ASBESTOS MANAGEMENT PROGRAM

Last updated: March 2018

1.0 PURPOSE
This program outlines procedures and controls to ensure safe working conditions when working with or near asbestos at the University of Waterloo.

2.0 SCOPE
University of Waterloo's Asbestos Management Program encompasses all work with asbestos containing material (≥ 0.5% asbestos) under University of Waterloo control including buildings, equipment and grounds.

This program incorporates the requirements of Ontario Regulation 278/05 Designated Substance - Asbestos on Construction Projects and In Buildings and Repair Operations. The University of Waterloo Joint Health and Safety Committee reviews this program.

3.0 DEFINITIONS

Asbestos
A general term given to a group of naturally occurring mineral silicates that are made up of long thin fibres. It was added to a wide variety of products to strengthen them, to provide heat or electrical insulation, to offer fire or chemical resistance, and/or to absorb sound. Asbestos containing products ranged from fireproofing to vehicle brake pads.

Asbestos family
Refers to six unique substances that belong to the serpentine and amphibole mineral families: chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite. These terms do not refer to mineral descriptions but to a broad term that refers to unique fibers.

Asbestos inventory
A listing of locations of all UW buildings that contains asbestos. It is available through the Safety Office.

Asbestos containing material (ACM)
A material that contains 0.5 percent or more asbestos by dry weight.
**Friable material**
Material that when dry can be crumbled, pulverized or powdered by hand pressure or is crumbled, pulverized or powdered.

**HEPA filter**
Sometimes called high-efficiency particulate arresting or high-efficiency particulate air, is a type of air filter. To qualify as HEPA, an air filter must remove (from the air that passes through) 99.97% of particles that have a size of 0.3 um.

**4.0 ROLES AND RESPONSIBILITIES**

**4.1 SUPERVISORS/MANAGERS**
- Notify workers who may be affected by asbestos work.
- Adhere to the requirements of the Asbestos Management Program, and Asbestos Regulations prior to any repair, modification or renovation of buildings.

**4.2 SENIOR MANAGERS (DIRECTORS/DEANS/CHAIRS/DEPARTMENT MANAGERS)**
- Provide the direction and resources required to support and maintain the University of Waterloo Asbestos Management Program.
- Enforce the University of Waterloo Asbestos Management Program.
- Confirm that occupants are notified of the University of Waterloo Asbestos Management Program.

**4.3 WORKERS**
- Follow task-specific standard operating procedures (SOP’s) that address both the hazards and the necessary controls required to perform the requested work.
- Inform supervisor of any discovery of suspected asbestos and any asbestos containing material that requires repair or removal.
- Complete asbestos training as required for specific work duties.
- Clean and maintain personal protective equipment as required.
- Log hours of work while performing Type 2 asbestos operations so the supervisor can provide an asbestos work report to the Safety Office.
- Document repairs or removals of asbestos containing material (ACM) so the supervisor can maintain the asbestos record.
- Ensure the supervisor is made aware of any repairs and removals that would affect the inventory for proper record keeping.

**4.4 SAFETY OFFICE**
- Maintain the University of Waterloo Asbestos Management Program.
- Prepare a record containing both friable and non-friable asbestos for all University owned buildings and update when new information is made available.
- Conduct annual asbestos inspections to evaluate the condition of ACM.
- Provide notification to building occupiers of asbestos in the area(s) they occupy.
- Provide Asbestos Awareness training. Arrange for Asbestos Worker (Type 1 and 2) training.

**4.5 JOINT HEALTH & SAFETY COMMITTEE (JHSC) WORKER MEMBERS**

- Review the University of Waterloo Asbestos Management Program on a scheduled basis.
- Review asbestos record on an annual basis.
- Review and participate in air clearance testing for Type 3 operations.

**4.6 PLANT OPERATIONS**

**4.6.1 DESIGN AND CONSTRUCTION SERVICES**

Responsibilities with respect to planned construction/renovation/demolition to include the following:

- Provide an updated designated substances assessment report to all bidders.
- Prepare detailed plans and specifications showing the locations of all asbestos materials.
- Hire asbestos abatement contractors with proper training, experience, certifications and adequate insurance and maintain a record of approved contractors.
- Notify Safety Office of all projects that involve direct and/or potential contact with ACM.
- All asbestos abatement work involving repairs, removals, renovations and demolition to be documented and forwarded to the Safety Office in order to keep the asbestos record (inventory) current.
- Arrange inspection and air monitoring by a 3rd party and inform the Safety Office to have the JHSC attend the sampling if required.
- Inform employees about planned asbestos abatement.
- Share inspection/air monitoring results with 3rd party, required by Regulation 278/05 for final clearance of type 3 work.
- Submit Ministry of Labour (MOL) Notice of Project where applicable.
- Ensure MOL is advised in writing of all projects involving required Type 2 and all Type 3 operations (Reg. 278/05 Section 11 - advance notice re: Type 2 and 3 operations).
- Provide notification to workers and contractors who may work in close proximity and could disturb the asbestos.
- Submit analysis of ACM (Reg. 278/05 - Table 3) results to Safety Office for filing.
4.6.2 MAINTENANCE AND UTILITIES
Responsibilities include repair and removal of asbestos excluding Type 3 asbestos operations (to be performed by an approved 3rd party asbestos abatement contractor):

- Asbestos is to be maintained in good condition.
- Ensure all work procedures are compliant with the University’s Respiratory Protection Program.
- Provide notification to workers and contractors who may work in close proximity and could disturb the asbestos.
- Hire asbestos abatement contractors with proper training, experience, certifications and adequate insurance and maintain a record of approved contractors.
- Supervisors develop and update task specific Standard Operating Procedures (SOP) for workers performing asbestos work under their supervision.
- All asbestos abatement work involving repairs, removals, renovations and demolition to be documented and forwarded to the Safety Office in order to keep the asbestos record (inventory) current.
- Adhere to asbestos waste containment and disposal procedures.
- Ensure MOL is advised in writing of all projects involving all required Type 2 and all Type 3 operations.
- Supervisors provide Asbestos Work Report (Reg. 278/05, Section 21) to Safety Office to notify the MOL Provincial Physician each calendar year and upon the termination of any worker who has performed Type 2 work.

4.7 CONTRACTORS/SUBCONTRACTORS
- Work in compliance with the University’s Asbestos Management Program and Asbestos Regulation 278/05.

5.0 PROCEDURES
5.1 NOTIFICATION
Various notification procedures are required to ensure that workers and occupants of buildings as well as contractors are not over exposed to asbestos.

5.1.1 NOTIFICATION TO BUILDING OCCUPANTS AND WORKERS
- Every entrance to locations containing friable asbestos material shall be posted with readily visible warning sign stating “Notice: This is to remind you that asbestos is present in the ceiling.” When working in the ceiling area, adhere to the regulations published by the Ministry of Labour.
- University of Waterloo buildings contain asbestos and therefore caution must be exercised prior to doing any work that may disturb asbestos containing material.
- Asbestos awareness training session for all workers who may work with or in proximity to materials that are (or are presumed to be) friable or non-friable asbestos.
- Supervisors shall advise their workers of asbestos locations when the workers are working in close proximity to friable or non-friable asbestos containing material. (Reg. 278/05 Section 5 - Information for workers).
- In the event of discovery of suspected asbestos-containing material not on the inventory, a worker shall notify his/her supervisor immediately.
- View the Sample List of Suspect Asbestos-Containing Building Materials (DOCX).

5.1.2 REGISTRATION OF WORKERS INVOLVED IN ASBESTOS REPAIRS/REMOVALS
- The Safety Office shall be notified by the supervisor of any University worker involved in a certain Type 2 or Type 3 asbestos work. (Reg. 278/05 Section 11 - Advance notice re: Type 2 and 3 operations).
- The Safety Office will submit an Asbestos Work Report (PDF) to the chief physician of the Ministry of Labour's Occupational Health Medical Service and the worker will receive a copy of the Asbestos Work Report.

5.1.3 NOTIFICATION TO CONTRACTORS/SUB-CONTRACTORS
- Plant Operations Design and Construction Services must inform their contractor/sub-contractor of the location of friable or non-friable asbestos containing material that is in close proximity and may be disturbed by the work.
- Plant Operations Design and Construction Services contracting work are responsible for ensuring that the contractor/sub-contractor follow work procedures under Ontario Regulation 278/05 and UWaterloo's asbestos control program.
- If the type of friable asbestos is not known, it shall be treated as though it contained a type of asbestos other than chrysotile.

5.1.4 MINISTRY OF LABOUR (MOL) NOTIFICATION OF WORK
The Ministry of Labour shall be notified when:

- Type 1 and 2 work is covered by a "Notice of Project" (covered by notice of project not Reg. 271/05).
- Prior to commencing Type 2 asbestos glove bag work when more than one square meter of asbestos is to be removed and/or, prior to commencing Type 3 asbestos work. [Reg. 278/05 Section 11 - Advance notice re: Type 2 and 3 operations] applies.
5.2 DISCOVERY OF SUSPECTED ASBESTOS

5.2.1 UNEXPECTED DISCOVERY OF SUSPECTED ASBESTOS-CONTAINING MATERIAL DURING THE COURSE OF WORK:

- The worker shall report the discovery immediately to the supervisor.
- The supervisor shall stop any work that may disturb the suspected asbestos-containing material.
- The supervisor shall notify the Safety Office.
- The Safety Office will immediately notify in writing or orally an MOL inspector at the office of the Ministry of Labour nearest the workplace, Plant Operations, JHSC and the contractor if applicable.
- Plant Operations Design Section will arrange collection and analysis of bulk samples as well as communication of results to the Safety Office.
- No work will be performed unless it is determined that the material is not asbestos or, the work is performed as though the material is asbestos or in the case of sprayed on material, as though it contained a type of asbestos other than chrysotile.

5.2.2 IF THE WORK IS COVERED UNDER A “NOTICE OF PROJECT”, THE FOLLOWING PROCEDURE APPLIES:

- The worker/contractor shall report the discovery immediately to the supervisor or project coordinator.
- The supervisor shall stop any work that may disturb the suspected asbestos-containing material.
- The supervisor shall immediately notify the Ministry of Labour Inspector nearest the workplace in writing and orally.
- The supervisor shall notify the Project Coordinator in Plant Operations Design and Construction Services, JHSC and the Safety Office.
- Plant Operations Design Section will arrange collection and analysis of bulk samples as well as communication of results to the Safety Office.
- No work will be performed unless it is determined that the material is not asbestos or, the work is performed as though the material is asbestos or in the case of sprayed on material, as though it contained a type of asbestos other than chrysotile.

5.3 WASTE DISPOSAL

Contractors/sub-contractors are responsible for disposal of asbestos waste generated under their contract.

Asbestos waste generated by Plant Operations will be handled as follows:

- Friable asbestos must be transported as per Transport of Dangerous Goods Regulations.
- Asbestos waste is wetted and double bagged in approved asbestos disposal bags, sealed with duct tape.
• The exterior of the bags are to be cleaned with a damp cloth or a HEPA vacuum immediately before removal from the work area.
• Transport asbestos waste to the Bauer Warehouse in the vehicle cargo area. Do not use passenger van.
• Place asbestos waste in containers supplied at the Bauer Warehouse.
• Plant Operations grounds section will arrange for a roll-off bin designed for the transport of asbestos waste in accordance with Transportation of Dangerous Goods Regulations and the Environmental Protection Act, Reg. 347, Section 17.

**Note:** Non-friable asbestos may be shipped in the same manner. Only accredited waste haulers may transport bulk asbestos waste.

### 5.4 WORK PROCEDURES
Asbestos work procedures have been developed to minimize exposure to asbestos. These procedures were reviewed by the UWaterloo Joint Health and Safety Committee. Supervisors are required to develop task specific SOP’s for workers performing asbestos work under their supervision.

[Checklist for Type 1 Operations (DOCX)](Checklist_Type_1.docx)
[Checklist for Type 2 Operations (DOCX)](Checklist_Type_2.docx)
[Checklist for Type 3 Operations (DOCX)](Checklist_Type_3.docx)

### 5.5 SUSPECTED EXPOSURE TO ASBESTOS
If a worker believes they have had an inhalation exposure to asbestos in the course of employment, the worker should:

• Report the suspected exposure to the supervisor.
• Complete an Incident and Investigation form.

### 6.0 ASBESTOS RECORD
The asbestos record (inventory) of all asbestos in UW buildings can be found at the Safety Office. If you require information from the asbestos record, please contact your supervisor. Supervisors that require information can contact the Safety Office.

### 7.0 CLASSIFICATION OF ASBESTOS WORK
Asbestos work is classified according to the potential for exposing workers and occupants to asbestos fibres.
What does the classification of work determine?

The classification of the work determines what other provisions of the Regulation apply to an operation; for example, notification requirements (section 11), measures and procedures (sections 14, 15, 16, 17, and 18), medical surveillance (section 22), record keeping (sections 21 and 22), and training and certification requirements for workers involved in Type 3 operations (section 20). As the classification of the work goes from Type 1 to Type 3, the corresponding requirements of the Regulation become increasingly more stringent. The Regulation does not specify who is to do the classification, but, in most cases, it will be the constructor or employer, often in consultation with an appropriately qualified consultant.

What is the difference between the classifications of work?

The three classifications of operations (Type 1, Type 2 and Type 3) have been established according to the asbestos hazard presented by the work, both to those doing the work and to others outside the work area. They can be thought of as being associated with a low, medium, and high risk of exposure. Activities have been assigned to one of the three types of operations based on an assessment of the risk of exposure. Factors that affect worker exposure to asbestos include the type of asbestos, the type of binder or matrix, the type of work, and the type of control measures used.