

University of Kansas – Lawrence Campus  
Policy on Asbestos/Lead Management  
Provost Office

The following policy related to campus asbestos/lead based paint management is hereby established from the Provost's Office. This policy is necessary in order to facilitate recent programmatic changes, assure continued regulatory compliance, protect the safety and health of University personnel and visitors, prevent contamination of campus facilities, and to achieve the goals and requirements of the University's Safety and Health Policy.

- 1) The KU Department of Environment, Health & Safety (EHS) shall be the initial, main and oversight point of contact for all questions, concerns, survey, sampling & testing, air monitoring, project management, repair, removal and abatement of asbestos or lead based paint containing materials at any KU-Lawrence campus facility.
- 2) KU-EHS shall be responsible for managing and coordinating the acquisition and use of any/all "outside entities" providing asbestos/lead services to the KU-Lawrence campus.
  - a) This includes both consultants that may perform various asbestos/lead surveys, testing, air monitoring and project management and contractors performing asbestos/lead repair or abatement.
  - b) EHS will establish and maintain the necessary contracts for these services through Campus Purchasing with appropriate input from Facilities Planning and Management.
  - c) Campus units that may have a need for these services are to contact KU-EHS to make arrangements.
- 3) No University personnel (faculty, staff, or students), visitors or outside contractors shall engage in any job, project, task, or activity which may disturb known or suspect asbestos or lead based paint containing material without first having prior review and approval from KU-EHS.
  - a) Prior to conducting any activity that may disturb known or suspect asbestos or lead based paint containing material, the responsible unit/person shall contact EHS to notify of the desired activity and obtain EHS review/approval.
  - b) EHS will collect/review the necessary data, which may include conducting surveys to collect samples of suspect asbestos/lead for analytical testing. EHS will determine/assess the potential risk of disturbance to asbestos/lead materials by the activity. EHS will develop and implement, with the conference of the responsible unit/person, a protective action plan to prevent/minimize disturbance of asbestos or lead based paint containing materials by the activity, or have the materials abated prior to the desired activity.

4) Only appropriately trained/certified EHS personnel and/or EHS contracted asbestos abatement personnel will be allowed to disturb, repair, or abate **FRIABLE** asbestos containing material on the KU-Lawrence campus.

5) Only appropriately trained/certified EHS personnel and/or EHS contracted asbestos abatement personnel and/or EHS trained campus maintenance personnel with prior EHS review and approval will be allowed to disturb, repair, or remove **NON-FRIABLE** asbestos containing material on the KU-Lawrence campus.

6) Only appropriately trained/certified EHS personnel and/or EHS contracted lead abatement personnel will be allowed to **ABATE** lead based paint containing material on the KU-Lawrence campus.

7) Only appropriately trained and certified personnel (construction, contractor or campus maintenance personnel) with prior EHS review and approval may be allowed to **DISTURB** lead based paint containing material on the KU-Lawrence campus.

8) Activities being conducted through Design & Construction Management under the campus PPMR process.

a) This covers any/all building construction, renovation, addition, remodeling, repair, exterior work or infrastructure improvement projects that are planned, designed, managed and constructed through Facilities Planning and Management, Design & Construction Management (DCM) services unit.

b) Any/all PPMR activities being conducted that may disturb known or suspect asbestos or lead based paint containing materials shall have prior review and approval by KU-EHS. During the feasibility study stage, responsible DCM person shall contact EHS to notify of project intent. EHS will provide a "best-cost" estimate based upon the desired scope of the project and information available. If/when the PPMR project is approved/funded, and then during project design, the EHS cost estimate and protective action plan shall be re-evaluated and further refined as the scope of the project is finalized.

c) Activities being conducted under the PPMR process shall pay for any/all asbestos/lead cost associated with the project. Asbestos/lead services rendered by EHS to the PPMR project will be billed on a time and materials basis. EHS will prepare and submit an invoice to the identified DCM project/construction manager for payment from the PPMR project budget. Asbestos/lead services rendered through EHS by an outside consultant or contractor to the PPMR project will be billed in accordance with established contracts. Outside consultant or abatement contractor will submit invoice to EHS. EHS will review for accuracy and ensure that other necessary project documentation has been received from consultant/contractor before further payment processing. Once complete, consultant/contractor invoice will be forwarded to the identified DCM project/construction manager for further payment processing against the PPMR project budget.

## 9) Client Discretionary Projects conducted by Facilities Operations

- a) This covers replacement/repair of facility components and/or building modifications that do not require licensed professional design through DCM that are initiated by clients (campus units) through the FO work order process and implemented by FO.
- b) Any/all Client Discretionary project activities being conducted by Facilities Operations that may disturb known or suspect asbestos or lead based paint containing materials shall have prior review and approval by KU-EHS. During the planning phase of the FO-CD project and prior to implementation, the responsible FO person shall contact KU-EHS to obtain prior review/approval.
- c) Client Discretionary Projects being implemented by Facilities Operations will be expected to pay for any/all asbestos/lead cost associated with the project. Asbestos/lead services rendered by EHS to the FO-CD project will be billed on a time and materials basis. EHS will prepare and submit an invoice to the identified unit/client representative for payment from the CD project budget or other unit/client funds. Asbestos/lead services rendered through EHS by an outside consultant or contractor to the FO-CD project will be billed in accordance with established contracts. Outside consultant or abatement contractor will submit invoice to EHS. EHS will review for accuracy and ensure that other necessary project documentation has been received before further payment processing. Once complete, consultant/contractor invoice will be forwarded to the identified unit/client representative for further payment processing against the CD project budget or other unit/client funds.

## 10) Maintenance/Non-billable activities being conducted by Facilities Operations

- a) This covers daily operations and routine maintenance being conducted by Facilities Operations on campus facilities.
- b) Any/all daily/routine operations/maintenance activities being carried out by FO personnel that may disturb known or suspect asbestos or lead based paint containing materials shall have prior review and approval by KU-EHS. Responsible FO person shall contact KU-EHS prior to implementing the maintenance activity to obtain prior review/approval.
- c) Materials cost of asbestos/lead services rendered by EHS or the EHS contracted abatement contractor to the FO maintenance activity will be billed by EHS to the cost center established and funded by the Provost Office for covering asbestos/lead cost associated with FO maintenance activities.

11) Activities being conducted by Auxiliary and other campus units not previously identified.

- a) This covers discretionary construction, renovation, remodeling, and/or maintenance being conducted by Auxiliary and/or other campus units (i.e., Student Housing, Athletics, Unions, NTS, Research, Academic, etc.) not previously identified.
- b) Any/all activities being conducted by Auxiliary or other campus units that may disturb known or suspect asbestos or lead based paint containing materials shall have prior review and approval by KU-EHS. Responsible unit person shall contact KU-EHS prior to implementing the desired activity to obtain prior review/approval.
- c) Auxiliary and other campus units shall pay for any/all asbestos/lead cost associated with the project. Asbestos/lead services rendered by EHS to Auxiliary and other campus unit activities will be billed on a time and materials basis. EHS will prepare and submit an invoice to the identified unit responsible individual for payment. Asbestos/lead services rendered through EHS by an outside consultant or contractor to Auxiliary and other campus unit maintenance activities will be billed in accordance with established contracts. Outside consultant or abatement contractor will submit invoice to EHS. EHS will review for accuracy and ensure that other necessary project documentation has been received before further payment processing. Once complete, consultant/contractor invoice will be forwarded to the identified unit responsible individual for payment.

12) Emergency Situations

- a) This covers incidents that require immediate response by maintenance or other personnel to perform emergency maintenance or repair of failed or damaged mechanical or utility systems or facility components.
- b) If the emergency situation has caused damage to, or disturbed known or suspect asbestos or lead based paint containing materials, then responding personnel are to immediately contact KU-EHS.
  - i) While awaiting the arrival of KU-EHS, responding personnel shall take immediate measures to protect themselves from exposure to and limit spread of contamination from known or suspect asbestos or lead based paint containing materials. Action shall be taken to secure the emergency area from entry by unauthorized personnel.
  - ii) KU-EHS will perform and/or initiate response actions as appropriate. An attempt will be made to facilitate both the emergency maintenance/repair needs as well as the containment/cleanup of damaged asbestos/lead containing materials. However, priority will be given to addressing any situations that are immediately dangerous to life or health first.

c) No emergency maintenance or repair activity shall be conducted that may disturb known or suspect asbestos or lead based paint containing materials without prior review and approval by KU-EHS.

i) Responsible unit/person shall immediately contact KU-EHS prior to implementing the emergency maintenance/repair activity to obtain prior review/approval.

ii) KU-EHS will perform as much emergency cleanup, repair and/or removal as possible, within capabilities, to facilitate the desired emergency maintenance/repair activity. In some instances, it may be necessary to utilize the EHS on-call abatement contractor to facilitate emergency cleanup, repair or removal.

d) Any/all asbestos/lead cost associated with response to emergency situations by either KU-EHS or the utilization of the KU-EHS on-call abatement contractor shall be billed for recovery in accordance with direction provided by the Provost Office (Vice Provost of Administration and Finance).