



## ASBESTOS PROGRAM

### 1. PURPOSE

- 1.1. The University of Notre Dame's Asbestos Program establishes a formal process for the safe and compliant management of asbestos on campus. The objective of the program is to protect faculty, staff and contractors by minimizing the potential exposure to asbestos fibers.

### 2. SCOPE

- 2.1. This applies to all University of Notre Dame personnel and contractors, other than Facilities Design and Operations (FDO) project contractors, who may come into contact with asbestos in campus facilities.

### 3. DEFINITIONS

- 3.1. **Asbestos:** It is a group of six naturally occurring fibrous minerals composed of thin, needle-like fibers. Exposure to asbestos causes several cancers and diseases, including mesothelioma and asbestosis. Asbestos has been used in a wide variety of manufactured goods as insulation and as a fire retardant because of its fiber strength and heat resistant qualities. Asbestos can be found in insulation, floor tile and floor tile adhesives, coating on hot water and steam pipes, textured paint, plaster and patching compounds, among other goods.
- 3.2. **Asbestos Containing Material (ACM):** Any material containing more than 1% asbestos.
- 3.3. **Presumed Asbestos Containing Material (PACM):** Thermal system insulation and surfacing material found in buildings constructed no later than 1980.

### 4. RESPONSIBILITIES

- 4.1. Risk Management and Safety (RMS) is responsible for:
  - 4.1.1. Guidance related to regulatory compliance and safety of building occupants.
  - 4.1.2. Assisting in and providing guidance for asbestos sampling and monitoring.
  - 4.1.3. Conducting the Asbestos Program triennial review.
  - 4.1.4. Developing and providing a means to conduct general awareness training to affected personnel.
- 4.2. Facilities Design and Operations (FDO) is responsible for:
  - 4.2.1. Coordinating asbestos assessments and sampling prior to building renovation or demolition.
  - 4.2.2. Coordinating asbestos abatement prior to renovation or demolition when necessary.
  - 4.2.3. Ensuring all staff who may come into contact with ACM or PACM are properly trained.
- 4.3. Office of Information Technology (OIT), Campus Dining, Building Services and



other departments who's employees may be exposed to ACM or PACM in the course of their work are responsible for:

- 4.3.1. Notifying Risk Management and Safety (RMS) when assistance is needed with asbestos assessments and sampling prior to work in areas of buildings with ACM or PACM.
- 4.3.2. Ensuring all staff who may come into contact with ACM or PACM are properly trained.
- 4.4. Contractors are responsible for:
  - 4.4.1. Complying with FDO's Design and Construction Guidelines.
- 4.5. Asbestos Contractors are responsible for:
  - 4.5.1. Complying with FDO's Design and Construction Guidelines.
  - 4.5.2. Complying with the Indiana Department of Environmental Management (IDEM) Rules for demolition/renovation operations.

## 5. IDENTIFICATION OF ASBESTOS CONTAINING MATERIAL IN THE WORKPLACE

- 5.1. RMS shall provide guidance on acquiring assessments of buildings for the presence of asbestos containing materials upon request. Asbestos assessments and inspections for the presence of asbestos shall be conducted by State certified asbestos inspectors.
- 5.2. In the event that a student, faculty, or staff member suspects exposure to or disturbance of asbestos materials, they are to leave the area undisturbed, secure the area as much as possible from further disturbance (e.g., close doors and windows), and contact RMS.

## 6. NOTIFICATION AND LABELING

- 6.1. Project Managers shall notify building workers and outside contractors about the location and physical condition of ACM and communicate that contractors shall avoid disturbing any materials until cleared to do so.
  - 6.1.1. Location and physical condition will be determined through asbestos assessments and sampling.
- 6.2. Area Posting and Material Labeling – In service and maintenance areas, postings and labeling shall be used to remind maintenance and custodial employees not to inadvertently disturb ACM. Labeling serves as a final line of defense to prevent unprotected individuals from disturbing ACM or entering areas where repair or renovation activities involving ACM are underway. Signs that can be placed at entrances to areas where ACM is prevalent shall read:

DANGER - ASBESTOS MAY CAUSE CANCER  
CAUSES DAMAGE TO LUNGS AUTHORIZED PERSONNEL ONLY

## 7. ASBESTOS SAMPLING AND ANALYSIS

- 7.1. Not all facilities on campus have been surveyed for the presence of asbestos



containing materials (ACM). Therefore, existing campus buildings shall have an asbestos survey and necessary sampling conducted prior to any renovation or construction work commencing where building infrastructure, insulation, flooring, etc., may be disturbed.

- 7.2. Sampling for the presence of asbestos shall be conducted by an Indiana State certified contractor. All regulatory requirements and methods for sampling ACM shall be followed at all times.
- 7.3. Sample analysis shall be conducted by an appropriately accredited laboratory.

## 8. EMERGENCY RELEASE

- 8.1. A fiber release episode can occur at any time as long as ACM is present in the building. Any evidence of a fiber release, such as water or physically damaged ACM, shall be reported to RMS immediately.
- 8.2. Project Managers, with guidance from RMS as needed, shall contact an asbestos abatement contractor.
- 8.3. Project Managers, with guidance from RMS as needed, shall ensure entry into the area is restricted and signs posted or "Do Not Enter" tape installed to prevent entry by non-essential personnel.
- 8.4. Project Managers, with guidance from RMS as needed, shall contact Utilities to shut off or temporarily modify the air handling system (HVAC) to prevent the distribution of fibers to other areas of the building when necessary.
- 8.5. Project Managers, with guidance from RMS as needed, shall ensure initial air monitoring by a third party to evaluate the release is conducted.
- 8.6. Project Managers, with guidance from RMS as needed, shall ensure all abatement work is completed in accordance to regulatory requirements.
- 8.7. Project Managers, with guidance from RMS as needed, shall ensure appropriate air monitoring by a third party is conducted to determine if response actions were sufficient.
- 8.8. Project Managers, with guidance from RMS as needed, shall ensure appropriate air monitoring by a third party is conducted when health concerns due to potential exposure are raised by campus personnel or contractors.

## 9. ASBESTOS ABATEMENT REMOVAL

- 9.1. Asbestos abatement and removal shall be done by approved, Indiana State licensed asbestos contractors. State licensed asbestos contractors can be found on the [IDEM Licensed Asbestos Professionals and Training Providers Site](#).
- 9.2. FDO, with guidance from RMS as needed, shall coordinate asbestos abatement projects for both renovation work and emergency releases.
- 9.3. FDO shall ensure air monitoring is conducted for all renovation work and emergency releases. Air monitoring may include continuous air, OSHA monitoring and sampling, or any additional monitoring required by RMS. The environmental consultant conducting the air monitoring shall provide a



comprehensive report including date and location of samples, identification of personal air monitoring, sampling calibrations and monitoring data, certifications of employees, name and address of laboratory, accreditation of laboratory, copies of data sheets, and copies of laboratory results.

10. ASBESTOS RECORD RETENTION

- 10.1. RMS shall maintain records of all known asbestos containing materials on campus. The information shall be updated as new information becomes available through asbestos assessments and sampling.
- 10.2. Project Managers shall submit information on asbestos abatement projects to RMS and include the location from which asbestos was removed, the amount of friable and non-friable asbestos removed, the name and address of abatement contractors, copies of training certifications, copies of any disposal paperwork.
- 10.3. Records shall be retained by RMS per the University of Notre Dame Records Retention and Disposition Schedule.

11. TRAINING

- 11.1. All Notre Dame personnel who may come into contact with ACM or PACM shall be trained annually in general awareness of asbestos in buildings on campus and the requirements within this procedure.

12. FREQUENCY OF REVIEW

- 12.1. This procedure shall be reviewed triennially and updated as needed to meet applicable regulatory changes.

13. REFERENCES

- 13.1. IDEM. Rules for demolition/renovation operations. Indiana Department of Environmental Management [326 IAC 14-10](#).
- 13.2. OSHA. "Toxic and Hazardous Substances, Asbestos." Occupational Safety and Health Standards. Occupational Safety and Health Administration, 1910 Subpart Z. <<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1001>>

**Revision History Table**

History	Effective Date
Procedure Developed	May 2020