

**Beth Israel Deaconess Medical Center  
Environment of Care Manual**

**Title: ASBESTOS MANAGEMENT POLICY**

**Policy #: EC-66**

**Purpose:**

This policy has been developed to provide guidance and assistance with the management of asbestos-containing materials (ACM) in Beth Israel Deaconess Medical Center buildings. This policy is intended to establish actions to be taken during maintenance, telecommunications, and renovation/demolition activities in order to prevent asbestos from becoming an airborne hazard.

This document serves to comply with the OSHA Standards 29CFR 1910.1001, *Asbestos*, 1926.1101, *Asbestos in Construction*, Massachusetts DEP 310 CMR 7.09, *Dust, Odor, Construction and Demolition*, and 7.15, *Removal & Disposal of Asbestos*, the EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61, Subpart M, and the Massachusetts Division of Occupational Safety's 453 CMR 6.00, *The Removal, Containment or Encapsulation of Asbestos*.

**Scope:**

The **Asbestos Management Policy** applies to all properties and facilities owned, occupied, or managed by Beth Israel Deaconess Medical Center (BIDMC), including clinical, research, and administrative areas on the main campus and at off-site locations. In some cases, certain responsibilities under the **Asbestos Management Policy** are shared with or delegated to local managers and/or outside parties such as landlords, tenants, or contractors. As applicable to particular locations, the **Asbestos Management Policy** also covers BIDMC patients, employees, clinical or research staff, and visitors present in these locations.

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**Policy Statement:**

Beth Israel Deaconess Medical Center (BIDMC) is to provide and maintain safe and healthy conditions for its employees, contractors, and visitors. Accordingly, any asbestos-containing material (ACM) will be managed in accordance with all applicable Federal, State, and Local regulations.

**DEFINITIONS**

- **Asbestos Regulated Materials:** Any material containing asbestos of greater than or equal to 1%. Asbestos-containing material (ACM) is regulated by the Environmental Protection Agency (EPA), Occupational Health and Safety Administration (OSHA) and the Massachusetts Department of Environmental Protection (MassDEP).
- **Friable Asbestos:** Material containing at least one percent asbestos which can be crumbled, pulverized, or reduced to a powder by hand pressure.

- **Presumed Asbestos Containing Material (PACM):** Any material that is suspected of containing asbestos material, until sampled and analyzed by an accredited laboratory. Thermal System Insulation (TSI) and spray-on materials shall be presumed asbestos containing in all buildings or renovations constructed prior to 1980.
- **Asbestos Operations and Maintenance (O&M):** a manner in which asbestos materials are managed as required by the Environmental Protection Agency (EPA) where any known ACM are present in buildings. This may include the repair, removal, inspection or encapsulation of asbestos materials.
- **Small Scale, Short Duration Asbestos Removal:** The removal of a limited amount of asbestos-containing material that constitutes less than or equal to one disposal bag/ one glove-bag.
- **Response Action:** An approved method, including removal, encapsulation, enclosure, repair, operations and maintenance that protect human health and the environment from asbestos-containing material.

**Asbestos Inspector:** Certification as an Asbestos Inspector authorizes the person to review building records, perform visual inspections, collect samples, prepare written inventories and conduct other forms of investigation necessary to determine and document the presence and condition of known or suspect ACM in facilities. Certified Asbestos Inspectors must apply current concepts and state-of-the-art knowledge to evaluate the conditions and accessibility of ACM and shall otherwise conduct their activities according to procedures described in current EPA guidance documents or applicable federal laws or rules and regulations.

## **GENERAL RESPONSIBILITIES**

### ***General Building Occupants***

In the event that a BIDMC employee suspects exposure to or possible risk of disturbance of asbestos materials, they are to leave the material undisturbed and contact the EH&S department. If the material has been disturbed, and there is an immediate hazard to others or a chance contamination could spread a Code Orange Alert page must be activated to ensure first responders get to the area quickly. Refer to [EC-43 Hazardous Spill Response Program \(Code Orange\)](#).

### ***Project Managers/Supervisors from Facilities & Engineering, Maintenance and/or other Departments***

- Manages/coordinates, approves, and schedules all asbestos related projects conducted.
- Use only asbestos certified contractors approved by EH&S, Facilities and Maintenance. This includes abatement, inspection and air clearance work.
- Contact EH&S for an assessment prior to the start of any project that will likely disturb asbestos. See the PACM workflow in Attachment A.

- Provide Drawing Controls group the information necessary to keep CAD files up to date.
- Documentation of asbestos waste manifests is to be maintained by the department responsible for the project and copy sent to EH&S.

### ***Environmental, Health and Safety (EH&S) Department***

- EH&S will assist in assessing risk of exposure before project begins.
- Take bulk samples to submit for analysis if needed
- Communicate results to requestor and Facilities for record keeping.
- Coordinate all required training with Departments.
- Recommend outside assistance when needed for extensive sampling, guidance, project monitoring and exposure potential.

### ***Drawing Controls Group in the Facilities Department***

- Use information from EH&S and Project Managers to maintain asbestos CAD files
- Provide copies of asbestos drawings and survey documentation to project managers.

### ***Employee Occupational Health***

- Provide medical oversight when needed, for BIDMC employees, such as in the case of potential exposures or medical surveillance for respirator users.

## **Procedures**

### **[EC-66 P1 Identification and Operations & Maintenance of Asbestos-Containing Materials](#)**

Refer to Procedure #1 for specific responsibilities and procedures related to the identification and operations and maintenance of asbestos-containing materials.

### **[EC-66 P2 Removal of Asbestos Containing Materials](#)**

Refer to Procedure #2 for specific responsibilities and procedures related to removal of asbestos-containing materials.

### **[EC-66 P3 Environmental/Personal Monitoring, Medical Surveillance and Respiratory Protection](#)**

#### **Procedures**

Refer to Procedure #3 for specific responsibilities/procedures related to environmental/personal monitoring, medical surveillance and respiratory protection procedures.

### **[EC-66 P4 Recordkeeping and Training Procedures](#)**

Refer to Procedure #4 for specific procedures related to recordkeeping and training procedures.

## **Attachment A: Potential Asbestos-Containing Materials Work Flow**

**Approved By:**

**Vice President Sponsor:** Walter Armstrong, SVP , Capital Facilities and Engineering

**EOC Committee: 5/10/2017**

K. Murray & W. Armstrong  
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**Requestor Name:** Gary Schweon, Director Environmental Health and Safety

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**Eliminated:**

**References:**

### Potential Asbestos-Containing Materials Work Flow Chart

