

INTERNAL/DEPARTMENTAL POLICY AND PROCEDURE

TITLE: Harmful Substance Exposure Prevention Program

EFFECTIVE DATE: October 4, 2017

CANCELLATION: None

DIVISION: BUSINESS AND ADMINISTRATIVE AFFAIRS (BAA)

CATEGORY: Risk Management/Safety/Compliance (Y)

RESPONSIBLE DEPARTMENT: Risk Management, Safety, Compliance Office

PROCEDURES & SPECIFIC INFORMATION

1. **Purpose**

To promulgate the College's procedures for preventing exposure and mitigating potentially harmful substances on Delgado Community College campuses and sites.

2. **Scope and Applicability**

This policy applies to students, employees, visitors, and persons using College facilities.

3. **Responsibilities**

In accordance with the College's [Comprehensive Safety Program policy](#), Delgado is committed to providing a safe environment on all campuses and sites, and this policy is intended to mitigate risk of contact with potentially harmful substances. The Office of Facilities and Planning is responsible for managing environmental issues and has designated the College's Safety and Risk Manager responsibility to these oversee standing operating procedures. The responsibilities are outlined as follows:

A. *The Safety and Risk Manager:*

1. Oversees implementation of occupational and environmental rules and procedures relating to potentially harmful substances as part of a continuing prevention effort according to the College's [Work Environment Safety Program](#) policy.
2. Serves as the point of contact to ensure compliance with Louisiana Office of Risk Management, Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA), and the Louisiana Department of Environmental Quality (DEQ).
3. Provides harmful substance awareness information and training upon request.

- B. *The Office of Facilities and Planning:*
 - 1. Maintains the College's Harmful Substance Operation and Maintenance Plan, including periodic surveillance.
 - 2. Provides for a crew to conduct small scale removal as needed.
 - 3. Ensures that harmful substance removal workers, inspectors, and planners are trained and certified.
 - 4. Maintains all harmful substance and indoor air quality inspection documentation.
- C. *Building Coordinators* ensure that potential harmful substances are reported to the Safety and Risk Manager in a timely fashion.
- D. *Employees and Building Occupants:*
 - 1. Are responsible for fostering an awareness of potential harmful substances hazards.
 - 2. Report concerns of harmful substances immediately to their supervisors and the Safety and Risk Management Officer.
 - 3. Do not undertake a job or activity that may involve direct contact with a known harmful substance, such as asbestos.
 - 4. Have a right to view inspection documentation for their work area or location, which is available in the Office of Facilities and Planning.

4. **Asbestos Containing Material**

- A. The Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA) and subsequently the Louisiana Department of Environmental Quality (DEQ) have developed strict regulations regarding the use, removal, and disposal of asbestos and asbestos containing material.
- B. As a result of State of Louisiana surveys for asbestos containing materials, an Asbestos Management Plan has been established for each building on each campus and site. The Plan lists which materials are asbestos containing and which materials are not. As per EPA and Louisiana Department of Environmental Equality regulations, Delgado is mandated to "manage in place" asbestos containing materials until they are removed.
- C. "Manage in Place" by definition ensures that no asbestos containing materials are disturbed, except in the rare case when there is an emergency. The Safety and Risk Manager manages the maintenance, corrective actions and removal of asbestos containing materials on campus. Periodic surveillance inspections are held every six months, so that Delgado can be proactive in keeping the asbestos containing materials in good condition. The Plan is continually updated following any modifications.
- D. Removal and disposal of asbestos and/or asbestos containing material is a very exacting process and must be done only by individuals who have been specially trained and certified to perform such tasks. Anticipated work that might involve asbestos or asbestos containing material shall be coordinated through the Safety and Risk Management Officer. This is also true if it is only suspected that asbestos could be involved. Removal of materials such as floor tiles, acoustical ceiling tiles, ceiling and wall plaster, insulated pipes, or removal of insulation from pipes or any sprayed or trowled on material within a building is not acceptable unless performed through the Office of Facilities and Planning by trained and certified workers.

- E. All building maintenance and renovation projects are reviewed for asbestos containing materials. Asbestos containing materials are safely removed from the project area prior to the start of the maintenance or renovation work. All contractors working onsite are given an Asbestos Notification Form, informing them of what asbestos materials have been removed and what, if any, asbestos materials remain in the project area.
- F. The presence of asbestos containing materials does not mean the health of building occupants is endangered. If asbestos containing materials remain in good condition and are unlikely to be disturbed, exposure will be negligible. Health issues arise when asbestos materials are disturbed to the extent that asbestos fibers can become airborne and then inhaled by the occupants of a building. Procedures are in place to prevent this type of disturbance from occurring through routine maintenance and renovation activities. Since the creation of the Asbestos Management Plan, the College's Office of Facilities and Planning and the Safety and Risk Manager work closely with building coordinators, department heads, and individuals to educate the College community about asbestos.
- G. The Office of Facilities and Planning has available Asbestos Awareness training for interested employees, employees as directed by state and federal regulations. This level of training does not permit an employee to handle asbestos containing material in any circumstance, as working with asbestos require advanced training. Employees. Employees who work with asbestos on a routine basis require additional training. The level of training depends on the amount of exposure and type of activities involved in the task the employee is required to perform.
- H. If asbestos problems, such as dust or fallen material on floors, exposed pipe insulation, etc. are suspected, the employee or building occupant reports the matter to the Safety and Risk Manager. Employees and occupants have the right to view asbestos inspection documentation for their work area or location, which is available in the Office of Facilities and Planning.

5. **Air Quality/ Unknown Substances**

- A. The Safety and Risk Manager oversees the indoor air quality program across the College's facilities. Routine air quality inspections are conducted in all College facilities to reduce the potential for air quality challenges.
- B. Indoor air quality and unknown substance concerns are responded to quickly and a condition assessment is performed immediately.
- C. A determination of the cause of the indoor air quality issue or the nature of the unknown substance is made, and necessary corrective action to eliminate the problem is taken as applicable. This may include remediation to remove the substance and cleaning or removal of contaminated building materials, based on the determination.
- D. If air quality and/or unknown substances are of concern, the employee or building occupant reports the matter to the Safety and Risk Manager. Employees and occupants have the right to view air quality and unknown substance inspection documentation for their work area or location, which is available in the Office of Facilities and Planning.

6. **Lead Containing Paint/Materials**

- A. Delgado Community College has not used lead-based paint on any campus and site since approximately 1970, and as such it is rare to find lead-based paint in any buildings.
- B. Inspections for lead in paint and materials (such as ceramic tiles) is routinely performed through the Office of Facilities and Planning.
- C. If lead containing paint/materials are suspected, the employee or building occupant reports the matter to the Safety and Risk Manager. Employees and occupants have the right to view lead inspection documentation for their work area or location, which is available in the Office of Facilities and Planning.

Reference:

Delgado Community College [Comprehensive Safety Program policy](#)
Delgado Community College [Work Environment Safety Program](#)

Review Process:

Ad Hoc Committee on Harmful Substance Exposure Prevention Program Policy 8/31/17
Business & Administrative Affairs Council 10/4/17

Approval:

Vice Chancellor for Business and Administrative Affairs 10/4/17