UNIVERSITY OF OREGON

Environmental Health & Safety
Building Environmental Sciences Team Involvement Guidance

I. INTRODUCTION

This document is provided to assist departments in decision-making while determining if involving the Environmental Health & Safety Building Environmental Science Team (EHS) should be engaged dealing with building-related issues.

II. SCOPE

This scope of this document is to provide guidance that departments can base departmental policies and procedures on regarding EHS engagement for the program areas identified. This guidance applies to complaints received from staff or residents, emergency mitigation work, as well as planned work associated with construction or renovation projects. Specific categories covered by this document are listed below:

A. Water intrusion

B. Mold

C. Asbestos

D. Lead-based paint

E. Indoor air quality

III. EHS CONTACTS

A. During business hours contact Adam Jones (541.346.8397), Nate Ferguson, (541.346.2901), Jack Burgess (541.346.2512), or the EHS General Line (541.346.3192).

B. For emergencies that occur after hours and on weekends, contact UOPD Dispatch or your departmental duty administrator to contact the EHS duty administrator.

IV. REIMBURSEMENT CONSIDERATIONS

Work provided by EHS will be conducted and billed based on existing agreements with University Departments and Auxiliaries. This document does not change existing reimbursement agreements.

V. WATER INTRUSION

A. EHS should be contacted when there is a water intrusion that meets the following criteria. Please note that the majority of water intrusion impacts may not be apparent, requiring advanced equipment to determine the full extent of impacts.

1. A water intrusion of indeterminate size or duration, where water intrudes into finished or unfinished building spaces.
2. A water leak of more than 2 gallons, where water reached a wall, ceiling, or floor finish. Spills that are immediately cleaned up and do not result in damage do not need to be reported.
3. Condensation is observed that is new or seems out of place.
4. Any water intrusion involving grey-water or sewage.

B. EHS will provide the following services related to water intrusion issues:

1. Inventory damage and provide mitigation recommendations.
2. Provide water intrusion mitigation protocols and written scopes for contractors.
3. Manage and provide assistance with mitigation projects.
4. Provide confirmation that moisture issues have been appropriately mitigated.

VI. MOLD

A. EHS should be contacted when there is mold growth or suspected mold growth reported or observed that fits within any of the conditions listed below. Based on the type of issue, sampling and laboratory analysis may be prudent to confirm or refute that a suspected substance is mold growth. Assumption that a suspected substance is or is not mold growth is generally not the best practice.

1. University personnel, students, tenants or the general public report mold exposure in a University facility.
2. Requires University staff or contractors to remediate.
3. Suspected mold is possibly linked to a building failure, like a roof leak, plumbing leak, spill, or otherwise.
4. Suspected mold is reported by a building user, resident, or tenant as something they consider an issue.
5. Suspected mold is present in amounts that exceed 1 square foot.
6. There is concern that conditions maintained by a building user, resident, or tenant may cause long term damage to the building and finishes or lead to unsafe conditions within the affected space or adjacent spaces.

B. EHS will provide the following services related to Mold issues:

1. Perform mold inspections, inventory damages and provide mitigation recommendations.
2. Prepare mold abatement protocols and written scopes for contractors.
3. Manage and provide assistance with mitigation projects.

4. Provide and document confirmation that mold issues have been appropriately mitigated.

VII. ASBESTOS

A. EHS involvement is required for asbestos issues as indicated below. This process should be followed in every building regardless of construction date, for impacts as minimal as drilling a few holes or driving screws into a sheetrock wall, or even paint prep.

1. University personnel, students, tenants or the general public report asbestos exposure in a University facility.
2. Anytime there are impacts to suspected or known asbestos-containing materials.

B. EHS will provide the following services related to Asbestos issues:

1. EHS will investigate exposure complaints.
2. EHS will review historic data and perform a site visit.
3. EHS will prepare and send a survey document indicating whether the materials to be impacted contain asbestos or not. The memo must be kept onsite at all times during work.
4. EHS will provide a written protocol for abatement and written scopes for contractors as needed to complete work.
5. EHS may recommend contracting with a consultant if project scope is beyond internal staffing capabilities. In these cases, EHS will prepare a written scope of work for the consultant and manage their work onsite.
6. Certain types of work may be conducted without a survey by appropriately trained staff using the appropriate equipment. EHS should be contacted to coordinate work methods prior to conducting this work.
7. EHS may elect to perform exposure assessment monitoring on workers completing asbestos impacts.
8. EHS will manage clearance air monitoring requirements of projects, as required.

VIII. LEAD-BASED PAINT

A. Requirements for lead paint management vary based on the type of structure. Commercial facilities are subject to various OSHA regulations, while pre-1978 residential buildings, day care facilities, or other target housing or child occupied facilities must comply with the provisions outlined above, as well as HUD Title X, EPA RRP, and OHA Lead regulations. EHS should be contacted for lead issues as indicated below:

1. University personnel, students, tenants or the general public report Lead exposure in a University facility.

2. Prior to paint impacts in all residences, day care facilities, target Housing, and other child occupied facilities built in 1978 or before.
3. Prior to paint impacts in commercial facilities where the following tasks may be conducted:
    a. Paint removal
    b. Demolition
    c. Renovation
    d. Dry sanding
    e. Blasting with any media
    f. Torch or plasma cutting on painted components

B. EHS will provide the following services related to Lead issues:

1. Determine which regulation applies based on building type and project scope.
2. Determine if paint contains lead through analytical means or presumption. The decision to test or presume is made based on facility type, scope of work, and work methods.
3. Provide guidance with protocols.
4. Conduct exposure monitoring during work, as needed
5. EHS will conduct or manage clearance examination requirements of projects, as required.

IX. INDOOR AIR QUALITY (IAQ)

A. EHS should be contacted anytime there are IAQ complaints that fit within any of the conditions listed below.

1. An odor source cannot be immediately identified
2. Odor or IAQ complaints are persistent and without apparent cause
3. A “mold” or “wet” odor is reported
4. Subject reports that IAQ is leading to physical symptoms
5. Subject refers to a building as “toxic”, a “sick building”, or similar
6. A natural gas odor is reported that can’t be immediately identified and stopped
7. Dust or odors are the result of a construction project in an adjacent building or building area.

B. EHS will provide the following services related to Mold issues:

1. Perform IAQ investigations
2. Prepare IAQ Investigation reports and provide mitigation recommendations
3. Perform follow-up monitoring
4. Work with Campus Design and Construction and Contractors to mitigate dust and odor migration resulting from construction projects.