

Liberty University/Liberty Christian Academy Procedures, Policies, and Summary of Operations and Maintenance Plan for Managing Asbestos- Containing Materials



Purpose:

In order to prevent harmful exposures to asbestos, and to ensure compliance with all local, state, and federal regulations, including OSHA 29 CFR 1926.1101, OSHA 29 CFR 1910.1001, EPA 40 CFR 61, EPA 40 CFR 762, EPA 40 CFR 762 & 763, the Virginia Administrative Code and the Virginia Department of Professional and Occupational Regulation, Liberty University has created this Program.

Program Summary:

Asbestos Containing Material (ACM) within Liberty University buildings must be properly managed. Any University building constructed prior to 1988 may contain ACM. Many building materials must be presumed to contain asbestos until properly tested and proven asbestos-free.

The exercise of due diligence (as noted in the OSHA asbestos standards) requires that, where a building owner knows or should have known that materials other than Presumed (Potentially) Asbestos-Containing Materials (PACM) are asbestos-containing, these materials must be treated as Asbestos-Containing Materials (ACM) until proven otherwise. A building constructed prior to 1981 could contain both PACM and suspect ACM. **Newer buildings (constructed after 1980) would contain only suspect ACM that would also require testing prior to any renovation or demolition**

LU Environmental Health & Safety (LU EHS) manages ALL aspects of asbestos compliance for LU. This includes maintenance of records, including past ACM inspections within LU buildings and all past abatement/repair activities. Furthermore, LU EHS manages all asbestos sampling and air monitoring and provides regulatory and safety oversight of all abatement for the university as of April 1, 2022.

Additionally, EHS provides asbestos awareness training classes to maintenance, custodial and any other departments that have the potential to come in contact with presumed, suspected, and actual ACM to inform them of the dangers of ACM, help them to recognize suspected ACM, and instruct them on how to report damaged ACM, where necessary.

To prevent accidental disturbance of ACM, which could lead to airborne asbestos hazards, LU EHS performs inspections prior to maintenance, renovations, or demolition projects to determine what materials contain asbestos. Disturbance of these identified ACM must either be avoided during the project, or the ACM properly removed or repaired prior to the project initiation. If ACM abatement or repairs are necessary, LU EHS will provide oversight of the removal of ACM by the EHS approved contractor providing abatement or repair services. The acquisition of services for an abatement contractor will be handled by the LU project management team overseeing all aspects of the project. Furthermore, LU EHS will employ a separate third-party consultant to conduct air monitoring and/or clearance sampling.

Policy:

Liberty University has a Policy for the Management of Asbestos-Containing and/or Lead-Containing Materials in University Facilities that is a separate document. It is included in this document as Appendix A.

Definition of Terms:

ACM Abatement Project: The removal of ACM by a State Licensed Asbestos Abatement Contractor with Licensed Abatement Workers and Supervisors using methods specified by a State Licensed Asbestos Abatement Project Designer.

ACM Abatement Project Monitoring: Daily inspections of asbestos abatement activities conducted by a State Licensed Abatement Project Monitor, that include confirming integrity of work site enclosures, abatement equipment, worker credentials, regulatory and specifications compliance, and taking air samples during and

after abatement to ensure a healthy environment for Liberty University faculty, staff, and students and/or future occupants of the area(s) involved.

ACM Inspection: Inspection of a building or portion of a building by a State Licensed Asbestos Inspector for ACM, which includes taking samples of suspected ACM, the analysis of these samples by a State Licensed Asbestos Analytical Laboratory using Polarized Light Microscopy (PLM), and a report summarizing the types and locations of identified ACM.

ACM Management Plan: Plan developed by a State Licensed Asbestos Management Planner which describes how ACM will be properly managed in-place, while ensuring the safety of building occupants, visitors, and maintenance/custodial personnel, until such materials can be properly removed.

Asbestos: Asbestos is a widely used, mineral-based fibrous material that is resistant to heat and corrosive chemicals. Depending on the chemical composition, fibers may range in texture from coarse to silky. The properties which make asbestos fibers so valuable to industry are its high tensile strength, flexibility, heat and chemical resistance, and good frictional properties.

Asbestos-Containing Materials (ACM): Materials that contain greater than 1% asbestos by laboratory polarized light microscopy (PLM) analysis.

Class IV: 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. This may include dusting surfaces where ACM waste and debris and accompanying dust exists and cleaning up loose ACM or PACM debris from thermal system insulation or surfacing ACM/PACM following construction activity.

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 (1f/cc) as averaged over a sampling period of thirty (30) minutes.

Friable ACM: ACM, which when dry, in whole or in part, can be crumbled, pulverized, or reduced to a powder by hand pressure, and when disturbed, readily releases asbestos fibers into the air.

OSHA: Occupational Safety and Health Administration

PACM: Presumed (Potentially) Asbestos-Containing Material

Project Manager: Liberty University representative who may be the Facilities Management Project Manager, Maintenance Superintendent, Cost Center Manager, or other person who either oversees, plans, supervises or arranges for a maintenance, construction, renovations, or demolition projects within Liberty University facilities.

Procedures:

In an effort to protect all personnel the following procedures must be followed in buildings constructed prior to 1988:

1. Prior to any maintenance, renovation or demolition project that could disturb building materials or involve work in areas where ACM may be present, the Project Manager (PM) shall first contact LU EHS to request a hazardous materials inspection. A representative from LU EHS shall discuss the project scope with the PM and review past inspection records. If the area(s) in question has already been inspected, a copy of the report shall be sent to the PM. If an inspection is needed, the PM shall meet an LU EHS representative on site and provide a floor plan which specifies the area(s) and scope of work involved with the project.

The LU EHS representative will assess the work to be performed and manage the inspection of the materials by an independent consultant. The consultant will take samples where necessary and submit

them to a laboratory for analysis. Once the results are received, LU EHS will send a report to the PM detailing types and locations of the identified ACM or notify the PM that the area is free of asbestos or lead.

2. Unless LU EHS determines the identified ACM is in stable condition and will not be disturbed by the planned project, the ACM must either be properly repaired or abated/removed prior to the project starting. All ACM repair, encapsulation, or abatement activities must have LU EHS oversight. The abatement contractor must provide EHS copies of their State License and provide proof of EPA/AHERA or board-approved accredited asbestos worker or supervisor training for all employees who will be working on the abatement project prior to being authorized to perform work. This is required each and every time the contractor performs work for LU. When required abatement projects/activity will be monitored by a separate third-party consultant which will be acquired by the EHS department. Additionally, when required a third-party consultant will perform air monitoring and/or clearance sampling. This will also be handled and procured by the EHS department. The PM must contact LU EHS well in advance of a planned asbestos abatement/repair activity, to schedule the abatement monitoring, and/or air sampling work. The facilities management or planning and construction project manager will have full project management responsibilities for the project including the acquisition of the abatement contractor, the scheduling of the abatement project and the overall management of the project. EHS provides safety and regulatory oversight and will only intervene if there is a safety or compliance issue.
3. LU EHS will provide OSHA-required Asbestos Awareness training to all maintenance and custodial staff who work in LU buildings constructed before 1988. Such training shall consist of a 2-hour initial course presented during the employee's first year of employment, and an update course each year thereafter. Attendees of these courses are trained in ACM recognition, regulations, health effects, personal protection, and this policy. This training will consist of instruction provided directly by LU EHS personnel, a third-party contractor or through e-learning.
4. Each department will be responsible for ensuring that employees are scheduled for their initial training as well as for all subsequent annual trainings.

Liberty University Asbestos Operations & Maintenance Plan Summary with Modifications

Introduction

Asbestos fibers can be carried into the body as airborne particles. These fibers can then become embedded in the tissues of the lung and digestive system. Once the fibers become trapped in the lung's alveoli (air sacs), they cannot be removed. Years of exposure to asbestos has caused a number of disabling and fatal diseases. Among these are asbestosis, an emphysema-like condition; lung cancer; mesothelioma, a cancerous tumor that spreads rapidly in the cells of membranes covering the lungs and body organs; and gastrointestinal cancer, which is caused by ingesting asbestos contaminated food. Recognizing the danger of asbestos levels in the workplace, the Occupational Safety and Health Administration developed a more protective regulation that reduces the permissible exposure limit and prescribes a separate standard for general industry and for construction.

The principal objective of the Asbestos O & M Program is to minimize the exposure of building occupants, maintenance, and custodial personnel to airborne asbestos fibers by:

- The survey and periodic reassessment of all suspect and known asbestos-containing materials (ACM) to monitor the condition of ACM and ensure that ACM is maintained in an undamaged non-hazardous condition.
- Training individuals who may encounter ACM during their normal work activities.
- Having procedures that will allow renovation, construction, or emergency maintenance to be performed safely.

This program has been designed to comply with applicable state and federal regulations pertaining to asbestos.

****Note that this document is only a summary of the Operations and Maintenance (O&M) Program for Asbestos-Containing Materials which includes modifications to include the role of the LU Environmental Health & Safety department in the oversight of ACBM. For sampling locations and ACM identification please refer to the full O&M plan created by NLSEC, LLC in August of 2007 as well as the August 2007 Asbestos-Containing Building Materials Survey and Assessment and subsequent testing in the maintaining of the O&M Program. These are available for viewing at the office of Environmental Health & Safety. *Moving forward testing will be done on all materials identified in the 2007 survey as non-asbestos prior to disturbing or renovating those materials.***

Custodial and Maintenance Training

All maintenance and custodial staff who perform duties that contact but do not disturb ACM (OSHA Class IV work) shall receive Asbestos Awareness training on an annual basis. Training will include:

- Purpose of the Asbestos O&M Program
- Information regarding asbestos and its various uses and forms
- Information on the health effects associated with asbestos exposure
- Locations of asbestos-containing building material identified throughout each school building in which the employee works
- Recognition of damage, deterioration, and delimitation of asbestos-containing building material
- Recognition and response actions when identifying ACM or suspect ACM damage and deterioration
- Proper response to accidental fiber release episodes
- Name and telephone number of the person designated to carry out general local education agency responsibilities under 40 CFR 763.84 and the availability and location of the management plan

This training is detailed in 40 CFR 763.92(a)(1). EPA specifies that this training is to be (2) hours in length.

Inspector, Management Planner, Supervisor, Designer, and Project Monitor Training Qualifications

Personnel who sample suspect ACM, conduct building inspections, perform condition assessments, make recommendations for removal procedures or who monitor asbestos projects shall meet the minimum qualifications for Asbestos Inspector, Project Monitor, Project Designer and/or Asbestos Supervisor as established by the DPOR as applicable, and shall meet the definition of "competent person" as defined by the EPA.

Building Maintenance and Custodial Supervisors

Preventative maintenance personnel and custodial supervisors should coordinate with LU EHS to assure they know the location of all suspect and known ACM in the buildings for which they are responsible.

Request for Sampling of Suspect ACM or PACM

It is the mandate of the Virginia Department of Labor and Industry and Liberty University, that no demolition, renovation, alteration of a building material, or maintenance activity will occur that has not been reviewed either for the possibility of contact with, or disruption of, ACM, or the presence of damaged or deteriorated ACM in the work area. It is Liberty University policy that anything that falls in these categories will be assessed by LU EHS to determine what needs to be done.

Each department performing the following types of activities must follow this program to assure all suspect asbestos materials that may be disturbed are identified and removed using approved procedures or that proper precautions are taken to avoid the material:

- Conduct maintenance, renovation, or repair activities
- Conduct work in known asbestos containing work environments.
- Work with ACM during machinery repair (for example, during the replacement of asbestos brake shoes or clutch pads)
- Conduct any work or operation that potentially impacts ACM.

All suspect asbestos materials must be analyzed, and asbestos abatement or repair and air monitoring activities must be coordinated through the Environmental Health & Safety department, which will assure this information is maintained in a centralized repository.

Regulated Areas

The employer must establish a regulated area for those areas where airborne concentrations of asbestos exceed the permissible exposure limit (PEL).

- Only authorized personnel may enter regulated areas and they must use a respirator and wear protective clothing.
- No smoking, eating, drinking, chewing tobacco or gum, or applying cosmetics is permitted in regulated areas.
- Warning signs must be displayed at each regulated area and must be posted at all approaches to regulated areas. The employer must ensure that employees working in, and contiguous to, regulated areas comprehend the warning signs. Means to ensure employee comprehension may include the use of foreign languages, pictographs, and graphics. These signs must bear the following information:

Danger

Asbestos

Cancer and Lung Disease Hazard

Authorized Personnel Only

Respirators and Protective Clothing Are Required in this Area

- Warning labels must be placed on all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers. The label must include the following information:

Danger

Contains Asbestos Fibers
Avoid Creating Dust
Cancer and Lung Disease Hazard

Signs and labeling of ACM

LU EHS will maintain a labeling program to identify known ACM in university buildings and university owned buildings. The number and location of these signs or labels shall be sufficient to clearly identify ACM in routine maintenance areas. Labels shall conform to current OSHA Asbestos standards.

New non-asbestos thermal system insulation (TSI) shall be labeled as either "Asbestos Free" or "Non-asbestos" by the installer. If the non-asbestos product is installed in-line with existing ACM (for example, on the same run of pipe), then the boundary between ACM and non-ACM shall be clearly delineated. **Safety Data Sheets must be provided to LU EHS for all new building materials installed in buildings.**

Signs or labels will be substituted by employee training and the distribution of records in accordance with this program for some types of ACM. These types include asbestos-containing floor tile and linoleum, asbestos-cement ceiling tile and ductwork, and other types of non-friable ACM maintained in good condition and repair.

Reasonable precautions shall be taken to ensure that labels remain visible. During painting or other operations where labels will be hidden or covered, existing labels shall either be removed and new labels affixed after painting, or existing labels shall be otherwise protected. If labels are removed the department that removed the labels are responsible for putting new labels back in the same locations found.

Access to contaminated building areas may be restricted by limiting the availability of keys to these areas to personnel with appropriate asbestos-related training, who will enter only under the supervision and/or direction of LU EHS personnel.

Contractor Awareness Program

All General Contractors will ensure that all sub-contractors shall be informed of construction projects containing ACM and of the location of suspect and known ACM in the work area to which they are assigned. Contractors shall, under no circumstances, damage or disturb suspect or known ACM unless they are a licensed Asbestos Abatement Contractor and have been specifically employed to perform asbestos removal.

The general contractor shall provide sub-contractors with a copy of the asbestos inspection report specific to their work and the materials that are not to be disturbed.

The university project manager shall caution contractors that they shall not proceed with any change in work that requires that a material be disturbed that the inspection report shows has not been previously tested (e.g., "suspect" ACM). If a change in the scope of work becomes necessary, a new request shall be submitted to the project manager who will then submit it to LU EHS.

It will be the responsibility of the general contractor to provide their own asbestos awareness program that complies with OSHA requirements.

Building Surveys, Inspections, and Condition Assessments

Building inspections for the presence and condition of ACM shall be performed in accordance with the asbestos survey standard for buildings to be renovated or demolished as promulgated by the Environmental Protection Agency's National Emission Standards for Hazardous Air Pollutants and enforced by the Department of Labor and Industry (DOLI). **Buildings built after January 1, 1978, shall not be exempted**

unless suitable documentation can be obtained that certifies that installed materials are asbestos free. A copy of the current survey standard may be obtained by contacting LU EHS.

Reassessment of ACM and Suspect ACM

Facilities Management shall assure that the condition of all known or suspect ACM is periodically assessed as required. Any change in material condition shall be noted during this inspection and, if necessary, the relative hazard posed to building occupants by this material shall be assessed. A complete record of these assessments shall be provided to the LU Environmental Health & Safety department. **All abatement activities and air monitoring must be scheduled by and through LU EHS.**

Construction Projects

LU Planning & Construction or Facilities Management Design and Renovations will contact LU EHS prior to any work being performed in areas where there is ACM or PACM. LU EHS will then secure the services of a licensed Asbestos Inspector to collect samples of suspect ACM that will be damaged or disturbed by the proposed work. The inspecting agency shall prepare an inspection report in accordance with the survey standards detailed herein. The report shall include an assessment of damaged or deteriorated ACM in the work area as well as ACM in other building areas that may be damaged or disturbed by the proposed work (e.g., through traffic, construction induced vibration, and so forth). The inspecting agency shall be provided access to LU EHS records and sampling data for the building(s) in question.

Exposure Monitoring

OSHA issued a revision to the standard which became effective October 11, 1994. The rule requires employers to ensure that employee exposure to an airborne concentration of asbestos does not exceed 0.1 fiber per cubic centimeter of air as an eight (8) hour time-weighted average (TWA). The employer must also 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; this is the **excursion limit**. If these levels are exceeded, employers must begin compliance activities such as air monitoring, employee training, and medical surveillance.

LU EHS will schedule all personal air monitoring and project clearance sampling as needed or required. All air sample results must be provided to LU EHS. Once received and reviewed LU EHS will notify appropriate parties so work can proceed. Historic sampling data may only be used if previous samples were taken during an asbestos project involving similar material types under similar material and environmental conditions.

A copy of personal air sampling results shall be submitted to the employee for which the samples were secured within 15 days of receipt from the laboratory.

Asbestos abatement contractors shall be responsible for securing air samples for their own personnel to meet the requirements of 29 CFR 1926.1101.

Air Sampling during Asbestos Projects

A licensed Project Monitor is required for all asbestos abatement projects performed in buildings that are occupied or intended to be occupied upon completion of the asbestos project, and the removal exceeds 260 linear feet, 160 square feet, or 35 cubic feet of ACM. The project monitor shall secure baseline (e.g., background) air samples before the start of the project, if necessary, and shall secure air samples outside of the work area during the project. The project monitor will, in addition, perform a final visual inspection and will secure final clearance air samples using aggressive air sampling techniques (if required) as outlined in 2.1-526.14:1 of the Code of Virginia.

The work area will be considered safe for re-occupancy if all final clearance air samples are less than 0.01 fibers per cubic centimeter (f/cc) of air sampled as determined by Phase Contrast Microscopy (PCM).

Aggressive air sampling will not be performed if the work area is not contained and is not under negative pressure.

In the event that baseline air samples indicate that the background particulate load will not allow the use of PCM for analysis of final clearance air samples, and if it is not possible to establish a clean source of make-up air to the work area, then final clearance samples shall be analyzed using Transmission Electron Microscopy (TEM) in accordance with 40 CFR, Part 763.

Management

The university's O&M program will be administered by the Asbestos Program Manager with the Environmental Health & Safety department and assigned personnel from that department. As part of the management process LU EHS will keep records documenting locations of all ACM materials, all abated ACM and all new non-asbestos containing thermal system insulation. Files, reports, studies, assessments, inspection records, removal project records, disposal manifests, training records or other documentation pertaining to asbestos-related activities will be managed and maintained by LU EHS as part of the management process.

APPENDIX A

Liberty University Policy for the Management of Asbestos-Containing and/or Lead-Containing Materials in University Facilities

PURPOSE & SCOPE

Liberty University is committed to providing a safe and healthful work environment for our entire LU community. In pursuit of this endeavor, this policy and its procedures are intended to protect the University community from harmful exposures to asbestos-containing and/or lead-containing materials during renovation, maintenance, and demolition activities in university facilities.

POLICY Summary

Asbestos-Containing and Lead-Containing Materials within Liberty University buildings must be properly managed. To ensure continuity and compliance with regulations all work involving renovation, maintenance, and demolition of materials must be reviewed, coordinated, managed, and approved through Environmental Health & Safety (EHS) to determine if materials need to be tested and/or abated due to health hazards prior to beginning work on building materials.

APPLICATION, IMPLEMENTATION AND RESPONSIBILITIES

The Asbestos Operations and Maintenance Program is administered by Environmental Health & Safety. Environmental Health & Safety will provide technical support, employee exposure investigations, and oversight for this program. However, involvement by EHS does not relieve the departments, supervisors, or contractors of their responsibilities for this program.

Liberty University will comply with all federal, state, and local regulations that apply to the handling and disposal of asbestos-containing materials and lead-containing materials in any University facility. Project Managers are required to contact the Department of Environmental Health & Safety (EHS) under the Office of Security & Public Safety prior to renovation, maintenance, and demolition projects for the purpose of identifying the presence of asbestos or lead in work areas. **In accordance with the Environmental Protection Agency and the Department of Labor & Industry, Prior to the renovation or demolition of building materials, there must be an inspection for suspect ACM regardless of the age of the building.**

Project drawings and detailed work specifications must be submitted to the EHS department for review. This review will determine if there is the potential of disturbing any asbestos-containing or lead-containing materials. EHS will then review existing records to determine if asbestos-containing materials or presumed asbestos-containing materials or lead-containing materials have been identified in the proposed work area. Additionally, EHS will examine the area to be renovated or demolished and determine what steps need to be taken if any.

If EHS determines testing is needed, EHS will contract the appropriate licensed consulting firm to perform testing. If abatement is necessary, then a licensed abatement company will be contracted through **the Liberty Department conducting the work and must be approved by EHS in order** to remove asbestos-containing materials or lead-containing materials and a licensed consultant will be contracted by the **EHS department to provide abatement monitoring and appropriate air sampling** when required. EHS in conjunction with the project

manager for the LU department conducting the work will ensure all notifications required by regulations will be completed by the contractor.

The EHS team member handling the project will work closely with the LU Department Project Manager to communicate timelines and do, to the best of their ability keep the project within specified deadlines. However, under no circumstances will testing and or abatement be compromised to meet a project deadline. All testing and abatement will be done in accordance with local, state, and federal regulations. If the scope of work changes during renovation, then the project manager must contact LU EHS before proceeding so that EHS can determine if any further testing needs to be done.

[Note: This policy applies to all University buildings. Any asbestos-containing materials that are encapsulated or not friable and in good condition and will not be disturbed, do not pose a health hazard.]

If any department has questions or concerns regarding this policy or concerns regarding potential asbestos or lead containing materials, please contact the LU EHS office at 434-582-3389 or at lusafety@liberty.edu.

ENFORCEMENT

Failure to follow this policy and procedures can potentially result in exposures of staff, faculty, and students that could be harmful to their health or cause life threatening diseases such as asbestosis, lung cancer, mesothelioma, or lead poisoning. Project managers and their leaders are responsible for ensuring compliance with this policy. Proceeding with the demolition, renovation, encapsulation, or disturbance of building materials without the assessment by LU EHS could put members of the LU community at risk. Therefore, **Failure to follow the policy and procedures can result in disciplinary action up to and including discharge.**

In addition, non-compliance with:

- asbestos inspections may be subject to enforcement and penalties as defined by Code of Virginia § 40.1-51.22 and § 40.1-51.39.
- asbestos or lead OSHA requirements may be subject to enforcement and penalties as defined by the US DOL Federal Civil Penalties.
- the EPA's NESHAPS and RRP regulations may be subject to enforcement and penalties as defined by Section 409 of TSCA and civil penalties can be assessed pursuant to Section 16 of TSCA.

This policy is available for review and for duplication to share with personnel in departments by going to the [LU EHS website](#) under Policies, Programs & SOP's.

Additionally, this policy can be found in Appendix A of the Liberty University/Liberty Christian Academy Procedures and Summary of Operations and Maintenance Plan for Managing Asbestos-Containing Materials.

**Liberty University/Liberty Christian Academy
Procedures, Policies, and Summary of Operations
and Maintenance Plan for Managing Asbestos-Containing Materials
Acknowledgement**

I hereby acknowledge receipt of the Liberty University and Liberty Christian Academy Procedures and Summary of Operations and Maintenance Plan for Managing Asbestos-Containing Materials.

I also certify that I have had an opportunity to read and become familiar with the terms and conditions of these Procedures and Maintenance Plan and agree to abide by the procedures as set forth. I understand that the full Asbestos Operations and Maintenance Plan is available for viewing at the Environmental Health & Safety Office. I understand and agree that the University reserves the right to amend, alter, or abolish any or all of the terms of these procedures and maintenance plan as circumstances warrant with or without advance notice, and as prescribed by law.

I understand that these Procedures, Policies and Maintenance Plan now replaces and supersedes any previous verbal or written policies, understandings, or agreements concerning the Liberty University Management of Asbestos-Containing Materials and conditions therein.

Nothing in these Procedures and Maintenance Plan or Acknowledgement is intended to set forth either expressed or implied contractual obligations of the University. I understand that I am an employee at-will with Liberty University; and as such, that we each remain free to terminate the employment relationship with or without advance notice for any reason or for no reason at all.

I understand these Procedures, Policies, and Maintenance Plan will be used in conjunction with any other policies or regulations specific to the performance of my job, if any. These include but are not limited to regulations under the U.S. Department of Transportation (DOT) and Federal Motor Carrier Safety Regulations (FMCSR) as periodically updated, Policies such as the Liberty University Vehicle Safety Policy and other policies under specific Departmental Standard Operating Procedures, and job descriptions. I have read the Procedures, Policies, and Operation and Maintenance Plan for Managing Asbestos-Containing Materials.

Signature

Date

Print Name

Signed copies of this form must be submitted to EHS and copies maintained by the department for the duration of the employee's employment.

Liberty University/Liberty Christian Academy Procedures and Summary of Operations and Maintenance Plan for Managing Asbestos- Containing Materials

REVISION TRACKING

Revision Number	Revision Description	Revision Location	Date Originated/Revised	Policy Author Revisor Reviewer	Policy Approvers
Original	Original		2016	Greg Bennett	
01	Rewrite of Program to follow new format standard for Standards/SOP's from Environmental Health & Safety and did a full update revision.	Throughout	August 30, 2021 January 28, 2022 April 14, 2022	Bob Drane Greg Bennett Dana Burgess	Greg Bennett John Peterson Ronald Sloan
02	Further clarification of who handles and pays for sampling, abatement, and air monitoring	Throughout	August 29. 2022	Greg Bennett	Greg Bennett John Peterson Ronald Sloan