

The University of Chicago Medical Center

POLICY NAME: ASBESTOS MANAGEMENT PROGRAM
POLICY NUMBER: S06-60
ISSUE DATE: JANUARY 1992
REVIEW/REVISION DATE: AUGUST 15, 2018
APPROVED BY: INSTITUTIONAL SAFETY & ENVIRONMENT OF CARE COMMITTEE

PURPOSE

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

SCOPE

This policy applies to the physical environment and associated activities for the following buildings and grounds:

- | | |
|---|--|
| <ul style="list-style-type: none">• Abbott• A.J. Carlson Animal Research Facility• American School• Armour• Billings• Biological Sciences Learning Center (BSLC)• Bob Roberts• Center for Care and Discovery (CCD)• Chicago Lying-In (CLI)• Comer• Comer II• Cummings Life Sciences Center• Drexel Garage• Duchossois Center for Advanced Medicine (DCAM)• Emergency Department• Franklin McLean Memorial Research Institute (FMI) | <ul style="list-style-type: none">• Gilman Smith• Goldblatt Pavilion• Goldblatt Memorial• Hicks-McElwee• Knapp Center For Biological Discovery (KCBD)• Kovler• Mother's Aid Research Pavilion (MARP)• Mitchell• MRI• Parking A• Parking B• Peck• Rubloff• Surgery Brain• Wyler |
|---|--|

OBJECTIVES

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

- Provide for an assessment of The University of Chicago Medical Center (UCMC) facilities, identifying the location and condition of ACM;
- Include operations and maintenance guidelines designed to minimize exposure to asbestos by continual monitoring of ACM and taking action, as necessary;
- Provide for effective and safe removal (abatement) of ACM by licensed abatement contractors;
- Ensure appropriate signage is displayed in areas in which staff may disturb asbestos containing materials including but not limited to mechanical areas, electrical rooms.
- Coordinate 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

The University of Chicago Medical Center

- Ensure that employees receive appropriate levels of training consistent with their roles in the Asbestos Management Program.

DEFINITIONS

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 (), friction products, heat-resistant fabrics, packaging, gaskets, and coatings.

Asbestos-Containing Material (ACM) – Any material containing more than one percent asbestos. Various materials at UCMC that have been found to have ACM include but are not limited to insulation products, duct mastics, flooring adhesives, terrazzo and sheet flooring, lab counter tops, fume hood enclosures, various adhesive products (i.e. glue pucks), exterior & interior caulks/glazing, roofing shingles, ceiling and floor tiles and asbestos cement products

Asbestos Fiber – A particulate form of asbestos, 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to 1.

RESPONSIBILITIES

Areas of responsibility include, but not limited, to the following:

A. UCMC Environmental Health and Safety

1. Overseeing all aspects of the Asbestos Management Program at The University of Chicago Medical Center;
2. Determining the presence and location of ACM and maintaining ACM reference documentation;
3. Overseeing and managing all work impacting ACM at The University of Chicago Medical Center including abatement activities;
4. Procuring the services of licensed asbestos abatement contractors and consultants;
5. Developing and conducting training to all relevant personnel on their roles in the Asbestos Management Program;
6. Covering the cost of non-project related bulk sampling if not in reference documentation; and
7. Ensuring that all relevant regulatory standards and requirements are met.

B. Facilities, Planning Design and Construction Project Management

1. Notifying UCMC Environmental Health and Safety Office x5-SAFE or pager 8382 during the design phase of projects that have the potential to disturb ACM at The University of Chicago Medical Center;
2. Notifying University Environmental Health and Safety Office x29999 for projects in University buildings (Cummings, Kovler, KCBD, BSLC/Knapp)
3. Notifying Environmental Health and Safety Office during the design phase of the desire to remove any ACM as a part of the renovation project;
4. Convey the entire renovation scope to ensure a licensed asbestos inspector can properly determine the abatement scope.

The University of Chicago Medical Center

5. Disclosing the presence of ACM to any outside service contractors and consultants;
6. Providing outside service contractors of a copy of The University of Chicago Medical Center Asbestos Management Program;
7. Notifying the client and all affected building occupants (i.e. nearby departments, offices, clinic, etc.) of abatement activities; and
8. Covering the costs associated with project-related abatement, monitoring and consulting services.

C. Physical Plant

1. Notifying UCMC Environmental Health and Safety Office x5SAFE or pager 8382 when normal work activities may disturb potential ACM or in an emergency where there is the potential for exposure due to damaged ACM (i.e., steam leak); in order to arrange for bulk sampling and/or abatement activities;
2. Notifying University Environmental Health and Safety Office x29999 for activities in University buildings (Cummings, Kovler, KCBD, BSL/Knapp);
3. Notifying the client and all affected building occupants (i.e. nearby departments, offices, clinic, etc.) of abatement activities;
4. Covering the cost associated with repair-related abatement, monitoring and consulting services;
5. Procuring and covering the cost of pipe re-insulation, as necessary;
6. Disclosing the presence of ACM to any outside service contractors and consultants;
7. Providing outside service contractors of a copy of this Program; and
8. Notify outside service contractors of the presence of known asbestos-containing materials prior to beginning work activities.

D. Outside Contractors

1. 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; and
2. Contractors shall contact Environmental Health and Safety Office in the event that suspect asbestos-containing materials are discovered during work activities.

PROCEDURES

A. Disturbance of Asbestos

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

1. Removing or repairing flooring materials;
2. Drilling, sanding, cutting, or abrading flooring materials, 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 flooring or residual adhesive underneath it.

The University of Chicago Medical Center

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

B. Asbestos Documentation

Information on the location of ACM has been gathered to identify actual as well as suspect ACM throughout UCMC. 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.

C. Asbestos Sampling

Licensed asbestos inspectors within the Environmental Health and Safety Office 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 UCMC collect samples of suspected ACM. Facilities, Planning Design and Construction project managers and Physical Plant supervisors or engineers shall contact the Environmental Health and Safety Office if asbestos bulk sampling is required.

D. Asbestos Abatement

All asbestos abatement projects within UCMC 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). Environmental Health and Safety Office shall procure the services of licensed asbestos abatement contractors and consultants and oversee the progress of all existing asbestos abatement.

E. 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 Environmental Health and Safety Office.

F. 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 Environmental Health and 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 Environmental Health and 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 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 Environmental Health and Safety Office in accord with regulatory requirements. Employee training records will be maintained for one year beyond the last date of each worker's employment.

The University of Chicago Medical Center

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 Environmental Health and Safety Office Director or designee has the authority to implement emergency response abatement, as necessary. Where potential exposure is suspected, the Environmental Health and Safety Office shall restrict access to all effected areas until air monitoring has been conducted and results indicate no exposure. The Environmental Health and Safety Office is responsible for ensuring that all relevant regulatory guidelines are followed in the event of an asbestos emergency response.

The University of Chicago Medical Center

PERFORMANCE MONITORING / EVALUATION

The performance and effectiveness of management plans and supporting safety policies are monitored by the Institutional Safety and Environment of Care Committee. Key Performance Indicators (KPIs) using measurable values are established to identify opportunities to improve or demonstrate the effectiveness of maintaining or reaching a desired target. Responsible managers collect and evaluate data for KPIs and report associated data to the Institutional Safety and Environment of Care Committee on quarterly basis via a scorecard reporting system. The KPIs are monitored over time and plans, policies and programs are adjusted as needed to improve the KPIs in support of the Environment of Care Program's strategic goals.

Contractors not following this policy shall be immediately dismissed from working at UCMC. Non-compliance of this policy by UCMC employees is subject to disciplinary action.

POLICY REVIEW / REVISIONS

The Institutional Safety and Environment of Care Committee shall review this policy at least every three years or as needed to improve process and/or comply with applicable regulatory requirements.

REFERENCES

OSHA 29 CFR 1910.1001 Asbestos for General Industry
OSHA 29 CFR 1926.1101 Asbestos for Construction
OSHA 29 CFR 1910.134 Respiratory Protection Standard
EPA 40 CFR Part 61 & Part 763
IDPH 77 IL Adm. Code 855
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPS)

Marco Capicchioni
Vice President, Facilities Planning, Design and Construction

Sharon O'Keefe
President