



Department of Environmental Health & Safety

Asbestos Management Program

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OHIO University
Asbestos Management Program

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Ohio University

Asbestos Management Program

1.0 Scope

- 1.1 The OHIO University Asbestos Management Program (herein called the “Program”) requirements apply to all employees, properties, and projects at OHIO University (OU) Main Campus. The “Program Staff” means the appropriate members of Environmental Health & Safety (EHS) and the Facilities Management, Environmental Services Shop (FM/ESS).
- 1.2 The program is in place at the Main Campus in Athens, Ohio. Staffing and funds have not been made available to extend EHS programs to the Regional Campuses at this time. Regional Campuses should contact EHS at the main campus for phone assistance for asbestos project planning. All asbestos regulatory requirements must be met at all OU campuses as required by law.
- 1.3 All construction, renovation, capital facilities, and demolition projects are subject to this program. Project planners must contact EHS early in the project planning stages to avoid problems, scheduling conflicts, regulatory liability, and to insure adequate funding in the project budget.
- 1.4 Because of the potential for health and safety risks and regulatory non-compliance, no OU employee shall cause the disturbance of any building material, utility, structure, or other potentially asbestos-containing material (ACM) before first consulting with the Asbestos Program Staff to determine the asbestos status, regulatory, and program requirements.

2.0 Purpose

- 2.1 Asbestos exposure is a well-documented health hazard. Exposure to this material can contribute to the development of asbestosis, lung cancer, mesothelioma, and other illnesses. The amount of exposure required to produce disease is variable and not known with certainty; therefore it is prudent to prevent such exposures and keep any exposure to a level as low as reasonable achievable.
- 2.2 The purpose of the program is to:
 - protect employees, students, contractors, and visitors from the potential health hazards of asbestos exposure on campus
 - prevent illness, injuries, and death from accidents during asbestos abatement activities on campus
 - allow for appropriate construction, renovation, and demolition project planning
 - insure regulatory compliance with the many asbestos regulations, and many agencies, on the state and federal level

- insure that appropriately trained, qualified, and state licensed individuals administer the Asbestos Management Program at OU
 - protect the property and facilities of OU
 - protect the reputation of OU and prevent public relations problems
- 2.3 The Program continues to be a model asbestos program nationwide.
- 2.4 Many OU buildings have asbestos-containing building materials and other asbestos containing equipment in them. This list is kept by EHS, and has been passed out to Facilities Management maintenance and custodial staff. Full reports and locations are maintained by the Program staff. Contact EHS for a summary building list.

3.0 Organization

- 3.1 EHS administers the Asbestos Management Program. The Director of EHS shall assign a program administrator from the EHS staff.
- 3.1.1 The current Program Administrator is:
The Environmental Safety Coordinator
- 3.1.2 The Program Administrator shall be licensed by the State of Ohio as needed.
- 3.2 The program is managed jointly by the Dept. of Environmental Health & Safety (EHS) and the Dept. of Facilities Management (FM), Environmental Services Shop (ESS)
- 3.2.1 FM/ESS was originally established as the Insulation Shop to conduct asbestos maintenance, do minor abatement, and fix insulation on campus. Their current role is to keep the OU operations and maintenance plan in compliance. Upon request FM/ESS can conduct small scale short duration abatement work.
- 3.2.2 The Manager of the FM/ESS shall supervise the shop and campus asbestos projects by the shop and outside contractors on campus on a daily basis, under the general direction of the EHS Program Administrator.
- 3.2.2.1 The FM/ESS Manager shall be licensed by the State of Ohio as needed for asbestos work.
- 3.2.2.2 All asbestos abatement workers in the FM/ESS shall be licensed by the State of Ohio as needed.
- 3.3 OU shall be licensed by the State of Ohio, Ohio Dept. of Health as an Asbestos Contractor.
- 3.4 Throughout the 1990's asbestos requirements have become standardized and the OU Asbestos Program has adopted and changed forms and other procedures to be in line with national and state norms.
- 3.5 The major components of the Asbestos Management Program are:

- Program Management and Oversight
 - EHS
 - FM/ESS
- The FM/ESS Operations
 - Operations & Maintenance Program (O&M)
 - Carpet/Tile Shop & CNS operations oversight
 - In-house abatement projects
 - Contractor supervision
 - Material surveillance and maintenance
- Building Asbestos Surveys and Testing
 - Building Bulk Survey Reports and Testing Data
 - OU EHS Asbestos Lab (Biochemistry Building 125)
 - Air Monitoring
- Contracted Asbestos Projects
 - OU Asbestos Project Specifications
 - Term Consultants
 - Term Contractors
 - Contracted Project Cost Estimating and Proposals
- Other OU Staff
 - Custodians and Maintenance Personnel
 - Communications Network Services (CNS)
- Construction & Renovation Projects
 - Facilities Planning Projects
 - Facilities Management Projects
 - Demolition
- Records
- Regulatory Updates

4.0 References and Definitions

4.1 There are a tremendous number of state and federal regulations and regulatory requirements surrounding asbestos abatement. References are listed here:

- 4.1.1 Title 29, Code of Federal Regulations, Section 1926.1101, Asbestos in Construction, Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 4.1.2 Title 29, Code of Federal Regulations, Section 1910.1001 Asbestos (General Industry), Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 4.1.3 Title 29, Code of Federal Regulations, Section 1910.134 Respiratory Protection, Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 4.1.4 Title 29, Code of Federal Regulations, Section 1910.1200, Hazard Communication (General Industry), Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.

- 4.1.5 Title 29, Code of Federal Regulations, Section 1926.59 Hazard Communication (Construction Industry), Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 4.1.6 Title 29, Code of Federal Regulations, Part 1926, Subparts C-M, T, X, Z. Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 4.1.7 Title 29, Code of Federal Regulations, Part 1910, Subparts J. Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 4.1.8 Title 40, Code of Federal Regulations, Part 61, Subparts A and M, National Emissions Standards for Hazardous Air Pollutants, U.S. Environmental Protection Agency (EPA).
- 4.1.9 Title 49, Code of Federal Regulations, Hazardous Materials Transportation Regulations, U.S. Department of Transportation (DOT).
- 4.1.10 Ohio Revised Code, Chapter 3710-ODH Asbestos Regulations & Licensing
- 4.1.11 Ohio Revised Code, Chapter 3745-OEPA Asbestos Regulations
- 4.1.12 Public Employees Risk Reduction Program (PERRP) – these state employee rules are the same as OSHA requirements for asbestos.
- 4.1.13 Other State and local regulations having authority over asbestos-related activities.

4.1.14 Guidance Documents

- Asbestos-Containing Materials in School Buildings: A Guidance Document, Part 1. Office of Toxic Substances, U.S. EPA, Washington, D.C. 1979.
- Asbestos-Containing Materials in School Buildings: A Guidance Document Part 2. Office of Toxic Substances, U.S. EPA, Washington, D.C. 1979.
- Guidance for Controlling Friable Asbestos-Containing Materials in Buildings: Washington, D.C., Office of Pesticides and Toxic Substances, U.S. EPA. 1983

Appendix F: Recommended Specifications and Operating Procedures for the Use of Negative Pressure Systems for Asbestos Abatement.

- Guidance for Controlling Asbestos-Containing Materials in Buildings: Washington, D.C., Office of Pesticides and Toxic Substances, U.S. EPA. 1985

- Measuring Airborne Asbestos Following an Abatement Action: Washington, D.C., Office of Pesticides and Toxic Substances, U.S. EPA 1985.
- Asbestos Waste Management / Guidance: Generations, Transport, and Disposal: Washington, D.C., Office of Solid Waste, U.S. EPA 1985.

4.0.12 Codes and Standards

- ANSI - American National Standards Institute, ANSI Z 9.2, Fundamentals Governing the Design and Operations of Local Exhaust Systems.
- NEC - National Electric Code, any work involving electrical equipment in a facility shall be performed in strict accordance with the National Electrical Code.
- NFPA - National Fire Protection Association, Standard 90A: Installation of Air Conditioning and Ventilation Systems.

4.2 Definitions

- 4.2.1 Intact - The ACM in question has not been broken, pulverized, or deteriorated.
- 4.2.2 The numerous regulations listed above contain hundreds of definitions that are available on the web and are not reproduced here. The OU Program uses these definitions as default if not listed above.
- 4.2.3 Abatement – Operation which reduces a hazard, including but not limited to; removal, encapsulation, and management in place.

4.3 Web sites for regulations and definitions:

- 4.3.1 OSHA – General Industry & Construction Asbestos Standards
[OSHA Standards](#)
- 4.3.2 EPA – Asbestos NESHAPS Air Regulations, AHERA, and others
[EPA Standards](#)
- 4.3.3 DOT – Department of Transportation - Waste Labeling & Transport
[DOT Standards](#)

- 4.3.4 ODH – Ohio Dept. of Health Asbestos Rules & Licensing
[ODH Asbestos Regulations](#)
- 4.3.5 OEPA – Ohio EPA Asbestos Air & Waste Rules
[Ohio EPA Asbestos Regulations](#)
- 4.3.6 OHIO Environmental Health & Safety – Asbestos, Respiratory Protection, and Other Programs
[OHIO EHS Programs](#)

5.0 The Ohio University Program

- 5.1 EHS started the formal OU Asbestos Management Program in 1985. This written program document was updated in 1987. An Asbestos Shop (originally called the Insulation Shop) was started at Facilities Management and EHS during this period, and eventually became the Environmental Services Shop (FM/ESS) in the late 1990's. FM/ESS now ensures OU operations and maintenance program compliance.
- 5.2 The OHIO Program is managed jointly by EHS and the FM/ESS, who coordinate the program and requirements with the campus community.
- 5.3 Locations and Contacts
 - 5.3.1 EHS, Environmental Safety Coordinator (Program Administrator) – 215 Hudson, 593-1685
 - 5.3.2 FM/ESS, Assistant Director (Program Manager) – FM, 593-9157 / ESS, 593-9146
 - 5.3.3 Asbestos Microscopy Lab – Biochemistry Building 125
- 5.4 Program personnel work closely with the following groups:
 - 5.4.1 Facilities & Auxiliaries Management
 - Facilities Management – Various shops as needed
 - Facilities Management – Renovations
 - Facilities Management – Engineering
 - Custodial Services
 - Housing
 - 5.4.2 Facilities Planning – Capital Projects, Construction & Demolition
 - 5.4.3 Occupational Health Services (OHS)
 - 5.4.4 Communications Network Services (CNS)
 - 5.4.5 The Campus Community
- 5.5 This written program document and other program information is available on the EHS web site (along with a link to FM/ESS) at:
[EHS web site](#)
- 5.6 Program and project documents are stored by EHS, FM/ESS, and Occupational Health Services at various campus locations, based on the

information source and need. Long-term storage of documents with a 30-year regulatory requirement is maintained by EHS.

6.0 The Facilities Management, Environmental Services Shop Operations

- 6.1 The Manager of the FM/ESS runs the day-to-day operations of the asbestos program for the campus, in coordination with the EHS Asbestos Program Administrator.
- 6.2 All FM/ESS Shop personnel are appropriately trained, equipped, and licensed by the State of Ohio in their respective areas of asbestos responsibility. OHIO Asbestos Personnel are trained far in excess of any state requirements.
 - 6.2.1 The Environmental Services Shop maintains adequate workspace, shower facilities, laundry, safe work facilities, equipment, waste disposal dumpsters, and other necessary facilities at their shop at Facilities Management.
 - 6.2.2 Workers receive medical clearance, annual exams, annual training, and annual re-licensing.
 - 6.2.3 Workers participate in the OU Respiratory Protection Program.
 - 6.2.4 Waste disposal for the shop is at the Athens County Reclamation (Kilbarger Landfill) Facility in Nelsonville, OH, an OEPA approved asbestos disposal site.
- 6.3 OU (Program Staff) is a licensed Asbestos Abatement Contractor in the State of Ohio.
- 6.4 The FM/ESS Manager supervises the shop staff, asbestos abatement, asbestos surveillance, operations and maintenance, technical oversight for the CNS cabling crews, asbestos project price estimating, management of outside asbestos contractors and consultants in accordance with the OU Asbestos Specifications and our term contract, waste disposal, sampling, and daily coordination with the EHS Asbestos Program Administrator.
- 6.5 Asbestos abatement projects greater than or equal to 260 lineal ft, 160 sq. ft., or 35 cu. ft. of asbestos material and any demolition (even with no asbestos) require a 10-day notice and fee to Ohio EPA. Class 1 projects over 50 ft. require a 10-day notice and fee to the Ohio Dept. of Health (ODH). The FM/ESS will take care of these notices after the project planner gives adequate lead-time. Fees for the required regulatory notices are paid by the FM/ESS and billed to the project.
 - 6.5.1 Emergency notifications can be submitted to waive the 10 day notification period in true emergencies caused by building system failures, natural disasters, etc.
 - 6.5.2 Logistical, financial, or other emergencies caused by failure to plan or reasonably anticipate asbestos needs, are not considered emergencies in a regulatory sense, and emergency project notifications for these projects are not permitted by regulatory agencies.

- 6.6 The FM/ESS does routine maintenance, clean up, and repair of asbestos containing materials (ACM) and removal for other maintenance shops.
 - 6.6.1 Work orders for the shop can be submitted by calling 593-2911.
- 6.7 The shop does routine surveillance of acm around campus, conducts mechanical room inspections, and does audits as time allows.
- 6.8 The shop does asbestos abatement on small abatement jobs for renovations and capital improvements as time allows. Projects are billed for these services.
- 6.9 Any department planning renovations must include the asbestos work in the project cost, unless that department has obtained special funds separately. No renovations can be done without funding for required asbestos removal.
- 6.10 The Asbestos Management Program retains several asbestos consultants and contractors for larger jobs. This is outline in section 8.0 of this document.
- 6.11 The shop reserves the right to charge departments or projects for any asbestos abatement or clean up costs associated with their failure to follow university policies on acm or the guidelines of the Asbestos Management Program.
- 6.12 The FM/ESS coordinates the asbestos program with all other OHIO Safety and OSHA requirements; such as, lead paint, confined space, lock out/tag out, respiratory protection, fall protection, scaffolding, and other OHIO programs as needed.

7.0 Building Asbestos Surveys and Testing

- 7.1 New building materials can still contain asbestos, especially if they are imported. For this reason projects should specify all materials used do not contain asbestos.
- 7.2 Buildings must be surveyed, potential asbestos containing materials sampled and identified before any renovation, construction, or demolition. Removal is required if the project activities will disturb regulated acm. Contact EHS (593-1666) or FM/ESS (539-2911) for guidance.
- 7.3 Nearly all campus buildings were surveyed for asbestos containing building materials and mapped in early 1990's by several different consulting companies. Copies of these building reports are located at EHS, Hudson Health Center and the Environmental Services Shop, Facilities Management.
- 7.4 EHS also maintains a database of nearly 3,000 additional bulk asbestos sample results in campus buildings taken since about 1980.
- 7.5 EHS maintains an asbestos analysis microscopy lab in Biochemistry 125 which has the capability to analyze:
 - 7.5.1 Bulk samples of building materials by polarized light microscopy with dispersion staining. OU cannot make a negative determination.
 - 7.5.2 Air samples for fiber analysis by Phase Contrast Microscopy (PCM) NIOSH 582 Equivalent.

- 7.5.3 The lab is used for campus educational and maintenance purposes only and not for regulatory purposes. OU does not maintain normal laboratory quality control programs and certifications. (no NVLAP certification)
- 7.6 If there is a need to verify, resample, or otherwise analyze any asbestos bulk samples, contact EHS or the Environmental Services Shop. State law requires licensed individuals collect these samples. Other OU employees must not take any samples for analysis themselves.
- 7.7 Asbestos bulk sampling numbers may be found on some building materials and can be looked up on the EHS asbestos sample database. There are still some building mechanical rooms on campus where an old asbestos marking system is still on some pipes and tank insulation (three green/yellow/red tape stripes mean asbestos-containing material, and two green/red tape stripes mean not asbestos-containing).
- 7.8 Buildings purchased after the building surveys were done in the early 1990's may not be surveyed. If they are to be renovated or demolished, an asbestos bulk survey will need to be scheduled through EHS and the ESS and the cost included in the project budget. This will also add significant additional time to the project.
- 7.9 For all **renovations, construction, installation, and demolition** projects, it is the OU Project Manager's responsibility to plan for all asbestos and other environmental needs of the project, check with the Asbestos Program Staff early in the planning process, allow enough time in the project timetable (without unreasonable rush requests to the Asbestos Program personnel because of failure to plan adequately), and to pay for all asbestos and other environmental work needed for the project as part of the project budget.
- 7.10 The Asbestos Program Staff does is not required to make copies of building surveys for anyone. This is because the reports are very lengthy and technical information must be interpreted and explained by licensed program staff to insure proper understanding and implementation of the project. Interpretation errors can cause significant health hazards and liabilities.
- 7.11 EHS maintains all necessary air sampling equipment to conduct air sampling for asbestos projects by phase contrast microscopy (PCM) for fibers or transmission electron microscopy (TEM) for asbestos as needed for either personal samples, ambient air samples, or clearance samples. The FM/ESS maintains air-sampling equipment for personal sampling of their staff and projects.
- 7.12 EHS maintains a database of all employee exposure records (personal air sampling results) for asbestos as well as all other air monitoring parameters when required by OSHA (PERRP in Ohio).
- 7.13 EHS retains NVLAP certified outside labs for the analysis of all regulatory asbestos bulk and air samples, as well as for all other air monitoring parameters.

8.0 Contracted Asbestos Projects

- 8.1 The OU Asbestos Program has written asbestos project specifications that contractors and consultants must comply with. A multi-year term contract is bid out periodically and we retain three (3) asbestos term contractors to do work at OU. We also work with several consulting companies who work here at OU. Project Managers and others may not contract with any outside firm for asbestos work without going through the OU Asbestos Program Staff.
- 8.2 Some very large asbestos abatement projects for capital improvements may require a separate bid process managed through the Purchasing Department. Project Managers should consult with EHS or FM.
- 8.3 Outside contractors and consultants are used for larger asbestos bulk surveys and abatement projects that are beyond the scope or time abilities of our in-house Environmental Services Shop. The FM/ESS will make this determination when contacted by the Project Manager.
- 8.4 Consultants perform asbestos bulk surveys of buildings or areas if needed. They are also involved with asbestos project planning, cost estimates, time estimates, oversight of abatement projects, air sampling/monitoring of the project, and preparation of the final closeout documents. Consultants work with FM/EHS to plan and execute each project.
- 8.5 Contractors perform the actual asbestos abatement work.
- 8.6 All contractor asbestos personnel must be licensed by the State of Ohio in their given field. All asbestos contractors must have an Ohio Asbestos Contractors license.
- 8.7 Asbestos abatement projects greater than 260 lineal ft, 160 sq. ft., or 35 cu. ft. of asbestos material and any demolition (even with no asbestos) require a 10-day notice and fee to Ohio EPA. Class 1 projects over 50 ft. require a 10 day notice and fee to the Ohio Dept. of Health (ODH). The FM/ESS will make sure that this notice is submitted by the asbestos contractor, after the project planner gives adequate lead-time (generally several weeks). The fees are paid by the asbestos contractor as part of the project costs.
 - 8.7.1 Project Managers are required to plan properly and in a timely manner to meet regulatory and program requirements.
 - 8.7.2 Emergency notifications can be submitted to waive the 10 day notification period in true emergencies caused by building system failures, natural disasters, etc., where immediate remediation efforts are necessary.
 - 8.7.3 Logistical, financial, contract, or other emergencies caused by failure to plan or reasonably anticipate asbestos needs, are not considered emergencies in a regulatory sense, and emergency project notifications for these projects are not permitted by regulatory agencies.

- 8.8 Contractors must coordinate all safety programs with the OU Asbestos Program Staff. This includes lead, confined space, lock out/tag out, or any other applicable programs related to the project.
- 8.9 Clearance sampling criteria
- 8.9.1 Visual clearance will be conducted prior to air sampling, to ensure one hundred percent asbestos abatement is completed.
 - 8.9.2 Areas of reoccupation will be cleared by TEM, meeting a pass criteria of all five (5) individual samples are under seventy (70) structures per cubic millimeter.
 - 8.9.3 Areas of infrequent use or low disturbance will be cleared by PCM method.
 - 8.9.4 EHS may grant variances on a case-by-case basis for PCM clearance.
- 8.10 Waste from contracted projects is disposed at EPA approved landfills around the state and surrounding states. The Program personnel maintain all waste disposal records.

9.0 Other Ohio University Staff

- 9.1 There are two departments on campus that have been trained, equipped, and authorized to conduct limited, minor asbestos operations themselves. These include:
- 9.1.1 The FM/ESS has been prepared to perform small scale short duration abatement work. (less than 25 square feet or 25 linear feet)
 - A (1926.1101 (b)) competent person must evaluate the job before any removal
 - These workers are OSHA Class 1 certified
 - All workers must maintain annual asbestos and respirator training requirements as needed
 - Paperwork must be submitted promptly to EHS after a project (and FM/Environmental Services Manager if required)
 - No “open air” removal to be conducted without a negative exposure assessment.
 - 9.1.2 The CNS cabling crew has been prepared to drill minor holes and make minor attachments to asbestos containing materials.
 - An “asbestos competent person” must be made aware of the job first
 - These workers are OSHA Class 3 (ACM awareness) trained
 - All workers must maintain annual asbestos and respirator training requirements as needed

- Maintain records as required
 - 9.1.3 Shops authorized to do limited asbestos work are directly responsible for their actions, not exceeding their scope, their records, and other regulatory and program requirements.
 - 9.1.4 OU Facilities Management maintenance personnel are offered asbestos awareness training annually.
 - 9.1.5 OU Facilities Management Custodial and Housekeeping, Foodservice custodial, and Baker Center custodial personnel are required to attend asbestos awareness training annually.
 - 9.1.6 These employees have been instructed in ways to avoid damaging asbestos-containing materials and what to do if they find disturbances or damage.
- 9.2 All OU supervisors are responsible and required to make sure they keep adequate records of what OSHA requirements their staff need and make sure their staff meets these training or other requirements. Contact EHS if assistance is needed.
- 9.3 The OU Asbestos Program Staff does not authorize, control, or sanction any work done off the OU main campus, in non-university owned buildings, or at the OU Regional Campuses. Phone consultation is available upon request.
- 9.4 In an emergency situation where asbestos contamination is known or suspected:
 - 9.4.1 Remove the people from the area, close the door, record the names of the people in the area that may know what happened, post a warning sign with contact name and phone number on the door, restrict access to the area, and contact EHS and/or FM/ESS immediately.
 - 9.4.2 After hours, contact OU Campus Safety (OUPD). They are open 24 hours a day and have emergency contact numbers for all EHS and FM staff.

10.0 Construction & Renovation Projects

- 10.1 Prior to purchase of any commercial property by university officials, EHS recommends that a Phase 1 - Environmental Audit be done through EHS. This process looks at the environmental liabilities and history of the site before there is a purchase decision and commitment.
 - 10.1.1 This process looks at site history and uses, suspect asbestos materials, lead paint, PCB's, underground storage tanks, chemical waste, site contamination, and other issues.
 - 10.1.2 Building materials that are suspect asbestos-containing materials or any previously done asbestos surveys and sampling may be found.

- 10.1.3 A pre-purchase look at potential asbestos liabilities is recommended for all purchases (not just commercial).
 - 10.1.4 This information is essential when evaluating the value of the property, potential redevelopment costs, and public relations problems. This information is also valuable for property price negotiations.
- 10.2 For all renovations, construction, installation, and demolition projects, it is the OU Project Manager's responsibility to plan for initial asbestos and other environmental needs of the project, check with the Asbestos Program Staff early in the planning process, allow enough time in the project timetable (without unreasonable rush requests to the Asbestos Program personnel because of failure to plan adequately), and to pay for all asbestos and other environmental work needed for the project as part of the project budget.
- 10.3 Asbestos abatement projects greater than 260 lineal ft, 160 sq. ft., or 35 cu. ft. of asbestos material and any demolition (even with no asbestos) require a 10-day notice and fee to Ohio EPA. Projects over 50 ft. require a 10-day notice and fee to the Ohio Dept. of Health (ODH). The FM/ESS will make sure that this notice is submitted by the asbestos contractor, after the project planner gives adequate lead-time (generally several weeks). The fees are paid by the asbestos contractor as part of the project costs.
 - 10.3.1 Project planners are urged to plan properly and in a timely manner to meet regulatory and programmatic requirements, to avoid undue delays and adverse consequences.
 - 10.3.2 Emergency notifications can be submitted to waive the 10 day notification period in true emergencies caused by building system failures, natural disasters, etc., where immediate remediation efforts are necessary.
 - 10.3.3 Logistical, financial, contract, or other emergencies caused by failure to plan or reasonably anticipate asbestos needs, are not considered emergencies in a regulatory sense, and emergency project notifications for these projects are not permitted by regulatory agencies.
- 10.4 EHS and FM/ES work with the Facilities Planning, Facilities Management, CNS, on a daily basis on projects.
 - 10.4.1 When these departments hire new personnel it is essential that they train them about the OU system for these matters, to avoid health hazards, liabilities, and problems with project planning.
 - 10.4.2 It is the supervisor's responsibility to make sure any training or requirements are met for new employees as they are hired.
- 10.5 As a general rule, the Program tries to:
 - 10.5.1 Remove asbestos in an orderly manner and include logical abatement sections in all planned renovations (avoids "piece-mealing" the asbestos removal in areas)
 - 10.5.2 Keep building asbestos surveys updated after abatement

- 10.5.3 Perform destructive demolition and removal of all inaccessible acm for major building renovations.
- 10.5.4 Remove other environmental hazards in the renovation area as part of the asbestos project, if feasible; such as, loose lead paint, PCB light ballasts, mercury fluorescent lights, pigeon or bat guano, and the like.
- 10.6 EHS and FM/ESS staff is available to offer assistance, consultation, attend meetings, and otherwise help to insure a safe, cost-effective, compliant, timely, and successful project.

11.0 Documentation and Record keeping

- 11.0 Records must be kept for thirty (30) years for all asbestos projects. These records are managed by EHS and FM.
- 11.1 EHS maintains general asbestos files, written programs, files for contracted projects and OEPA renovation and demolition notices prior to 1-1-01, 30 year files in storage, building bulk reports, employee training, bid specifications, employee licensing, and employee exposure monitoring.
 - 11.1.1 FM/EHS maintains project records for contracted projects and OEPA renovation and demolition notices after 1-1-01, ESS shop projects, employee licensing, contractor license, and building bulk surveys.
 - 11.1.2 The Hudson Health Center, Occupational Health Clinic (OHC) maintains employee medical records and respirator medical approval records.
- 11.2 An annual review of the program is done by EHS and FM.
- 11.3 An annual Ohio EPA notice for the work to be done on campus by our FM/ESS is filed for the ensuing year each December by the ESS and EHS.

12.0 Regulatory Updates

- 12.0 Changes in regulatory requirements are immediately incorporated into this program before the effective date of the new regulations on an on-going basis.
- 12.1 Communications regarding any regulatory changes are sent to applicable departments, shops, and administrators.