

Rutgers Environmental Health and Safety (REHS)

Program Name:	Asbestos Management Program		
Responsible Executive:	Executive Director of REHS		
Adopted:		Reviewed/Revised:	August 2, 2018

1. Program Statement

It is the policy of Rutgers University to provide a safe and healthful workplace, including minimizing risks associated with asbestos containing materials (ACM).

2. Reason for Program

This program describes the procedures for managing asbestos at Rutgers in order to protect the faculty, staff, students, visitors and contractors from asbestos hazards. It is also designed to ensure compliance with the following regulatory standards:

- *Asbestos Hazard Abatement Subcode* – N.J.A.C. 5:23-8 (N. J. Department of Community Affairs)
- *Asbestos Licenses and Permits* – N.J.A.C. 8:60 and 12:120 (N. J. Department of Labor)
- *Solid and Hazardous Waste* – N.J.A.C. 7:26 (N. J. Department of Environmental Protection)
- *Asbestos Construction Industry Standard* – 29 CFR 1926.1101 (Occupational Safety and Health Administration) – Adopted by N. J. Department of Labor (PEOSH) on August 5, 1996
- *Asbestos General Industry Standard* – 29 CFR 1910.1001 (Occupational Safety and Health Administration)
- *National Emission Standard for Hazardous Air Pollutants (NESHAP)* – 40 CFR Part 61, Subpart M (Environmental Protection Agency)
- *Asbestos Containing Materials in Schools (ASHERA)* – 40 CFR Part 763, Subpart E (Environmental Protection Agency)

3. Who Should Read this Program

This program applies to all Rutgers faculty, students and staff who occupy buildings with presumed asbestos containing material (PACM) or ACM.

4. The Program

I. Background

Asbestos is a generic name that refers to the following family of naturally occurring fibrous hydrated silicate minerals:

- Chrysotile (white asbestos)
- Amosite (brown asbestos)
- Crocidolite (blue asbestos)
- Anthophyllite

- Tremolite
- Actinolite

Asbestos exhibits the following characteristics:

- Heat resistant
- Chemical resistant
- Tensile strength (greater than steel)
- Good insulator
- Flexible enough to be woven into fire-retardant fabrics

As such, asbestos was incorporated into many building materials and installed during new construction. However, epidemiological studies published in the 1960s and early 1970s have shown associations between occupational asbestos exposure and pulmonary diseases such as lung cancer, asbestosis, and mesothelioma. The occurrence of these diseases is influenced by the type of asbestos mineral fiber, the size of the mineral fiber, as well as the concentration and duration of airborne asbestos exposure. Asbestos-related diseases do not develop immediately after inhalation of asbestos fibers, but rather take 20 or more years for symptoms to appear. As a result of these studies, asbestos is classified a confirmed human carcinogen and regulated by various federal and state agencies to protect the public health and the occupational workforce.

The mere presence of asbestos in a building does not mean that the building occupants are endangered. Intact and undisturbed ACM do not pose a health risk. In 1988, the Environmental Protection Agency (EPA) evaluated various asbestos control and abatement (removal) actions to help building owners manage ACM in their facilities, to alleviate unwarranted fears about the mere presence of asbestos in buildings, and to discourage spontaneous decisions to remove all ACM regardless of its condition.

In 1990, EPA issued a guide titled *Managing Asbestos In Place*, which expanded upon and refined previous EPA guidance documents. This guide emphasizes the importance of in-place management as opposed to asbestos abatement, and stated that a properly conducted Operations and Maintenance (O&M) Program is as appropriate, if not more appropriate, than asbestos abatement. In addition, this guide communicates the following "five facts" (reprinted exactly below):

- 1) Although asbestos is hazardous, the risk of asbestos-related disease depends upon exposure to airborne asbestos fibers.
- 2) Based upon available data, the average airborne asbestos levels in buildings seems to be very low. Accordingly, the health risk to most building occupants also appears to be very low.
- 3) Removal is often *not* a building owner's best course of action to reduce asbestos exposure. In fact, an improper removal can create a dangerous situation where none previously existed.
- 4) EPA *only* requires asbestos removal in order to prevent significant public exposure to airborne asbestos fibers during building demolition or renovation activities.
- 5) EPA *does* recommend a proactive, in-place management program whenever asbestos-containing material is discovered.

Rutgers incorporates these "five facts" as the basis for its Asbestos Management Program, as well as other regulations to protect its employees, outside contractors, and visitors from asbestos hazards.

II. Roles and Responsibilities

To effectively manage ACM and prevent asbestos exposures, the Rutgers Asbestos Management Program requires participation by *all* members of the Rutgers community. The

overall responsibility for implementing this program is shared between the REHS, Rutgers Facilities, Auxiliary Services, and the Occupational Health departments. The following summarizes the key duties and responsibilities of each of these departments.

A. Rutgers Environmental Health and Safety (REHS)

Health Safety Specialists

- 6) Surveys, inspects, and assesses PACM and ACM in Rutgers buildings
- 7) Provides written notification to building occupants and staff regarding asbestos survey results, proposed asbestos hazard abatement projects, and completed asbestos abatement activities conducted in Rutgers buildings
- 8) Provides asbestos awareness training to Rutgers employees that may have direct contact with ACM during their normal work activities
- 9) Provides information to the Rutgers administration to support decisions on asbestos abatement projects and the Asbestos Management Program
- 10) Provides expertise and guidance to Facilities and Auxiliary Services departments to maintain compliance with regulatory requirements and Rutgers policy and to define the scope of asbestos abatement work
- 11) Monitors the progress of asbestos abatement projects performed by asbestos abatement contractors as needed
- 12) Evaluates the qualifications of asbestos abatement contractors and asbestos safety control monitors, as well as specifications and requirements for asbestos abatement projects
- 13) Monitors and assesses airborne asbestos exposures to students, faculty, and staff
- 14) Maintains documentation on asbestos surveys, assessments, abatement projects, air monitoring, and asbestos exposures
- 15) Communicates effectively with regulatory agencies as needed, as well as the Rutgers Public Information Department, the Rutgers community, and general public

Asbestos Abatement Manager

- 1) Schedules asbestos abatement work requested by Facilities and Auxiliary Services staff, as well as asbestos abatement contractors and asbestos safety control monitors necessary to complete this work
- 2) Notifies the Director of Facilities Maintenance and the Chief of Rutgers University Police of all scheduled asbestos abatement work
- 3) Notifies the AAUP of proposed and successfully completed asbestos abatement work and air monitoring results, if collected, in AAUP occupied buildings
- 4) Prepares documents and specifications as needed for asbestos hazard abatement projects
- 5) Schedules all meetings necessary for asbestos hazard abatement projects

- 6) Retains approved and licensed asbestos abatement contractors and asbestos safety control monitors to complete asbestos abatement work
 - 7) Assures that the heating, ventilation, and air conditioning units in buildings scheduled for asbestos abatement work are turned off prior to and for the duration of asbestos abatement work, as needed
 - 8) Assures through the asbestos safety control monitor that asbestos waste generated during asbestos hazard abatement projects is properly disposed
- B. Facilities Maintenance, Project Administration and Auxiliary Services
- 1) Requests asbestos surveys and assessments from REHS prior to planned maintenance and renovation activities which may impact PACM or ACM
 - 2) Defines the scope of work necessary for maintenance and renovation projects, and requests estimates and scheduling of asbestos abatement from REHS
 - 3) Provides identification, descriptions, drawings, and other documentation to REHS to facilitate budget estimates and scheduling of asbestos removal work
 - 4) Notifies building occupants of asbestos abatement work scheduled through REHS
 - 5) Identifies building coordinators or contacts to REHS for building occupant notification required for asbestos hazard abatement projects in occupied buildings
 - 6) Identifies employees requiring asbestos awareness training and assures that new custodial and maintenance employees receive this training within 60 days after beginning employment at Rutgers University
 - 7) Ensures employee attendance at required training sessions, and implements elements of the training program in their daily work activities
 - 8) Conducts work activities in a manner to prevent damage to or disturbance of PACM or ACM
 - 9) Reports damaged PACM or ACM to their supervisors and REHS to arrange for surveys and assessments, as required
 - 10) Reports maintenance or proposed work activities to their supervisor and REHS which may result in airborne asbestos exposures. Arranges for assessment and monitoring of these work activities prior to work commencement
 - 11) Complies with this Asbestos Management Program
- C. Occupational Health Department
- 1) Performs medical surveillance of university employees exposed to asbestos at or above the Permissible Exposure Limit of 0.1 fibers per cubic centimeter of air, calculated as an 8 hour time weighted average, for 30 or more days per year
 - 2) Maintains medical records as required by state and federal regulations
- D. Rutgers Employees, Faculty, Staff and Students

An effective Asbestos Management Program requires the participation of all members of the Rutgers community, and an understanding of each employee's responsibility within this program. Rutgers University employees **shall not** perform work activities that disturb PACM and ACM. Rutgers University employees **must** avoid all activities that could result in damage to or disturbance of these materials. If an employee believes their assigned work activities will disturb PACM or ACM, the employee must notify their supervisor immediately. The supervisor must evaluate the work activities and suggest alternate work methods that will not disturb PACM or ACM. If alternate work methods cannot be developed that avoid damaging or disturbing ACM, then the supervisor must postpone the scheduled work activities until the ACM is removed.

Currently, licensed asbestos abatement contractors perform all asbestos abatement work at Rutgers University. REHS is available to develop and review work practices performed by Rutgers University employees for activities which result in contact with ACM. However, work practices must be developed and approved on a case-by-case basis that, at a minimum, complies with all state and federal regulations. Until these specific work practices are developed, the following guidelines **must** be observed by all employees to avoid damage to or disturbance of ACM:

- 1) Directors
 - a. Ensure supervisors, project managers and planner/estimators review and comply with provisions of this Asbestos Management Program
 - b. Ensure employees receive appropriate training and supervision to maintain compliance with this document
 - c. Ensure building occupants are notified of planned and scheduled asbestos abatement (removal) work within their buildings
- 2) Supervisors, Project Managers and Planner/Estimators
 - a. Requests asbestos survey information on building materials impacted by planned maintenance and renovation activities
 - b. Defines the scope of the maintenance and renovation projects
 - c. Requests estimates and coordinates scheduling of asbestos abatement work with REHS and the building occupants
 - d. Notifies building occupants of planned asbestos abatement work for maintenance and renovation activities (See Section IV (D)(2)(c) for notification requirements)
 - e. Ensures their employees attend asbestos awareness training as required and ensures employees implement the elements of this training in their daily work activities
 - f. Contacts REHS to assess potential employee exposures prior to initiation of work activities
 - g. Reports incidents that damage ACM and asbestos debris discovered in buildings
 - h. Attends required training and complies with the Asbestos Management Program
- 3) Maintenance and Custodial Workers

- a. Before starting work, consult with your supervisor to determine if asbestos will be impacted by your work activities
- b. Carefully plan and complete your work to avoid damaging asbestos
- c. Immediately report any suspected asbestos exposure or damaged asbestos in your work area to your supervisor
- d. Attend required training necessary to perform your work activities
- e. Do not drill, sand, or cut into ACM
- f. Do not sweep or vacuum asbestos containing debris
- g. Do not store materials against ACM or damage asbestos while moving furniture or other objects
- h. Do not eat, drink, or store food in areas containing friable ACM

III. Definitions

<i>Asbestos</i>	Includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, actinolite, and any of these minerals that have been chemically treated and/or altered
<i>Asbestos Containing Material (ACM)</i>	Any material containing more than 1% asbestos
<i>Employee Exposure</i>	Exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment
<i>Excursion Limit</i>	An airborne concentration of asbestos of 1.0 fiber per cubic centimeter averaged over a 30-minute period. Exceedance of the Excursion Limit requires the establishment of regulated areas and corrective actions to reduce exposure.
<i>Fiber</i>	A particulate form of asbestos 5 micrometers or longer with a length-to-width ratio of at least 3 to 1
<i>High Efficiency Particulate Air (HEPA)</i>	A filter capable of trapping and retaining at least 99.97% of 0.3 micrometer diameter mono-disperse particles
<i>Homogeneous Area</i>	An area of surfacing material or thermal system insulation that is uniform in color and texture
<i>Permissible Exposure Limit (PEL)</i>	An airborne concentration of asbestos of 0.1 fiber per cubic centimeter of air as an 8-hour time-weighted average. Exceedance of the PEL requires the establishment of regulated areas and corrective actions to reduce exposure.
<i>Presumed Asbestos Containing</i>	Thermal system insulation and surfacing material found

<i>Material (PACM)</i>	in buildings constructed no later than 1980
<i>Surfacing ACM</i>	Surfacing materials which contain more than 1% asbestos and are sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing on structural members or other materials on surfaces for acoustical, fireproofing and other purposes)
<i>Thermal System Insulation (TSI)</i>	ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain

IV. Procedures

A. Asbestos Identification and Building Surveys

To prevent work activities that release airborne asbestos fibers or result in asbestos debris, building materials must be surveyed and assessed to determine if they contain asbestos prior to initiation of work activities. Common building materials that may contain asbestos include:

- Insulation (pipe, duct, spray-in)
- Structural steel fireproofing
- Acoustical plaster ceilings
- Spackling compound
- Gaskets and packings
- Cement pipes and sheet material
- Electrical wiring
- Siding and roofing materials
- Wallboard
- Floor Tiles
- Lab hoods and benchtops
- Fire doors
- Fire blankets and curtains
- Ceiling tiles

Surveys are performed by qualified asbestos consultants and/or REHS, depending upon the size of the area to be assessed and the time constraints of the project.

Supervisors, project managers, and planner estimators anticipating maintenance, renovation, or construction work activities in a building must do the following:

- 1) Contact REHS to obtain asbestos survey information for the building materials impacted by the proposed work activities. Identify all proposed work, alternates, and other pertinent information.
- 2) Meet with a REHS Campus Health Safety Specialist to review your work activities and to identify the building materials to be sampled. REHS will provide available asbestos survey information and arrange to collect additional samples as necessary. REHS shall provide a verbal and written summary of the results and recommendations to the person requesting the asbestos survey, and a copy will be sent to the employee's supervisor for their records.

B. Contractor, Employee and Student Notification

Contractors

OSHA requires building owners to provide written notification to contractors that identifies ACM at a work site prior to commencement of any activities impacting building structures

or substrates. To comply with these notification requirements, Rutgers will employ the following procedures:

- 1) The Rutgers project manager, regional engineer, or planner/estimator will provide a copy of the REHS asbestos survey memo or report to all contractors and employees prior to commencement of their work activities.
- 2) All asbestos abatement work at Rutgers is performed by licensed asbestos abatement contractors in accordance with N.J.A.C. 5:23-8, the Asbestos Hazard Abatement Subcode. Contractors are prohibited from performing asbestos removal work or other activities that damages or disturbs asbestos. All asbestos abatement work required by contractors shall be identified to the project manager, and scheduled through the REHS Asbestos Abatement Manager. The REHS Asbestos Abatement Manager will provide written notification to the project manager, regional engineer, or planner/estimator upon successful completion of asbestos abatement work, indicating when the work was completed as well as clearance air sample results, if collected.
- 3) If an outside contractor or a Rutgers employee discovers building materials that are not identified in the asbestos survey during the execution of their work, the contractor and/or Rutgers employee shall:
 - a. Immediately notify the Rutgers project manager, planner/estimator, or regional engineer, and
 - b. Refrain from work activities that can damage or disturb these materials. The project manager, planner/estimator, or regional engineer must call REHS immediately to arrange for an asbestos inspection of these materials.
- 4) OSHA also requires building owners to post signs at mechanical room entrances that contain either PACM and/or ACM. These signs serve as additional notification to personnel who may enter or work in these areas.

Employees

All Rutgers maintenance and custodial employees receive annual asbestos awareness training that instructs them to treat any building material as asbestos containing until bulk sample analysis determines that it does not. In addition, this training also instructs employees not to damage or disturb any ACM or PACM and to immediately report any observed damage to their supervisor.

Students

Students who live in Rutgers dormitories, apartments and other residences that have asbestos containing surfacing (ceiling) materials are notified when they move in that the ceiling contains asbestos and are instructed to keep these materials intact. Students are further encouraged to report any damage immediately to the Housing Office or REHS.

C. Periodic Building Assessments

ACM must be periodically assessed to monitor changes in physical condition. Annual inspections of asbestos containing surfacing (ceiling) materials are conducted by REHS in the following locations:

- 1) Academic Buildings – January
- 2) Residence Halls – May through August

REHS records physical damage, water damage and changes due to natural deterioration of the ceiling material. REHS recommends and initiates appropriate response actions to repair or remove damaged ACM and return it to an intact condition.

D. Asbestos Abatement Projects

Licensed asbestos abatement contractors perform all asbestos abatement activities at Rutgers in accordance with N. J. A. C. 5:23-8, which is commonly referred to as Subchapter 8. Asbestos abatement projects consist of operations where:

- ACM is stripped from structures or substrates
- ACM is encapsulated to minimize airborne emission of asbestos fibers
- Disturbed ACM is repaired to an intact state and debris is cleaned up
- ACM is enclosed within an airtight, impermeable, permanent barrier

Asbestos abatement projects are initiated whenever:

- Planned maintenance or renovation activities are scheduled that damages or disturbs ACM
- Damaged or significantly damaged (>10% of a building material) ACM is discovered which may result in exposure to employees, faculty or staff

Asbestos abatement work activities can be further subdivided into three groups:

- Operations and Maintenance Activities
- Asbestos Hazard Abatement Projects
- Non-Friable ACM Removal

1) Operations and Maintenance Activities

Subchapter 8 defines Operations and Maintenance (O&M) Activities as corrective actions, not intended as asbestos hazard abatement projects that remove either less than 25 square feet of friable ACM on any equipment or surface area, or less than 10 linear feet of friable ACM on covered piping.

- a. Operations and Maintenance activities do not require a construction permit, a certificate of occupancy, or clearance air monitoring conducted at the conclusion of the work.
- b. The N. J. Department of Labor requires asbestos abatement contractors provide notification 10 calendar days prior to removal of greater than 3 square or 3 linear feet of ACM for O&M activities.
- c. At the conclusion of O&M asbestos removal projects, REHS visually inspects each work area to ensure no visible debris is present. REHS also reserves the right to perform clearance air monitoring to consider O&M activities successfully completed. This determination is made on a case-by-case basis and depends upon the nature of the removal work, building occupancy, and other factors. The

decision to require clearance air monitoring is made prior to initiation of the O&M asbestos removal project.

2) Asbestos Hazard Abatement Projects

Rutgers employees are prohibited from removing ACM and performing work activities that damage and/or disturb ACM. REHS schedules, coordinates and completes asbestos removal projects for departments requesting this work as follows:

- The supervisor, project manager, or planner/estimator contacts the REHS campus Health Safety Specialist to request asbestos survey information for the building materials impacted by the proposed work activities. REHS provides this information and arranges to collect additional samples as necessary. The maintenance supervisor, planner/estimator, or project manager must clearly define the scope of work.
- Once the campus Health Safety Specialist provides asbestos survey information, the supervisor, project manager, or planner/estimator contacts the REHS Asbestos Abatement Manager at 848/445-2550 to obtain cost estimates and to schedule the asbestos abatement work.
- Facilities Maintenance coordinates with and notifies the building occupants of asbestos abatement work necessary for the project or work activities. For large renovation projects, the project manager notifies Facilities Maintenance and the building occupants of the asbestos abatement work.

In almost all instances, Asbestos Hazard Abatement Projects precede renovation activities by a general contractor to prevent the unauthorized removal or disturbance of ACM. Subchapter 8 defines Asbestos Hazard Abatement Projects as: (1) The removal, enclosure, or encapsulation of greater than 25 square feet of ACM on any equipment or surface area, or (2) The removal or encapsulation of greater than 10 linear feet of ACM on covered piping.

- a. Asbestos Hazard Abatement Projects require an asbestos abatement construction permit and building occupant notification.
 1. Building occupant notification is a condition of the asbestos abatement construction permit if the building is occupied at any time during the asbestos abatement project, and must be provided 20 business days prior to commencement of the project.
 2. REHS writes the building occupant notification to the building coordinator or other designated individual(s), and provides copies to the asbestos safety control monitor (ASCM), the Rutgers Project Manager or Planner/Estimator, and the Facilities Maintenance Department Director.
 3. Although REHS provides a copy of the building occupant notification to the ASCM for the asbestos abatement construction permit, the Rutgers Project Manager assumes the primary responsibility for building occupant notification.
 4. REHS generally provides a similar occupant notification for asbestos abatement projects in unoccupied buildings.
- b. For all Asbestos Hazard Abatement Projects, a licensed ASCM provides oversight of the asbestos abatement contractor to ensure compliance with state and federal

regulations, as well as additional Rutgers requirements. Some responsibilities of the ASCM include:

1. Reviewing plans and specifications for asbestos abatement projects
 2. Providing technical assistance and performing inspections and air monitoring during asbestos abatement projects
 3. Providing a final written report
- c. The following table summarizes key state and federal regulatory requirements for friable asbestos abatement projects.

Asbestos Abatement Project Requirements for Friable Materials (Ceiling Plaster, Fireproofing, Pipe Insulation, Ceiling Tile)

Requirements	<3 LF or <3 ft ² of Asbestos	>3 LF but <10 LF or >3 ft ² but <25 ft ² of Asbestos	>10 LF and/or >25 ft ² of Asbestos
Building Occupant Notification	No	No	Yes ¹
Regulatory Agency Notification	No	Yes ²	Yes ³
Asbestos Abatement Permit	No	No	Yes
Air Monitoring	No	No ⁴	Yes

¹Rutgers notifies building occupants for all asbestos abatement work as described in this document. However, building occupant notification is only a regulatory requirement for Asbestos Hazard Abatement Projects. For buildings occupied during the asbestos abatement project, occupants must be provided written notification 20 business days before the start of the project. This written notification must be posted on building entrances 7 calendar days before the start of the project.

²The asbestos abatement contractor must notify the N. J. Department of Labor 10 calendar days prior to the start of the asbestos abatement project.

³The asbestos abatement contractor is responsible for notifying the N. J. Department of Labor and the Department of Community Affairs. If the project exceeds 160 ft² or 260 LF the ASCM notifies the U. S. EPA.

⁴REHS may require air monitoring for some projects based upon the nature of the removal work, building occupancy, and other factors. This requirement will be determined before the removal project.

d. Post Abatement Clearance and Notification

Once the asbestos abatement contractor completes their work, the asbestos safety control monitor conducts a thorough visual inspection within the work area(s) and conducts air monitoring required by Subchapter 8.

Upon successful completion of an asbestos hazard abatement project, REHS performs post asbestos abatement project notification in the following manner:

1. REHS provides the American Association of University Professors (AAUP) President an "Asbestos Project Final Test Result Form" for all buildings occupied by AAUP faculty.

2. The building coordinator receives a memo indicating the asbestos removal project has been successfully completed along with any clearance air monitoring results. A copy of this memo is sent to the project manager and Facilities Maintenance Director.

3) Non-Friable ACM Removal

Non-friable ACM are building materials which when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure. Examples include floor tile, Transite™ wallboard, asbestos cement siding, lab benchtops and roofing materials.

- a. If *interior* non-friable ACM are removed in a manner that does not generate airborne asbestos (i.e. the materials are removed intact), this work does not require an asbestos abatement construction permit under Subchapter 8 provided:
 1. Interior requirements include general isolation of the work area and implementation of safe work practices as defined in OSHA 29 CFR 1926.1101
 2. Proper cleanup and disposal of asbestos waste is implemented in accordance with the N. J. Department of Environmental Protection.
- b. If non-friable ACM are removed in a manner which is capable of generating airborne asbestos (i.e. grinding and mechanical tasks that break the materials), the project must follow all Subchapter 8 requirements including occupant notification.**
- c. Removal of *exterior* non-friable ACM, such as asbestos cement siding and roofing materials, are not covered by Subchapter 8. For this type of removal work, requirements include implementation of safe work practices (as defined in OSHA 29 CFR 1926.1101) which minimize employee exposure during removal activities, and proper waste disposal in accordance with N. J. Department of Environmental Protection and Environmental Protection Agency 40 CFR Part 61, Subpart M.
- d. Licensed asbestos abatement contractors performing interior non-friable asbestos removal work greater than 3 square or linear feet, or exterior asbestos removal work performed as part of a demolition project, must notify the N. J. Department of Labor 10 days prior to project commencement.
- e. The following table summarizes key state and federal regulatory requirements for non-friable asbestos abatement projects.

Asbestos Abatement Project Requirements for Non-Friable Materials (Lab Benchtops, Transite™ Wallboard, Intact Floor Tiles)

Requirements	<3 LF or < 3 ft ² of Asbestos	>3 ft ² but <160 ft ² of Asbestos	>160 ft ² of Asbestos
Building Occupant Notification ¹	No	No	No
Regulatory Agency Notification	No	Yes	Yes

Asbestos Abatement Permit	No	No ²	No ²
Air Monitoring	No	No	Yes

¹Rutgers notifies building occupants for all asbestos abatement work as described in this document. However, building occupant notification is not a regulatory requirement for non-friable asbestos removal projects.

²Asbestos abatement work that does not break or otherwise damage non-friable ACM does not require a permit. However, if the removal method breaks or damages non-friable materials, the requirements for friable materials apply.

V. Training Requirements

All maintenance and custodial employees that may have direct contact with ACM during their normal work activities must receive asbestos awareness training. Asbestos awareness training provides information about asbestos, the health effects associated with asbestos exposure, safe work practices to prevent disturbance of asbestos containing building materials, and elements of the Rutgers University Asbestos Management Program.

All new custodial and maintenance employees must receive this training within 60 days of beginning employment at Rutgers University. All custodial and maintenance employees are required to attend annual asbestos awareness training. Please see the REHS [Asbestos Awareness Training](#) web page for an updated schedule for all new employees. Additional training sessions, including those provided in Spanish, can be scheduled by calling REHS at 848/445-2550.