



**San Diego Community College  
District  
Risk Management Office**

**Asbestos Management  
Plan**



**PROGRAM AUTHORIZATION**

<hr/> <div>Chancellor</div>	
<hr/> <div>Trustee</div>	<hr/> <div>Trustee</div>
<hr/> <div>Trustee</div>	<hr/> <div>Trustee</div>
<hr/> <div>Trustee</div>	
<hr/> <div>Vice Chancellor, Facilities</div>	<hr/> <div>Vice Chancellor, Human Resources</div>
<hr/> <div>Risk Manager</div>	
<div>Date: _____</div>	

## REVISION RECORD

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## **I. PURPOSE**

The role of the Office of Risk Management is to protect the assets of the district, both human and financial, against the adverse effects of accidental loss. To that end, the Office has been given responsibility for overseeing the occupational environmental safety and health programs for the District.

The Office of Risk Management acts in an advisory and consular role to the various campuses and facilities. As part of that responsibility, the Office generates policies and procedures for required health and safety programs that may be adopted or modified by the various entities that comprise the District. Additionally, the Office will be responsible for reviewing programs generated by the campuses to ensure compliance with District, City, County, State, and Federal regulations.

The Asbestos Management Plan applies to general industry workplaces where activities related to the handling, maintenance, use, removal, and disposal of friable and nonfriable asbestos-containing materials (ACMs), ACM debris, and presumed asbestos-containing material (PACM). It covers workers that are exposed to ACMs in buildings and facilities where ACMs exist.

## **II. REGULATORY CITATIONS**

California Code of Regulations, Title 8, § 5208  
California Code of Regulations, Title 8, § 1529

## **III. DISTRICT POLICIES AND PROCEDURES**

Board Policy 6800  
POL-RM-003 Air Monitoring  
POL-RM-018 Respiratory Protection  
POL-RM-019 Personal Protective Equipment  
POL-RM-012 Hazard Communication

## **IV. AUTHORITY**

### **A. RISK MANAGEMENT OFFICE**

Responsible for the implementation and maintenance of this program as described above, including:

1. Development and maintenance of employee training, technical assistance, and workplace evaluation resources
2. Identifying and coordinating the evaluation of targeted work operations and investigation of accidents related to exposure to Asbestos
3. Ensuring the implementation of corrective action plans resulting from any workplace injuries



4. Maintaining records of all inquiries and injury assessments including Medical Surveillance and Facility Site Surveys
5. Ability to locate building survey information in coordination with District Architect

## **B. SUPERVISORS**

Responsible for implementing and enforcing the provisions of this program, including:

1. Ensuring participation in training efforts for new employees and existing employees
2. Working with employees to develop corrective actions and supporting their implementation through the allocation of monetary resources and employee time, including any required asbestos-related testing
3. Performing initial evaluation when concerns are reported and consulting with risk management as an additional resource
4. Notifying employees in adjacent areas of any work activity where ACM is present which may pose a health risk
5. Approving the use of outside contractors to perform work activities when ACM is encountered

## **C. EMPLOYEES**

Responsible for complying with the provisions of this program including:

1. Participating in training efforts and following procedures related to Asbestos exposure
2. Working with their supervisor and Risk Management to develop corrective actions
3. Following work practices related to respiratory protection and personal protective equipment.

Regional Facility Officers (RFOs) will ensure that:

1. ACM that may be disturbed in any renovation and maintenance activities is identified in the scope of work and removed only by qualified asbestos abatement or maintenance workers.
2. Survey protocols are conducted in accordance with all requirements.

## **V. IDENTIFICATION AND ASSESSMENT**

Presumed Asbestos-Containing Material (PACM) is defined as thermal insulation and surfacing material found in buildings constructed no later than 1980.

Asbestos-Containing Material (ACM) refers to any material or product that contains more than 1% asbestos by weight.



The District and its colleges will use the services of a professional remediation contractor to perform asbestos-related work as required. Contact with ACM will be restricted to only those staff that have been properly trained.

## **A. EXPOSURE LIMITS**

1. The purpose of inspection, surveillance and monitoring is to determine the absence of, presence of, and number of asbestos fibers per volume of air to which the employees are exposed.
2. "Asbestos fibers" are defined as particles at least 5 microns in length, with a length-to-diameter ratio of at least 3:1.
3. There are two critical components of the permissible exposure limit (PEL)
  - a. Time-weighted average (TWA) limit specifies that employees may not be exposed to airborne asbestos in excess of 0.1 fiber per cubic centimeter (f/cc) averaged over a period of 8 hours.
  - b. Excursion Limit specifies an employee exposure is limited to no more than 1 f/cc averaged over 30 minutes.

## **B. INSPECTION**

1. Inspection includes, and is limited to, conducting visual observation of undisturbed material and shall be conducted:
  - a. Prior to a building renovation which disturbs PACM
  - b. Before starting demolition activities when ACM data is not available for that site
  - c. As requested by employees of a college working in the area
  - d. Using as-built drawings for the area or site being inspected
2. In accordance with the Asbestos Hazard Emergency Response Act (AHERA) any disruption of material must be performed by an Asbestos Inspector. Activities in the workplace requiring a professional include:
  - a. Touching, or handling of, suspect material
  - b. Attempts to identify the type of suspect material using tools
  - c. Collecting sample materials to be analyzed by a third party

## **C. SURVEILLANCE**

1. Period Surveillance may be performed on an as-needed basis in an effort to maintain up-to-date information to assess the conditions for potential future disturbance and health risk.
2. No certification is required for periodic surveillance activities as long as they follow the inspection criteria set by the District
3. Recommended frequencies are set to follow up and evaluate the physical condition of ACM over time.
  - a. Once a year for friable ACM Thermal System Insulation (TSI) and surfacing materials (pipes, boilers, ductwork, etc.)
  - b. Once every 3 years for nonfriable ACM (flooring, roofing materials, etc.)



## **D. EXPOSURE MONITORING**

1. *Initial exposure assessment.* Initial monitoring is required for each job in each work area where employees are, or may reasonably be expected to be, exposed to asbestos above the permissible exposure limit (PEL); however, no monitoring is required if:
  - a. Tests meeting the PEL measurements were done after March 31, 1992; or
  - b. Objective data show that airborne asbestos levels are not capable of reaching the PEL under the expected conditions. Such data should be carefully documented.
2. *Periodic monitoring.* After the initial measurements, periodic monitoring is required at intervals that will indicate the level of employee exposure with reasonable accuracy, but not less than every 6 months where exposure may be reasonably foreseen to exceed the PEL.
  - a. Monitoring may be discontinued for employees, for whom initial and/or periodic monitoring shows that exposures are below PEL.
3. *Monitoring methodology.* Breathing-zone air samples are taken by pumping air through a filter over a period of 8 hours to determine the TWA or 30 minutes to determine the excursion limit.
  - a. TWA determinations, samples are taken for each employee in each job classification and each work area over a full shift.
  - b. Samples representing 30-minute exposures are taken during operations most likely to result in elevated exposures.
  - c. The number of fibers present on each sample filter is then determined using microscopic techniques. Sample analysis
4. *Sampling analysis* must be done by a qualified laboratory and is handled by a certified and properly licensed vendor

## **E. REGULATED AREAS**

1. Identified Areas are mitigated by outside contractors when an area calls for mitigation. The protocols listed below shall be implemented by the third-party, appropriately licensed contractor.
2. Access to regulated areas is limited to authorized people
3. Warning signs shall be displayed at each location so that a worker is able to read the signs and implement control measures prior to entering the area
4. Warning labels will be affixed to all raw materials, scrap, waste, debris and other products containing asbestos fibers. If the items are placed in a container, the container shall display the necessary labels
5. Personal Protective Equipment (PPE) Regulated areas have specific requirements:
  - a. Respirators (refer to *Appendix A – Fit Testing Record*)
    - 1) All personnel within the regulated area must wear half-face air purifying respirators with HEPA cartridge





- 2) If the concentrations are above the PEL and TWA a full-face purifying must be worn with HEPA cartridge
- b. Protective clothing and devices requirements
  - 1) Vented goggles or face shields
  - 2) Gloves
  - 3) Head and Foot coverings
6. Decontamination All contaminated protective clothing and equipment must be removed in a special changing room, with two separate storage facilities to avoid contamination of street clothes, and stored in closed containers all subject to warning label requirements above
  - a. Access to showers will be provided with employees showering at the end of the shift prior to changing into street clothes
  - b. Employees shall wash hands with soap and water for 30 seconds prior to eating, drinking or smoking

## **VI. EXPOSURE RESPONSE PROCEDURE**

OSHA sets the permissible exposure limit (PEL) and excursion limit (EL) of asbestos. The District has policies and procedures in place to limit an employee's exposure to asbestos using the PEL and EL established.

Given the operation and maintenance activities performed by District personnel there is potential for finding previously unidentified asbestos

### **A. INITIAL CONTACT WITH ACM**

Examples of when a District employee might encounter ACM include:

1. ACM painted over or encapsulated with colored sealant
2. ACM concealed behind a suspended ceiling
3. ACM firmly adhered to or bound to the raw material observed
4. ACM is discovered when damaged materials become noticeable
5. Accidentally damaging or disturbing an adjacent surface while performing an unrelated task

### **B. STOP WORK PROCEDURE**

1. *Immediately* stop working if an activity involves materials that could contain asbestos.
2. Notify your supervisor and the Regional Facilities Officer (RFO)
3. Notify Risk Management for guidance and support
4. If outside contractors are engaged on the project notify the superintendent and/or project manager assigned



### **C. RESPONSE ACTION**

Upon receiving information that a material may contain asbestos, Risk Management, or its designee, will implement the following actions:

1. Verify that the activity is stopped that could result in the release of asbestos fibers.
2. Visually inspect the area, or material of concern, to determine the exact location, type of material, appearance, condition, and activity.
3. Refer to the asbestos files for records of sampling and/or positive identification of ACM previously conducted.
  - a. If the asbestos files indicate negative sampling results for ACM in the confirmed area or material of concern, notify the appropriate personnel to halt further action and authorize when to resume work.
  - b. If new sampling is required, perform only a visual inspection and request sampling.
4. If the asbestos files indicate there is material previously evaluated to be ACM or when the returned sampling analysis tested positive for asbestos, consult with Risk Management and refer to additional response procedures.
5. Document the findings and update the asbestos files.

### **D. INTERIM MEASURES**

1. Protect and secure the work site until implementation of the response action
2. Place proper asbestos warning signs and labels to deter people from entering
3. Inform building occupants of the precautionary measures taken and consider evacuating area when necessary.

### **E. NOTIFICATION REQUIREMENTS**

1. Employees adjacent to operations and maintenance activities in regulated areas must be communicated with, informing the occupant of this program
2. Employees and their representatives must be allowed to observe any monitoring of employee exposure. Employees must be given the monitoring results in writing, individually, or by posting within 15 working days of receiving the results. If a PEL has been exceeded, the written notice must specify the corrective action being taken by the District.

### **F. REMOVAL AND ABATEMENT**

SDCCD has determined that it is not cost-effective to perform or maintain the training, certifications, licenses, equipment, and other related activities needed for site personnel to perform asbestos remediation.

SDCCD will use the services of a professional and certified remediation contractor to perform asbestos-related work, when required.

Determining the appropriate response measure is based on hazard ranking, prioritized tasking, and immediate health risk. Making this determination should be a consultative process between District, College personnel and outside service providers.

1. Hazardous waste shall be disposed of in accordance with County, State and Federal regulations
2. Prepare the appropriate work order request for abatement and coordinate with appropriate personnel to secure funding and contract administration.
3. Review documentation for completeness and compliance to ensure proper procedures have been followed.
4. Maintain asbestos files and associated reports

## **G. MEDICAL SURVEILLANCE**

1. A licensed physician shall perform all medical examinations and procedures at no cost to the employee. Examinations will include:
  - a. Medical and work history
  - b. A complete physical examination with emphasis on the respiratory system, the cardiovascular system, and the digestive tract
  - c. A chest X-ray
  - d. Pulmonary function tests
  - e. Respiratory disease standardized questionnaire
  - f. Any additional tests deemed appropriate by the examining physician
2. The District shall provide the physician with:
  - a. A copy of the asbestos regulation and relevant appendices
  - b. A description of the affected employee's duties as they relate to his or her asbestos exposure
  - c. The employee's actual or anticipated exposure level
  - d. A description of any PPE and respiratory equipment used or to be used
3. Once the physician has completed the exam, he or she will submit a signed opinion to the Third-Party Administrator for Worker's Compensation. The opinion will be shared with Risk Management for review and consideration. The opinion will contain:
  - a. The results of the medical examination and the physician's opinion as to whether the employee has any detailed medical conditions that would place the employee at an increased risk from exposure to asbestos
  - b. A statement that the employee has been informed by the physician of the results of the examination

- c. A statement that the employee has been informed by the physician of the increased risk of lung cancer attributable to the combined effects of smoking and asbestos exposure

## VII. TRAINING

All employees potentially exposed to asbestos will be trained in asbestos awareness using Keenan SafeColleges

### A. INITIAL CONTACT WITH ACM

District Service Center employees performing maintenance and operations tasks will require special training ("Type 2") *in addition to* the asbestos awareness training assigned to all employees. Cal/OSHA defines Class I-IV operations to categorize different levels of asbestos exposure risk in work-related activities.

**Class I Operations:** Activities that generate high levels of asbestos exposure, such as demolition or removal of ACM.

**Class II Operations:** Activities that involve moderate levels of asbestos exposure, such as cutting or disturbing ACM.

**Class III Operations:** Activities with lower levels of asbestos exposure, such as maintenance or repair work involving ACM.


**Class IV Operations:** Activities with minimal asbestos exposure risk, such as general construction work where ACM is not disturbed.

#### 1. Type 2: Special Operations and Maintenance Training

This training is for maintenance and custodial workers involved in general maintenance and asbestos-containing material repair tasks. This training generally lasts at least 14 hours. Special O&M training includes:

- a. Federal, state, and local asbestos regulations
- b. Proper asbestos-related work practices
- c. Descriptions of the proper methods of handling ACM, including waste handling and disposal
- d. Respirator use, care, and fit-testing
- e. Protective clothing donning, use, and handling
- f. Hands-on exercises for techniques such as glovebag work and HEPA vacuum use and maintenance
- g. Appropriate and proper worker decontamination procedures.

## VIII. RECORD KEEPING

 <b>SAN DIEGO</b> Community College District	<b>Asbestos Management Plan</b>	<b>Risk Management Office</b>
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## **A. TYPES OF RECORDS**


The District must maintain records to be included in the Asbestos Management Plan. These records, among other things, include:

1. Each facility and whether the building have asbestos-containing building material, and the type of asbestos-containing material
2. Date of the original school inspection
3. Plan for re-inspections
4. Construction documents that clearly identify the location of asbestos-containing building materials that remain in the building
5. Description of any response action or preventive measures taken to reduce asbestos exposure
6. Copies of the analysis of any building, and the name and address of any laboratory that sampled the material
7. Name, address, and telephone number of the designated person, or Asbestos Plan Manager, for the District during the time of inspection
8. Description of steps taken to inform occupants about inspections, re-inspections, response actions, and periodic surveillance

## **B. DOCUMENT RETENTION**

1. Permanent Records include all records concerning the presence of ACM and PACM for the duration of ownership of the facility (including when the building is demolished) as well as all medical records and employee exposure measurement results
2. 3-year requirement is in place for all employee training records

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## APPENDIX A: Fit Test Record

Date:	Employee:	Campus/Facility: City / Mesa / Miramar / Other:
Job Class:		Supervisor:
<b>Test Method</b>		
Isoamyl acetate / Saccharin / Bitrex / Stannic chloride		Sensitivity/Detection: Y / N
<b>Respirator</b>		
Type: Filtering facepiece / APR	Manufacturer:	Model:
	Cartridge type: HEPA / OV NA	Size: S / SM / M / ML / L
<b>Test Result</b>		
Pass		Fail
Name of fit tester:		Signature

Note: this fit test expires one year from the date noted on the top of the form.

Provide one (1) copy to test subject, one (1) copy for supervisor and retain original.