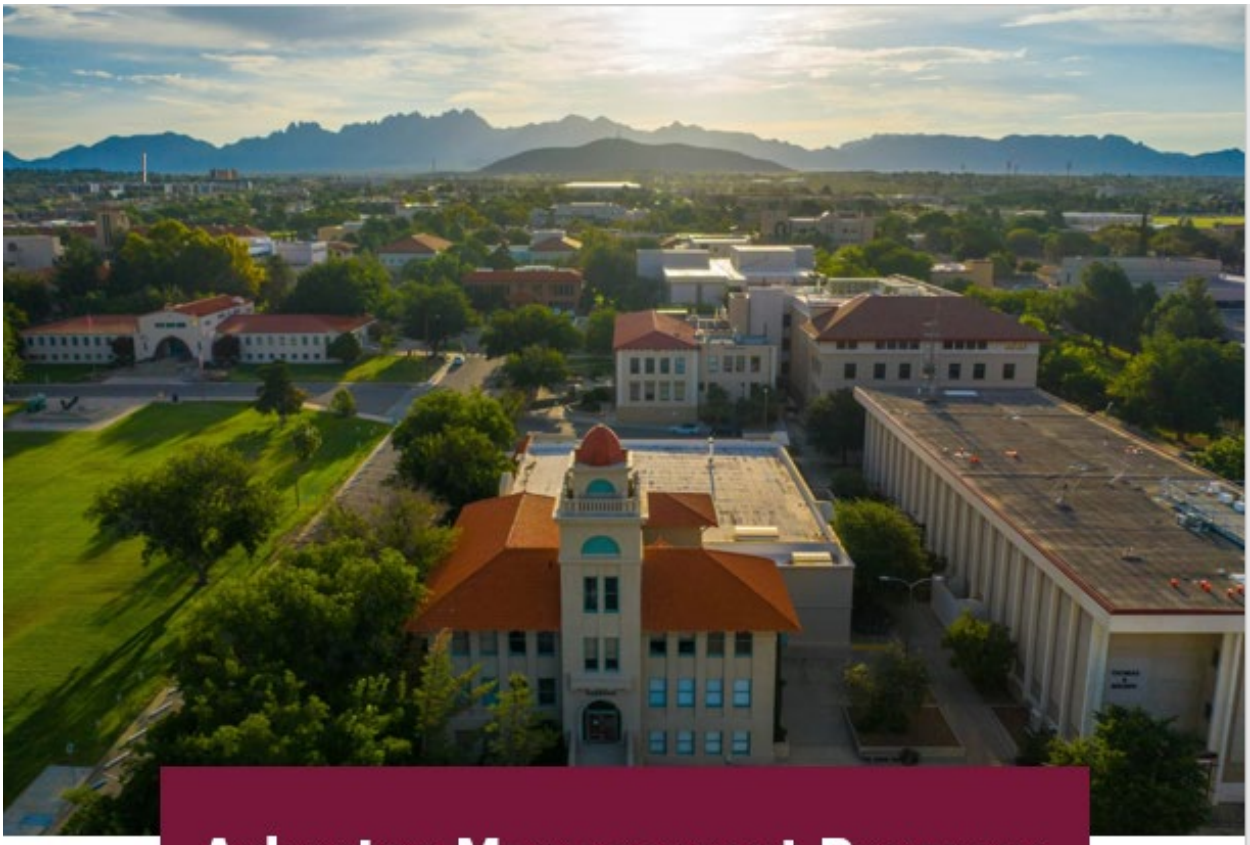


Asbestos Management Program

Prepared by Environmental Health Safety & Risk Management at New Mexico State University

NM STATE

BE BOLD. Shape the Future.®
New Mexico State University

Table of Contents

1. PURPOSE

This program establishes the processes and procedures designed to protect the New Mexico State community from the hazards associated with exposure to asbestos through evaluation, reporting, training, notification, and abatement. This program is part of the Indoor Air Quality (IAQ) Initiative.

2. SCOPE

This program applies to New Mexico State employees and contractors who perform service or maintenance activities and may encounter asbestos-containing materials (ACM) or presumed asbestos-containing materials (PACM). This program also applies to the removal and disposal of asbestos from campus property.

3. ACRONYMS, DEFINITIONS & REGULATIONS

ACM	Asbestos-containing material. Any material with more than 1% of the minerals chrysotile, amosite, crocidolite, tremolite, anthophyllite, actinolite, and any of these minerals that has been chemically treated and/or altered.
AHERA	Asbestos Hazard Emergency Response Act
Critical Barrier	one or more layers of plastic sealed over all openings into a work area or any other similarly placed physical barrier sufficient to prevent airborne asbestos in a work area from migrating to an adjacent area.
Decontamination Area	an enclosed area adjacent and connected to the regulated area and consisting of an equipment room, shower area, and clean room, which is used for the decontamination of workers, materials, and equipment that are contaminated with asbestos.
Demolition	the wrecking or taking out of any load-supporting structural member and any related razing, removing, or stripping of asbestos products.
EHSRM	New Mexico State University Environmental Health Safety & Risk Management

EPA	The United States Environmental Protection Agency
Excursion Limit	an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes.
Fiber	a particulate form of asbestos, 5 micrometers or longer, with a length-to diameter ratio of at least 3 to 1.
Glovebag	not more than a 60 × 60 inch impervious plastic bag-like enclosure affixed around an asbestos-containing material, with glove-like appendages through which material and tools may be handled.
HEPA	High-Efficiency Particulate Air. A filter capable of trapping and retaining at least 99.97 percent of all mono-dispersed particles of 0.3 micrometers in diameter.
NESHAP	National Emission Standards for Hazardous Air Pollutants. A standard issued by the EPA to regulate the emissions of hazardous air pollutants.
NOI	Notice of Intent
OSHA	The Occupational Health and Safety Administration
PEL	Permissible Exposure Limit
PLM	Polarized Light Microscopy. A laboratory analytical method to determine the concentration of asbestos in bulk building materials.

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
SOP	Standard Operating Procedure
Surfacing Material	material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).
TSI	Thermal System Insulation. ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.
TWA	Time weighted average of exposure of an 8-hour period.
NMED	The New Mexico Environment Department

Regulations

Asbestos General Standard	OSHA 1910.1101
Asbestos Construction Standard	OSHA 1926.1001
Asbestos Hazard Emergency Response Act (AHERA)	https://www.govinfo.gov/content/pkg/USCODE-2011-title15/pdf/USCODE-2011-title15-chap53-subchapII.pdf
National Emission Standards for Hazardous Air Pollutants (NESHAP)	https://www.govinfo.gov/content/pkg/CFR-2011-title40-vol8/pdf/CFR-2011-title40-vol8-part61-subpartM.pdf
US DOT Hazardous Material Regulation	49 CFR Part 171
Respiratory Protection Act	OSHA CFR 1910.134
National Emissions Standards for Hazardous Air Pollutants	EPA 40 CFR 61
Asbestos Hazard Emergency Response Act	EPA 40 CFR 763
Standard Practice for Comprehensive Building Asbestos Surveys	ASTM E2356-18
Hazard Communication	OSHA 1910.1200

4. WORK CLASS DESCRIPTIONS

A. **Class I**
Activities involving the removal of thermal system insulation (TSI) and surfacing ACM and PACM. New Mexico State employees are not permitted to perform Class I activities.

B. **Class II**
Activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics. New Mexico State employees are not permitted to perform Class II activities.

C. **Class III**
Repair and maintenance operations where ACM, including TSI and surfacing ACM and PACM, is likely to be disturbed. New Mexico State employees are not permitted to perform Class III activities.

D. **Class IV**
Maintenance and custodial 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, and III activities. New Mexico State employees may perform maintenance and custodial activities during which employees contact but do not disturb ACM or PACM, with adequate training, NMSU EHSRM offers only Asbestos Awareness training for Class IV employees. New Mexico State employees are not permitted to perform activities to clean up dust, waste, and debris resulting from Class I, II, and III activities.

5. RESPONSIBILITIES

A. Environmental Health Safety and Risk Management (EHS&RM)

i. Adhere to the requirements of this program.
ii. Review and revise this program, as necessary.
iii. Coordinate and/or administer training, NMSU EHSRM offers only Asbestos Awareness training for Class IV employees.
iv. Provide consultation and guidance, as necessary and upon request, to identify, evaluate, and control potential exposure to asbestos.
v. Investigate asbestos-related concerns and provide guidance related to potential asbestos fiber release incidents.
vi. Review abatement project scopes to ensure they meet University and regulatory requirements.
vii. Maintain an inventory of the type, quantity, and location of known or presumed ACM, building materials that have been tested for asbestos content, and ACM that has been removed, encapsulated, enclosed, or repaired.
viii. Coordinate with Facilities & Services other departments to facilitate material sampling and analysis, abatement, and air monitoring, as necessary.

ix. Notify occupants and Building Monitors of abatement activities.

B. **Departments and Units**

i. Adhere to the requirements of this program.
ii. Ensure that employees complete required Asbestos Awareness training.
iii. Ensure that employees do not perform Class I, II, or III activities, or activities to clean up dust, waste, and debris resulting from Class I, II, or III activities (see **Section IV – Work Class Descriptions**).
iv. Inform employees and contractors of the location of known or suspected ACM where employees or contractors may be exposed to asbestos.
v. If suspected ACM is discovered and may be disturbed by work activities, stop work, and contact EHS&RM to coordinate sampling, analysis, and abatement, if necessary, before work is continued.
vi. Provide resources and funding for material sampling, laboratory analysis, abatement, and air monitoring, when necessary.
vii. Coordinate with EHS&RM and qualified and licensed contractors to identify project scopes, material sampling and analysis, abatement, and air monitoring.
viii. Provide material sampling results, reports, abatement plans, and air monitoring results to EHS&RM for review.

C. **Project Managers and Supervisors of Facilities & Services**

i. Adhere to the requirements of this program.
ii. Complete required Asbestos Awareness training.
iii. Notify or inquire with EHS&RM of planned projects immediately to assess if any known or suspected ACM might be disturbed during a project for assessment. EHSRM is the repository for all documentation related to ACM or PACM. EHS&RM will determine if previous survey information is adequate for the project or if further assessment is required prior to work being performed and ACM or PACM is disturbed and a potential exposure occurs. *An Asbestos Abatement Project Checklist is provided in Appendix A.*
iv. Notify EHS&RM of any known or suspected ACM that has been disturbed, damaged, appears deteriorated, or may be disturbed by planned activities.
v. Assist EHS&RM notification of occupants and Building Monitors of abatement activities.
vi. Coordinates all asbestos abatement and disposal activities with EHS&RM. Original copy of the Waste Manifest to be forwarded to EHS&RM. If signing a waste manifest fill out the right side of the Generator Section as follows.

NMSU
1780 East University
Las Cruces, NM 88003
(575) 646-0111

D. **Employees**

i. Adhere to the requirements of this program.
ii. Complete required Asbestos Awareness training as necessary.
iii. May perform maintenance and custodial activities during which employees may contact but do not disturb ACM or PACM, when trained.
iv. Are not permitted to disturb any material that may contain or is presumed to contain asbestos.
v. Notify supervisor or EHS&RM immediately if ACM or PACM has potentially been disturbed.

E. **Contractors (e.g., Maintenance, Operations, Custodial, Construction)**

i. Adhere to the requirements of this program.
ii. Ensure that subcontractors adhere to the requirements of this program.
iii. Ensure that employees complete all applicable asbestos training, as required.
iv. Inform employees and NMSU EHS&RM of the location of known or suspected ACM where employees may be exposed to asbestos.
v. Are not permitted to disturb any material that may contain or is presumed to contain asbestos.
vi. Notify a NMSU EHS&RM immediately if ACM or PACM has potentially been disturbed.

F. **Environmental Health Consultants & Abatement Contractors**

i. Adhere to the requirements of this program.
ii. Perform work in accordance with federal, state and local rules and regulations.
iii. Ensure that subcontractors adhere to the requirements of this program.
iv. Ensure that employees are appropriately licensed, qualified and trained for the scope of work.
v. Coordinate material sampling and abatement activities with EHS&RM.
vi. Perform air monitoring as necessary.
vii. Provide all documentation (analysis, reports, manifests, records of service) to EHS&RM.
viii. Contractors are responsible for coordinating NESHAP submissions with EHS&RM when applicable, see below.

NESHAP - If the amount of regulated ACM to be removed exceeds 260 linear feet, 160 square feet, or 35 cubic feet, a Notice of Intent (NOI) must be filled out by the abatement contractor via the federal National Emission Standard for Hazardous Air Pollutants (NESHAP) and submitted to the New Mexico Environment Department (NMED) Air Quality Bureau. The NESHAP must be submitted and approved at least 10 business days prior to the start of abatement. The Asbestos NESHAP Notification form must be downloaded from the NMED website and emailed to sbestos.abq@state.nm.us. The contractor must keep a copy of the NOI at the job site.

OVERSIGHT - It is the responsibility of EHS&RM, Project Managers or third-party sampling/monitoring contractors to ensure that the abatement contractors abide by the requirements of this SOP, all relevant asbestos regulations, and the appropriate health and safety guidelines. EHS&RM and/or the Project Managers must arrange access to the project area and identify the nearest utilities, locations of fire extinguishers, and evacuation routes. The contractors shall be informed of any specific hazards in the project area (i.e. chemicals stored in a laboratory). The abatement contractors are required to have copies of the asbestos regulations and their company's
Health & Safety Plan/Respiratory Protection Program on site. The UNM Project Manager or the third-party consultant shall verify these documents are in place.

Respiratory Protection - Respiratory protection is required when working in an asbestos environment in accordance with 29 CFR 1910.134. Employees must wear a half-mask or full-face tight-fitting air-purifying respirator to enter a regulated area where Class I-III activities are conducted or where employees may be exposed above the PEL. The training and fit testing must be performed by an RPP Administrator, RPP Instructor, or a qualified third-party vendor. RPP Administrators and Instructors must follow the fit testing procedures (Respirator Fit Testing Standard Operating Procedures). Fit test records shall be retained by the employee and the contractor until the next fit test is administered.
All abatement contractors are required to have their own respiratory protection program. This program shall be kept onsite and made available for review by NMSU EHS&RM personnel or a third-party oversight contractor.

Critical Barrier Containment - A negative pressure enclosure (NPE) system is required for all projects for which a NESHAP is submitted. For projects that don't require a NESHAP, contact EHS to determine which type of containment is required. The specifications for an NPE system are as follows:

1. The NPE may be of any configuration
2. At least 4 air changes per hour shall be maintained in the NPE
3. A minimum of -0.02 column inches of water pressure differential, relative to outside pressure, shall be maintained within the NPE as evidenced by manometric measurements
4. The NPE shall be kept under negative pressure throughout the period of use and air movement shall be directed away from employees performing asbestos work within the enclosure and toward a HEPA filtration or a collection device

As part of the critical barrier containment, a decontamination area must be adjacent and connected to the containment. All PPE must be decontaminated and/or removed prior to exiting the decontamination area. All PPE that is determined to be contaminated and designated as asbestos waste must remain in the regulated area. All equipment must be decontaminated before being moved outside of the containment. EHS&RM or a NMSU-approved contractor must periodically inspect the NPE during the abatement.

6. IDENTIFICATION & SAMPLING

A. Departments, supervisors, or project managers must notify EHS&RM of any suspected ACM, known ACM, or PACM that may be disturbed, has been disturbed, or must be disturbed to facilitate repairs, maintenance, or renovation projects.

B. ACM that is in good condition that does not present a danger to students, staff, faculty, or contractors, as determined by EHS&RM or a qualified environmental health consultant, may be left in place with appropriate signage (see Section 7 – Labeling and Signage) and recordkeeping (see Section 12 – Recordkeeping).

C. All activities that may disturb suspected ACM must stop until:

   i. Analysis confirms that the material is not asbestos, or

   ii. If the material is confirmed asbestos, appropriate abatement is complete (i.e., removal, encapsulation, enclosure, or repair).

D. Departments must coordinate efforts & inform EHS&RM of all material sampling.

E. A qualified and licensed contractor must collect an appropriate number of samples for analysis in accordance with ASTM E2356-18 Standard Practice for Comprehensive Building Asbestos Surveys.

F. Survey reports must include analytical results and recommendations for abatement, and must be communicated to EHS&RM, Project Managers, and applicable departments as necessary.

7. LABELING & SIGNAGE

A. Facilities & Services is responsible for securing and affixing asbestos danger labels and signs in areas identified by EHS&RM or a qualified environmental health consultant.

B. Labels must be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers.

C. Thermal System Insulation (TSI) Labeling

   i. TSI on ductwork, piping, and other systems that is known or presumed to contain asbestos must be appropriately labeled with an asbestos danger label.

   ii. Labels must be applied where confusion may occur, such as close to valves or flanges and adjacent to changes in direction, branches, and where pipes pass through walls, floors, or ceilings.

   iii. Labels must be applied at the beginning and end of continuous ductwork and pipe runs.

   iv. Labels must be placed at reasonable intervals (e.g., every 75-feet) on unobstructed continuous ductwork and pipe runs.

   v. Labels must be affixed in a manner and size that is clearly visible and legible.

vi. Asbestos danger labels must include the following information: DANGER: CONTAINS ASBESTOS FIBERS; MAY CAUSE CANCER; CAUSES DAMAGE TO LUNGS DO NOT BREATH DUST; AVOID CREATING DUST

(Labeling and Signage Example).

D. Danger Signage

i. In lieu of the labeling requirements danger signage may be posted at the entrances to areas (e.g., mechanical and boiler rooms) known to contain ACM or PACM.

ii. If danger signage is posted in lieu of labels, a list of ACM or PACM must be kept in the area and made accessible to room entrants.

iii. Danger signage must contain the same information as labels.

iv. Danger signs must be affixed in a manner and size that is clearly visible and legible.

8. ABATEMENT

If known or presumed ACM is in poor condition, may be disturbed by planned work activities, or otherwise presents a risk of exposure, it must be abated.

A. Asbestos abatement must be performed by a licensed and qualified contractor, in accordance with all federal, state, and local rules and regulations.

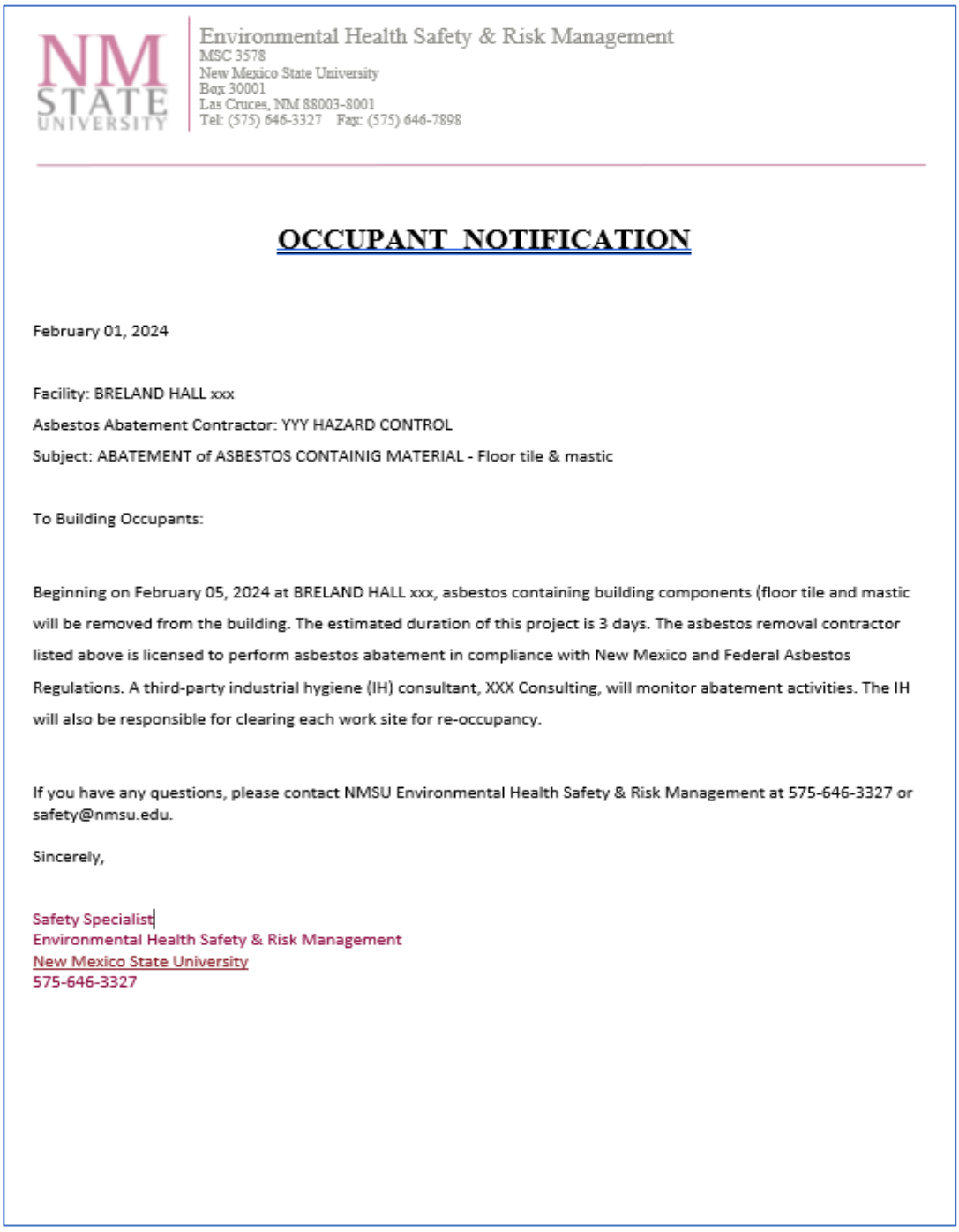
B. The preferred method of abatement is removal, when feasible.

C. When removal is not feasible, ACM may be encapsulated, enclosed, or repaired.

D. ACM that is not removed must be appropriately labeled and documentation of the type, quantity, and location of the ACM must be maintained by EHS&RM documentation.

E. Prior to abatement, EHS&RM and the Project Manager must review the contractor's scope of work to ensure University and regulatory requirements are adhered to.

F. The Project Manager or EHS&RM must provide as much advanced notification to potentially affected building occupants, departments and contractors the dates, locations, nature, extent of asbestos, abatement process, and scope of work. Notification must be posted conspicuously in public areas near the abatement.



NM STATE UNIVERSITY

Environmental Health Safety & Risk Management
MSC 3578
New Mexico State University
Box 30001
Las Cruces, NM 88003-8001
Tel: (575) 646-3327 Fax: (575) 646-7898

OCCUPANT NOTIFICATION

February 01, 2024

Facility: BRELAND HALL xxx

Asbestos Abatement Contractor: YYY HAZARD CONTROL

Subject: ABATEMENT of ASBESTOS CONTAINIG MATERIAL - Floor tile & mastic

To Building Occupants:

Beginning on February 05, 2024 at BRELAND HALL xxx, asbestos containing building components (floor tile and mastic will be removed from the building. The estimated duration of this project is 3 days. The asbestos removal contractor listed above is licensed to perform asbestos abatement in compliance with New Mexico and Federal Asbestos Regulations. A third-party industrial hygiene (IH) consultant, XXX Consulting, will monitor abatement activities. The IH will also be responsible for clearing each work site for re-occupancy.

If you have any questions, please contact NMSU Environmental Health Safety & Risk Management at 575-646-3327 or safety@nmsu.edu.

Sincerely,

Safety Specialist
Environmental Health Safety & Risk Management
New Mexico State University
575-646-3327

Figure 1: EHS&RM Notification. EHS&RM will facilitate this notification.

G. The abatement contractor must make all necessary state and local notifications detailing the nature and extent of the abatement. Copies of all notifications must be forwarded to the Project Manager and EHS&RM.

H. Areas where Class I, II, or III activities are performed must be designated as regulated areas.

i. Only qualified abatement contractors may enter and work in regulated areas; NMSU employees and unqualified contractors are not permitted to enter or work in regulated areas.

ii. Abatement contractors must adhere to the requirements of 29 CFR 1926.1101(e) for regulated areas, including but not limited to area demarcation, posting signage, restricting access, enforcing prohibited activities, and ensuring that contractors wear personal protective equipment, including appropriate respiratory protection.

I. Air monitoring must be performed during abatement, as necessary, and is the responsibility of the abatement contractor.

i. Area air monitoring at the perimeter of each regulated area must be performed daily. For regulated areas that include a decontamination unit, at least one sample must be collected at the entrance to the decontamination unit.

ii. Personal air monitoring must be performed in accordance with 29 CFR 1926.1101.

iii. Final air clearance monitoring must be performed following all abatement activities except for the following, unless deemed necessary by EHS&RM:

a) glove bag operations where the glove bag is the sole means of removal or repair, or

b) the removal of intact, non-friable asbestos-containing materials

iv. Post-abatement final clearance air monitoring must be conducted by a licensed contractor using aggressive methods.

v. Air samples must be analyzed by Phase Contrast Microscopy (PCM, NIOSH method 7400) or Transmission Electron Microscopy (TEM, NIOSH Method 7402).

vi. All air monitoring results must be provided to the Project Manager and EHS&RM within 24 hours of analysis.

J. Regulated areas may not be removed or returned to normal occupancy until:

i. All abatement work is complete,

ii. The area is determined to be free of visible dust, debris, and residue by an IDPH-licensed asbestos supervisor,

iii. Final clearance air monitoring, if necessary, has been performed and verifies that airborne asbestos concentrations are below the applicable regulatory limits, and

iv. All abatement-related waste, barriers, and equipment have been removed from the work area.

K. Asbestos-containing waste, including protective clothing and equipment, will be containerized in watertight containers labeled “DANGER: CONTAINS ASBESTOS FIBERS; MAY CAUSE CANCER; CAUSES DAMAGE TO LUNGS DO NOT BREATH DUST; AVOID CREATING DUST” (see Labeling and Signage Example page xx.

L. Abatement contractors must complete a waste shipment record (i.e., manifest) and ensure the transport of ACM waste to an appropriately licensed disposal site in accordance with 40 CFR Part 61, Subpart M.

M. A copy of the waste shipment record (i.e., manifest) signed by the owner or operator of the designated disposal site must be sent to the project manager and EHS&RM within 35 days of the date the waste was accepted by the initial transporter.

9. FIBER RELEASE EVENTS

If known or presumed ACM is disturbed:

A. Contact supervisor and EHS&RM immediately.
B. Restrict access to the area with signs, barrier tape, and locks, as necessary.
C. Shut down or isolate the HVAC system serving the immediate area of the fiber release until clean-up and/or abatement is complete.
D. Only EHS&RM, qualified environmental health consultants, or other qualified or authorized individuals as determined by EHS&RM, may enter the area, with appropriate training and personal protective equipment (PPE).
E. Follow the abatement procedures listed in Section 8 – Abatement.
F. In the event an employee's body or clothing is contaminated with ACM or PACM:
    i. Contact supervisor and EHS&RM immediately.
    ii. Wash hands and other potentially affected body parts immediately.
    iii. Prevent spreading fibers by avoiding such activities as driving/riding in vehicles until clothing has been changed.
    iv. When able, change clothing, and put contaminated clothing in a watertight bag or container, and dispose of in accordance with Section 8 – Abatement.
    v. Take a shower as soon as practical.

10. MEDICAL SURVEILLANCE PROGRAM

New Mexico State University employees are generally not required to be enrolled in a medical surveillance program for exposure to asbestos, which is required for all employees who for a combined total of 30 or more days per year are engaged in Class I, I, and III work or are exposed at or above a permissible exposure limit (PEL). However, if employee activities change in a way that requires employee enrollment in a medical surveillance program, EHS&RM will develop such a program and ensure that the appropriate employees are enrolled.

11. TRAINING

New Mexico State University employees must complete training, as follows:

All NMSU employees are Class IV employees and as such Facilities & Services employees are required to complete NMSU 2-hour Asbestos Awareness training. Employees who perform maintenance and custodial activities during which they may contact but do not disturb ACM or PACM must complete 2-

hour awareness level asbestos training and an annual 1-hour refresher training. Contact EHS&RM to be enrolled in the necessary training.

12. RECORD KEEPING

A. Project Managers must forward all project scopes, sampling and analytical reports, abatement records, notifications to occupants and air monitoring results to EHS&RM for recordkeeping.

B. EHS&RM will maintain records of asbestos testing and the type, quantity, and location of all known ACM, PACM, and ACM that has been identified, removed, encapsulated, enclosed, or repaired.

C. Training records will be maintained by EHS&RM in Training Central and the NMSU Safety Hub. Notify EHS&RM with any issues and training not recorded in Training Central.

APPENDIX A – ASBESTOS ABATEMENT PROJECT CHECKLIST

This checklist outlines the steps required to complete an asbestos abatement project that is in compliance with OSHA asbestos regulations (29 CFR 1926.1101). All NMSU Managers and Supervisors must follow these steps when managing asbestos projects with the assistance of EHS&RM. The Manager must notify EHS&RM of the scope of work, the project schedule and the contractors selected to perform the work. If you are unclear on these requirements, please contact EHS&RM for assistance. EHS&RM is record keeping repository and is the authority of the Indoor Air Quality Program at NMSU.

Building Name/Number: **Room Number(s):**

☐ Submit an Asbestos Records Request to EHS&RM to determine whether or not samples need to be collected. This can be an e-mail, documentation will be noted in EHS&RM Asbestos Abatement files.

☐ If no records exist for the project area, samples must be collected. Schedule a contractor to collect samples from the project area. Contact EHS&RM for contractor information.

☐ Select abatement/remediation and sampling contractors and establish project schedule.

Contact EHS&RM for contractor information.

☐ All projects must be cleared by collecting clearance samples. Schedule clearance sampling prior to starting work.

☐ Notify building managers and occupants of the project schedule 2-3 days prior to the start of work.

☐ Sign the waste manifest and final inspection report after abatement/remediation is completed.

☐ After clearance samples confirm the area is clear of asbestos the containment can be removed. Schedule contractor to break down containment.

☐ Send closeout documentation, including copies of sampling data, waste manifests and final reports, to EHS&RM. It is very important that EHS&RM keeps accurate and up-to-date records for asbestos-containing building materials.