



APPENDIX E

Asbestos Management Guide for Project Managers

Purpose. This guide has been provided to assist University Project Managers with the Western Kentucky University Asbestos Operations & Maintenance Program.

All asbestos work activities, management, or response, for all properties owned or maintained by Western Kentucky University (WKU) involving inspection, analytical, consulting, management, removal, or disposal shall be approved by the University's Department of Environment, Health & Safety (EHS), Division of Asbestos Management, prior to the response being planned, designed, or performed. Asbestos work activities shall adhere to the guidelines set forth in the WKU Asbestos Operations and Maintenance Program and all applicable asbestos regulations and work practices that may apply.

If proper procedures are not followed during demolition and renovation activities, asbestos-containing material (ACM) may be disturbed and possibly raise levels of airborne asbestos. All workers are prohibited from conducting any work in a manner that may disturb ACM without proper training. This "Asbestos Management Guide for Project Managers" intention is to ensure proper procedures are engaged whenever there is a possibility of disturbing ACM during demolition and renovation work and is but a component of the WKU Asbestos Operations and Maintenance Program, not an all-inclusive guide. The WKU Asbestos Operations and Maintenance Program includes provisions to direct each type of asbestos work activity anticipated during projects and shall be strictly adhered to for all properties owned or maintained by the University.

Anyone at WKU whose job duties include, or take upon themselves, the role of undertaking demolition, construction, modification, or renovation of any project (ie. painting, carpet replacement, wall removal or additions, alterations to HVAC systems and electrical systems, etc.) regardless of their job title are considered a WKU Project Manager (PM), for purposes of this Asbestos Operations and Maintenance Program. WKU Project Managers shall proceed as outlined in this procedure prior to the inception of that activity conducted on properties owned or maintained by WKU and shall strictly adhere to the WKU Asbestos Operations and Maintenance Program and this procedure for controlling ACM during these actions.

Asbestos Management. It is often one of the most difficult tasks to minimize inadvertent disruption of ACM during project work activities. To better control this situation at WKU, a system requiring all work activity that disturbs or has the potential to disturb ACM be documented by an online "Asbestos Management Request" prior to beginning the work.

This Asbestos Management Request shall be completed by the WKU Project Manager proposing the work activity prior to starting the project, the WKU Asbestos Program Coordinator shall review the Asbestos Management Request and direct, advise, mandate or provide guidance concerning the correct procedure required to manage or abate the ACM for that particular project. The designated WKU Departmental Asbestos Coordinator for the PM shall be copied on all correspondence concerning the Asbestos Management Request until completion of the proposed project. All proposed demolition, maintenance, renovation, and service work activities conducted on properties owned or maintained by WKU shall strictly adhere to this procedure for controlling ACM.

The key step in a proposed project is utilizing the online "Asbestos Management Request" system in the pre-planning stage of the project to initiate an asbestos survey. This will aide

with information such as the location and type of ACM that may be affected. Because of this, it is essential that the WKU Asbestos Program Coordinator participate in all project planning. To control this situation during projects at WKU, a system requiring all work activity that disturbs or has the potential to disturb ACM be documented by an online Asbestos Management Request prior to beginning the project. All proposed demolition, maintenance, renovation, and service work activities conducted on properties owned or maintained by WKU shall strictly adhere to this procedure. The WKU Asbestos Program Coordinator shall review the Asbestos Management Request and provide direction, advice, regulatory requirements, or guidance concerning the correct method required to manage or abate the ACM for that project or circumstance. The WKU "Asbestos Management Request" is available online at the WKU EHS web site:

https://www.wku.edu/ehs/asbestos/asbestos_mgt_form.php

The WKU Asbestos Program Coordinator shall be given ample time to review the Asbestos Management Request along with available project drawings and specifications in order to determine whether ACBM may potentially be impacted. Asbestos sampling and analysis work has been conducted, and/or is ongoing, for facilities owned or maintained by WKU. The WKU Asbestos Program Coordinator shall search the "Asbestos Building File Archive" for relevant asbestos information; any information retrieved shall be reviewed for integrity and forwarded to the appropriate PM along with the recommended response action to proceed.

In some instances, additional analytical sampling is required to verify the previous asbestos survey. For construction, renovation, and other projects where no previous sampling data is available, an asbestos survey and hazard assessment is required. Such a survey involves collection of representative bulk samples such that various materials may be classified as ACM or non-ACM. The Asbestos Program Coordinator shall make the determination pertaining to the survey being conducted utilizing EHS means or contract services.

The Asbestos Program Coordinator shall contact the PM where no previous, or an insufficient amount of, sampling data is available for their project and provide direction, advice, regulatory requirements, or guidance concerning the correct action to manage the asbestos located in the projects scope of work. If the determination is to rely on contract services to provide the asbestos survey the Asbestos Program Coordinator shall provide a listing of licensed and accredited contractors approved for asbestos work activities on buildings owned or maintained by WKU. The "Approved Asbestos Contractor List" appendix L of the WKU Asbestos Operations and Maintenance Program shall be referenced for all asbestos work activity providers, current price contract vendors shall be used if specified.

The WKU Project manager shall solicit bids for all asbestos work activities pertaining to the asbestos survey for their project and serve as the "point of contact" for that contractor, technical oversight shall be provided by the Asbestos Program Coordinator to guide the PM. All survey results shall be provided to the Asbestos Program Coordinator by the asbestos service provider. All asbestos sampling activity costs associated with the project are the responsibility of the project, a purchase order for these costs shall be provided by the PM prior to contracting such activities.

Worker Notification of Asbestos Locations. *All WKU contractors, employees of contractors, service workers, or others not employed by WKU have the right to know and be aware of asbestos-containing materials in buildings or work areas. Contractors, service workers, or others not employed by WKU that may have the potential to disturb ACM during their contracted work activities shall be made aware of its presence prior to beginning work.*

All contractors and/or subcontractors shall be notified of the locations of asbestos-containing building materials for the project prior to beginning work and that the work may be around but not including asbestos-containing material. The "Demolition and Renovation Contractors Asbestos Location Notification" Appendix A of the WKU Asbestos Operations and Maintenance Program shall be utilized for this OSHA requirement. The applicable WKU Departmental Asbestos Coordinator and Project Manager for the project shall make certain this completed notification is provided to the WKU Asbestos Program Coordinator, prior to starting the project, for all contractors and/or subcontractors performing work on properties owned or maintained by the University.

This "right-to-know" notification shall be accomplished utilizing the appropriate WKU Designated Asbestos Coordinator and PM associated with the contractor, service worker or others providing work on WKU projects that may have the potential to disturb ACM, the Asbestos Program Coordinator or a person designated by the Asbestos Program Coordinator shall assist with providing this information. As the legal "Building Owner" WKU may be liable for all environmentally related incidences regardless of contractor negligence. Locations of ACBM, confirmed and presumed, are recorded for use by maintenance and custodial personnel, service workers or other parties of interest. The "WKU Master Asbestos Location List" is continually revised and can be obtained at the WKU Department of Environmental Health and web site:

[WKUKnownAsbestosLocationList 10 Jun 24.pdf](#)

Demolition, maintenance, or renovation of buildings or building system replacements can cause major disturbance of ACM. Demolishing buildings or structures, removing walls, replacing flooring, steam, heating, plumbing or air conditioning systems, etc. involve breaking, cutting, or otherwise disturbing ACM that may be present. Prior planned asbestos management or removal of ACM, by accredited asbestos personnel, shall be performed in these situations as required by NESHAP. If prior planned asbestos management or removal is not undertaken, the entire project shall be considered equivalent to an asbestos removal project. All procedures and precautions for accredited asbestos management or removal required by EPA, OSHA, and the WKU Asbestos Management Program shall be utilized.

In order to avoid delaying general demolition, maintenance, or renovation construction, it is highly recommended that asbestos-related phases of projects (survey, and management or abatement plan) be scheduled as soon as possible once the project is budgeted. If extensive interior demolition is anticipated, enclosed, or concealed ACM running behind walls and above ceilings may be exposed and shall be considered in defining the scope of work.

The WKU Asbestos Program Coordinator prefers areas be rendered asbestos-free during renovation or construction projects on properties owned or maintained by WKU (complete abatement of ACM during renovation or construction projects).

Any ACM remaining in the projects work area shall be clearly identified and labeled, these locations of ACM shall be added to the "as-built" project plans. An Asbestos Management Plan may be required as determined by the WKU Asbestos Program Coordinator.

A cost effective abatement alternative shall always be considered and proposed by the Asbestos Program Coordinator. However, the foresight of additional upcoming renovation work may dictate complete removal as the most feasible abatement option since it does offer a permanent solution. In many circumstances, the Asbestos Program Coordinator shall recommend to the PM several asbestos response alternatives for their project, a joint effort by both the PM and Asbestos Program Coordinator, or a person appointed by the Asbestos Program Coordinator, shall determine the asbestos response for the project.

The WKU Asbestos Program Coordinator shall provide a listing of licensed and accredited contractors approved for asbestos work activities on buildings owned or maintained by WKU. The "Approved Asbestos Contractor List" appendix L of the WKU Asbestos Operations and Maintenance Program shall be referenced for all asbestos work activity providers.

Asbestos Contractor Management. Contractors providing asbestos services for PM projects shall be considered a "contractor for the project" not an EHS contractor. The PM shall solicit all bids for all asbestos work activities pertaining to their project and serve as the "point of contact" for that contractor, technical oversight from the Asbestos Program Coordinator shall be provided to assist the PM as needed. All additional asbestos work activity costs associated with the project are the responsibility of the project, a purchase order for these costs shall be provided by the PM to the Asbestos Program Coordinator prior to contracting such activities through Environmental Health and Safety.

For effective management of asbestos work activities for projects involving WKU the Asbestos Program Coordinator, Designated Asbestos Coordinator, and Project Manager shall compile an ongoing joint effort from the projects inception until completion or all asbestos-related hazards have been addressed and have meet all applicable regulations of the WKU Asbestos Operations and Maintenance Program for that project. *This shall include oversight of the asbestos work activities involving accredited asbestos contractors.* The asbestos contractor's scope of work shall be clearly defined prior to starting the work; the project specifications, work plan, and schedule shall provide clear instructions for the project.

Renovation and construction projects run on a continually changing schedule of events, in order to alleviate confusion and inefficiency. The PM and their Designated Asbestos Coordinator shall set the work schedule for the asbestos contractor and notify the Asbestos Program Coordinator and effected WKU Building Coordinator with the date(s) and time(s) of the anticipated asbestos work activity schedule and all changes to that schedule until completion in order to comply with the University employed building occupants "right-to-know" OSHA regulation.

The PM shall provide point of contact, direction, management, parking, building access, keys, utilities, etc. to the asbestos contractor (consultant or abatement) for the duration of the project. The WKU Asbestos Program Coordinator or a person designated by the Asbestos Program Coordinator shall provide regular site evaluations, act as liaison for WKU and regulatory agencies, and provide asbestos-related technical assistance to the DAQ and PM for the duration of all asbestos-related work activities for the duration of their project. The PM and their Designated Asbestos Coordinator shall be provided with such actions and findings from the Asbestos Program Coordinator.

The WKU Asbestos Program Coordinator or a person designated by the Asbestos Program Coordinator shall provide the final approval on all asbestos-related work activities for projects involving properties owned or maintained by WKU. These described sequences of operational events shall be adhered to for management of confirmed or presumed ACM during building projects for all properties owned or maintained by the University.

General duties for Project Managers during demolition and renovation projects pertaining to buildings owned or maintained by Western Kentucky University:

- ☒ Notify the Asbestos Program Coordinator and their Designated Departmental Asbestos Coordinator of projects that have the potential to disturb suspect or known ACM by submitting an online Asbestos Maintenance Request for evaluation in the pre-planning stage of the project.

- ☑ Provide defined scope of project work to the Asbestos Program Coordinator as requested including drawings, demo spec, and utility routes.
- ☑ Be prepared to accompany the Asbestos Program Coordinator as requested for a pre-planning survey of the proposed work site.
- ☑ Assure the PDC Designated Asbestos Coordinator is aware of the projects scope of asbestos work activity during all phases of the project.
- ☑ Develop a prioritization scheme for scheduling asbestos-related actions in such a way as to minimize impact or exposure to occupants and workers.
- ☑ Arrange contracts for asbestos services from the Appendix L WKU Approved Asbestos Contractor List covering all associated asbestos costs.
- ☑ Provide asbestos service contractors with direction, management, parking, building access, keys, utilities, etc.
- ☑ Become the point of contact for occupants, workers, and contractors for all issues concerning asbestos-related work activities during the entire project.
- ☑ Advise relevant contractors and sub-contractors of the presence of known ACM; provide the Asbestos Program Coordinator with completed "*Demolition and Renovation Contractors Asbestos Location Notification*" Appendix A forms.
- ☑ Arrange for appropriate occupant and/or shutdown notices, including entrance/exit detours and temporary relocations if necessary.
- ☑ Be available to field or refer questions pertaining to the project from concerned occupants, contractors, and sub-contractors.
- ☑ Accompany the WKU Asbestos Program Coordinator/Liaison during visits from asbestos regulatory compliance officers and inspectors, being prepared to address issues and concerns with contractors and sub-contractors.
- ☑ Stop all project work activity and clear the area of workers in the event of unplanned ACM disturbance and contact WKU Asbestos Program Coordinator.
- ☑ Ensure all asbestos-related project records are provided to the WKU Asbestos Program Coordinator for required record retention.
- ☑ *Ensure all new building materials shall be certified asbestos-free.*
- ☑ Request assistance from the WKU Asbestos Program Coordinator concerning the correct action to manage the asbestos located in the projects scope.

General duties for the Asbestos Program Coordinator during demolition and renovation projects pertaining to buildings owned or maintained by Western Kentucky University:

- ☑ Provide and manage Approved Asbestos Contractor List and Price Contract.
- ☑ Provide and manage Master Location Asbestos List survey database.
- ☑ Respond to the online Asbestos Maintenance Request in a timely manner.
- ☑ Request the defined scope of project work from the PM as needed to determine required asbestos management.
- ☑ Request PM assistance and information during the pre-planning survey.
- ☑ Assure the Designated Asbestos Coordinator is aware and involved concerning the projects scope of asbestos work activity.
- ☑ Provide assistance, guidance, and oversight for determining the asbestos response for the project.
- ☑ Make the determination if a project is beyond the scope of in-house asbestos management (survey and abatement).
- ☑ Assist with asbestos-related questions pertaining to the project from concerned occupants, contractors, and sub-contractors.
- ☑ Act as liaison for the University pertaining to DAQ asbestos regulatory compliance officers and inspectors for the duration of the project.
- ☑ Compile and manage asbestos-related work activity records retention database.
- ☑ Assist PM with all asbestos-related work activity as requested.

ASBESTOS MANAGEMENT PROCEDURES

Maintenance/Renovation/Demolition Planning PRIOR TO DISTURBING SUSPECT ASBESTOS-CONTAINING MATERIALS

