

1.0 Purpose and Applicability

- 1.1 It is the policy of the University of Pennsylvania in coordination with the Office of Environmental Health and Radiation Safety to provide the University community with a safe and healthful environment. This policy is designed to ensure that University employees follow the appropriate procedures to prevent asbestos exposure to themselves, building occupants, visitors, maintenance personnel, and contractors.
- 1.2 This policy applies to all University employees involved with activities that may result in the disturbance of asbestos-containing materials.

2.0 Definitions

- 2.1 “*Asbestos*” is a fibrous silicate mineral that was commonly added to a variety of building materials to provide strength and fire/chemical resistance. Asbestos also has excellent thermal and acoustical insulating properties and was widely used in thermal and acoustical insulation products. “*Asbestos-containing materials*” (ACM) contain greater than 1% asbestos by weight as determined by polarized light microscopy (PLM) analysis.
- 2.2 An “*asbestos abatement contractor*” is any person, firm, or corporation, that has valid licenses issued by both the Commonwealth of Pennsylvania and the City of Philadelphia Air Management Services - Asbestos Control Unit, for the purpose of removal, enclosure, or encapsulation of asbestos-containing materials.
- 2.3 An “*asbestos project inspector*” (API) is a person accredited by the Philadelphia Air Management Services - Asbestos Control Unit, who functions as the on-site representative of the University, performing air sampling, inspection and oversight of the asbestos abatement contractor.
- 2.4 An “*asbestos investigator*” is a person accredited by the Philadelphia Air Management Services - Asbestos Control Unit, who has the sole authority to sign Asbestos Inspection Reports. The reports are required by the City of Philadelphia on all demolition projects or renovation projects in excess of \$50,000 involving commercial and residential dwellings with four or more units constructed prior to 1981.
- 2.5 “*Effected employees*” have duties involving housekeeping, building and vehicle maintenance, construction, renovation, demolition, cable installation, etc. that may be expected to encounter asbestos-containing materials in the performance of their duties.

3.0 Roles and Responsibilities

- 3.1 The ***Office of Environmental Health and Radiation Safety (EHRS)*** is responsible for:
- 3.1.1 Maintaining the University's Asbestos Management Program.
 - 3.1.2 Inspecting Penn facilities to identify and assess the condition of asbestos-containing materials.
 - 3.1.3 Assessing impact of construction, renovation, demolition, or infrastructure upgrade projects on asbestos-containing materials.
 - 3.1.4 Coordination of asbestos abatement projects.
 - 3.1.5 Sampling, inspection, and oversight of asbestos abatement projects.
 - 3.1.6 Conducting periodic inspections of known asbestos-containing materials that are managed in place within facilities.
 - 3.1.7 Providing Asbestos Inspection Reports required for City of Philadelphia Building and Demolition permits.
 - 3.1.8 Conducting asbestos awareness training for all employees and selected contracted employees that have the potential to encounter asbestos-containing materials.
- 3.2 The ***University of Pennsylvania Division of Facilities and Real Estate Services (FRES)*** is responsible for:
- 3.2.1 Notifying EHRS of all renovation, construction, demolition and infrastructure upgrade projects that may impact asbestos-containing materials.
 - 3.2.2 Requesting Asbestos Inspection Reports for construction, renovation, or infrastructure upgrade projects.
 - 3.2.3 All costs associated with operations & maintenance or construction/renovation-related asbestos inspections, sampling, and abatement projects.
- 3.3 ***Facility Managers*** are responsible for:
- 3.3.1 Notifying EHRS of maintenance activities and internally managed construction or renovation projects that may disturb asbestos-containing materials within the facilities they oversee.
- 3.4 ***Supervisors of Effected Employees*** are responsible for:
- 3.4.1 Scheduling and ensuring effected employee attendance at annual EHRS safety training.

- 3.4.2 Notifying EHRS of any damaged suspected asbestos-containing materials reported by employees.
- 3.5 **Effected Employees** are responsible for:
- 3.5.1 Participating in annual EHRS safety training.
 - 3.5.2 Following proper procedures to prevent disturbance of asbestos-containing materials while performing assigned duties.
 - 3.5.3 Reporting damage of suspected asbestos-containing materials to supervisors or EHRS.

4.0 Procedures

- 4.1 Written Asbestos Standard Operating Procedures
The Asbestos Standard Operating Procedures outline asbestos management procedures and controls implemented by EHRS to prevent asbestos exposure to building occupants, visitors, maintenance personnel and contractors within University-owned facilities.
- 4.2 Emergency Procedures
Contact EHRS at (215) 898-4453 (24/7) to report any situation where it is suspected that asbestos-containing materials have been damaged. EHRS will provide guidance to the caller and immediately dispatch staff to the location to assess and coordinate corrective action if required.
- 4.3 Construction and Maintenance-Related Asbestos Activities
EHRS plans, schedules and coordinates all asbestos abatement activities with external abatement contractors.
- 4.3.1 For construction projects, FRES shall submit the scope of work, including plans, to EHRS for review of impact upon asbestos-containing material (ACM). An EHRS Asbestos Investigator shall inspect and sample as required and provide an Asbestos Inspection Report to the project manager for submittal with the City of Philadelphia building permit application. If required, EHRS will develop asbestos abatement specifications, project oversight cost estimates and coordinate abatement contractor competitive bidding with the FRES project manager. FRES shall contract with the selected asbestos abatement contractor using the University's Asbestos Removal Agreement.

- 4.3.2 For maintenance-related projects, the supervisors and facility or area managers shall contact EHRS to coordinate asbestos abatement required for maintenance/repair work.
- 4.3.3 Non-emergency asbestos abatement projects require one to ten calendar days advance notice, depending on the quantity of ACM to be removed, for notification of Philadelphia Air Management Services - Asbestos Control Unit.
- 4.3.4 EHRS conducts or coordinates asbestos abatement project oversight including inspections and air sampling.
- 4.4 Periodic Asbestos Building Inspections
EHRS performs periodic inspections of buildings that contain asbestos-containing materials to assess condition and coordinate corrective action where required.
- 4.5 Training
EHRS conducts annual asbestos awareness training for maintenance personnel, housekeepers and other employees who may work around or have the potential to encounter asbestos-containing materials. The training includes the following: recognition of suspected asbestos-containing materials, health effects, regulations and regulatory exposure limits, sampling and abatement methods and a description of asbestos services provided by EHRS.
- 4.6 Recordkeeping
EHRS maintains all documents relating to asbestos-containing materials including sampling data, waste disposal manifests, regulatory agency and other correspondence. EHRS also maintains an electronic database of all asbestos samples and projects.

5.0 References and Resources

- [Philadelphia Air Management Services - Asbestos Control Unit](#)
- [United States Environmental Protection Agency Asbestos Home Page](#)
- [Occupational Safety & Health Administration – Occupational Exposure to Asbestos](#)