



Harvard University

Asbestos Management Policy

October 1, 1990

1. Introduction

Asbestos containing materials (ACM) were used widely as construction and insulating materials in buildings from the 1940s through the late 1970s. In many Harvard University buildings, asbestos is present in the form of pipe, duct, and boiler insulation and in other construction materials such as floor tiles, fire proofing, and surface finishes. Asbestos containing materials are regulated by the Federal Government through the Environmental Protection Agency (EPA) and the Occupational Health and Safety Administration (OSHA) and by the Commonwealth of Massachusetts through the Departments of Public Health (DPH), Environmental Protection (DEP), and Labor and Industries (DLI). In terms of employee and environmental protection, while asbestos is a serious health and safety concern, currently available data and risk assessments indicate that properly managed, undamaged asbestos containing materials in buildings do not present a significant health risk to building occupants. Therefore, Harvard University's policies regarding asbestos focus on providing comprehensive and effective management rather than total removal.

2. Responsibilities

Each school and administrative department is responsible for management of asbestos containing materials in accordance with the overall policies of the University, including notification to the Massachusetts Department of Environmental Protection of planned removal or unanticipated release of asbestos. In support of the schools and departments, Harvard University provides central resources through the Departments of Environmental Health and Safety (EHS) and Facilities Maintenance (FM) for technical and professional services in all aspects of asbestos management. The Department of Environmental Health and Safety is responsible for being aware of all University asbestos abatement activities and represents the University on matters of regulatory compliance. EHS provides technical oversight, specifications, and recommended procedures as requested by the schools and departments and maintains a record of all asbestos abatement projects conducted by the University. In support of these responsibilities, each school and administrative department will notify EHS when asbestos abatement projects are initiated.

Effective management of asbestos containing materials may include the following approaches, depending on the nature of the material, its condition, and potential for exposure, ACM that is in a safe condition and does not present a danger to students, staff, and/or faculty may be left in place. For ACM that presents a potential for exposure, one or more of the following remedial actions may be appropriate:

- a). Removal and secure disposal of asbestos containing materials
- b). Enclosure and encapsulation of asbestos containing materials
- c). Restricted access and isolation of non-public areas where ACM may be present

3. University Policies

Harvard University is committed to protecting the health and safety of its students, faculty, and staff from unsafe exposure to asbestos. The University and its individual schools and departments will comply with applicable laws and regulations concerning asbestos containing materials. In support of this policy, the following principles will guide the schools and departments in the management of asbestos at Harvard University:

- a). Suspected asbestos problems will be promptly investigated and appropriate action taken to protect the safety and health of the University community. Abatement procedures and activities should be fully documented and appropriately recorded by EHS.
- b). Where required, abatement of asbestos may include removal, encapsulation, enclosure, or other forms of isolation and security to properly protect health and safety.
- c). Protection of service workers with the potential for exposure to asbestos containing materials through their duties is a University priority. Employees and contractors engaged in service work that may result in exposure to asbestos containing materials shall be properly trained in asbestos awareness. When working in areas where asbestos exposure is a potential hazard, service employees shall be provided with appropriate protective equipment.
- d). Asbestos abatement projects and disposal of asbestos containing materials shall be performed by qualified University or contractor personnel in accordance with established laws and regulations.
- e). Communication with occupants of University buildings is an important element in effective asbestos management. Students, faculty and staff should be provided timely and accurate information about asbestos and asbestos abatement activities that may affect them.