



University of New Haven

POLICIES AND PROCEDURES

Policy Title:

Asbestos Management
Program

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Responsible Official: Associate Vice President of Public Safety & Administrative
Services

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1.0 Introduction

Asbestos is a mineral fiber that has been widely used in building construction materials for insulation and fire resistance up until the 1980s. Because of the age of some of the University's buildings, the University of New Haven acknowledges that asbestos-containing materials are present in residence halls and other campus buildings. Materials containing asbestos at the University of New Haven may include pipe insulation, ceiling tiles, flooring tiles and wall coatings. As long as these materials are in good condition, and remain undisturbed, they do not present a health risk to residents and others in the immediate area.

Materials in buildings constructed prior to 1981 are presumed to contain asbestos unless sampling and analysis in Underground storage tank at western side of building indicates otherwise. The University of New Haven's Facilities Department maintains asbestos-containing building materials in a manner that prevents deterioration that may release hazardous fibers into the air. University staff and students are instructed to contact the Facility office at 203.932.7087 if any damaged building materials within residence halls, rooms or other areas throughout the campus are identified.

The University of New Haven has a capital improvement plan in place that includes identification and removal of asbestos containing materials from the residence halls and other buildings on campus.

1.1 Purpose

The University of New Haven's Asbestos Management Program was developed in accordance with the Occupational Safety and Health Administration's (OSHA) Asbestos Standards [29 CFR 1910.1001, 29 CFR 1926.1101] and regulations set by the Environmental Protection Agency (EPA) and the State of Connecticut. The purpose of the Program is to protect the health and safety of the University of New Haven's employees, students and visitors from the potential exposure to asbestos within the University's buildings.

2.0 Roles and Responsibilities

2.1 Associate Vice President of Public Safety & Administrative Services

- Provide administrative support for this program;
- Ensure the asbestos management program is implemented and maintained, including periodic audits, to ensure compliance with University policies and state and federal regulations;
- Review and revise the asbestos management program as needed and at least annually;
- Work with staff, including the residence life department to ensure that appropriate notifications have been made to the student population; and
- Receive and file all shipping documents for asbestos disposed of off-site.

2.2 Associate Vice President of Facilities

- Ensure that all contractors hired to perform asbestos abatements at the University have the appropriate license and training to complete this work;
- Ensure proper disclosure of ACM or PACM to all outside contractors that work at the University;
- Ensure that all contractors and buildings and grounds staff are following federal, state and asbestos management regulations as well as University policies and procedures; and
- Work with University staff and contractors to notify CT DPH at least 10 days in advance of known asbestos abatement projects greater than 3 linear or square feet.

2.3 Director of Facilities

- Ensure that all work completed by building and grounds staff adheres to this program;

- Ensure all state notification requirements are met when work (removal, repair, enclosure, encapsulation, or disturbance) is scheduled for an ACM or PACM of more than 10 linear feet or 25 square feet;
- Coordinate construction and/or renovation work within areas containing ACM or PACM to include a pre-work asbestos survey with the contractor;
- Maintain all files on historical abatements, inspections, and asbestos sampling results;
- Maintain historical clearance air sampling results for all asbestos projects and abatements;
- Ensure the posting and maintenance of any necessary building occupant notifications;
- Ensure all waste as part of the abatement process is disposed of properly, and forward the shipping documents to the Associate Vice President of Public Safety & Administrative Services; and
- Ensure that all employees and students in areas of abatement have been properly notified of the work and schedule clearance air monitoring.

2.4 Custodial Manager

- Ensure that all work completed by custodial services staff adheres to this program.

2.5 Manager of Facilities Operations

- Ensure that all work conducted by building and grounds staff adheres to this program.

2.6 University Employees

- Comply with all local, state and federal regulations and University of New Haven policies and procedures as outlined in this program;
- Attend required training annually;

- Inspect all materials to ensure they are intact and undisturbed prior to performing work in an area that contains ACM or PACM;
- Immediately notify the supervisor if any materials in an area containing ACM or PACM seem to not be intact or undisturbed; and
- Conduct daily work activities in a manner that does not disturb ACM or PACM.

3.0 Definitions

Term	Definition
Asbestos	Includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered.
Asbestos containing material (ACM)	Any material containing more than 1% asbestos.
Competent person	One who is capable of identifying existing asbestos hazards in the workplace which and selecting the appropriate control strategy for asbestos exposure, and who has authorization to take prompt corrective measures to eliminate the identified hazards. For class I, II or II work, the person must also meet special training requirements. All abatement and other construction work conducted at the University must be supervised by a competent person.
Class I, II, III asbestos work	Work activities that will be completed by a trained outside contractor that involve the removal or repair of asbestos containing thermal insulation, surfacing materials or other ACM.
Class IV asbestos work	Work that involves the maintenance and custodial activities during which employees or subcontractors may contact but do not disturb ACM or PACM. This may involve cleaning in mechanical rooms or removal of equipment and material in areas where ACM is or may be present.
Friable ACM	Material, that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure. Connecticut state regulations concerning asbestos includes in this definition materials that were non-friable at the time of manufacture but have deteriorated or delaminated in place to the extent that they can release asbestos fibers when physically contacted or eroded by air or water.
HEPA vacuum	A vacuum cleaner that has been designed with a high-efficiency particulate air (HEPA) filter as the last stage of filtration. A HEPA filter is a filter that is capable of capturing particles of 0.3 microns in diameter.

Intact	The ACM has not crumbled, been pulverized, or otherwise deteriorated.
Non-friable ACM	Materials in which asbestos has been bound and cannot, when dry, be crumbled, pulverized, or reduced to powder by hand pressure. When the bond fails, or it is disturbed, the materials become regulated as friable.
Permissible Exposure Limits (PEL)	A level of airborne fibers specified by OSHA as an occupational exposure standard for asbestos. The PEL for asbestos is currently 0.1 fibers per cubic centimeter of air over an 8-hour time weighted average, as measured by phase contrast microscopy.
Presumed asbestos-containing materials (PACM)	Thermal system insulation and surfacing material found in buildings constructed no later than 1980.
Spot repair	In Connecticut, the abatement of less than 3 linear feet or 3 square feet of ACM or PACM in. This is comparable to OSHA’s Class III asbestos work but restricts the amounts of material to less than allowed by OSHA.

4.0 Regulatory Requirements Involving ACM Removal, Repair, and Maintenance

According to the federal regulations, removal or maintenance of ACM falls under one of four categories:

Class I- Class I asbestos work means activities involving the removal of asbestos containing material (ACM) which is thermal system insulation (TSI) or surfacing material. Examples of TSI are pipe insulation and breaching (boiler insulation). Examples of surfacing materials are spray-on fireproofing (generally on metal structural components).

Class II - Class II asbestos work means activities involving the removal of ACM which is not TSI or surfacing. This includes asbestos-containing wallboard, floor tile and sheet flooring, roofing and siding shingles, and construction mastics.

Class III - Repair or maintenance that could disturb a small amount of ACM (less than 3 square or linear feet). Examples would be removing less than 3 square or linear feet of tile, repairing less than 3 square or linear feet of boiler insulation and/or taking asbestos

samples. This does include nail holes, tack holes and any other crack or holes less than 3 square or linear feet.

Class IV – Maintenance and custodial activities that contact but do not disturb ACM such as stripping wax on asbestos containing floor tile.

Class I and II activities require the use of licensed asbestos abatement contractors. These projects require the use of negative air containment, appropriate personal protective equipment and specific training requirements as outlined in the state and federal regulations. When Class I and II activities are completed at the University, air monitoring is performed by a third-party contractor. All class I and II work is completed by a licensed asbestos contractor chosen by the University.

Class III activities are those that disturb less than 3 linear or square feet of material. They are typically conducted using a glove bag or other airtight barrier and require appropriately trained personnel and specific engineering and workplace controls. Currently at the University, all class III activities are conducted by an outside contractor. Where able, Class III work will be scheduled for semester breaks and air sampling within the affected area will be completed to assure levels are below the PEL.

5.0 Procedures for Asbestos Fiber Release Episodes

The University has developed specific procedures should ACM or PACM be disturbed within buildings on campus.

See section 6.0 for information regarding requirements for release notifications.

5.1 Major Fiber Release

According to EPA guidance documents, a “major fiber release” is one involving more than three square or linear feet of ACM. The procedures to be followed after the report of a release will vary according to the site of the major release episode, the amount of ACM affected, the extent of fiber release from the ACM, the relationship of the release area to the air handling systems and whether the release site is accessible to building occupants. For all major releases, asbestos abatement contractors will be contacted to develop a strategy for conducting cleanup operations and sampling of the affected areas.

In the event of a major fiber release, or a Class I or II release:

- Affected areas must be isolated, typically by closing doors and/or erecting temporary barriers to restrict airflow and traffic as well as access to the site;
- All occupants must be immediately removed from the affected area and alerted of the release;
- If necessary, signs should be posted immediately outside the fiber release site to prevent any unauthorized persons from inadvertently entering the area;
- The University’s asbestos management contractor will be contacted, and air sampling will commence within 24 hours of the reported release to ensure levels are below the PEL;
- If asbestos fibers could enter the HVAC system, the system should be modified to prevent fiber entry, or should be shut down and sealed off

5.2 Small Fiber Release

Similar procedures can be used for much smaller fiber release events where the amount of ACM is three square or linear feet or less. The HEPA vacuuming, wet wiping, and worker protection procedures outlined in this guidance document, as well as wetting ACM wastes and properly placing them in an appropriate leak-tight container (such as a properly labeled, 6-mil- thick plastic bag), are examples of some of the procedures that could be used for both major and minor fiber releases.

5.3 Release Cleanup

Best management practices for clean-up and inspection procedures for ACM releases are published on the EPA website. These guidance documents state that the final step in an ACM release should be to employ thorough cleanup procedures to properly control the release of the ACM. Conduct a careful visual inspection and final clearance air monitoring to verify satisfactory cleanup.

- Any contractors working in Class I, II and III areas shall follow all applicable local, state and federal regulations including wearing appropriate personal protective equipment during clean-up in the affected area.

5.4 Internal Asbestos Fiber Release Notification Protocol

University staff are instructed to notify the Facility office at 203.932.7087 should ACM or PACM building materials be found to be disturbed.

University students are instructed to notify the Facilities office at 203.932.7087 and Residential Life and Housing staff should areas where ACM or PACM are present have been found to be disturbed.

- If Residential Life and Housing staff are notified of a policy violation after hours and notice a small “nail hole”, the event shall be documented and a work order placed, with a follow-up phone call at 8:30 AM the following morning to Facilities.
- If, however, Residential Life and Housing staff are made aware of a situation where there has been damaged to the ceiling, i.e., a large crack, hole, any crumbling debris from the ceiling, or water leaking through the ceiling, this event should be treated as an urgent situation and the on-call Facilities staff member should be contacted. A work order must also be placed.

6.0 Notification

The University understands that informed persons are less likely to disturb the material and cause fibers to be released into the air. Therefore the following notifications have been made to all students, employees and contractors on campus.

6.1 Building Occupant Notification

- In accordance with applicable OSHA regulations, all mechanical spaces in pre-1980s buildings must be posted with information on ACM and PACM that is found within the space. At the University of New Haven, the Facilities Department will be in-charge of maintaining these postings.
- Occupants within University buildings are notified yearly regarding the potential hazard in their vicinity in the form of ACM. A copy of the Annual Notification is available in Appendix A of this policy. All employees and tenants or tenant representatives likely to disturb ACM are included in the notification program. The notification was initially sent to the University community via e-mail and reiterated during floor meetings conducted by the Residential Life and Housing staff.
- Notifications may include but is not limited to:
 - “ACM has been found in University buildings and is located in areas where the material could be disturbed”;
 - The condition of the ACM, and who to notify if the condition changes;
 - “Asbestos only presents a health risk when fibers become airborne and are inhaled. The mere presence of intact ACM may not represent a health risk”;
 - “Do not disturb the ACM (e.g., do not push furniture against the ACM, do not penetrate the wall with tacks – use University recommended putty)”;
 - “Report any evidence of disturbance or damage of ACM to the Facility office at 203.932.7087 and Residential Life and Housing staff”;
 - “Cleaning and maintenance personnel are taking special precautions during their work to properly clean up any asbestos debris and to avoid disturbing ACM”; and
 - “All ACM is inspected periodically, and additional measures will be taken if needed to protect the health of building occupants.”

- Additionally, the University Hazardous Material Communication Program is accessible on the University's MyCharger site.

6.2 Contractor Notification

Prior to arriving at the University to work, all contractors will be notified about the presence of ACM or PACM in their contract documents. Contractors are required to inform all of their employees, including their subcontractors of the ACM and/or PACM that may be contained within the University buildings.

All contractors employed by the University are expected to be in compliance with all applicable and state regulations.

6.3 Department of Public Health Notification

When more than 10 linear feet or 25 square feet of removal, repair, enclosure, encapsulation, or any other disturbance is scheduled, the CT DPH must be notified, and the project must comply with the 10-day notification period prior to commencing. This is a mandatory notification unless an emergency exists. At the University of New Haven, the Facilities Department will work with all asbestos abatement contractors to ensure the state notification requirements are met.

7.0 Periodic Inspection and Air Monitoring

The University conducts periodic visual inspections of ACM and PACM to note the ACM's current condition and physical characteristics. Through this inspection, it is possible to determine both the relative degree of damage and assess the likelihood of future fiber releases. These inspections are completed by both the Facilities Department and Residential Life and Housing staff.

In addition to periodic visual inspections, the University also conducts periodic air monitoring to detect for airborne asbestos fibers in buildings during semester breaks as part of their on-

going commitment to maintain a safe environment on campus and to protect the health and safety of the University's employees, students and visitors from the potential exposure to asbestos within campus buildings.

8.0 Asbestos Identification and Surveys

Prior to the repair, removal or demolition of any building materials, OSHA, EPA and the state of Connecticut require that these areas be surveyed for ACM. It will be the duty of the Facilities Department, in cooperation with contractors, to complete this inspection prior to work commencing. If ACM will be disturbed during the project, it is required that it be removed prior to commencing work. If the ACM will not be disturbed during the project, measures must be taken to ensure that it is protected to prevent accidental disruption during the work.

Uncontrolled releases of asbestos are restricted under state and federal environmental law and also this policy.

The University of New Haven has partnered with a third-party contractor to begin identification of areas at the University that contain ACM. All areas at the University have not been surveyed. Until this survey has been completed, all common construction materials that contain ACM installed prior to 1981 can be reasonably expected to contain asbestos until testing shows it does not.

There is a potential for asbestos to be present in areas that have not yet to be identified or sampled. If you should have any questions on materials within your building, please contact the Facility office at 203.932.7087.

9.0 Training of Employees

There are various levels of training depending on the involvement of the affected employee. OSHA requires employers to train, institute, and ensure participation in a worker training program for employees exposed to fiber levels (either measured or anticipated) at or above the permissible exposure limit (0.1 fibers per cubic centimeter (f/cc) as an 8-hour, time-weighted average (TWA) and/or the excursion limit (1.0 f/cc as a 30-minute TWA). This training program consists of an initial training period, the duration of which is determined by the type of work the employee performs, and annual refresher training.

Awareness training includes the following topics:

- Background information on asbestos
- Health effects of asbestos
- Worker protection programs
- Locations of ACM and PACM in University building's
- Recognition of ACM and PACM damage and deterioration
- The asbestos management program for the University
- Proper response to fiber release episodes

Sample results conducted by a third-party contractor at the University have all been below the permissible exposure limit and/or excursion limit, so therefore the above-mentioned training has not been implemented at the University.

- Asbestos Awareness training for custodial services and building and grounds staff involved in cleaning and minor maintenance tasks where ACM may be accidentally disturbed is completed on an annual basis by an environmental consultant at the University.
- Currently there are no authorized persons employed by the University of New Haven that are able to repair, maintain or remove asbestos. All repair, maintenance, removal and/or asbestos sampling is conducted by a third-party contractor certified to do so.

Appendix A: Presence of Asbestos Annual Notification Letter

The University of New Haven acknowledges that due to the age of many of the University's buildings (those built prior to 1981), materials potentially containing asbestos may be present. Thus, the University has maintained a policy, developed in accordance with the Occupational Safety and Health Administration's (OSHA) Asbestos Standards, regarding asbestos management. It may be located on [MyCharger](#).

As part of this plan, the University is required to notify students, staff and faculty on an annual basis of the potential presence of asbestos containing materials (ACM) and is distributing this document for this purpose.

Having shared this, it is important to recognize that asbestos exists in buildings on campus it is also found public schools, office & government buildings, retail and commercial buildings, as well as many of the products and materials we come in contact with on a routine basis. Asbestos-containing materials (ACM) pose no threat to your health when left undisturbed. As long as the building materials are in good condition, they do not present a health risk.

Conversely when asbestos fibers become airborne due to deterioration, or as a result of damage or improper handling, the risk of exposure increases. For this reason, the University has maintained comprehensive programs to safely manage asbestos.

What Measures Does the University Take to Ensure Our Community's Safety?

The University of New Haven considers the safety of its students, faculty, staff, and visitors to be our highest priority. The University, in conjunction with contracted subject matter experts, has developed and implemented a comprehensive *Asbestos Management Plan* to safely manage asbestos on campus and comply with all applicable federal and state regulations.

The University maintains a capital improvement plan that includes identification and removal of asbestos-containing materials from the residence halls and other buildings on campus.

The University also employs a staff of trained professionals and outside experts who conduct building inspections, coordinate and supervise asbestos-related construction activities, perform air monitoring and surveys, and provide employee training.

What Materials May Contain Asbestos?

Asbestos was frequently used in construction for its fire-resistant characteristics. Building materials containing asbestos may include flooring, ceilings, walls, thermal system insulation on pipes and tanks and miscellaneous items. University construction and maintenance standard operating procedures presume materials in buildings built prior to 1981 contain asbestos and handled accordingly unless sampling and analysis indicates otherwise. This includes much of the University's West Haven and Orange campuses.

How to Keep Yourself Safe

- Avoid scraping or damaging ceilings, walls, floor tiles or pipes.
- Do not drill, nail, screw or otherwise place holes in walls, floors or ceilings.
- Do not hang plants or other objects from walls or ceilings.
- Do not disturb or personally handle suspected or damaged ACM.

If you notice or suspect any damaged building materials contact Facilities Department (24/7) at (203) 932-7087.

If you have further questions in reference to this information, please contact:

Louis Annino, AVP of Facilities

(p) 203-932-7153

(e) lannino@newhaven.edu

Appendix B: Construction Dates for University Buildings

Building Name	Year of Construction
1136 Campbell Avenue	1900
Gate House	1906
Maxcy Hall	1906
South Campus Hall	1906
Harugari Hall	1911
Arbieter Maenner Chor (German Club)	1912
114 Boston Post Rd. (Lighting Quotient Building) - Leased	1920
1132 Campbell Avenue	1920
445 Orange Avenue	1920
1076 Campbell Avenue	1925
46 Ruden Street	1930
92 Ruden Street	1930
Echlin Hall	1930
Allingtown Library Building – Leased	1932
41 Alling Street (former St. Pauls/convent)	1935/1955
1124 Campbell Avenue	1945
467 Orange Avenue	1945
3 Chauncey St.	1950
AMC/Garage	1950
AMC/PicnicStand	1950
202 Rockdale Road	1957
208 Rockdale Road	1957
222 Rockdale Road	1957
Charger Plaza A (Vacant - Retail Space)	1958
Charger Plaza B (Classroom / Office Building)	1958/1959
196 Rockdale Road	1959
15 Ruden Street	1960
19 Ruden Street	1960
21 Ruden Street	1960
20 Atwood	1961
16 Rockview Street	1962
20 Ricardo Street	1962
Orange Graduate Center	1963
1 Care Lane	1965
Bartels Hall	1965
Buckman Hall	1969
Dunham Hall	1969

Winchester Hall	1969
Kaplan Hall	1970
Sheffield Hall	1970
Bethel Hall	1971
Bookstore (includes University Police)	1971
Charger Gymnasium	1971
Peterson Library	1974
32 Hoffman Street	1975
Charger Plaza C (Band Building)	1975
Bartels Student Activity Center (Formerly Psychology)	1980
17 Chauncey Street	1952
Pressbox	1982
Dodds Hall	1983
Ticket Booth	1985
Subway Building	1988
Anemone & Steven Kaplan Hall (Formerly Bayer Hall)	1991
Campus Walls	1992
Dental Hygiene	1994
Bixler Hall	1996
Gerber	1996
Grandstands	1999
Bergami Hall	2004
David A. Beckerman Recreation Center	2007
Celentano	2009
Gehring Building - Lee Institute	2010
North Hall	2013
Westside Hall	2014
Athletics Trailer	2015
Coaches Trailer	2015
Football Trailer	2015
1 Atwood (Leased)	2017
Sports Med Trailer	2018
Canal Dock - Marine Science Center	2018
Concessions Building	2019
Utility Building	2020
Bergami Center for Science, Innovation & Tech.	2020
Park view (Leased)	2020