

Appendix P: TACM Contractor Quick Guide

This quick guide was created to assist contractors with CMU requirements for performing work on trace asbestos containing materials (TACM) on CMU property. TACM includes all materials that have been confirmed to contain $>0\%$ and $\leq 1\%$ asbestos.

Licensed asbestos abatement contractors will be required to follow this Quick Guide to the extent noted throughout.

The information found herein is meant to supplement information in the Asbestos Management Program (AMP). Please reference the [Asbestos Management Program](#) for full details and contact EHS at safety@andrew.cmu.edu or 412-268-8182 for additional guidance.

1. Receive EHS approval to perform TACM work

Approval must be obtained by contractors before performing TACM work on CMU property for the first time. To receive approval, each contractor must submit to EHS via safety@andrew.cmu.edu their TACM work program that establishes compliance with relevant components of the OSHA Asbestos Construction Standard (1926.1101), including but not limited to:

- Practices for handling TACM and subsequent worker protection, which should include processes and procedures, as needed, for:
 - o Negative exposure assessments and employee exposure monitoring
 - o Written Respiratory Protection Program and respirator specifications for TACM work
 - o Medical monitoring requirements
 - o Engineering controls and work practices, such as:
 - Utilization of tools equipped with HEPA vacuums, wet methods, drop cloths, methods for dust control, etc.
 - Prohibition of: dry sweeping, utilization of compressed air to remove asbestos materials, employee rotation as a means to reduce exposure to airborne asbestos fibers, etc.
 - Waste handling and disposal—prompt clean-up, sealing of all waste into sealed, leak-tight bags, and appropriate disposal of waste.
 - Demonstrated competency to construct containment areas out of poly sheeting to prevent migration of dust.

The contractor must also submit to EHS “Attachment #1: Contractor Acknowledgement of CMU Expectations TACM Work on CMU Property,” which can be found at the end of this Quick Guide.

Additional notes:

- It is not necessary for a contractor to wait to be awarded work involving TACM before seeking EHS approval to perform such work. Approval may be granted to a contractor at any time in anticipation of the potential need to perform work on TACM.
- Licensed asbestos abatement contractors are not required to submit a TACM program as described above, but must still be approved by EHS prior to working on campus for the first time. Contact EHS for more information.
- Licensed asbestos abatement contractors are required to submit a completed copy of Attachment #1, which can be found at the end of this Quick Guide.

2. Submit site-specific work plan and obtain EHS permit

This section details the permitting process for TACM work on CMU property conducted by approved TACM contractors and licensed asbestos abatement contractors. Only contractors who have been approved by EHS to perform TACM work on campus or approved licensed asbestos abatement contractors are permitted to request a TACM permit.

EHS must grant approval for all TACM work prior to its commencement. Notification to EHS must be made to safety@andrew.cmu.edu at least two business days prior to the proposed start date of work. However, it is highly suggested to submit notification as early as possible to prevent potential delays created by deficiencies found in the submission. Notification may be completed by the CMU work manager or a competent representative from the contractor.

For emergencies, as much of the below information should be supplied to safety@andrew.cmu.edu. The permitting process can be waived to ensure expediency of response actions. EHS will follow up as needed for additional information pertaining to the work and subsequent repair actions.

The following information that is specific to the TACM worksite must be supplied:

- Planned start and finish dates of TACM work
- TACM work location, including building name, room number, and any other relevant locational identifiers
- Name of CMU work manager
- Name of contractor performing TACM work
- Name and contact information for competent representative from the TACM contractor who can be reached regarding questions related to this submission and for questions that may arise during work or after its completion

- Detailed description of project-specific work practices that will be followed from work start to completion as it relates to the TACM work. This should include descriptions of the following:
 - o Daily work plans—describe in detail what work will occur each day including:
 - Types of tools and equipment to be utilized
 - Plans for posting signage of the TACM work area
 - Plans for protection of office supplies equipment and/or erection of containment, if needed
 - Plans for air monitoring, area and/or personal
 - Plans for responding to elevated air monitoring results, breaks in containment, or other issues that may feasibly arise
 - Supplemental drawings or photos of the work area, identifying where penetrations and/or demolition is planned to be conducted

Once notification is received by EHS, a review will be completed to ensure all appropriate actions are being taken to protect CMU personnel and property. If EHS has questions regarding the submission or identifies any deficiencies, EHS will reach out to the CMU work manager and the contact supplied in the notification for clarification or to rectify deficiencies. Once approved, EHS will supply a permit to the requestor for the duration of the proposed work date(s).

EHS must be notified via safety@andrew.cmu.edu if changes to any of the following occurs:

- Work date(s)
- Scope of work
- Method of removal (only if significantly different from what was originally proposed)

A summary of updates along with the original permit must be submitted to EHS at safety@andrew.cmu.edu before proceeding with work.

3. Submit work documentation

It is the responsibility of the contractor, including licensed asbestos abatement contractors, to ensure the documentation outlined below is supplied to the CMU work manager in a timely manner at the completion of work. Checklists are provided in Attachment #2 at the end of this quick guide and are intended to be completed by the contractor and submitted along with the listed documentation.

The following documentation is required for work disturbing >100 sf or 100 linear feet of TACM.

- If different from the original description submitted for permitting: a written

description of the work performed (i.e. exact description of where wall penetrations were made, what walls were removed, etc.). Drawings/sketches may be utilized for additional illustration.

- Identification of any unusual issues or problems related to the project.
- Any other documents or materials produced by the contractor, such as on-site photographs, project drawings, notes, etc. (optional).

The following documentation is required for work disturbing ≤ 100 sf or 100 linear feet of TACM (this information may be generated by the work manager in lieu of the contractor).

- If different from the original description submitted for permitting: a written description of the work performed—i.e. exact description of where wall penetrations were made. Drawings/sketches may be utilized for additional illustration.
- Identification of any unusual issues or problems related to the work.
- Any other documents or materials produced by the contractor or work manager, such as on-site photographs, project drawings, notes, etc. (optional).

Attachment #1: Contractor Acknowledgement of CMU Expectations for TACM Work on CMU Property

By signing this form, you are acknowledging (insert contracting company's name)'s, herein referred to "the contractor," capability and agreement to comply with the below CMU requirements for performing TACM work on CMU property.

It is CMUs expectation that the contractor will protect their own employee's and property and personnel of the university by complying with the contents of the contractor's own TACM program. TACM program contents must be compliant with all relevant components of the Occupational Safety and Health Administration's (OSHA) Asbestos Standard for Construction (1926.1101). Additionally, CMU expects the contractor to comply with the following while performing work that impacts TACM on CMU property:

- At no time should the contractor perform work on ACM, including ACM debris, PACM, and suspect ACM, unless an appropriately licensed asbestos abatement contractor.
- All work must be performed in a manner that reduces creation of dust and uses wet methods. Where wet methods are infeasible for safety concerns (e.g. around electrical equipment), equipment outfitted with local, HEPA filtration must be utilized.
- Regardless if wet methods are used, it is preferred that all power equipment utilized to cut, drill or otherwise impact TACM be outfitted with local, HEPA filtration. Equipment that is not fitted with HEPA filtration must be utilized in conjunction with a HEPA vacuum to catch any falling dust or debris directly from the area being worked on.
- The following activities are prohibited:
 - o Dry sweeping of TACM and its debris
 - o Use of compressed air to remove TACM
 - o Use of high-speed abrasive disc saws that are not equipped with HEPA filtration
- All materials (e.g. desks, shelves, chairs, rugs, etc.) within a work space that may be impacted by the TACM work must be removed from the space or sufficiently protected with plastic sheeting/tarps prior to commencing work to prevent unwanted dust, water, etc. from settling on them.
It will be the responsibility of the CMU space owner to coordinate removal of electronics or other sensitive items from the space, as needed, prior to the start of work.
- All waste generated from work must be promptly cleaned up by wetting the waste, double-bagging it and sealing the bag shut so that it is leak tight. No

waste is permitted to be removed from the work site until it has been bagged and sealed shut as described.

- Signage must be placed surrounding the work area that identifies TACM work is being performed. Only approved TACM contractors and authorized CMU personnel are permitted to enter the immediate area of TACM work.
- A permit must be obtained from EHS prior to conducting TACM work (see section "TACM Work Permitting for Approved TACM Contractors" of the Contractor TACM Quick Guide).

Written Name

Company

Signature

Date

Attachment #2: Contractor's Report for TACM Work

This checklist should be completed and submitted by the contractor or work manager, where noted, along with the documentation listed below based on size of TACM disturbance.

Required documentation for work disturbing >100 sf or 100 linear feet of TACM:

- If different from the information supplied in the permit: a written description of the work performed (i.e. exact description of where wall penetrations were made, what walls were removed, etc.). Drawings/sketches may be utilized for additional illustration.
- Identification of any unusual issues or problems related to the project.
- Any other documents or materials produced by the contractor, such as on-site photographs, project drawings, notes, etc. (optional).

Required documentation for work disturbing \leq 100 sf or 100 linear feet of TACM (this information may be generated by the work manager in lieu of the contractor):

- If different from the information from the information supplied in the permit: a written description of the work performed—i.e. exact description of where wall penetrations were made. Drawings/sketches may be utilized for additional illustration.
- Identification of any unusual issues or problems related to the work.
- Any other documents or materials produced by the contractor or work manager, such as on-site photographs, project drawings, notes, etc. (optional).