Lead and Asbestos Management Plan

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DOCUMENT REVISION LOG

Document: Lead and Asbestos Management Plan

Rev. No.	Effective Date	Revision Description	Pages Replaced	Completed by:
1	3/29/21	Updated SRS to EHS, revised PDC section	0	SRC
2	7/14/23	Added culture of safety statement to Intro Added information about lead-based paint to all sections and renamed document "Lead & Asbestos Management Program" Updated all sections to include HSCP	N/A	TCE, MT
2.1	7/14/23	Updated formatting, added in links to the CFRs and updated how they're laid out	N/A	VG

ACRONYMS & DEFINITIONS

ACM	Asbestos-containing material. Any material with more than 1% of the minerals chrysotile, amosite, crocidolite, tremolite, anthophyllite, actinolite, and any of these minerals that has been chemically treated and/or altered.
AHERA	Asbestos Hazard Emergency Response Act
Class I Work	activities involving the removal of TSI and surfacing ACM and PACM
Class II Work	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 Work	repair and maintenance operations, where ACM, including TSI and surfacing ACM and PACM, is likely to be disturbed.
Class IV Work	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.
Competent Person	one who is capable of identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure and who has the authority to take prompt corrective measures to eliminate them, as specified in 29 CFR 1926.32(f): in addition, for Class I and Class II work, who is specially trained in a training course which meets the criteria of EPA's Model Accreditation Plan (40 CFR part 763) for supervisor, or its equivalent and, for Class III and Class IV work, who is trained in a manner consistent with EPA requirements for training of local education agency maintenance and custodial staff as set forth at 40 CFR 763.92 (a)(2).
Critical Barrier	one or more layers of plastic sealed over all openings into a work area or any other similarly placed physical barrier sufficient to prevent airborne asbestos in a work area from migrating to an adjacent area.
Decontamination Area	an enclosed area adjacent and connected to the regulated area and consisting of an equipment room, shower area, and clean room, which is used for the decontamination of workers, materials, and equipment that are contaminated with asbestos.

Demolition	the wrecking or taking out of any load-supporting structural member and any related razing, removing, or stripping of asbestos products.
EHS	UNM Environmental Health & Safety
EOHS	UNM Employee Occupational Health Services
EPA	The United States Environmental Protection Agency
Excursion Limit	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.
Fiber	a particulate form of asbestos, 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to 1.
Glovebag	not more than a 60 × 60 inch impervious plastic bag-like enclosure affixed around an asbestos-containing material, with glove-like appendages through which material and tools may be handled.
HEPA	High-Efficiency Particulate Air. A filter capable of trapping and retaining at least 99.97 percent of all mono-dispersed particles of 0.3 micrometers in diameter.
HSC	UNM Health Sciences Center
LBP	Lead-based paint
NESHAP	National Emission Standards for Hazardous Air Pollutants. A standard issued by the EPA to regulate the emissions of hazardous air pollutants.
NOI	Notice of Intent
OSHA	The Occupational Safety and Health Administration

PEL	Permissible Exposure Limit
PLM	Polarized Light Microscopy. A laboratory analytical method to determine the concentration of asbestos in bulk building materials.
Regulated Area	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
RPP	EHS Respiratory Protection Program
SOP	Standard Operating Procedure
Surfacing Material	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).
TSI	Thermal System Insulation. ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.
TWA	Time weighted average of exposure of an 8-hour period.
UNM	The University of New Mexico
NMED	The New Mexico Environment Department

Regulations

Asbestos General Standard	https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.1101
Asbestos Construction Standard	https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1001
Asbestos Hazard Emergency Response Act (AHERA)	https://www.govinfo.gov/content/pkg/USCODE-2011-title15/pdf/USCODE-2011-title15-chap53-subchapII.pdf

National Emission Standards for Hazardous Air Pollutants (NESHAP)	https://www.govinfo.gov/content/pkg/CFR-2011-title40-vol8/pdf/CFR-2011-title40-vol8-part61-subpartM.pdf
Lead General Standard	https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1025
Lead Construction Standard	https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.62

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1. Introduction

Safety is a core value of the University of New Mexico (UNM). UNM is committed to creating and fostering a culture of safety within the community. To learn more, visit the Culture of Safety information page. To further this commitment, it is expected and required that personnel covered by the Scope of this program are familiar with and abide by its contents.

The University of New Mexico (UNM) was established in 1889, long before the use of materials that contain lead and asbestos were banned or fell out of common usage. Therefore, many UNM buildings contain lead-based paint and asbestos.

Lead is a naturally-occurring element that was commonly added to pre-1978 paints to speed up the drying process, to increase durability and to resist moisture. The use of lead-based paint (LBP) was banned in residential use in 1978 due to lead's damaging effects on the brain, nervous system, kidneys, and blood cells.

Asbestos is a naturally-occurring mineral commonly used in pre-1989 building materials because of its fire resistance and imperviousness to chemical corrosion. Asbestos-containing materials (ACM) can be found in drywall, pipe insulation, floor tile, ceiling tile, and numerous other building materials. Asbestos becomes hazardous when it degrades and/or is disturbed, as its fibers become airborne and breathable. Common medical conditions that occur as a result of exposure to airborne asbestos fibers are lung cancer, mesothelioma, and asbestosis.

2. Purpose

The purpose of this program is to provide well-defined roles and responsibilities of UNM personnel who oversee projects that have the potential to disturb building materials that contain lead-based paint and/or asbestos, and to guide project managers through the steps required to safely manage scopes of work involving disturbance or removal of LBP and ACM.

3. Scope

This program applies to all UNM personnel and third-party contractors who conduct, coordinate and/or oversee LBP and ACM surveys, sampling, and/or abatement in UNM-owned buildings. Activities with the potential to disturb LBP and/or ACM are covered by this scope and include:

1. Demolition
2. Remodeling/upgrading infrastructure such as sinks, toilets, cabinets, engineering control equipment
3. Drilling and/or cutting into walls, floors, ceilings
4. Removal/replacement of floor tiles or ceiling tiles
5. Window replacement

6. Sanding/scraping of painted surfaces
7. Removal/replacement of HVAC and fume hood ductwork
8. Dismantling of fume hoods

4. Roles and Responsibilities

4.1. Environmental Health and Safety (EHS)

1. Prepare and maintain an up-to-date version of this program
2. Monitor compliance with this program
3. Provide general asbestos awareness training
4. Maintain records of sampling, abatement and disposal
5. Notify building managers and occupants of abatement activities
6. Certify and sign hazardous materials manifests
7. Review clearance testing documentation and give permission to reoccupy space
8. For urgent requests by FM, EHS may provide sampling services
9. For small FM projects that are not associated with a budgeted project, EHS may provide sampling and project monitoring services

4.2. Employee Occupational Health Services (EOHS)

1. Conducts medical surveillance in accordance with 29 CFR 1910.1001 and 29 CFR 1926.1101 for employees who may be exposed to asbestos at concentrations above the Permissible Exposure Limit (PEL)
2. Maintains records of physical examinations, X-rays and tests
3. Provides written medical opinion to both employee and employer

4.3. Facilities Management (FM) Supervisors and/or Building Coordinators

1. Notifies EHS of any activity that may disturb LBP and/or ACM
2. Uses only EHS-approved abatement contractors
3. Enforces this program with any contractor engaged in activities that may disturb LBP and/or ACM
4. Abides by the Asbestos Abatement/Mold Remediation Project Checklist (Appendix A)
5. Coordinates with EHS for all abatement and disposal activity

6. Ensures that employees with potential exposure to LBP and/or ACM complete the trainings listed in Section 5

4.4. Planning, Design and Construction (PDC) and the Health Sciences Capital Projects (HSCP)

1. Notifies EHS of any activity that may disturb LBP and/or ACM
2. Uses only EHS-approved abatement contractors
3. Enforces this program with any contractor engaged in activities that may disturb LBP and/or ACM
4. Submits an Asbestos Records Request Form on the EHS website prior to any sampling or abatement
5. Follows the Asbestos Abatement/Mold Remediation Project Checklist (Appendix A)
6. Notifies EHS of asbestos survey results
7. Coordinates with EHS for all ACM disposal

4.5. Supervisors, Deans, Directors, and Chairs

1. Ensure all employees that require training on asbestos hazards receive it
2. Provide new employees with information regarding this procedure
3. Ensure employees work in accordance with this procedure
4. Notify EHS of activities that may require abatement contractors at least 10 business days in advance through Facilities Management iServiceDesk (TMA Work Order)
5. Immediately contact EHS if ACM or PACM has been discovered in a damaged state or is otherwise disturbed

4.6. Facilities Management & Maintenance Employees

1. Employees will not remove or disturb any LBP and/or ACM
2. Notify supervisors of activities that may disturb LBP and/or ACM and any of these materials that are in a deteriorated condition
3. Notify supervisors and EHS if there is a reasonable concern they have been exposed to LBP dust and/or asbestos fibers

4.7. Contractors Performing Asbestos Abatement at UNM

1. Contractors and their employees will comply with all parts of this plan
2. Contractors will comply with all EPA, OSHA, NMED, and City of Albuquerque requirements
3. Contractors are responsible for NESHAP submissions when applicable
4. Contractors will have in place a medical surveillance program that meets the minimum requirements of 29 CFR 1926.1101(m) or 29 CFR 1910.1001(l)

5. Contractors will ensure all employees wear proper PPE, including respirators per their company's Respiratory Protection Program
6. Contractors will ensure that no employee is exposed to concentrations of lead and/or asbestos over their respective PELs and/or excursion limits by means of personnel air sampling

5. Training Requirements

All UNM staff who perform work that may expose them to LBP dust and/or ACM must be aware of the hazards and how to protect themselves from the hazards. This is done through training. The type of training required is dependent upon the work performed.

UNM staff (such as FM) who conduct routine maintenance in areas where LBP and/or ACM is present must take the following trainings:

1. Asbestos Hazard Awareness – available on Learning Central; must be taken once per year
2. Lead Awareness – available on Learning Central; must be taken once per year

EHS staff and consultants who provide contractor oversight, collect bulk and air asbestos samples, and perform the duties of a competent person as described in 29 CFR 1926.1101(o), must take the following trainings:

1. Asbestos Building Inspector Initial (annual refresher required)
2. Asbestos Contractor Supervisor Initial (annual refresher required)
3. Asbestos Project Monitor NIOSH 582 (refresher required every six years)

Contractors who perform abatement of LBP and/or ACM must have training in accordance with the requirements in 29 CFR 1926.1101 or 29 CFR 1910.1001 and with the EPA Model Accreditation Program. Only contractors approved by EHS may be used for abatement of lead and/or asbestos on UNM campus.

6. Recordkeeping

EHS maintains a database for keeping track of all areas at UNM with confirmed LBP and ACM, as well as areas where the presence of such materials has been ruled out. This database is used to complete records requests and therefore must be continuously updated as new records are generated. Records that are generated during projects managed by FM, PDC and/or HS-CP *must be sent to EHS*.

Records generated internally (by FM, PDC, HS-CP, EHS) include:

1. Scopes of work
2. Contractor proposals
3. Memos
4. Sampling/monitoring reports

Records generated by abatement contractors that must be submitted to UNM within 30 days of project completion include:

1. Daily logs
2. Waste manifests
3. Personnel air sampling data
4. Employee training certificates

7. Medical Surveillance

Medical evaluation and surveillance as described in the OSHA Asbestos Standard is available through Employee Occupational Health Services (EOHS) to all UNM employees exposed to asbestos above the PEL for a combined total of 30 or more days per year. Employees required by this standard to wear an air-purifying respirator must be deemed physically able to perform the work by a physician. Employees are to contact EOHS at 505-272-8043 or HSC-EOSHForms@salud.unm.edu to schedule a medical evaluation and obtain medical clearance to wear a respirator.

8. Pre-Project Requirements – Asbestos/Lead Abatement

8.1. Records Request

Prior to any activities that may disturb suspect ACM, an Asbestos Records Request must be submitted to EHS. EHS will gather information from the requestor, review previous sampling/abatement reports, and conduct a site inspection, if necessary. EHS will provide any and all sampling/abatement reports to the requestor and to the appropriate Facilities Management Area Managers/Supervisors.

8.2. Asbestos and Lead-Based Paint Survey & Sampling

If no records exist or there is any ambiguity in the records, an asbestos and/or lead-based paint survey must be conducted to identify all suspected ACM and LBP within the project area. The Asbestos Building Inspector is responsible for determining if LBP and/or ACM is present and assess the physical characteristics/condition of each. If EHS is unable to conduct the survey and/or collect samples, the UNM Project Manager (PDC, FM or HS-CP) shall hire a contractor, approved by EHS, to conduct the survey and sample all of the suspect materials.

8.2.1. Asbestos Sampling and Testing

The EPA's Asbestos Hazard Emergency Response Act (AHERA) defines the number of samples to collect for each homogenous suspect material. Materials are classified as either thermal system insulation (TSI), surfacing, or miscellaneous. Samples may be collected by EHS or by a third-party vendor. Copies of laboratory analytical reports must be sent to EHS. The number of samples required to be collected are as follows:

1. A total of three samples are required to be collected for TSI materials.
2. For surfacing materials, the "3-5-7 Rule" meets the minimum AHERA requirements:

a. Between 1 and 1,000 square feet of material, a minimum of three samples must be collected.

b. Between 1,001 and 5,000 square feet of material, a minimum of five samples must be collected.

c. For material greater than 5,000 square feet, a minimum of seven samples must be collected.

The samples must be sent under chain-of-custody to a UNM-approved laboratory for testing by Polarized Light Microscopy (PLM) (EPA Method 600/R-93/116). Copies of laboratory analytical reports must be sent to EHS.

8.2.2. Lead-Based Paint Sampling & Testing

Samples may be collected by EHS or by a third-party vendor. Copies of laboratory analytical reports must be sent to EHS. The sampling methods and number of samples to be collected is as follows:

1. XRF (X-Ray Fluorescence) Sampling

    a. At least five (5) measurements must be taken of each homogeneous building component with a similar coating.

2. Bulk Sampling for LBP

    a. At least two (2) samples must be taken of each building component with similar coating. If sampling by scraping paint, the area scraped must be quantified/measured. The paint within this test area (6.25 cm2/2.5 inches2 is recommended) is scraped down to the substrate and submitted for analysis of lead content (in ppm) by an accredited laboratory.

3. Waste characterization sampling by the EPA's Toxicity Characteristic Leachate Procedure (TCLP) method

    a. Representative composite samples of at least 125 grams will be taken of the materials expected to become construction debris during any renovation and/or demolition of buildings, and which were determined to be LBP during XRF and bulk sampling.

    b. Composite samples are to be submitted for lead analysis by the EPA's TCLP method by an accredited laboratory.

If TCLP analysis indicates lead levels are equal to or greater than 5 milligrams per liter, the waste the samples were collected from is considered hazardous and must be disposed of as hazardous waste.

8.3. Notice of Intent

If the amount of regulated ACM to be removed exceeds 260 linear feet, 160 square feet, or 35 cubic feet, a Notice of Intent (NOI) must be filled out by the abatement contractor via the federal National Emission Standard for Hazardous Air Pollutants (NESHAP) and submitted to the New Mexico Environment Department (NMED) Air Quality Bureau. The NESHAP must be submitted and approved at least 10 business days prior to the start of abatement. The Asbestos NESHAP Notification form must be downloaded from the NMED website and emailed to asbestos.abq@state.nm.us. The contractor must keep a copy of the NOI at the job site.

8.4. Notification to EHS

EHS must be notified of all projects that involve the activities described in Section 3. The PDC Project Manager, HSCP Project Manager, or FM Area Manager, or their designee, must notify EHS by calling 505-277-2753 or by sending an email to ehsweb-L@list.unm.edu.

8.5. Notification of Building Occupants

EHS, PDC, HSCP and/or FM shall notify the Building Manager and any other necessary occupants of the project schedule and scope of work. It is the responsibility of the building stakeholder or manager to inform the building occupants of the location and condition of ACM. The building manager will also instruct the building occupants on best practices to avoid disturbing asbestos.

9. DURING-PROJECT REQUIREMENTS

9.1. Contractor Oversight

It is the responsibility of EHS, UNM Project Managers, or third-party sampling/monitoring contractors to ensure that the abatement contractors abide by the requirements of this SOP, all relevant asbestos regulations, and the appropriate health and safety guidelines. EHS and/or the Project Managers must arrange access to the project area and identify the nearest utilities, locations of fire extinguishers, and evacuation routes. The contractors shall be informed of any specific hazards in the project area (i.e. chemicals stored in a laboratory).

The abatement contractors are required to have copies of the asbestos regulations and their company's Health & Safety Plan/Respiratory Protection Program on site. The UNM Project Manager or the third-party consultant shall verify these documents are in place.

9.2. Respiratory Protection

Respiratory protection is required when working in an asbestos environment in accordance with 29 CFR 1910.134. Employees must wear a half-mask or full-face tight-fitting air-purifying respirator to enter a regulated area where Class I-III activities are conducted or where employees may be exposed above the PEL. EHS's Respiratory Protection Program (RPP) outlines the requirements for all UNM employees who are required to wear any type of respiratory protection.

Employees required to wear an air-purifying respirator must be trained and fit-tested annually. The training and fit testing must be performed by an RPP Administrator, RPP Instructor, or a qualified third-party vendor. RPP Administrators and Instructors must follow the fit testing procedures listed in Attachment B of the RPP (Respirator Fit Testing Standard Operating Procedures. Fit test records shall be retained by the employee and EHS until the next fit test is administered.

All abatement contractors are required to have their own respiratory protection program. This program shall be kept onsite and made available for review by UNM EHS personnel or a third-party oversight contractor.

9.3. Personal Protective Equipment

In addition to respirators, all personnel entering a regulated area or working in an environment where exposures exceed the PEL must wear Tyvek© suits and boot covers. Any contaminated suit must be disposed of as asbestos waste (see Section 10.2).

9.4. Regulated Areas

All Class I-III work must be conducted within a regulated area. Prior to the commencement of removing ACM, the regulated area must be inspected to ensure the following:

1. The area has been demarcated to restrict persons from entering.
2. Proper signage is posted as described in Section 9.5.
3. The critical barrier containment, decontamination area, and ventilation tubing are properly erected and secured.
4. All HVAC vents are covered with plastic.
5. The area is under negative pressure and HEPA vacuums are working properly.
6. If glove bag systems are to be used for abatement, the glove bags shall be inspected for leaks or any damages.

Only UNM employees who have received proper training shall be permitted to enter a regulated area.

9.5. Signage/Labeling

Areas where the airborne levels of asbestos are found to exceed the PEL will be regulated areas. Access to these areas will be limited to persons trained on the hazards of asbestos. All entrances and access ways will be posted with signs bearing the following information:

DANGER!
ASBESTOS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY

In addition, where the use of respirators and protective clothing are required to enter the regulated area, the warning signs shall include the following:

WEAR RESPIRATORY PROTECTION AND PROTECTIVE CLOTHING IN THIS AREA

Areas where the airborne levels of lead are found to exceed the PEL will be regulated areas. Access to these areas will be limited to persons trained on the hazards of lead. All entrances and access ways will be posted with signs bearing the following information:

DANGER
LEAD
MAY DAMAGE FERTILITY OR THE UNBORN CHILD
CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM
DO NOT EAT, DRINK OR SMOKE IN THIS AREA

9.6. Container Labels

Labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers. When previously installed ACM and/or PACM is identified, labels or signs shall be affixed to warn employees of what materials contain ACM and/or PACM. The labels shall include the following information:

DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATH DUST

9.7. Critical Barrier Containment

A negative pressure enclosure (NPE) system is required for all projects for which a NESHAP is submitted. For projects that don't require a NESHAP, contact EHS to determine which type of containment is required. The specifications for an NPE system are as follows:

1. The NPE may be of any configuration
2. At least 4 air changes per hour shall be maintained in the NPE
3. A minimum of -0.02 column inches of water pressure differential, relative to outside pressure, shall be maintained within the NPE as evidenced by manometric measurements
4. The NPE shall be kept under negative pressure throughout the period of use and air movement shall be directed away from employees performing asbestos work within the enclosure and toward a HEPA filtration or a collection device

As part of the critical barrier containment, a decontamination area must be adjacent and connected to the containment. All PPE must be decontaminated and/or removed prior to exiting the decontamination area. All PPE that is determined to be contaminated and designated as asbestos waste must remain in the regulated area. All equipment must be decontaminated before being moved outside of the containment. EHS or a UNM-approved contractor must periodically inspect the NPE during the abatement.

9.8. Project Area Air Sampling/Monitoring

During abatement of ACM or materials with LBP where a NPE is required, area air samples shall be collected by EHS personnel or a UNM-approved contractor per the requirements for Class I and II work (29 CFR 1926.1101(g)(4) and 29 CFR 1926.1101(g)(7). Laboratory analysis of the samples will confirm whether or not asbestos fiber levels are below the Permissible Exposure Limit.

1. Area air samples must be analyzed at a UNM-approved laboratory by Phase Contrast Microscopy (NIOSH 7400). Samples are collected using 0.8 µm mixed cellulose ester (MCE) filter cassettes. Each cassette is fitted to a low or high-volume air pump and calibrated to a defined volume. The recommended volume range is 1,200-1,800 liters. At a minimum, two area samples shall be collected:
    a. outside the project entrance;
    b. a location in close proximity to the regulated area.
2. Permissible Exposure Limit (PEL) -- The PEL for asbestos is 0.1 fiber per cubic centimeter (f/cc) of air as an 8-hour time-weighted average (TWA).
3. The NPE shall be inspected periodically per the requirements set forth in Section 9.7

10. POST-PROJECT REQUIREMENTS

10.1. Clearance Sampling

When abatement activities have ceased, but before the containment has been removed, additional air samples must be collected and analyzed in the same manner as listed above. The area cannot be cleared for reoccupation until laboratory data proves the concentration of asbestos fibers is below the PEL. At a minimum, one sample shall be collected inside the regulated area, one sample collected at the project entrance, and one sample collected in close proximity to the regulated area.

The clearance samples will be sent to an UNM-approved laboratory for analysis by Phase Contrast Microscopy via NIOSH Method 7400. If sample results are below the PEL of 0.01 f/cc, the project area will be deemed safe for re-occupancy by EHS.

10.2. Waste Disposal

10.2.1. Asbestos Waste

The abatement contractor shall abide by federal, state, and local regulations governing the packaging, transportation and disposal of all asbestos waste generated during the abatement. The New Mexico Solid Waste Bureau regulates the transportation and disposal of ACM and can be reached at 505-827-0197.

The abatement contractor must coordinate with EHS to get a signature on the waste manifest before the waste can be taken off the work site. Current EHS employees who are certified to sign waste manifests include:

1. Tommy Evans, EHS Tech III – 505-553-0433
2. Gonzo Orona, EHS Tech II – 575-499-4004
3. Melissa Terry, Chemical Hygiene Officer – 415-797-2223

If an EHS employee who is certified to sign manifests is not available, the abatement contractor may have the Project Manager or other representative sign a "Delegation of Authority" document authorizing the abatement contractor to sign the waste manifest on behalf of UNM (owner).

10.2.2. Lead-Based Paint Waste

As with asbestos waste, the abatement contractor shall abide by federal, state, and local regulations governing the packaging, transportation and disposal of all lead-based paint waste generated during the abatement. The Environmental Protection Agency regulates the disposal of lead-based paint waste and can be reached at 800-424-5323 or 312-886-6003.

Lead-based paint waste which adheres to the demolition/construction debris may be disposed of in a properly permitted landfill. Lead-based paint which has been removed from the demolition/construction debris is considered hazardous waste and must be disposed of in a facility that has a permit to store, treat or dispose of hazardous waste.

Contact EHS at 505-277-2753 to coordinate the disposal of hazardous lead-based paint waste.

10.3. Final Reports and Communication

All sampling and abatement contractors are required to submit final reports and project closeout documents to EHS. Upon receipt, EHS shall electronically send these documents to the Facilities Management managers/supervisors, building managers, and appropriate stakeholders. A memo shall be sent to include a project summary, sampling results, and any actions required by UNM personnel. All documents and relevant communication shall be recorded per the requirements in Section 6.

APPENDIX A: ASBESTOS ABATEMENT AND MOLD REMEDIATION PROJECT CHECKLIST

This checklist outlines the steps required to complete an asbestos abatement/mold remediation project that is in compliance with OSHA asbestos regulations (29 CFR 1926.1101). All UNM Managers and Supervisors must follow these steps when managing asbestos and/or mold projects without the assistance of EHS. The Manager must notify EHS of the scope of work, the project schedule and the contractors selected to perform the work. If you are unclear on these requirements, please contact EHS for assistance. EHS is fully equipped to manage asbestos and mold projects and can assist at any time.

Building Name/Number:
Room Number(s):

☐ Submit an Asbestos Records Request to EHS to determine whether or not samples need to be collected. Request form is located on EHS website.

☐ If no records exist for the project area, samples must be collected. Schedule a contractor to collect samples from the project area. Contact EHS for contractor information.

☐ Select abatement/remediation and sampling contractors and establish project schedule. Contact EHS for contractor information.

☐ All projects must be cleared by collecting clearance samples. Schedule clearance sampling prior to starting work. NOTE: For mold remediation, you must wait 24 hours before clearance samples can be collected. If you are unclear on whether clearance sampling is required, contact EHS.

☐ Notify building managers and occupants of the project schedule 2-3 days prior to the start of work.

☐ Sign the waste manifest and final inspection report after abatement/remediation is completed. Anyone who signs the asbestos waste manifest must take DOT training initially and every three years thereafter. Contact EHS for information for the online DOT training.

☐ After clearance samples confirm the area is clear of asbestos or mold, the containment can be removed. Schedule contractor to break down containment.

☐ Send closeout documentation, including copies of sampling data, waste manifests and final reports, to EHS. It is very important that EHS keeps accurate and up-to-date records for asbestos-containing building materials.

Lead and Asbestos Management Plan R2.1

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