to a critical event (e.g., loss of heat to a building) and a fiber release has not occurred, maintenance and custodial employees must contact the [Facilities Operations Center](#) (860-486-3113) and provide details of the proposed abatement, location, and the approximate quantity of asbestos needed for removal. The Facilities Operations Center staff will contact an on-call asbestos abatement contractor to arrange for removal after hours.

17 APPENDICES

17.1 [ASBESTOS INFORMATION SHEET](#)

17.2 [ASBESTOS PROJECT NOTIFICATION FORM](#)

17.3 [MECHANICAL SPACE POSTING](#)

DANGER

**CERTAIN MATERIALS WITHIN THIS MECHANICAL ROOM/AREA
 CONTAIN ASBESTOS FIBERS
 AVOID CREATING DUST
 CANCER AND LUNG DISEASE HAZARD
 AVOID BREATHING AIRBORNE ASBESTOS FIBERS**

As required by the Occupational Safety and Health Administration (OSHA) for buildings constructed no later than 1980, this posting must be used to alert individuals to the presence of asbestos-containing materials (ACM) within this building area/space. Any questions may be directed to Environmental Health and Safety (ehs@uconn.edu)/(860) 486-3613).

AREA: _____

The following forms of confirmed ACM are present within this space.

ACM Material	General Location

Any of the following suspect materials which are present within this space are presumed asbestos containing materials (PACM) in accordance with OSHA regulations until proven otherwise.

PACM Material	General Location
No PACM found	

Note: Additional building materials yet to be identified may also contain asbestos fibers but are not required to be labeled as PACM by OSHA. Contact the [University Planning, Design and Construction](#) prior to any renovation, demolition or disturbance of building materials.

**Do not disturb the ACM/PACM or use dry sweeping or non-HEPA vacuums to clean up ACM/PACM debris.
 Report ACM/PACM damage to the University EHS Department at 486-3613.**

DO NOT REMOVE THIS POSTING