

**ADVISORY NO. 3.6: ASBESTOS ROOFING MATERIAL ABATEMENT
PROGRAM PLAN**

Asbestos Containing Material (ACM) found within roofing material is classified under Asbestos NESHAP (Federal Register, Volume 55, Number 224, November 20, 1991) as Category 1 non-friable Asbestos Containing Material (ACM) in its passive state. All asbestos containing roofing material must be inspected and tested for friability before renovation or demolition commences. **If the ACM is in poor condition and friable (reduced to powder by hand pressure) it is to be considered as Regulated Asbestos Containing Material (RACM) and must be handled in accordance to NESHAP.**

If Category 1 non-friable ACM will be or is subjected to sanding, grinding, cutting, or abrading during the course of removal it is also to be considered as regulated ACM and is to be removed under all regulations and notifications. All waste disposal standards apply.

Ohio Department of Health states that no Asbestos Contractor's License is needed if roofing material is in good condition and non-friable. **But, an asbestos contractor's license is needed for any activity that makes Category 1 non-friable ACM into regulated ACM such as sanding, grinding, cutting or abrading.**

OSHA states that before a contractor begins full scale removal of material, initial monitoring should be performed to record if exposure meets or exceeds the Permissible Exposure Level (PEL) of 0.1 fibers/cc or the Excursion Limit (EL) of 1.0 fibers/cc. If data exists from a previous identical job done on campus the date should be supplied to Environmental Health & Safety [EH&S] before activity begins). When airborne concentrations exceed the PEL or EL then respirators and protective clothing must be worn. If levels cannot be reduced below the PEL or EL then a negative-pressure enclosure must be erected around the area (exemption: small scale, short duration abatement). All high-speed cutting tools must be attached to HEPA vacuums before cutting into asbestos roofing material. OSHA states that a competent person is required on site.

ASBESTOS ROOF ABATEMENT PROCEDURES:

- All workers medical and training documents are to reviewed by EH&S prior to any activity.
- All M.S.D.S. are to be reviewed by EH&S prior to any activity.
- All workers are to wear respirators and protective clothing.
- Regulated area must be demarcated and have restricted entry to authorized persons only.
- Prior to removing roof material it must be sprayed with penetrating encapsulant and kept adequately wet to control the release of asbestos fibers into the air throughout the abatement.
- All ventilation openings are to be sealed off within the area along with all windows with plastic sheeting sealed with tape prior to abatement to prevent contamination of to the interior area.
- All high speed cutting tools must have HEPA filter ventilation or attached to a HEPA vacuum and must be approved by EH&S prior to use.
- Material is to be lowered to leak proof waste containers either through an airtight chute or on a hoist platform system without dropping, throwing or otherwise damaging it.
- Waste containers are to be lined and sealed with polyethylene to prevent any airborne asbestos fiber release.
- If material is in good condition it can be carefully lifted and lowered to a waste container after encapsulating all exposed ends; all cutting must be done following all regulated guidelines.