

**University of Texas at San Antonio**  
**Office of Environmental Health, Safety, and Risk Management**

**Asbestos Management Plan**

i      **SIGNATURE PAGE**

This original version of this procedure manual has been reviewed for regulatory compliance and best management practices by the undersigned individuals and is hereby adopted for use and compliance by all employees at all University of Texas at San Antonio owned or operated facilities.

<b>PRINTED NAME</b>	<b>SIGNATURE</b>	<b>TITLE</b>	<b>DATE</b>
J. Brian Moroney	Signature On File	Director , EHSRM	02-20-2014
Richard M. Garza	Signature On File	Environmental & Construction Safety Manager	02-20-2014
V. Keith Kewley	Signature On File	Environmental & Construction Safety Coordinator	02-20-2014

Original: 11/01/2007

Revised: 07/11/2011

Revised: 02/20/2014

**This plan was reviewed/revised on 02/20/2014 and replaces plan dated 07/11/2011. Changes to this plan have been highlighted in “gray” and are summarized below:**

Page 8, Section VI. Asbestos Free Buildings – Added “San Saba Hall”

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### iii **EMERGENCY PROCEDURES & CONTACTS**

If an asbestos-containing material (ACM) is disturbed (via cutting, sawing, drilling, prying, etc), the Environmental & Construction Safety Coordinator / EHSRM must be notified immediately. The dust and debris from this ACM must be cleaned up using HEPA-filtered equipment, and by personnel trained in the proper techniques to accomplish the clean-up without further contamination of the indoor environment.

The Environmental & Construction Safety Coordinator / EHSRM will be responsible for engaging the proper personnel to perform the clean-up. This may involve in-house personnel for small-scale incidents and/or an independent asbestos licensed contractor, if deemed necessary.

To report a possible asbestos-related incident, OR if you have any questions or concerns regarding asbestos at UTSA, please contact the following:

UTSA Environmental & Construction Safety Coordinator:

V. Keith Kewley  
Phone: 210-458-4267  
Email: [keith.kewley@utsa.edu](mailto:keith.kewley@utsa.edu)

Safety Specialist II (for Environmental & Construction Safety)  
John Burns  
Phone: 210-458-6625  
Email: [john.burns2@utsa.edu](mailto:john.burns2@utsa.edu)

EHSRM Front Desk

Nancy Woodward  
Phone: 210-458-5250  
Email: [nancy.woodward@utsa.edu](mailto:nancy.woodward@utsa.edu)

## **I. OVERVIEW & PURPOSE**

The University of Texas @ San Antonio is committed to providing a safe environment for all students, faculty, and staff, and is also obligated to comply with the Texas Asbestos Health Protection Regulations (TAHPR) and the EPA's National Emission Standards for Hazardous Airborne Pollutants (NESHAP). The use of asbestos containing building products began well over a hundred years ago and was superior to most other products of the times. However, by the 1960's it was becoming obvious that there were negative health effects caused by asbestos (see FAQ's for more information). A variety of asbestos containing materials (ACM) exist in many of the UTSA buildings; this program is designed to safely and legally manage these asbestos containing materials. Any task or activity that may penetrate, damage, or remove a building material (i.e. cutting, sawing, drilling, prying, etc.) must be reviewed by EHSRM staff (the Environmental & Construction Safety Coordinator or designated representative) for potential disturbance of an asbestos containing material. This is necessary to ensure compliance with the applicable regulations, which in turn ensures a work and learning environment free of asbestos concerns.

## **II. SCOPE**

This Asbestos Management Program applies to all UTSA owned, leased, or operated properties. All UTSA faculty, staff, and students are required to comply with all aspects of this Program.

## **III. PERIODIC REVIEW**

This Program will be reviewed every three years, and may be modified / edited as necessary to ensure information included is accurate and the University maintains compliance with applicable regulations.

## **IV. RESPONSIBILITIES**

### **A. EHSRM**

1. Responsible for maintaining all official documents associated with this Asbestos Management Program, including but not limited to the building surveys, training and licensing, and all asbestos abatement activities, regardless of whether performed by in-house personnel or a third-party contractor.
2. Responsible for acquiring and maintaining appropriate training and licensing for the University as an Asbestos Operations & Maintenance (O&M) Contractor.

3. Responsible for acquiring and maintaining appropriate training, licensing, and medical information for the University personnel designated to participate on the in-house Asbestos Operations & Maintenance Program.
4. Responsible for advising the University on addressing and handling asbestos issues, including but not limited to work orders, construction projects, and potential risks of exposures.
5. Responsible for issuing an Asbestos Work Checklist for each asbestos-related activity to be conducted on any property owned, leased, or operated by the University; and whenever necessary in accordance to other sections of this Program.
6. Responsible to conduct Respiratory Protection training and fit tests for UTSA personnel participating in this Program.
7. Responsible for conducting Asbestos Awareness training to UTSA personnel.

**B. Facilities**

1. Responsible to notify EHSRM of any task that may potentially disturb an ACM. This includes, but is not limited to, work orders, construction projects, and general maintenance activities.
2. Responsible to designate FACILITIES personnel to participate on the in-house Asbestos Operations & Maintenance Program. This participation involves being trained and licensed in accordance with the TAHPR rules and performing small scale, short duration asbestos related tasks per instructions from EHSRM / Environmental & Construction Safety Coordinator. Task-specific instructions will be issued via the Asbestos Work Checklist.
3. Responsible to provide all information regarding an asbestos activity performed by in-house personnel to the EHSRM / Environmental & Construction Safety Coordinator, via completion and return of the Asbestos Work Checklist.

**V. ASBESTOS BUILDING SURVEYS**

In accordance with TAHPR, each building is surveyed for asbestos containing materials (ACM) by an Asbestos Consultant licensed by the Texas Department of State Health Services. Any building material that may potentially contain asbestos is sampled and analyzed by a laboratory. Building materials containing greater than 1% asbestos, by weight, are classified as ACM. The Environmental & Construction Safety Coordinator within the Office of Environmental Health, Safety, and Risk Management maintains custody of the asbestos building surveys, and is responsible for providing accurate advice on projects involving ACM.

These building surveys are available for review, upon request. To submit a request to review the asbestos building surveys, contact the personnel listed below:

UTSA Environmental & Construction Safety Coordinator:  
V. Keith Kewley  
Phone: 210-458-4267  
Email: [keith.kewley@utsa.edu](mailto:keith.kewley@utsa.edu)

Safety Specialist II (for Environmental & Construction Safety)

John Burns  
Phone: 210-458-6625  
Email: [john.burns2@utsa.edu](mailto:john.burns2@utsa.edu)

EHSRM Front Desk

Nancy Woodward  
Phone: 210-458-5250  
Email: [nancy.woodward@utsa.edu](mailto:nancy.woodward@utsa.edu)

## VI. ASBESTOS FREE BUILDINGS

A. In accordance with TAHPR, a survey of the building materials within each building has been conducted. The following UTSA buildings are considered asbestos free, as determined by the survey and other applicable construction documents:

- Applied Engineering & Technologies (AET)
- Athletics Office Building (*temporary*)
- Bio-Science & Engineering Building (BSE)
- Bioscience Building (BSB)
- Biowaste Cold Storage
- Business Building (BB)
- Business Services Annex (BSA)
- Chaparral Village - All Buildings (CV)
- Child Development Center (CDC)
- CNG Station
- Engineering Building (EB)
- Facilities Annex (FSA)
- Facilities Warehouse
- Hazardous Materials Building
- Hazardous Waste Storage Facility 2
- Hazardous Waste Storage Facility 3
- Hazardous Waste Storage Facility 4
- Lab & Waste Storage Building
- Laurel Village - All Buildings (LV)

- Main Building (MB)
- Margaret Batts Tobin Lab Building (MBT)
- MEMS Lab Building (MEMS)
- Portables 1, 2, 3 & 4 (SSB A, B, C, D)
- Recreation and Wellness Center (RWC)
- San Saba Hall (SSH)
- Tennis Center
- University Center Expansion (Phase 2)
- University Center Expansion (Phase 3) (UC3)
- Visitors Booth - JPL
- Visitors Booth - MS
  
- Buena Vista Building (BV/DTC)
- Durango Building (DBB/DTC)
- Frio Street Building (FS/DTC)
- Monterey Building (MNT/DTC)
- DTC Parking Garage

- B. Roofing materials were not tested in order to avoid causing leaks. Roofing materials must be tested prior to re-roofing any building.
- C. All other UTSA buildings, not listed above, have been determined to have one or more asbestos containing materials within.

## VII. TYPES OF ACM AT UTSA

- A. A building material is legally defined as an asbestos containing material (ACM) if it contains greater than 1% asbestos, by weight. The list below indicates some of the building materials found to contain asbestos UTSA; however, this list is not all-inclusive; if you are not sure whether a specific material contains asbestos, contact the Environmental & Construction Safety Coordinator for clarification.
- Sheetrock joint compound  
(contains only 2 – 3% asbestos, however this is the largest item of concern simply because of the overall quantity across campus)
  - Floor tile and mastic (glue)
  - Carpet mastic (glue)
  - Insulation on mechanical systems  
(boilers, hot water tanks, piping, etc.)
  - Undersink coatings
  - Mastic (glue) on HVAC ductwork insulation
  - Fireproof panels within column chase access'
  - Fireproof panels within older fume hoods



- Primary water piping services UTSA
- Roofing felts and mastics
- And other various types of materials in small quantities and specific locations; such as mechanical system gaskets.

## VIII. WORK ORDERS / MAINTENANCE REQUESTS

- A. Departments desiring to have work performed should submit a work request to Facilities - Work Control. Work Control shall then notify the Environmental & Construction Safety Coordinator of any and all work orders that may involve any task or activity that may penetrate, damage, or remove a building material. The Environmental & Construction Safety Coordinator shall be responsible to review the scope of work and provide information regarding potential asbestos involvement.
- B. Departments planning to perform work themselves, or plan to hire a contractor directly to perform any work, that may involve a task or activity that may penetrate, damage, or remove a building material are still responsible to submit their plans to the Environmental & Construction Safety Coordinator for review. All faculty, staff, and students have a responsibility to assist the University in maintaining regulatory compliance and a safe work and learning environment.

## IX. CONSTRUCTION / RENOVATION PROJECTS

- A. Facilities / Construction Project Coordinators are responsible to notify the Environmental & Construction Safety Coordinator of each new construction project, and to provide a detailed scope of work for review at the earliest possible opportunity. This detailed scope of work shall be provided prior to seeking contractor pricing (via bid or proposal). If asbestos containing materials are involved in the project, the options for appropriately addressing the asbestos will be discussed by the Environmental & Construction Safety Coordinator with the Construction Project Coordinator, and a course of action approved.
- B. Departments planning to perform work themselves, or plan to hire a contractor directly to perform, any work that may involve a task or activity that may penetrate, damage, or remove a building material, are still responsible to submit their plans to the Environmental & Construction Safety Coordinator for review. All faculty, staff, and students have a responsibility to assist the University in maintaining regulatory compliance and a safe work and learning environment.

- C. An Asbestos Work Checklist must be completed for each construction or renovation project. If there is no ACM involved on a particular project, the Environmental & Construction Safety Coordinator will sign-off on the Checklist indicating that the Scope of Work was reviewed and no ACM is involved. The Environmental & Construction Safety Coordinator and the Construction Project Coordinator will each maintain a copy of the executed Checklist for their respective records.

## **X. TRAINING & LICENSING**

- A. UTSA personnel designated to participate on the Asbestos Operations & Maintenance Program must attend either an Asbestos Supervisor or an Asbestos Worker training class conducted by a state licensed training provider. The EHSRM / Environmental & Construction Safety Coordinator will ensure that designated personnel are registered for appropriate training.
- B. UTSA personnel designated to participate on the Asbestos Operations & Maintenance Program must have a medical evaluation, which consists of a questionnaire, general exam by a physician, a pulmonary function test, and at the doctor's discretion, a chest x-ray. The EHSRM / Environmental & Construction Safety Coordinator and Occupational Health Coordinator will ensure that designated personnel receive the appropriate medical exam.
- C. UTSA personnel trained and licensed to perform asbestos activities must attend training on Respiratory Protection. Each employee will be issued a respirator and fit-tested in this respirator during this training. This training and fit-test will be conducted by the EHSRM / Environmental & Construction Safety Coordinator.
- D. UTSA personnel to be licensed as an Asbestos O&M Supervisor must successfully pass an accreditation exam administered by the TDSHS. The EHSRM / Environmental & Construction Safety Coordinator will ensure that designated personnel are registered for this exam. Personnel designated to be licensed as an Asbestos Worker are not required to take or pass this exam.
- E. UTSA personnel that work in close proximity to ACM but do not disturb the ACM in the performance of regular duties must attend Asbestos Awareness training every two years. This typically includes maintenance and custodial personnel. Any and all other University faculty and staff are encouraged to attend this awareness training; knowledge obtained

through this training will allow the employee to assist the University in maintaining compliance with the asbestos regulations.

## **XI. PERFORMANCE OF ASBESTOS RELATED ACTIVITIES**

- A. All tasks that may potentially disturb an asbestos-containing material must be performed by personnel trained and licensed in accordance with the TAHPR.
- B. Per TAHPR, all asbestos-related tasks performed must be documented.
  - 1. The documentation of work performed by third-party vendors (asbestos abatement contractors and consultants) is provided to the University by the vendor upon completion of the asbestos-related project.
  - 2. The documentation of asbestos-related work performed by in-house UTSA personnel is maintained by the Environmental & Construction Safety Coordinator.
- C. In order for in-house personnel to legally perform asbestos tasks, the University must also be licensed as an asbestos abatement contractor. **No UTSA employee shall perform any asbestos-related task without first contacting the Environmental & Construction Safety Coordinator and ensuring that all regulatory requirements are being followed; including providing the Environmental & Construction Safety Coordinator with the details of the asbestos-related work to be performed.** The Environmental & Construction Safety Coordinator will then provide an Asbestos Work Checklist to the specific personnel designated to perform the work; this checklist must be filled out completely and returned to the Environmental & Construction Safety Coordinator immediately upon completion of the work. This checklist will then be retained as part of the TAHPR-required documentation.
- D. Independent, third-party vendors licensed as Asbestos Abatement Contractors and/or Asbestos Consultants will be hired to perform asbestos abatement tasks when deemed necessary, and/or when determined to be in the best interest of the University. The decision on whether to use in-house personnel versus hiring a third-party vendor(s) will be determined by the Environmental & Construction Safety Coordinator based on current licensing status of the University and individual employees, the specific asbestos task to be performed, the workload of the maintenance shops at the time, and the quantity of asbestos-containing materials involved.
- E. The TAHPR mandates when a consultant is required, and includes restrictions on quantities that can be addressed via maintenance procedures.

## XII. FORMS

### A. Asbestos Work Checklist

1. The Asbestos Work Checklist includes the information necessary to comply with the TAHPR recordkeeping requirements.
2. An Asbestos Work Checklist must be completed for all work orders that involve the disturbance of ACM. This Checklist will be issued by the EHSRM / Environmental & Construction Safety Coordinator and must be completed by the personnel performing the work and returned to EHSRM.
3. An Asbestos Work Checklist must be completed for each construction or renovation project. If there is no ACM involved on a particular project, the Environmental & Construction Safety Coordinator will sign-off on the Checklist indicating that the Scope of Work was reviewed and no ACM is involved. The Environmental & Construction Safety Coordinator and the Construction Project Coordinator will each maintain a copy of the executed Checklist for their respective records.

### B. Work Request

1. A work request form must be completed and submitted to Facilities – Work Control to initiate any tasks, including asbestos-related activities.