

The George Washington University

Identification And Removal Of Asbestos- Containing Material

Policy Purpose:

To establish general procedures for staff, students, faculty and contractors who encounter asbestos containing materials (ACM) at any of the George Washington University campuses.

Policy Statement:

It is the University's policy of the University to minimize the potential of exposure to airborne asbestos fibers in University Buildings. This policy establishes general safety procedures for staff, students, faculty, contractors, and the general public in accordance with the regulations issued by the Occupational Safety and Health Administration (OSHA) Asbestos Standard (29 CFR 1926.1101), the Environmental Protection Agency (EPA), and the District of Columbia.

General

Asbestos-containing material is defined as any material that contains greater than one-percent asbestos. Asbestos was incorporated into a number of widely used products, many of which were used in building construction beginning in the late 1800's. By the mid-1980's most products containing asbestos were removed from the market. The most common uses of asbestos in GWU buildings were in floor tiles and mastic glue, thermal insulation, acoustical decorative plaster, ceiling tiles, structural steel fireproofing and drywall joint compound.

On GWU campuses, the Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA) and the District of Columbia regulate the asbestos removal process. According to the OSHA Asbestos Standard (29 CFR 1926.1101), building material installed prior to 1980 must be presumed to contain asbestos unless historical information and testing indicates otherwise.

Procedures

- Prior to building maintenance or renovation projects, the University's Project Manager is responsible for arranging a survey to determine if asbestos containing material is present in the work area, and if so, whether it will be impacted by the planned work. This can be accomplished by contacting the Risk Management Office at (202) 994-3265. The Risk Management Office may also provide guidance and coordination for asbestos removal projects. Larger scale projects may require the University to hire an outside firm to coordinate and design abatement.
- The Project Manager is responsible for ensuring that all contractors and subcontractors are informed of the location of suspect and known ACM, and that materials that may be impacted by the work are abated.
- Under no circumstances shall University or contracted workers damage or disturb known or suspect ACM unless they are a licensed abatement contractor or environmental consultant and have been specifically employed to perform sampling, removal or repair.
- Asbestos does not always need to be removed if it will not be disturbed. In some cases, management in place may be advisable. The Risk Management Office will provide specific recommendations for each project that involves asbestos-containing materials.
- If abatement is needed, the District of Columbia requires notification of the project 10 days in advance of the anticipated start date. The District also requires the use of a licensed firm to perform the abatement and the air monitoring of the project area during removal, inspection, and clearance testing prior to re-occupancy. In most cases, an outside contractor performs each of these functions.

- If suspect asbestos materials are discovered during the course of renovation/demolition work, the Project Manager/Site Supervisor should suspend work that could disturb the material and contact the Risk Management Office for testing of the materials. Work must not resume until the material can be positively identified.
- In the event that asbestos is impacted, Project Managers/Contractors should take all reasonable precautions to protect University employees, students and visitors from exposure to asbestos fibers. Emergency response measures may include: isolating the work area with plastic sheeting, employing wet methods, and/or using a HEPA vacuum.
- Contractors performing work in GWU buildings containing asbestos are responsible for ensuring that their employees have had the appropriate level asbestos-awareness training required by OSHA.
- Some projects may indirectly disturb ACM. For example, where asbestos is sprayed on the structural beams above the ceiling tiles, small amounts of ACM may loosen and fall onto the surface of the ceiling tile. To avoid personal exposure or building contamination, a licensed asbestos abatement contractor must clean the surface of the ceiling tiles before they are removed or replaced. Should you encounter a situation such as this, you should contact the Risk Management Office for advice and recommendations.
- ACM must be disposed of in a secure landfill in a manner consistent with relevant state and federal regulations.

Enforcement

Departmental Directors and the Directors of Architecture, Engineering and Construction, Facilities Management, Special Projects, Property and Real Estate Management will be responsible for complying with this policy. Compliance includes the communication of the policy to all relevant members of their staff as well as all contractors under their control.

Information and Questions

If you have any questions on the Identification And Removal Of Asbestos-Containing Material Policy, please contact the Risk Management Office at (202) 994-3265.

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Author: Risk Management