



Environmental Health and Safety

600 Moyer Boulevard | 188 Warren Life Sciences Building | Mail Stop 640
East Carolina University® | Greenville, NC 27834-4354
252-744-2070 office | safety@ecu.edu | oehs.ecu.edu

EAST CAROLINA UNIVERSITY

ASBESTOS MANAGEMENT PLAN

REVISED AUGUST 2025

TABLE OF CONTENTS

1.0 SCOPE AND APPLICATION.....	1
2.0 POLICY	1
3.0 RULES AND REGULATIONS.....	1
4.0 EMERGENCY CONTACT	2
5.0 INTRODUCTION.....	2
6.0 DEFINITIONS	2
7.0 LOCATION OF ASBESTOS.....	4
8.0 NOTIFICATIONS.....	4
9.0 FACILITIES SERVICES OPERATIONS	4
10.0 PROHIBITED FACILITIES OPERATIONS	4
11.0 RENOVATION AND DEMOLITION ACTIVITIES.....	5
12.0 ASBESTOS WORK CATEGORIES.....	5
13.0 TRAINING.....	6
14.0 RECORDKEEPING	6
15.0 RESPONSIBILITIES	6

APENDIXES

APPENDIX A - ASBESTOS FACT SHEET.....	8
APPENDIX B - ASBESTOS ABATEMENT NOTICE	9

1.0 SCOPE AND APPLICATION

The purpose of this plan is to establish the policies and procedures to be used at East Carolina University (ECU) in the management of building materials containing more than one percent (>1%) asbestos. This plan is to be used in conjunction with the State and Federal regulations covering asbestos, and the NC Department of Administration State Construction Office Guidelines and Policies on Asbestos Abatement.

This program applies to all university employees, contractors, and subcontractors who work in or around asbestos containing materials (ACM).

2.0 POLICY

ECU practices the in-place management of ACM. The information provided will follow the NC Dept. of Administration, State Construction Policy on ACM found in state buildings: If asbestos containing material is in good condition and will not be disturbed during renovation, the material may be left in place and the owner will continue upkeep and maintenance of the material. If ACM is to be disturbed during renovation and/or demolition activities, then it shall be removed. The ACM removal shall be designed and abated by accredited individuals.

The basis for these policies is that intact and undisturbed ACM does not pose a health risk to building occupants. The proper management of ACM minimizes the potential release of fibers into the air, and the risk of asbestos related health problems is minimized.

3.0 RULES AND REGULATIONS

- 15A NCAC 19C.600: North Carolina Administrative Code - Asbestos Hazard Management Program
- 29 CFR 1910.100: OSHA - Asbestos Standard for General Industry
- 29 CFR 1926.1101: OSHA - Asbestos Standard for the Construction Industry
- 40 CFR Part 61, Subpart M: EPA - National Emissions Standards for Hazardous Air Pollutants (NESHAPS)
- 40 CFR Part 763: EPA, Subpart E, Asbestos
 - Appendix B - Work Practices and Engineering Controls
 - Appendix C - Asbestos Model Accreditation Plan
 - Appendix D - Transport and Disposal of Asbestos Waste

Applicable References

- *North Carolina Asbestos Rules, Regulations, and Procedures*; Information packet from the Health Hazards Control Unit, NC Department of Health and Human Services
- *Guidance for Controlling Asbestos-Containing Materials in Buildings*, (Purple Book) EPA publication number: 560 / 5-85-024
- *Managing Asbestos in Place, A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, (Green Book) EPA 20T-2003
- *Asbestos Abatement Guidelines and Policies*, NC Department of Administration, State Construction Office
- *Guidance Manual: Asbestos Operations & Maintenance Work Practices*, National Institute of Building Sciences
- *Safety & Health Requirements for Asbestos*, Office of State Personnel

4.0 EMERGENCY CONTACT

The following is the sequence for any calls regarding questions, or to report an asbestos disturbance that may lead to potential exposure.

During normal operating hours (M-F, 8:00 a.m. – 5:00 p.m.) contact Environmental Health & Safety at (252) 744-2070.

An asbestos related emergency occurring outside of normal operating hours should be directed to ECU Police at (252) 328-6787. They will contact EH&S call-back personnel for response.

For fiber release episodes, work in the affected area should be stopped immediately, occupants should vacate the affected area and the area secured. The area should not be reoccupied until clearance is provided by EH&S.

5.0 INTRODUCTION

The term asbestos refers to a specific group of naturally occurring fibrous minerals found in certain types of rock formations. There are many varieties of asbestos but the three most common are chrysotile, amosite, and crocidolite.

Asbestos has been found used in more than 3,000 different building products. These include, but are not limited to, thermal system insulation (pipe and boiler insulation), fireproofing, floor coverings, ceiling tiles, cement pipes, and acoustical and decorative treatment for ceilings and walls. Asbestos became a very popular commercial product because it was a relatively inexpensive, virtually indestructible material with desirable physical properties including chemical resistance, fire resistance, thermal insulating ability, electrical insulating ability, mechanical strength, flexibility and good friction and wear characteristics.

The amount of asbestos in these products varies but any material with at least 1 percent asbestos is an asbestos-containing material (ACM). While it is often possible to suspect that a product or material contains asbestos by visual inspection, actual determinations can only be made by laboratory analysis. Until a material is tested, presume that it contains asbestos.

Although asbestos is an excellent building material, it has the potential to cause serious health problems, especially if it inhaled. For asbestos fibers to be inhaled, they must first become airborne through some type of disturbance. Intact, undisturbed material does not pose a significant health risk and can be safely managed in place.

The three most common illnesses associated with asbestos exposure are asbestosis (non-cancerous scarring of lung tissue), lung cancer and mesothelioma (rare form of cancer which affects the lining of the lungs). These diseases do not develop immediately after inhalation but may take 15 to 40 years before symptoms appear. Documentation indicates that smokers who are also exposed to asbestos greatly increase their risk of lung cancer.

6.0 DEFINITIONS

Asbestos includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that has been chemically treated and/or altered.

Asbestos-containing material (ACM) means any material containing more than one percent asbestos.

Class I asbestos work means activities involving the removal of TSI and surfacing ACM and PACM.

Class II asbestos work means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III asbestos work means repair and maintenance operations, where “ACM”, including TSI and surfacing ACM and PACM, is likely to be disturbed.

Class IV asbestos work means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

Employee exposure means that exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment.

Fiber means a particulate form of asbestos, 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to 1.

Homogeneous area means an area of surfacing material or thermal system insulation that is uniform in color and texture.

Intact means that the ACM has not crumbled, been pulverized, or otherwise deteriorated so that the asbestos is no longer likely to be bound with its matrix.

Permissible exposure limit (PEL) - Time-weighted average limit (TWA). The employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter of air as an eight (8) hour time-weighted average (TWA).

Permissible exposure limit (PEL) - Excursion limit. The employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes.

Presumed Asbestos Containing Material means thermal system insulation and surfacing material found in buildings constructed no later than 1980. The designation of a material as “PACM” may be rebutted pursuant to paragraph (k)(5) of this section.

Regulated area means: an area established by the employer to demarcate areas where Class I, II, and III asbestos work is conducted, and any adjoining area where debris and waste from such asbestos work accumulate; and a work area within which airborne concentrations of asbestos, exceed or there is a reasonable possibility they may exceed the permissible exposure limit.

Surfacing material means material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).

Thermal system insulation (TSI) means ACM applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain.

7.0 LOCATION OF ASBESTOS

A limited scope asbestos survey has been conducted for campus buildings constructed prior to 1991 to identify materials that contain asbestos. This survey should be utilized as a starting point to determine the likelihood or presence of building materials containing asbestos. The Office of Environmental Health and Safety maintains a database of samples collected on campus and has developed an inventory summary to assist in identifying areas where asbestos-containing material is located. Suspect material that has not been surveyed must be managed as presumed asbestos containing material (PACM). Once ACM or PACM has been identified it will be inspected periodically to monitor condition of the material. The type and location of material will determine inspection frequency.

8.0 NOTIFICATIONS

The following shall be notified of the presence, location, and quantity of ACM and/or PACM:

- Prospective employers applying or bidding for work whose employees may be expected to work in or adjacent to areas containing this material.
- Contractors hired to work in or adjacent to areas containing this material.
- University employees who may work in or adjacent to areas containing this material.
- Building occupants who may incidentally encounter this material.
- Tenants who occupy University spaces containing this material.

9.0 FACILITIES SERVICES OPERATIONS

University asbestos response activities, including Operations and Maintenance (O&M) tasks, are conducted by accredited off-campus contractors. Maintenance and custodial activities are performed by campus personnel in areas with ACM but are performed in a manner that does not disturb the material. Employees are instructed to ensure that suspect material is not damaged in routine activities and that any damaged material is reported immediately to their supervisor and EH&S.

Prior to the commencement of work which may disturb building materials, the employee or supervisor will check with the campus-wide asbestos survey to verify the presence or absence of ACM or PACM in the worksite. If the work involves the likely disturbance of ACM or PACM, then the work must be performed by an accredited contractor under the management of an ECU Facilities Project Manager.

10.0 PROHIBITED FACILITIES OPERATIONS

It is very important that all personnel, especially those involved in maintenance, repair, and custodial activities understand that certain activities normally performed are prohibited where ACM or PACM is present. The following is a list of prohibited activities for university employees.

- Do not drill holes in presumed asbestos containing materials (PACM) or asbestos containing materials (ACM)
- Do not hang plants or pictures on structures covered with PACM or ACM
- Do not sand asbestos containing floor tile
- Do not damage asbestos containing floor tile
- Do not install curtains, drapes, or dividers in such a way that they damage PACM or ACM
- Do not dust floors, ceilings, moldings, or other surfaces in asbestos contaminated environment with a dry brush or sweep with a dry broom

- Do not remove lock or other hardware in asbestos containing doors
- Do not use an ordinary vacuum to clean up asbestos containing debris
- Do not remove ceiling tiles below asbestos containing materials

11.0 RENOVATION AND DEMOLITION ACTIVITIES

Prior to initiation of renovation or demolition activities, a comprehensive building survey will be conducted by accredited personnel to identify ACM and appropriate work practices and engineering controls to assure protection of workers and building occupants in accordance with applicable rule and regulations. A comprehensive asbestos abatement design by an accredited asbestos designer is required for asbestos projects involving the removal of more than 3000 square feet, 1500 linear feet or 656 cubic feet of friable ACM. Accredited third party personnel provide project inspection and clearance air monitoring prior to releasing the work site for occupancy.

“Public Area” is defined as any area other than areas to which access by the general public is usually prohibited or is usually limited to access by escort only. Individually permitted asbestos removal activities conducted in public areas are required to be designed and conducted by persons accredited by the Department of Health and Human Services (DHHS). When asbestos work activity is performed on thermal system insulation (TSI), surfacing material or other friable material in a public area, the area shall be monitored by a licensed and accredited air monitor in accordance with 15A NCAC 19C.0605. This includes nonfriable material that will be sanded, abraded, cut, or otherwise made friable. If asbestos work activity is performed on nonfriable material and monitoring of the worker performing the work reveals that Permissible Exposure Limit (PEL) has been exceeded, clearance air sampling shall be performed by a licensed and accredited air monitor to ensure the work area is not contaminated. For individually permitted asbestos removals, ambient air sampling shall be conducted in public areas adjacent to the work area. Clearance air sampling shall be conducted by a licensed and accredited air monitor.

All renovation and demolition activities must include notification of and coordination with affected building occupants. Notification must be timely and include information regarding location and quantity of asbestos-containing material, project summary including work practices and engineering controls and project schedule. Notification will also be provided to occupants upon project completion and include clearance monitoring results.

12.0 ASBESTOS WORK CATEGORIES

The following classification of work with asbestos containing building materials is to be used in accordance with this program.

Class I -- Activities involving the removal of TSI and asbestos containing surfacing materials, where the primary reason for the project is to remove the material from the facility. This includes removal of ACM in quantities greater than 260 linear feet, 160 square feet, or 35 cubic feet, requiring a permit from the DHHS. **No ECU employee will conduct Class I activities.**

Class II-- Activities involving the removal of asbestos containing materials (ACM) which is not TSI or surfacing material. This includes, but is not limited to, the removal of asbestos containing wallboard, floor tile and sheeting, roofing and siding materials, and construction mastics. This includes removal of ACM in quantities greater than 260 linear feet, 160 square feet, or 35 cubic feet, requiring a permit from the DEHNR. **No ECU employees will conduct Class II activities.**

Class III -- Activities involving repair and maintenance where asbestos containing material, including TSI and surfacing material, is likely to be disturbed. Class III work will only be performed by employees who are accredited to at least the worker level in accordance with DHHS requirements (twenty-four-hour training). **ECU employees are not currently authorized to perform Class III activities.**

Class IV -- Maintenance and custodial activities during which employees contact asbestos containing material and activities to clean up waste and debris containing suspect or asbestos containing materials. Examples include, but are limited to:

- Sweeping, mopping, cleaning, and vacuuming of asbestos containing material
- Stripping and buffing of asbestos containing resilient flooring
- Cleanup of waste or debris after a Class I, II, or III operation

NOTE: ECU employees will not participate in the clean-up of waste and debris containing suspect or asbestos containing materials after a Class I, II, or III operation; however, employees who perform maintenance and custodial activities will receive Asbestos Awareness Training annually due to the nature of their work.

13.0 TRAINING

All members of Facilities Services, including housekeeping staff, who may encounter asbestos-containing material must receive asbestos awareness training. Employees will receive training upon initial employment and annually thereafter. The training shall include, but not be limited to:

- Information regarding asbestos and its various uses and forms,
- Information on the health effects associated with asbestos exposure,
- Location of asbestos-containing material, recognition of damage, deterioration, and delamination of asbestos-containing material, and
- Name and telephone number of person designated as Program Administrator

14.0 RECORDKEEPING

Program documentation will be maintained including, but not limited to, the following:

- Air and bulk sampling reports.
- Inspection and assessment reports.
- Personal air sampling records
- Medical records for each employee subject to medical surveillance program
- Training records

15.0 RESPONSIBILITIES

Environmental Health and Safety (EH&S) shall:

- Designate someone as the University's Asbestos Program Manager (**APM**).
- Provide technical review of abatement designs and specifications for asbestos abatement projects.
- Assist Facilities Services in the identification, conditional review, and risk assessment of ACM and/or PACM in campus buildings.
- Maintain asbestos campus-wide asbestos survey data.

- Provide initial Asbestos Awareness training and annual refresher training when required.
- Investigate asbestos concerns of employees, contractors, and building occupants. Assist in informing building occupants of location of ACM and PACM.
- Investigate reports of damaged asbestos.
- Investigate occurrences of unintended asbestos disturbances.
- Establishing and maintaining a medical surveillance program when required for compliance.
- Establishing and maintaining a respiratory protection program when required for compliance.

Facilities Services shall:

- Attend annual asbestos awareness training provided by EH&S.
- Consult with the APM about questions concerning the identity of materials.
- Ensure that construction and renovation projects are completed in accordance with all applicable OSHA, EPA, and NC Asbestos Hazard Management Branch rules and regulations.
- Forward to the APM copies of daily air sampling results at abatement projects and reports of any bulk samples collected by contractors.
- Notify all prospective contractors of the presence and location of ACM in or adjacent to their work areas.
- Monitor the condition of known or presumed ACM in their work areas and notify the APM of damaged ACM.

Contractors shall:

- Be licensed and accredited abatement contractors as specified by applicable regulations and will be managed by designated ECU Facilities Project Managers.
- Perform all work in compliance with current applicable federal, state, and local regulations, including U.S. EPA, OSHA, and any other accepted industry standards.

Building occupants shall:

- Complete asbestos awareness training.
- Become familiar with the ACM in building/area and inform building occupants to not disturb the material.
- Monitor the condition of ACM in building/area and notify EH&S if it becomes damaged or starts to deteriorate.

APPENDIX A – ASBESTOS FACT SHEET

- Asbestos is a group of naturally occurring minerals that occur as bundles of microscopic fibers. These minerals are divided into two major classes, the serpentine, and the amphibole groups. The serpentine group contains chrysotile. Amosite, crocidolite, tremolite, anthophyllite and actinolite comprise the amphibole group.
- Because of its many useful characteristics, including resistance to chemicals, fire and heat, asbestos was used in the manufacture of some 3,000 different building materials, including floor tile, linoleum or sheet vinyl, cement siding, roofing materials/sealants, pipe insulation, adhesives, sprayed-on fireproofing, and decorative ceiling treatments. Asbestos-containing material (ACM) means any material which contains more than 1% asbestos.
- There are three categories of asbestos-containing material: **Surfacing material**, **thermal system insulation (TSI)** and **miscellaneous material**. Examples of surfacing material are textured ceiling material and sprayed-on fireproofing. Examples of TSI are pipe insulation and boiler insulation. Miscellaneous material is everything else that does not fall into the surfacing material or TSI categories and includes floor tile, mastic, and transite sheeting.
- Asbestos-containing materials can be found in many building on the ECU campus. All textured surfacing materials and floor tile are considered suspect. All insulation material is suspect unless it is fiberglass or foam. Assume all suspect material contains asbestos and consult with EH&S before proceeding with a project that may disturb suspect material. Do not attempt to clean up damaged suspect material and report to EH&S for response.
- Asbestos-containing material can also be classified as **friable** and **non-friable**. Friable means any material that when dry can be broken, crumbled, pulverized, or reduced to powder by hand pressure. **Friable material** is at greater risk of being disturbed. Examples of friable material are textured ceiling material and sprayed-on fireproofing. In **non-friable material**, such as vinyl floor tile and siding, asbestos is combined with a binding material so that it is not readily released into the air and requires significant action (sanding, drilling, etc.) to be disturbed.
- Adverse health effects are associated with asbestos exposure. Asbestos is a respiratory hazard and diseases associated with exposure include asbestosis, lung cancer and mesothelioma.
- **The mere presence of asbestos-containing material in a building does not pose a hazard.** The material must be disturbed in an uncontrolled manner and release fibers into the air to be a potential health risk. Risk of developing disease is also based on the level and duration of exposure.
- ECU practices "in-place" management of asbestos-containing material. Removal of these materials is not usually necessary unless the material is severely damaged or will be disturbed by a building demolition or renovation project.
- Suspect material is presumed to be asbestos until it is tested by an accredited laboratory to confirm its identity. Building surveys are conducted prior to renovation/construction projects by an accredited inspector to identify asbestos-containing material and the material is then abated in a safe and controlled manner by an accredited contractor. Clearance air monitoring is conducted by a third-party accredited air monitor to assure clean air in accordance with EPA requirements.



APPENDIX B – ASBESTOS ABATEMENT NOTICE

This notice must be posted for review by all employees who will perform the abatement work, employees who work and/or will be working in adjacent areas and building occupants. The notice should be posted in conspicuous locations throughout the building and at least 1 week prior to the scheduled start date.

An asbestos abatement project will be conducted according to the information listed below. The work will be performed in accordance with applicable federal and state rules and regulations using work practices and engineering controls to assure proper protection of the health of workers and building occupants. The contractor personnel performing the asbestos work have been trained and are accredited by the State of North Carolina. Air monitoring will be conducted within and adjacent to the work area to assure that work practices and engineering controls are adequate to contain the asbestos within the work area. Final inspection and clearance monitoring will be conducted prior to releasing the work site for occupancy. An independent third-party consultant has been hired by ECU to monitor the air and the project to help ensure the work is performed properly. Facilities Services and Environmental Health and Safety will also provide project oversight. Any questions or concerns regarding this project or asbestos and its health effects should be addressed to the appropriate contacts listed below.

- **Building/Location:** _____
- **Scheduled Start Date and Time:** _____
- **Scheduled Completion Date and Time:** _____
- **Location of Asbestos-Containing Material:** _____
- **Quantity of Asbestos-Containing Material:** _____
- **Project Summary:** _____
- **Precautions/Work Practices/Engineering Controls Used:** _____

PROJECT CONTACTS

ECU Facilities Services Contact and Phone:

Consultant/Air Monitor Contact and Phone:

ECU Environmental Health & Safety Contact and Phone: