# Table of Contents

I. Purpose ................................................................................................................................................. 2  
II. Scope..................................................................................................................................................... 2  
III. Responsibilities ..................................................................................................................................... 2  
IV. Program Requirements......................................................................................................................... 3  
V. Medical Surveillance Program .............................................................................................................. 4  
VI. Training ................................................................................................................................................. 4  
VII. Recordkeeping ...................................................................................................................................... 4  
VIII. Regulatory Authority ............................................................................................................................ 5  
IX. Contact .................................................................................................................................................. 5
I. Purpose
This program establishes a process to protect employees from the asbestos-related hazards. This program will provide guidance on reporting, identifying, and reducing asbestos-related hazards and exposure among Northwestern community members and contractors.

II. Scope
This program applies to all designated Northwestern University staff and contractors who perform service or maintenance activities and may encounter asbestos-containing material (ACM) or presumed asbestos-containing material (PACM) or those who have the potential to encounter or disturb asbestos as a part of their work assignments.

III. Responsibilities
A. Environmental Health and Safety (EHS)
   i. Oversee the development and implementation of this program.
   ii. Facilitate delivery of training to assist in the interpretation and implementation of this program.
   iii. Provide consultation and guidance when requested to identify, evaluate, and control possible asbestos exposure.
   iv. Maintain of inventory of locations containing asbestos or abated.
   v. Review and revise this program to reflect changes in regulatory requirements as necessary.

B. Facilities Operations Supervisors and Projects Managers
   i. Complete the appropriate asbestos training, assign training to new employees prior to working around potential asbestos, and ensure training completion for all staff who may come be potentially exposed to asbestos or ACM.
   ii. Ensure impacted operations and maintenance employees are enrolled in the medical surveillance program and offered an annual physical exam as required by OSHA.
   iii. Inform contractors and custodial staff of known locations and the possibility of asbestos.
   iv. If suspect material is found, stop work, and coordinate with EHS to schedule sampling and analysis before work is continued.
   v. Coordinate with EHS prior to sampling to provide EHS sampling results and abatement plans.
   vi. Responsible for costs associated with training, sampling, and laboratory analysis.
   vii. Facilities Operations is responsible for securing and affixing the labels in areas identified by EHS or other qualified consultant.

C. Employees
   i. Complete the applicable asbestos training, as assigned.
   ii. Contact their supervisor if there is any uncertainty whether or not something contains asbestos.
   iii. Maintenance and Operations employees must enroll in the medical surveillance program and be enrolled in the Respiratory Protection Program, as directed by their supervisor.
D. Custodial Contractors  
  i. Provide required two-hour Asbestos Awareness Training and submit proof of training to EHS. Northwestern University can provide the required training, if necessary. Custodial contractors or supervisor must coordinate training through EHS.  
  ii. Share locations where asbestos is known to be present with employees.  
  iii. Do not conduct tasks that will disturb asbestos in an identified area. Notify your supervisor or EHS if you suspect that asbestos has been disturbed.  

E. Sampling and Abatement Contractors  
  i. Comply with Contractor Safety Program and Northwestern University EHS Safety Policy.  
  ii. Coordinate with Facilities Operations and Project Managers, as needed.  
  iii. Provide thorough testing, reporting, and recording of service(s) done on Northwestern University campuses.  
  iv. Work performed should be in accordance with the highest standard of care adopted by a nationally recognized environmental firms performing services of a similar nature and under similar conditions, adhering to all applicable federal and state rules and regulations.  
  v. Provide thorough analysis and reporting of the testing results along with suggested recommendations for abatement work, should it be required.  

IV. Program Requirements  
  A. Reporting  
     i. If an employee observes material that might contain asbestos, they are to contact their supervisor immediately.  
     ii. Suspected ACM should be sampled in partnership with EHS.  
  B. Asbestos Identification and Sampling  
     When a supervisor or employee suspects or is unsure if a building material may contain asbestos, sampling will be coordinated with EHS.  
     i. Depending on the location and how quickly results are needed, EHS or a consultant will collect an adequate amount of samples. Results collected by a consultant should be submitted to EHS for review.  
     ii. All results will be communicated to Facilities Operations or Capital Projects with recommendations for corrective actions. In the event of a fiber release any employees that are directly exposed to ACM will be contacted (see Fiber Release Event).  
     iii. If the sample results are positive, abatement arrangements will be made with an asbestos abatement contractor before work can be continued.  
        a. ACM that is in good condition that should not present a danger to students, staff, faculty, or contractors may be left in place with appropriate signage and documentation.  
        b. ACM that presents a potential for exposure may be remediated by one of the following measures:  
           1. Removal of asbestos with proper disposal of ACM  
           2. Enclosure and encapsulation of ACM  
           3. Restricted access and isolation of area where ACM may be present where appropriate signage should be posted and
appropriate personal protective equipment (PPE) must be worn if maintenance must be completed.

C. **Fiber Release Event**
   In the event that known asbestos-containing building material is disturbed and fibers are released, the following steps need to be taken:
   i. Contact your supervisor immediately.
   ii. Isolate the area and anyone who was exposed to the fiber release.
   iii. Shut down all HVAC units to prevent fibers from being spread throughout a bigger area. If maintenance and operations employees must enter the area appropriate PPE must be worn before entering. Only those who have completed the Operations and Maintenance training should enter the area.

D. **Sample Location Inventory**
   i. EHS will maintain an inventory regarding sample location and results.
   ii. Any inquiries related to asbestos should be directed to EHS.

V. **Medical Surveillance Program**
   A medical surveillance program, as required by OSHA 1910.1001 App H will include in the routine examination:
   A. Medical and work histories, focusing on symptoms related to the respiratory system, cardiovascular system, and digestive tract.
   B. Completion of the respiratory disease questionnaire, similar to that of the Respiratory Protection Program
   C. A physical examination, which will include a chest x-ray and a pulmonary function test
   D. Additional lab tests may be ordered as the examining physician deems to be medically necessary.
   E. An annual exam must be offered to employees annually or more often if recommended by the examining physician. Results will be made available to the affected employee.

VI. **Training**
   All Northwestern University staff or contractors who have the potential for Asbestos exposure will be provided and are to complete training, which includes:
   A. Required asbestos training will be assigned to employees via myHR Learn.
      i. Project Managers – Annual 2 Hour Asbestos Awareness Course
      ii. Maintenance and Custodial Staff – Annual 2 Hour Asbestos Awareness Course
      iii. Operations and Maintenance Staff – 16 Hour Asbestos Operations and Maintenance Course, Annual 4 Hour Refresher Course
   B. An optional Asbestos Hazard Awareness course is available to all Northwestern University employees who would like to learn more about the hazards of asbestos in the workplace and how to avoid disturbing ACM or PACM.

VII. **Recordkeeping**
   A. Sampling and analysis records received from Facilities Operations or Capital Projects will be retained and maintained by EHS.
   B. Unless operating processes change, this program will be reviewed every 3 years by EHS.
   C. Training records of employees will be maintained by myHR Learn.
VIII. Regulatory Authority

Northwestern will comply with Occupational Safety and Health Administration’s (OSHA) standards and any other applicable codes and standards, including:

- OSHA 29 CFR 1910.1001 – Asbestos
- OSHA 29 CFR 1910.120 – Hazard Communications
- OSHA 29 CFR 1926.1101 – Construction Standard -Asbestos
- EPA 40 CFR 763 – Asbestos Hazard Emergency Response Act
- 105 ILCS 105 – Asbestos Abatement Act
- 225 ILCS 207– Commercial and Public Building Asbestos Act

IX. Contact

For questions, contact Environmental Health and Safety at ehs@northwestern.edu.