

<b>The University of British Columbia</b>		<b>Asbestos Safety Policy</b>
<b>Policy</b>		
		<b>I-B-05</b>
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## 1.0 Policy:

This policy is applicable to all UBC employees, appointed representatives of the university, and any persons brought onto UBC property to conduct work activities on, or near, asbestos containing materials.

The purpose of this policy is to ensure that all UBC employees are properly advised on the practices of working safely on, and in proximity to, asbestos containing materials. The policy describes the universities responsibilities for managing asbestos containing materials and training its workers in the hazards related to asbestos materials. UBC workers have a responsibility to observe all the policy requirements outlined below, and to follow the safe work procedures provided by the university for working on asbestos containing materials.

It is the responsibility of any person planning to work in a space to determine whether an asbestos hazard exists prior to the disturbance of any construction materials in buildings constructed prior to 1986. Instructions for completing this determination are included in this policy.

The policy is necessary to ensure the well being of personnel and to comply with current editions of the Workers' Compensation Board, Occupational Health and Safety Regulations Parts 5.70, 5.82, Table 5-4, 6.1 – 6.32 (Asbestos), 12.98, 20.2, and "Safe Work Practices for Handling Asbestos".

## 2.0 References:

- WCB Occupational Health and Safety Regulation Parts 6.1– 6.32. (Current Edition).
- Safe Work Practices for Handling Asbestos, Workers' Compensation Board (Current Edition).
- Plant Operations Asbestos Work Procedures (Current Edition).
- Land and Building Services Health and Safety Program (Current Edition).

### 3.0 Definitions:

The following definitions are policy specific. Standard definitions are assumed to apply to all other terms (employer, worker, etc.).

**Asbestos:** A naturally occurring fibrous mineral silicate. The Occupational Health and Safety Regulation defines asbestos as any fiber longer than 5 micrometers, with a diameter less than 3 micrometers, and an aspect ratio of greater than 3:1.

**Asbestos Containing Material (ACM):** The WCB define an Asbestos Containing Material as any manufactured articles or other materials that contain 1% or more asbestos by weight at the time of manufacture or 1% or more asbestos as determined by an approved laboratory method.

**SNOPA:** Standing Notice of Project for employment involving Asbestos. The document detailing pre-approved asbestos projects which the university may conduct without notifying the WCB.

**NOPA:** Notice Of Project: Asbestos. The document that the WCB require be submitted 24 hours prior to initiation of a project involving asbestos at UBC. This document must also be supplied to the Asbestos Management Program and can be faxed to (604) 827 - 5629.

**Friable Asbestos:** Asbestos Containing Materials that can be crumbled, pulverized or reduced to a powder by hand pressure when dry.

### 4.0 Responsibilities:

4.1 Management is responsible for:

- 4.1.1 The provision of a safe, healthy, secure and environmentally friendly workplace.
- 4.1.2 Ensuring that the work site is evaluated for asbestos hazards prior to the commencement of work (see Sections 5.0, 6.0, and 7.0).
- 4.1.3 Ensuring that all of the requirements of Section 12.2 of this policy are met when work on asbestos materials is to be completed by Asbestos Abatement Contractors and Consultants.
- 4.1.4 Supply of appropriate personal protective equipment required for the completion of work on asbestos containing materials.
- 4.1.5 Ensuring that supervisors understand and are trained in asbestos policy and procedures.

4.2 The Asbestos Management Program is responsible for:

- 4.2.1 Providing coordination and technical and administrative standards for the University of B.C.
  - 4.2.2 Inspection, asbestos bulk sampling, assessment, and identification of asbestos-containing material within UBC controlled buildings as identified in the UBC Space Inventory located on the UBC Point Grey campus.
  - 4.2.3 Compilation and updating of inventory of asbestos containing building products on a computer database.
  - 4.2.4 Maintaining an on-site information system comprising door labels identifying the presence of asbestos materials in a room (the Asbestos Identification Program).
  - 4.2.5 Monitoring of the condition of known asbestos containing materials on a semi-annual basis through the efforts of personnel updating the Asbestos Identification Program.
  - 4.2.6 Co-ordinating asbestos training and awareness programs for UBC employees.
  - 4.2.7 Ongoing assessment of asbestos containing building products in response to planning personnel requests.
  - 4.2.8 Maintaining a log of all asbestos work performed by UBC workers on Asbestos containing materials under the University SNOPA or NOPA.
- 4.3** Any person who instructs, directs, and controls workers in the performance of their duties, including those who may be in a bargaining unit such as heads and subheads, are responsible for:
- 4.3.1 Ensuring that employees are instructed on the Asbestos Management Program and informed of any asbestos containing material present in the work area.
  - 4.3.2 Ensuring that any damaged asbestos containing materials encountered by employees are reported to the Asbestos Management Group.
  - 4.3.3 Ensuring that no asbestos containing products are brought into the area of their responsibility.
  - 4.3.4 Ensuring adequate training is provided to employees should the disturbance of asbestos material be required.
  - 4.3.5 Informing the Asbestos Management Program of any work conducted under the University's SNOPA or NOPA.
- 4.4** UBC Employees are responsible for:
- 4.4.1 Attending scheduled training sessions supplied by the University.
  - 4.4.2 Reading and understanding any asbestos information posted on the job site or provided by supervisors.
  - 4.4.3 Following all procedures provided by the Asbestos Management Program and/or applicable regulatory agencies.
  - 4.4.4 Reporting any damaged asbestos containing materials encountered in their work area to their supervisor.

4.4.5 Determining, prior to working on a material, whether the material is asbestos containing or not, and working on them in the manner directed by the “Plant Operations Asbestos Work Procedures”.

**4.5** UBC Department Directors are responsible for:

4.5.1 Ensuring that the university employees and students which they represent are instructed on the Asbestos Management Program and the Asbestos Information System.

**4.6** Local Safety Committee’s are responsible for:

4.6.1 Reporting damaged or degraded materials within their building to the Asbestos Management Program at 822-8772.

4.6.2 Ensuring that employee’s questions and concerns regarding asbestos are properly addressed by the committee who may use the Asbestos Management Program as a resource.

4.6.3 Maintaining records of all asbestos related issues in which they are involved in the form of safety committee meeting minutes.

**4.7** Other responsible parties:

4.7.1 **LBS Stores** are responsible for the purchase and dispensing of appropriate personal protective equipment (disposable suites, respirators, etc.), asbestos waste bags, and other equipment required by UBC’s Asbestos Work Procedures that is not available from LBS tool crib.

4.7.2 The **LBS Tool Crib** is responsible for proper upkeep and rental of HEPA vacuum equipment.

## **5.0 Disturbing Asbestos Containing Materials:**

**5.1** The following guidelines for dealing with asbestos shall be followed by all persons planning to disturb building materials in any building at the University of British Columbia.

5.1.1 Clearly identify the project area and the scope of work, and determine which materials will be impacted.

5.1.2 Determine, using available resources (see Sections 6.0, and 7.0), which of these materials are asbestos containing and which are non-asbestos containing.

5.1.3 Determine, with the assistance of a properly qualified person, the appropriate hazard level and asbestos procedures for the type of work and material to be impacted. **Note:** For the purposes of this policy a properly qualified person shall be a member of the Asbestos Management Program, a recognized Asbestos Consultant, or an Asbestos Abatement Contractor Supervisor.

5.1.4 Either, log the proposed work with the Asbestos Management Program or obtain a completed NOPA from the Asbestos Management Program.

- 5.1.5 Conduct work in accordance with moderate to high-risk procedures as outlined in the WCB's booklet "*Safe Work Practices for Handling Asbestos*".
- 5.1.6 UBC employees will also work in accordance with the Plant Operations Asbestos Work Procedures. Non-university employees are responsible for supplying their own written safe work procedures, which must meet the requirements of this policy and all applicable WCB regulations and guidelines (see Sections 12.0, and 13.0).
- 5.1.7 Maintaining on-site, the NOPA (if applicable), and the asbestos work procedures being followed. If possible these documents should be posted for public examination.
- 5.1.8 Upon completion of the project review the work with the Asbestos Management Program in order to determine whether changes are required to the Asbestos Identification Program stickers for the room, or to the database.

## **6.0 Determining whether building materials are Asbestos Containing or Non-Asbestos Containing:**

- 6.1. The Asbestos Database** is a relational database containing information on every room of every building on campus built prior to 1990. Each room entry has a number of attached inspection reports describing the materials within the room and the asbestos content of that material. All asbestos sample results are recorded in this database. Querying the database allows quick assessment of proposed project areas although requests for assessment by the Asbestos Management Program are typically answered by a site visit to confirm the accuracy of data.
- 6.2. The Asbestos Identification Program** is an on-site summary of information contained in the asbestos database maintained by the Asbestos Management Program. The label containing information on suspect materials can be found on the edge of the main entry door, or on the door jam, or in another obvious place close to the doorway. Fume hoods often have their own labels. It is the responsibility of any person making any modification to the asbestos materials content of a room that would influence the sticker information to ensure that the sticker is updated through notification of the Asbestos Management Program.
- 6.3. The Asbestos Web Page** can be found at [www.hse.ubc.ca](http://www.hse.ubc.ca). Accessing this page will provide summary information directly from the asbestos database on any given room in any building selected through pull down menus.
- 6.4. The Asbestos Alert Bulletin** (Asbestos Management Program Periodical Publication) may be used only if the building in which the work is to be done is listed under the specific material that is to be impacted.
- 6.5. The Asbestos Identification Program, the Asbestos web page, and the Asbestos Alert** can be used to determine if a specific material in a clearly defined area is Asbestos Containing. If multiple materials are to be impacted in a project it is required to obtain a hazard assessment memo from the Asbestos Management Program.

**6.6. The Health, Safety, and Environment, Asbestos Data Coordinator** can be contacted directly by phoning (604) 822-8772.

## **7.0 Memos from the Asbestos Management Program:**

**7.1.** Work that will impact multiple materials will require a memo from the Asbestos Management Program.

**7.2.** The Asbestos Management Program will provide memos for projects that will impact materials in UBC controlled buildings on the Point Grey Campus.

**7.3.** Memos are written by assembling previously collected material information from the asbestos database, confirming and adding to this information by visiting the site, and sampling and laboratory analysis (if required).

**7.4.** Memos will always detail:

- i. The person for whom the memo was written.
- ii. The location to which the memo is applied (Building name, Key plan number, and room number).
- iii. Known asbestos materials present in the room.
- iv. Any materials present which remain suspect but which have not been tested.
- v. Any suspected materials the presence of which cannot visually confirmed.
- vi. The appropriate hazard level for the disturbance of materials identified as asbestos containing.

**7.5.** A memo will usually be supplied by the Asbestos Management Program within five working days. Please Note that stop-work issues will be resolved within one working day.

**7.6.** If a memo is supplied by the Asbestos Management Program it must be posted on the site safety board. In special cases where site safety boards are not available the memo must be a part of the work package and must be reviewed by the worker prior to commencing work.

## **8.0 Sampling of Asbestos Materials:**

**8.1.** The sampling of materials, transportation to the laboratory, and return of sample results is to be completed by the Asbestos Management Program or by their designated representative. Any other person initiating sampling of materials for asbestos in UBC buildings is responsible for ensuring that sampling is conducted by a qualified person and for forwarding sample results and information to the Asbestos Management Program.

**8.2.** The Asbestos Management Program does not conduct destructive testing. Materials uncovered during cutting, coring, or demolition will require assessment at the time that they are uncovered. Workers uncovering suspected asbestos containing materials will

immediately stop work and contact their supervisor who will resolve the issue and may request that the Asbestos Management Program visit the site.

- 8.3. Qualified abatement contractors and asbestos consultants may sample university materials but are responsible for their own analysis. The Asbestos Management Program must be supplied a copy of the laboratory sample results for any material thus sampled.
- 8.4. The Asbestos Management Program reserves the right to charge the requestor for sampling and analysis of any material where sufficient evidence already exists for a reasonable conclusion to be drawn about a materials asbestos content.

## **9.0 Working on Asbestos Containing Materials:**

- 9.1. University employees will not work on friable asbestos materials except in special circumstances, and under procedures approved by the Asbestos Management Program.
- 9.2. External contractors may work on asbestos containing materials under the general conditions of this policy and within the specific provisions of Section 13.0, this policy.
- 9.3. The normal time limit for asbestos operations performed by UBC employees is two hours within a single shift. This will not include set up and take down of the asbestos work area.
- 9.4. The following work will be conducted by a qualified asbestos abatement contractor:
  - i. Work on friable asbestos materials.
  - ii. Work of an expected duration greater than two hours.
- 9.5. UBC employees who have received Moderate Risk Asbestos Removal training will be permitted to conduct work on non-friable asbestos containing materials. Work will be conducted within the restrictions of UBC Plant Operations Asbestos Work Procedures, and all other related building codes and regulations. This work will include, but may not be limited too:
  - i. The disturbance of drywall or plaster.
  - ii. The disturbance of floor tiles or linoleum.
  - iii. The painting of any asbestos containing material.
  - iv. The modification of asbestos cored fire doors.
  - v. The patching or repair of asbestos roofing materials.
  - vi. Removal of vinyl asbestos baseboard, transite board, gaskets, elevator brake shoes, light heat shields, mastics, and glazing putty.
  - vii. Entry into contaminated spaces.
  - viii. Entry into ceiling spaces with the possibility of asbestos over spray.
- 9.6. Asbestos waste generated by UBC employees shall be promptly disposed of by that employee at the Environmental Services Facility located at South Campus. All asbestos waste shall be properly bagged and accompanied by a work order number which will be recorded on the asbestos waste log.

## **10.0 Standing Notice of Project Asbestos (SNOPA):**

- 10.1.** The university has in place a Standing Notice of Project: Asbestos. This is a document filed with the WCB describing the type of projects undertaken by UBC employees on asbestos materials. It contains work procedures written in accordance with current WCB regulations. These procedures have been accepted by the WCB. This document will be renewed annually.
- 10.2.** A record of all work conducted under the SNOPA will be maintained by the Asbestos Management Program.
- 10.3.** The supervisor responsible for the work must ensure that the Asbestos Management Program is informed of the work prior to its commencement. The following information is required:
  - i. Date of project
  - ii. Location of project
  - iii. Supervisors name
  - iv. Names of workers performing the project
  - v. Project Work Order Number

## **11.0 Notice of Project Asbestos (NOPA)**

- 11.1.** Any work not covered by the SNOPA to be performed by UBC employees will require the filing of a NOPA with the WCB. The Asbestos Management Program must be contacted to file this notice with the WCB no fewer than 24 hours prior to the commencement of work.

## **12.0 Asbestos Abatement Contractors and Asbestos Monitoring Consultants:**

- 12.1.** It is required that abatement contractors be contracted from the “Asbestos Abatement Contractor Bid List” a copy of which can be obtained from the Asbestos Management Program. All contractors on this list are appropriately qualified and references have been checked by the Asbestos Management Program.
- 12.2.** Roles and Responsibilities of UBC representatives responsible for asbestos abatement contractors:
  - 12.2.1. Inform abatement contractors and consultants of their roles and responsibilities as outlined below.
  - 12.2.2. Ensure that abatement contractors and consultants comply with all relevant portions of this policy.
  - 12.2.3. Ensure that all relevant asbestos information is passed to abatement contractors and consultants.
  - 12.2.4. Be responsible for informing all interested parties within the project building of the presence and purpose of abatement contractors and

consultants.

12.2.5. To determine the need for an asbestos consultant on their project.

12.2.6. To hire asbestos monitoring consultants from an approved list of consultants available from the Asbestos Management Program.

**12.3. Roles and responsibilities of Asbestos Abatement Contractors:**

12.3.1. To work on asbestos in university buildings contractors must supply a copy of the project NOPA to the WCB and the Asbestos Management Program.

12.3.2. Abatement Contractors must abide by all relevant portions of this policy.

12.3.3. All high-risk asbestos abatement projects will require the use of a qualified consultant who will be hired independently by the university. A consultant may also be required on moderate risk projects at the discretion of the University.

12.3.4. A consultant on-site shall be treated in every way as the owner's representative by the abatement contractor.

**12.4. Roles and responsibilities of Consultants**

12.4.1. The Consultant shall determine from the University what is required of him/herself. This shall include, but may not be limited to, providing removal specifications, appropriate air monitoring, inspections, and inspection reports, and a visual clearance report upon completion of the project.

12.4.2. Copies of all monitoring results and reports completed by the consultant shall be provided to the Asbestos Management Program.

**13.0 Asbestos Work by non-asbestos abatement contractors:**

**13.1.** At the discretion of the Asbestos Management Program non-asbestos abatement contractors may be allowed to complete asbestos projects under the following conditions:

- i. Contractors must heed all information communicated by the Asbestos Management Program.
- ii. Contractors must demonstrate that workers have received training in moderate risk asbestos removal and be able to provide training records, and up-to-date respirator fit test documentation.
- iii. A Notice of Project: Asbestos (NOPA) must be filed with the WCB, and with the Asbestos Management Program (fax to 827-5629). Written safe work procedures for all anticipated activities relating to the NOPA must be included with this document.
- iv. All appropriate documentation must be kept at the contractor's site office (NOPA, training records etc.).

**13.2.** UBC will not supply written safe work procedures, training, equipment, fit-testing services, or any document that is the usual responsibility of the contractor.

**13.3.** Contractors will be permitted to undertake (upon receipt by the Asbestos Management Program of NOPA and appropriate written safe work procedures) minor Moderate Risk operations on Asbestos Containing materials. This will include:

- i. The disturbance of drywall or plaster.
- ii. The disturbance of floor tiles.
- iii. Removal, by cut and wrap procedure, of asbestos mastics on ductwork.
- iv. The removal of other asbestos materials at the discretion of the Asbestos Management Program.
- v. Entry into contaminated spaces.
- vi. Entry into ceiling spaces with the possibility of asbestos over spray.

**13.4.** Contractors will not be permitted to work on friable asbestos materials.

**13.5.** Permission for non-asbestos abatement contractors to undertake asbestos work will be at the discretion of the Asbestos Management Program.

#### **14.0 Requirements for use of an Asbestos Monitoring Consultant:**

**14.1.** An Asbestos Monitoring Consultant is required to monitor all high-risk projects or at the recommendation of the Asbestos Management Program.

**14.2.** An Asbestos Monitoring Consultant will be required to write specifications for removal of asbestos materials when the total asbestos abatement budget of the project exceeds \$10,000.00, or at the recommendation of the Asbestos Management Program.

#### **15.0 Asbestos Building Materials:**

**15.1.** No new asbestos materials shall be used in University buildings without the approval of the Asbestos Management Program.

**15.2.** No existing asbestos materials shall be covered with non-asbestos materials except in special circumstances and with the approval of the Asbestos Management Program.

**15.3.** Materials, which have previously been covered with non-asbestos materials and are subsequently uncovered during building renovations, shall be removed except in special circumstances and with the approval of the asbestos management program.

**15.4.** In time-sensitive project situations supervisors will treat suspect materials as asbestos containing and direct workers to act accordingly.

#### **16.0 Training:**

**16.1.** UBC will provide a level of training to employees sufficient to ensure a knowledge and understanding of the dangers of asbestos and the proper procedures for working on, and around, asbestos containing materials. The appropriate level of training will be determined by the Asbestos Management Program in consultation with the

employees' supervisor.

**16.2.** Training at UBC will typically be:

- 16.2.1. For employees not expected to regularly encounter asbestos materials; a video awareness presentation is available from the Main Library or directly from the Asbestos Management Program
- 16.2.2. An Asbestos Awareness Orientation is provided to all LBS, ITS, and H&C employees and provides education and awareness on the danger and location of asbestos, the Identification Program, and the correct response to asbestos materials on the work site.
- 16.2.3. Moderate Risk Asbestos Removal Training is provided to all LBS, ITS, and H&C workers expected to encounter asbestos materials in their daily work.
- 16.2.4. Managing Asbestos Removal on Projects training is provided to all LBS, ITS, and H&C project managers, coordinators, designers, supervisors, and heads, and provides knowledge of the responsibilities and requirements for asbestos work conducted on their projects.

**16.3.** Training will not be supplied to non-university employees.

**17.0 Contaminated Spaces:**

**17.1.** A space will be considered asbestos contaminated if any, or all of the following apply:

- i. There is visible asbestos debris in the space in excess of that which may be reasonably cleaned by UBC workers under Plant Operations Moderate Risk Spill Clean Up Procedures.
- ii. The space has been historically considered contaminated and this status has not been revoked by the Asbestos Management Program.
- iii. If asbestos materials in the space are in such bad condition that entry into the space has a high probability of disturbing these materials.
- iv. The space is above a ceiling and contains over spray from the ceiling below.

**17.2.** The Asbestos Management Program will close any space and declare it to be asbestos contaminated if any of the following apply:

- i. The space is an active work site where asbestos containing materials have been inappropriately disturbed.
- ii. The space is a location where specialized knowledge indicates that the site should be considered to be suspected of asbestos contamination.
- iii. If any of the considerations of Section 17.1 are found to apply and the site has not been previously considered to be contaminated.

**17.3.** UBC workers may enter contaminated spaces to complete work on asbestos or non-asbestos materials provided that all appropriate requirements of this policy are met.

## **18.0 Incident Investigations**

- 18.1.** Incidents of asbestos exposure are required to be investigated under Division 10 s. 173 (c) of the Workers Compensation Act. An exposure to asbestos is viewed as having potential for causing serious injury to a worker.
- 18.2.** Incident investigations must be conducted in accordance with the provisions of:
- i. s.174 of the Act – “Investigation process”
  - ii. s.175 of the Act – “Incident investigation report”
  - iii. s.3.4 of the OH&S regulation – “Incident investigation reports”
- 18.3.** Incidents involving UBC personnel are to be conducted in accordance with the directions of Element 5, “Reporting and Investigating Accidents”, of the Health and Safety Program, and all applicable regulations.
- 18.4.** Investigation of incidents involving contractors are to be conducted by the University representative responsible for bringing the workers to the site in accordance with direction from the Asbestos Management Program, the provisions of Element 5, “Reporting and Investigating Accidents”, of the Health and Safety Program, and all applicable regulations. A document titled “Guidelines for Investigating Incidents of Asbestos Exposure” will be provided by the Asbestos Management Program.