

## THE UNIVERSITY OF CHICAGO MEDICAL CENTER

**POLICY NAME:** ASBESTOS MANAGEMENT PROGRAM  
**POLICY NUMBER:** S04-60  
**ISSUE DATE:** JANUARY 1992  
**REVISED DATE:** AUGUST 19, 2015  
**REVIEW DATE:** AUGUST 19, 2015

### **PURPOSE:**

The purpose of the Asbestos Management Program is to manage activities involving asbestos containing materials (ACM) at The University of Chicago Medical Center in a manner consistent with applicable laws and regulations in order to ensure the safety of patients, visitors and personnel.

### **DEFINITIONS:**

1. **Asbestos:** A naturally occurring mineral. The most common asbestos types include Chrysotile, Amosite, and Crocidolite. Because of its fiber strength and heat resistance asbestos has been used in a variety of building construction materials for insulation and as a fire retardant. Asbestos has also been used in a wide range of manufactured goods, mostly in building materials (roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products), friction products (automobile clutch, brake, and transmission parts), heat-resistant fabrics, packaging, gaskets, and coatings.
2. **Asbestos-containing material (ACM):** any material containing more than one percent asbestos.
3. **Asbestos Fiber:** a particulate form of asbestos, 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to 1.

### **POLICY:**

In order to ensure the safety of patients, visitors and personnel against asbestos health hazards, the Asbestos Management Program:

1. Provides for an assessment of The University of Chicago Medical Center (UCM) facilities, identifying the location and condition of ACM;
2. Includes operations and maintenance guidelines designed to minimize exposure to asbestos by continual monitoring of ACM and taking action, as necessary;
3. Provides for effective and safe removal (abatement) of ACM by licensed abatement contractors;
4. Coordinates activities of key departments required to work with or near ACM to ensure safety and to maintain the effectiveness of the Asbestos Management Program; and
5. Ensures that employees receive appropriate levels of training consistent with their roles in the Asbestos Management Program.

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### **DISTURBANCE OF ASBESTOS:**

Examples of activities that may result in the disturbance of suspect asbestos-containing materials include:

1. Removing or repairing floor tile;
2. Drilling, sanding, cutting, or abrading floor tile, lab bench tops, or fume hoods
3. Removing ceiling tiles where overhead pipe insulation has been damaged;
4. Removing pipe insulation to access pipes;
5. Making holes in or removing walls;
6. Removing carpet which has floor tile underneath it.

A majority of the UCM buildings have been surveyed for the presence and location of asbestos-containing materials. As such, Safety currently maintains this information with known locations of asbestos containing materials.

### **AUTHORITY AND RESPONSIBILITY:**

1. *Safety Office* is responsible for:
  - a. Overseeing all aspects of the Asbestos Management Program;
  - b. Determining the presence and location of ACM and maintaining ACM reference documentation;
  - c. Overseeing and managing all work impacting ACM at The University of Chicago Medical Center including abatement activities;
  - d. Procuring the services of licensed asbestos abatement contractors and consultants;
  - e. Developing and conducting training to all relevant personnel on their roles in the Asbestos Management Program;
  - f. Covering the cost of non-project related bulk sampling if not in reference documentation;
  - g. Ensuring that all relevant regulatory standards and requirements are met.
2. *Facilities, Planning Design and Construction Project Management* is responsible for:
  - a. Notifying Safety during the design phase of projects that have the potential to disturb ACM;
  - b. Notifying Safety during the design phase of the desire to remove any ACM as a part of the renovation project;
  - c. Convey the entire renovation scope to ensure a licensed asbestos inspector can properly determine the abatement scope.
  - d. Disclosing the presence of ACM to any outside service contractors and consultants;
  - e. Providing outside service contractors of a copy of The University of Chicago Medical Center Asbestos Management Program;
  - f. Notifying the client and all affected building occupants (i.e. nearby departments, offices, clinic, etc.) of abatement activities; and
  - g. Covering the costs associated with project-related abatement, monitoring and consulting services.

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3. *Physical Plant* is responsible for:
  - a. Notifying Safety when work activities may disturb potential ACM in order to arrange for bulk sampling and/or abatement activities;
  - b. Notifying Safety in the case of an emergency where there is the potential for exposure due to damaged ACM (i.e., steam leak);
  - c. Notifying the client and all affected building occupants (i.e. nearby departments, offices, clinic, etc.) of abatement activities;
  - d. Covering the cost associated with abatement, monitoring and consulting services;
  - e. Procuring and covering the cost of pipe re-insulation, as necessary;
  - f. Disclosing the presence of ACM to any outside service contractors and consultants;
  - g. Providing outside service contractors of a copy of this Program;
  - h. Notify outside service contractors of the presence of known asbestos-containing materials prior to beginning work activities.
4. *Outside Contractors*
  - a. All outside service contractors shall provide general awareness training for their employees to allow employees to identify suspect asbestos-containing materials if found during work activities.
  - b. Contractors shall contact Safety in the event that suspect asbestos-containing materials are discovered during work activities.

### **ASBESTOS DOCUMENTATION:**

Information on the location of ACM has been gathered to identify actual as well as suspect ACM throughout UCM. The intent of the asbestos documentation is to provide information, which will facilitate operations and maintenance without retesting each and every potential ACM. Suspect and known ACM will be treated in the same manner in regard to the operations and maintenance functions. When abatement is considered, suspect ACM will either be treated as known ACM or tested to confirm the presence of ACM. The assessment included the review of records, inspection of all facilities within the medical center for potential ACM, sampling of potential ACM and mapping the location and condition of ACM.

### **ASBESTOS SAMPLING:**

Licensed asbestos inspectors within the Safety Department may collect asbestos bulk samples or coordinate with a licensed consultant to collect samples to confirm the presence of ACM. Under no circumstances shall any other employees of UCM collect samples of suspected ACM. Facilities, Planning Design and Construction project managers and Physical Plant supervisors or engineers shall contact the Safety Office if asbestos bulk sampling is required.

### **ASBESTOS ABATEMENT:**

All asbestos abatement projects within UCM shall be performed under controlled conditions by asbestos abatement contractors and consultants who are trained accordingly and licensed by the Illinois Department of Public Health (IDPH). Safety shall procure the services of licensed asbestos abatement contractors and consultants and oversee the progress of all existing asbestos

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abatement.

### **ASBESTOS NOTIFICATIONS:**

Abatement greater than three (3) linear feet or three (3) square feet of ACM requires a two (2) working day notification submitted to the Illinois Environmental Protection Agency (IEPA) and a 10 working day notification submitted to the Chicago Department of Public Health (CDPH) before work shall begin. Abatement greater than two hundred and sixty (260) linear feet or one hundred sixty (160) square feet of ACM require a ten work day notification to IEPA and a 10 working day notification submitted to CDPH. All required notifications shall be completed and submitted by the abatement contractor and records shall be kept by Safety.

### **OPERATIONS AND MAINTENANCE:**

Operations and maintenance (O&M) described herein is designed to reduce employee exposure to asbestos fibers by maintaining such materials in good condition. In addition, it will ensure employee exposure to ACM is below all regulatory safety guidelines. The operations and maintenance program has five parts including training, surveillance, work practices, record keeping and emergency procedures. Cooperation by Physical Plant, Environmental Services, and Facilities, Planning Design and Construction is crucial to the success of O&M.

#### 1. Training

All employees who may come into contact with potential ACM as a part of their job shall receive asbestos awareness level training (instructor-led or in Oracle) consistent with OSHA training requirements. Asbestos awareness level training shall include the following information:

- (a) Asbestos Standard 29 CFR 1910.1001
- (b) Asbestos health hazards
- (c) Asbestos containing materials
- (d) Safety guidelines for reducing exposure
- (e) Recognition of asbestos exposure risks
- (f) Asbestos related regulatory requirements
- (g) Basic abatement work practices
- (h) Emergency response procedures

#### 2. Surveillance

Regular surveillance will be conducted to determine the risk of exposure to asbestos fibers. Information on ACM gathered through surveillance will be noted within the asbestos documentation in order to ensure current, accurate information. Corrective actions shall be made through the Safety Office.

#### 3. Work Practices

Contact with potential ACM should be avoided, if possible. In order to minimize the risk of employee exposure to asbestos, Physical Plant supervisors should review work assignments to determine if such assignments are likely to damage or disturb ACM. If damage or disturbance is likely, Physical Plant supervisors shall contact the Safety Office to determine appropriate safety precautions or abatement activities required before any work proceeds. Physical Plant shall review the work of outside service contractors in the

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same manner to determine if work is likely to damage or disturb ACM.

### 4. Record Keeping

Information gathered from the operations and maintenance program will be used to update the asbestos documentation to ensure current, accurate information on the location and condition of asbestos containing materials. All records must be maintained by the Safety Office in accord with regulatory requirements:

- a. Employee training records will be maintained for one year beyond the last date of each worker's employment

### 5. Emergency Response

An asbestos emergency response includes situations where a rapid response is necessary to mitigate damage to a building or prevent further serious damage to a building or major utilities are impaired and in which ACM or suspected ACM has become damaged and has the potential to create an exposure incident. The Safety Manager or designee has the authority to implement emergency response abatement, as necessary. Where potential exposure is suspected, the Safety Office shall restrict access to all effected areas until air monitoring has been conducted and results indicate no exposure. The Safety Office is responsible for ensuring that all relevant regulatory guidelines are followed in the event of an asbestos emergency response.

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### **INTERPRETATION, IMPLEMENTATION, AND REVISION:**

The Institutional Safety and Environment of Care Committee will evaluate the effectiveness of the Asbestos Management Program at least annually. Revisions to the program and/or policy content will be made as needed to improve program effectiveness, align with UCM standard of work practices and comply with applicable regulatory requirements.

### **REFERENCES:**

1. OSHA 29 CFR 1910.1001 Asbestos for General Industry
2. OSHA 29 CFR 1926.1101 Asbestos for Construction
3. OSHA 29 CFR 1910.134 Respiratory Protection Standard
4. 40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPS)

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### **REFERENCES**

OSHA 29 CFR 1910.1001  
EPA 40 CFR Part 61 & Part 763  
IDPH 77 IL Adm. Code 855