

ASBESTOS PROJECT MANAGEMENT

University of California, San Diego

UC San Diego project managers are responsible for complying with all federal, state, and local asbestos control regulations related to maintenance, repair, and construction of UC-owned and leased buildings where asbestos-containing materials (ACM) may be present, and for keeping Environment, Health & Safety (EH&S) informed as the agent of regulatory oversight.

It is strongly recommended that each of the departments listed below appoint a departmental asbestos coordinator to become familiar with code requirements regarding asbestos-containing materials in construction (CCR Title 8 Section 1529 and Rule 361.145 Subpart M - Standard for Demolition and Renovation, San Diego County Air Pollution Control District).

- 1. The following departments conduct projects with potential to disturb asbestos-containing materials:**
 - a. Facilities Management
 - b. Facilities Design & Construction
 - c. Housing, Dining & Hospitality
 - d. Medical Center Facilities Engineering
 - e. Administrative Computing & Telecommunications
 - f. Facilities Planning & Management
 - g. Capital Planning & Budgeting

- 2. General duties for project managers shall include:**
 - a. Being the point of contact for projects under their management for all issues concerning both potential and accidental disturbances of asbestos by reporting such incidents or exposures to EH&S using the online [Asbestos Project Information Sheet](#).
 - b. Developing a prioritization scheme for scheduling of actions and areas of abatement related to their projects.
 - c. Advising line personnel and contractors on necessary abatement procedures.
 - d. Arranging contracts for asbestos services from the current [Vendors for Asbestos Abatement Services](#) list.
 - e. Maintaining custody of current asbestos survey information for their projects.
 - f. Responding to inquiries from contractors and building occupants.

- 3. Activities for asbestos-related projects within designated departments**

Before the project begins:

- a. Check the current asbestos survey for information regarding the specific building(s) involved.
- b. In the event that information on the presence of asbestos is not already available relating to any area/building material within any structure, building, room, or appurtenance which may be disturbed during proposed renovation or demolition, a current asbestos survey must first be conducted for that structure, building, room, or appurtenance. All such surveys must be performed by an appropriately licensed entity/person. When in doubt about a particular substance or building material, arrange for bulk sampling using a consultant from the [Vendors for Asbestos Abatement Services](#) list.
- c. Define the scope of work and budget.
- d. Schedule asbestos-related projects in such a way as to minimize impact on and exposure to the general public.
- e. Ensure the Air Pollution Control District (APCD) is notified a minimum of two weeks in advance if the renovation and demolition project with friable asbestos-containing materials is over 160 square feet and/or 260 linear feet. There is a minimum 10-working day regulatory waiting period.
- f. Consult the current [Vendors for Asbestos Abatement Services](#) list for hiring qualified contractors and/or consultants if UCSD personnel cannot perform the work. If qualified UCSD personnel can perform the work, contact the appropriate department supervisor for a work order. (NOTE: UCSD Healthcare does not currently have in-house asbestos certified personnel. Asbestos abatement work must be contracted out at UCSD Healthcare facilities.)
- g. Arrange for air monitoring and site surveillance (consultant) services as needed – especially in occupied spaces.
- h. Arrange for appropriate occupant and/or shutdown notices, including detours and temporary relocations if necessary.
- i. Advise other contractors on the job site of the presence of known ACM.
- j. Prior to the start of work, obtain a copy of written notifications from the contractor to regulatory agencies (i.e., Environmental Protection Agency Region IX, Cal-OSHA, APCD).
- k. Contact a consultant from the [Vendors for Asbestos Abatement Services](#) list for additional information on how to proceed with the asbestos project.
- l. Complete and submit the online [Asbestos Project Information Sheet](#).

During the project (the following procedures may be delegated to the site consultant):

- a. Ensure the following records are maintained on-site until the project is completed:
 - Abatement work daily entry logs, incident logs, and specifications
 - Agency notifications

- Daily air monitoring results
 - Required Cal/OSHA postings, warnings, and notices
 - Copies of asbestos licenses and insurance
 - Current training and respirator certificates for all personnel on the job
- b. Be available to field or refer questions regarding the project from concerned occupants.
 - c. Notify EH&S immediately of any inspections, citations, or notices from regulatory agencies
 - d. Work with the consultant and contractor regarding any changes in the scope of work, emergencies, or unforeseen events.
 - e. Ensure written reports of injury are filed on the required forms within 24 hours (Employee Report of Injury/Exposure). See [What to Do if a Work-Related Injury, Illness, or Exposure Occurs](#).
 - f. Arrange with Environmental Management Facility, (858) 534-2753, for signature of asbestos waste manifests.

After the project:

- a. Ensure all work is completed to the satisfaction of contractual agreements.
- b. Ensure the consultant clears abated areas and grants approval for re-occupancy.
- c. Forwards copies of close out documents to EH&S for record keeping purposes: Mail Code 0958 or fax (858) 822-3769.

Proposed decision logic:

- If suspected asbestos-containing materials have potential of being disturbed during renovation, a sample must be collected for verification by a certified consultant. Otherwise the material must be presumed to contain asbestos unless proven otherwise by lab analysis.
- What building materials will be impacted by the proposed scope of work? (Friable or non-friable?)
- Check the asbestos database for presence of ACM relative to the scope of work.
- Does potential exist to disturb ACM that may not have been included in the asbestos database? NOTE: Materials listed in the database reflect non-destructive samples and may not include areas behind walls and other inaccessible places.
- Is additional sampling required?
 - If so, hire a qualified asbestos consultant to take the sample(s). Recommendation: Streamline the process by using a company that also provides lab services.
- Can project be “sole sourced” or are bids required?

- Contact vendors from the [Vendors for Asbestos Abatement Services](#) list.
- If a contractor/consultant is chosen outside of the list, use only for a small project to give them a chance to prove them selves (so they can make it on the list for future projects).
- Does the project require monitoring?
 - No, if it is confined to a single room less than 160 square feet, involves non-friable materials (i.e., floor tile and mastic), and can be performed in one or less 8-hour shift. Any disturbance or removal of construction material containing asbestos less than 160 square feet may only be performed by specially trained and certified UCSD Asbestos Elite Team personnel.
 - Yes, if conditions listed above cannot be met (part-time monitoring may be appropriate for these types of projects involving non-friable materials). All monitoring must be performed by specially trained and certified consultants.
 - Yes, if friable materials are being disturbed adjacent to occupied areas, or if occupant concerns warrant additional prudence by the project manager. All monitoring must be performed by specially trained and certified consultants.
 - Yes, if a new contractor is being used.
 - NOTE: It is never appropriate for the contractor to hire the monitoring company (consultant) except to analyze their personnel samples.
- How do you know if the project is satisfactorily completed?
 - Non-friable projects
 - Materials are removed;
 - Phase Contrast Microscopy Analysis: Air clearance sampling reflects less than 0.01 fibers/cc of air for minimum of 1200 liters of air per sample;
 - Area is clean for next phase of project; and
 - Waste has been manifested and removed by appropriate parties.
 - Friable projects
 - Materials have been removed;
 - Phase Contrast Microscopy Analysis: Air clearance sampling reflects less than 0.01 fibers/cc of air for minimum of 1200 liters of air per sample;
 - Containment is removed;
 - Area is clean for next phase of project; and
 - Waste has been manifested and removed by appropriate parties.

Related information:

Web: UCSD's [Asbestos Management Program](#)

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