

**VA Illiana Health Care System
Asbestos Operations and Maintenance Plan
FY2018**

May 24, 2018



**US Department of Veteran Affairs
VA Illiana Health Care System
1900 East Main Street
Danville, IL 61832**

STANDARD OPERATING PROCEDURE

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Facility Management Service (138)**

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1.0 Introduction

Asbestos is a common building material used in the United States prior to 1975. Asbestos is completely safe when maintained in 'good' condition, but becomes a potential hazard if the microscopic fibers are released into the air. This occurs when the material containing the asbestos becomes damaged and is friable—meaning when it is dry, it can be crumbled in your hand. If the dust containing the asbestos fibers is inhaled, these fibers can become trapped within the body and may eventually lead to asbestosis, mesothelioma, and lung cancer. If ingested, it may lead to many other types of cancer.

1.1 Regulatory History of Asbestos Bans

- In 1973, EPA banned spray-applied surfacing asbestos-containing material for fireproofing/insulating purposes. See National Emission Standards for Hazardous Air Pollutants (NESHAP) at [40 CFR Part 61, Subpart M](#).
- In 1975, EPA banned installation of asbestos pipe insulation and asbestos block insulation on facility components, such as boilers and hot water tanks, if the materials are either pre-formed (molded) and friable or wet-applied and friable after drying. See National Emission Standards for Hazardous Air Pollutants (NESHAP) at [40 CFR Part 61, Subpart M](#).
- In 1978, EPA banned spray-applied surfacing materials for purposes not already banned. See National Emission Standards for Hazardous Air Pollutants (NESHAP) at [40 CFR Part 61, Subpart M](#).
- In 1977, the [Consumer Product Safety Commission \(CPSC\)](#) banned the use of asbestos in artificial fireplace embers and wall patching compounds. ([16 CFR Part 1305](#) and [16 CFR 1304](#)).
- In 1989, the EPA issued a final rule under Section 6 of Toxic Substances Control Act (TSCA) banning most asbestos-containing products. However, in 1991, this rule was vacated and remanded by the Fifth Circuit Court of Appeals. As a result, most of the original ban on the manufacture, importation, processing, or distribution in commerce for the majority of the asbestos-containing products originally covered in the 1989 final rule was overturned. See [40 CFR 763 Subpart I](#).

2.0 Purpose

The purpose of the Asbestos Operations and Maintenance (O&M) Plan is to address the existing Asbestos Containing Materials (ACM)/Asbestos Containing Building Materials (ACBM) within the Veterans Affairs Illiana Health Care System (VAIHCS) facility and how to prevent/minimize the potential for asbestos fiber exposure to building occupants, visitors, residents, employees, etc. This plan will identify procedures to maintain any existing ACM/ACBM in 'good' condition until all ACM/ACBM is ultimately abated. This plan will include the updated details of routine surveys and inspections and the procedures for handling ACM/ACBM that may become 'damaged' or 'significantly damaged'.

The following definitions are the different conditions for all ACM/ACBM and how to identify what condition the ACM/ACBM is in:

1. Good: <1% overall damage and any damage does not appear to be a significant hazard.
2. Damaged: <10% localized damage or <25% total damage throughout homogeneous area.

3. Significantly Damaged: >10% localized damage or >25% total damage throughout homogeneous area.

Anytime a condition other than 'good' is identified, it shall be reported to the Asbestos Program Manager immediately.

The following OSHA asbestos regulations are applicable and must be followed where appropriate:

1. 29 CFR 1910.1001 General Industry:
 - a. Employees must not be exposed to asbestos fibers at or above the permissible exposure level (PEL) as per **29 CFR 1910.1001(c)**.
 - b. Employees must be notified of ACM/ACBM in the area as per **29 CFR 1910.1001(j)**.
 - c. If exposure limit reaches the PEL, proper procedures must be followed as per **29CFR 1910.1001(e) and (f)**.
 - d. If entry into this area is required, then **29 CFR 1910.1001(g), (h), (i), and (l)** must be followed.
2. 29 CFR 1926.1101 Construction:
 - a. Pertains to construction projects, repair operations, etc. as defined in **29 CFR 1910.12(b)**. Also includes housekeeping during and right after construction.
 - b. There are different procedures according to the class of asbestos work as defined in **29 CFR 1926.1101 'ASBESTOS'**; Class I, II, III, and IV which must be followed. See below.
 - c. If work is class I, II, or III, then the area must be regulated as per **29 CFR 1926.1101(e)**.
 - d. Regardless of the level of exposure of asbestos fibers, engineering controls and work practices must be taken, as per **29 CFR 1926.1101 (g)** and the specific class of asbestos work performed.
 - e. Proper notifications must be made during all asbestos-related work as per **29 CFR 1926.1101(k)**.

The different classifications of asbestos work are:

1. Class I: Activities involving the removal of TSI and surfacing ACM and PACM.
2. Class II: Activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
3. Class III: Repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.
4. Class IV: Maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

2.1 Scope and Objectives

The primary goal for the Asbestos Operation and Maintenance Plan is to prevent the release of asbestos fibers from existing ACM/ACBM. If prevention is not possible, then the O&M Plan will minimize the exposure of asbestos fibers. The O&M Plan will accomplish this by:

- Maintaining existing ACM/ACBM in 'good' condition.
- Routinely inspect the condition of known ACM/ACBM in a safe manner – without disturbing the material.
- Establishing procedures for managing ACM/ACBM that becomes damaged or has a potential for damage/significant damage. Refer to [MCM 001ESS-02](#).
- Respond to emergencies involving the disturbance of asbestos. Refer to [MCM 11-45](#).
- Keep a record of any surveys, inspections, CAD drawings, and document changes in the existence/condition of all ACM/ACBM, any newly discovered ACM/ACBM, and any abatement of ACM/ACBM. These records will be located in the following location:
[S:\zz-Troy's Reference Files\550 Danville HCS\03-Project Section\07-ACM Operations Plan\02-Asbestos O&M Plan](#)

3.0 Roles and Responsibilities

This section will identify the roles and responsibilities:

1. Facility Management Service (138):
 - a. *Chief, Facilities Management Services* - Manage, maintain and implement the VAIHCS Asbestos Management Program and O&M Plan.
 - b. *Chief, Maintenance and Operations* - Directs Operations and Maintenance staff to perform in-house work in compliance with the plan and report any deficiencies, newly discovered ACM, newly damaged ACM, etc.
 - c. *Asbestos Program Manager* – Performs routine updates to the plan and files relevant documentation.
2. Safety Section (001ESS):
 - a. *Safety Manager* - Provides guidance and support to ensure environmental program compliance.
 - b. *Industrial Hygienist* - Performs 6-month surveillance and ACM Sampling.
3. VISN 12 Contracting Office.
Provide government acquisition support for contracted services.
4. Occupation and Employee Health (11C-C).
Provide program support when exposures exceed permissible exposure limit (PEL) and for routine examinations.

4.0 Communication

This section describes the steps used to notify building occupants, contractors, and employees of the presence of asbestos in the building, abatement activities, and warning labels and caution signs. Good communication between management, tenants, contractors, and employees ensures:

- All regulatory requirements are met;
- All work is performed in accordance with the O&M Plan and applicable documents;
- Persons lacking appropriate training are prevented from disturbing asbestos; and
- Misunderstandings are prevented.

4.1 Communication with Patients, Visitors, and Employees

Being a healthcare facility, in some cases, it may be more practical to relocate patients, visitors and employees to another area within the facility versus formal notifications. For asbestos abatement projects, patients, visitors and employees will be relocated during the construction phase.

4.2 Outside Contractor Communication

When contractors are used to perform asbestos abatement within the facility, the contract documents normally define the amount, type, and condition of all known ACM/ACBM to be abated prior to contract award. If undefined ACM/ACBM is encountered during construction, the contractor will immediately notify the construction project manager/COR. Existing ACM that is not disturbed by the construction work will not always be abated. Contractors are responsible for performing all contract defined ACM abatement work in accordance with applicable federal, state, and local regulations and laws.

4.3 Employee Communication

Employers are required to comply with the OSHA regulations [29CFR 1910.1001](#) for General Industry and OSHA regulations [29CFR 1926.1101](#) during construction. There are specific details outlined depending on employee's duties and exposure levels. More specifically, refer to:

1. [29CFR 1900.1001\(d\): 'Exposure Monitoring'](#); (7): ['Employee notification of monitoring results'](#)
2. [29CFR 1900.1001\(j\): 'Communication of hazards to employees – Introduction'](#)
3. [29CFR 1926.1101\(k\): 'Communication of hazards'](#)

A notice will be sent to the local American Federation of Government Employees (AFGE) 1963 (830) for all asbestos abatement once construction is approved. Examples are in the following folder:

<S:\zz-Troy's Reference Files\550 Danville HCS\03-Project Section\07-ACM Operations Plan\04-Asbestos Abatement information\Notifications>

4.4 Notification to Agencies

This section outlines the notification requirements for Environmental Protection Agency (EPA) compliance. Depending on the type and amount of asbestos work, scheduled or emergency, the notification requirements will vary as follows.

4.4.1 Notification Requirements

Projects that do not disturb ACM/ACBM do not require notification. Notification is required if ACM/ACBM is disturbed or is found to no longer be in 'good' condition. Disturbance of ACM/ACBM is caused when any process, which through direct contact, vibration, air movement, or other means, physically moves ACM/ACBM in such a way that fibers could become airborne. If there is any doubt as to whether ACM/ACBM could be disturbed during an operation, the Asbestos Consultant should be consulted.

4.4.1.1 Planned Operations Involving ACM/ACBM

The following shall be followed depending on the amount and type of ACM/ACBM. Thermal insulation is generally measured in linear feet, surfacing material in ft.², and misc. ACM/ACBM is measured as appropriate.

- Under 3 ft.²/3 linear ft.

No notifications are required for this amount. Any ACM/ACBM waste shall be disposed of in accordance with the proper OSHA and EPA regulations.

- 3 ft.²/3 linear ft. – 160 ft.²/260 linear ft.

This requires at least a 2 working day notice to the Illinois Department of Public Health (IDPH) before any ACM/ACBM is disturbed.

- Over 160 ft.²/260 linear ft.

This requires at least a 10-working-day notice to the Illinois Environmental Protection Agency (Illinois EPA) before any ACM/ACBM is disturbed.

- Demolitions and Renovations.

For buildings being demolished, all RACM as defined in 'EPA NESHAP regulations 40CFR 61 Subpart M: 'National Emissions Standard for Asbestos'; section 141: 'Definitions' must be abated as stated in section 60.145: 'Standard for Demolition and Renovation'. Refer to the notification requirements as stated in section 60.145(b): 'Notification Requirements', for specific details. Generally, the notification timeline is 10 working days prior to the date the demolition begins, a detailed notice must be provided to the administrator. All asbestos abatement work and notifications are performed by a state-licensed asbestos abatement contractor.

4.4.1.2 Emergencies Involving ACM/ACBM

In the event of an accidental release of more than one pound of asbestos (ref. 40CFR302.4, 'List of Hazardous Substances and Reportable Quantities'). The reporting process we generally start with the Illinois Emergency Management agency. Notifications shall be made as early as possible. The affected area must be properly regulated in accordance with the appropriate OSHA regulations.

4.5 Warning Signs and Labels

Warning signs are placed in routine maintenance areas where ACM/ACBM is located and has a possibility of becoming disturbed during routine maintenance and/or construction. This is done to inform personnel that there is a potential hazard of asbestos fiber exposure if the ACM/ACBM

is disturbed. Warning labels are placed on actual ACM/ACBM to prevent accidental damage during routine maintenance and/or construction.

4.5.1 Warning Signs

'The Asbestos Hazard Emergency Response Act of 1986' (AHERA) mandates that warning signs be displayed where there is friable and non-friable ACM/ACBM in routine maintenance areas. Warning labels are placed directly on the ACM/ACBM, such as pipe insulation, or a sign is placed in an obvious location, such as each entry location, to be seen prior to entering an area containing ACM/ACBM so those entering can take the necessary precautions before entering. Per AHERA, the warning labels shall read:

**CAUTION: ASBESTOS. HAZARDOUS.
DO NOT DISTURB WITHOUT PROPER
TRAINING AND EQUIPMENT**

Per **29CFR 1910.1001**, warning signs shall be posted at all approaches to regulated areas so that an employee may read the signs and take necessary protective steps before entering the area."

29CFR1910.1001: Occupational Safety and Health Standards, sub-part title 'Toxic and Hazardous Substances', sub-part (j)(4)(ii)(A) says that these warning signs "shall bear the following legend:"

**DANGER
ASBESTOS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY**

In addition, **29CFR1926.1101**: 'Safety and Health Regulations for Construction', sub-part title 'Toxic and Hazardous Substances', sub-part (k)(7)(ii)(A) says that "The warning signs required by paragraph (k)(7) of this section shall bear the following information

**DANGER
ASBESTOS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY"**

4.5.2 Warning Labels

Under **CFR1910.1001(j)(5)(i)**, warning labels shall be places on "all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers." Sub-part (j)(5)(ii) says that the labels will read:

**DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST**

In addition, [CFR1926.1101\(k\)\(8\)\(i\)](#) states “Labels shall be affixed to all products containing asbestos and to all containers containing such products, including waste containers. Where feasible, installed asbestos products shall contain a visible label.” Per sub-part (k)(8)(iii), this label shall read:

**DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST**

5.0 Locations of ACM/ACBM

Currently, ACM/ACBM is known to be present in every building at the Danville VA campus with the exceptions of building 125, and ‘Green Homes’ buildings 128, 129, 130, and 131.

An asbestos survey was completed in 2005, 2007, and 2010. The results are filed in the following folder:

[S:\zz-Troy's Reference Files\550 Danville HCS\03-Project Section\07-ACM Operations Plan\05-Asbestos Surveys](#)

Refer to [VAIHCS 6-Month Asbestos Inspection Report; 17 August 2016](#) for the latest asbestos inspection report. This inspection breaks down the quantity, type and location of known ACM/ACBM by building and is performed every 6 months.

6.0 Training

Asbestos awareness training courses are available on the VA Talent Management System (TMS) and assigned by each service as required. The following training is recommended for appropriate personnel:

6.1 Asbestos Program Manager and Industrial Hygienist

A certification as a Management Planner is required for the Asbestos Program Manager. The VA’s Professional Industrial Hygienist (VPIH) must meet the requirements of a Professional Industrial Hygienist (PIH) and may be a Certified Industrial Hygienist (CIH).

6.2 Maintenance Staff (working with ACM/ACBM)

All Maintenance and Operations (M&O) personnel that may encounter ACM/ACBM will receive 2 hours of asbestos awareness training. Supervisors may be assigned to complete an intermediate ACM awareness training. Each course requires annual refresher training.

6.3 Other Building Employees

All personnel that may encounter ACM/ACBM will receive 2 hours of asbestos awareness training.

6.4 Abatement Contractors

All abatement contractors are required to be state-licensed through IDPH for all asbestos abatement work. The contractor’s Industrial Hygienist must be a PIH and may be a CIH in order to take ACM samples.

7.0 Worker Protection

7.1 Program Administrator

Refer to [MCM 11-45; 'Asbestos Medical Surveillance'](#).

7.2 Recordkeeping

Records pertaining to VA personnel medical information, etc. are documented and maintained by Occupational Health.

7.3 Medical Surveillance

As per OSHA regulations [29CFR 1900.1001 \(l\)](#): 'Medical Surveillance', and [29CFR 1926.1101\(m\)](#): 'Medical Surveillance', the VAIHCS local policy is outlined in [MCM 11-45; 'Asbestos Medical Surveillance'](#).

7.3.1 Who Should Receive Medical Surveillance

Any employees exposed to levels of asbestos exposure above the Permissible Exposure Limit (PEL) as defined in [29CFR 1900.1001\(c\)](#); '*Permissible Exposure Limit*'.

7.3.2 Frequency of the Medical Examination

Medical Examinations shall be performed annually as stated in [29CFR 1900.1001\(l\)](#). Be sure to note the table for the "Chest Roentgenogram" since it will vary by age and years since exposure.

7.3.3 Information Building Management Will Provide to Physician

Refer to [29CFR 1900.1001\(l\)\(6\)](#) regarding all information sent to the Occupational Health Physician.

7.3.4 Content of Examination

Refer to Occupational Health for any questions about the Examination process and [29CFR 1900.1001\(l\)](#).

7.4 Respiratory Protection Program

Respirator fit testing is performed by the Industrial Hygienist, as needed. Refer to the Industrial Hygienist for any information regarding respirator fit, storage, etc. All regulators shall be NIOSH approved and appropriate for specific contaminants.

7.5 Protective Clothing

Protective Clothing is generally available, though no in-house abatement is performed. Refer to Safety for any needed protective clothing requirements.

8.0 Emergency Response

An asbestos fiber release emergency occurs when there is a possibility of a fiber exposure. This can happen if the ACM/ACBM is reduced from 'good' condition to 'damaged' or 'significantly damaged'. The ACM/ACBM may degrade due to age, moisture, or physical damage. Maintenance staff should always be on the lookout for any possible evidence of fiber release. Any asbestos related problems should be reported immediately to the Asbestos Program Manager, the Industrial Hygienist, the Maintenance and Operations Chief, and the FMS Chief.

8.1 Minor Fiber Release Episode

A minor fiber release episode occurs when less than 3 square feet/3 linear feet of friable ACM/ACBM becomes damaged. Examples include:

- A small number of fallen ceiling tiles
- 3 or fewer dislodged or damaged floor tiles

This can be a result of accidental damage during maintenance or repair, or other physical damage and must be addressed immediately. The following procedures may be used unless the determination is made to abate the asbestos by contractor. In this case, the ACM/ACBM shall be sprayed with water to prevent further potential exposure.

8.1.1 Procedures for control:

1. Notify the Asbestos Program Manager.
2. Two workers will proceed to the area.
3. Evacuate any unauthorized personnel from the area.
4. One worker stays in the area, while the other retrieves the following:
 - a. Warning signs
 - b. Personal respirators and disposable suits
 - c. Water sprayer and amended water
 - d. HEPA vacuum
 - e. Clean rags
5. If any ACM/ACBM is disposed of, be sure to follow proper disposal procedures as stated in [29 CFR 1926.1101\(g\), \(h\), \(i\), \(k\)](#), and any other applicable regulation.

8.2 Major Fiber Release Episode

A major fiber release episode is a serious event and occurs when more than 3 square feet/3 linear feet of ACM/ACBM becomes damaged. A licensed asbestos abatement contractor must be called to remove the ACM/ACBM.

8.2.1 Procedures for Control:

1. Notify the Asbestos Program Manager.
2. Two maintenance personnel and the Asbestos Program Manager will proceed to the area.
3. All unauthorized personnel will be evacuated from the room.
4. The area will be isolated as soon as possible and properly demarcated.
5. If necessary, all doors, windows and vents shall be sealed to prevent further exposure.
6. Air supply to room may need to be turned off.
7. Asbestos consultant may need to be contacted to evaluate area.
8. The only authorized personnel to enter area are to isolate the area and must wear proper protective clothing and respirators.
9. Abatement shall be fully documented.

9.0 Procedures for Planned Activities

9.1 Routine Maintenance in Which Disturbance to ACM/ACBM is Unlikely

These are routine maintenance procedures. The following precautions must be taken:

- The worker shall be properly trained in identifying ACM/ACBM and its' potential hazards.
- The worker shall take extra care to avoid disturbing ACM/ACBM.
- The worker shall contact the Asbestos Program Manager if ACM/ACBM becomes disturbed.
- Respirators will be made available if needed to trained employees.
- Location of water sprayers, HEPA vacuums, and warning signs shall be made known to all trained workers.

9.2 Routine Maintenance in Which Disturbance to ACM/ACBM is Likely

If disturbance to ACM/ACBM is likely, a determination shall be made prior, whether abatement is required before proceeding. If not, extra precautions must be taken to avoid disturbance to ACM/ACBM. Factors may include:

- ACM ACBM may release fibers into air supply, if disturbed.
- Accessibility to the area.
- Any other hazards present.
- Workers ability to leave area if ACM/ACBM does become disturbed.
- Is ACM/ACBM adjacent to sensitive areas? (Near the surgical suite, tenants, etc.)?

9.3 Quality Assurance

Air monitoring is performed during business hours for isolated areas and after regular business hours in traffic areas.

9.4 Routine Cleaning

All staff working near ACM/ACBM shall be made aware of the potential hazards before beginning work. All routine cleaning procedures performed (and restrictions) during construction are outlined in **29 CFR 1926.1101**. All abatement of ACM/ACBM is performed by a licensed asbestos contractor. However, after abatement, there may be traces of fibers in the area. Workers shall follow all methods outlined in **29 CFR 1910.1001(k) 'Housekeeping'**.

9.5 Ceiling Tiles

Care must be taken when working above ceiling tiles to prevent any ACM/ACBM or other debris from falling into the space below. Occupants must not hang anything from ceiling tiles, dislocate ceiling tiles, or place any items that may intrude into the space above the suspended ceiling.

10.0 Equipment and Materials

10.1 Equipment

Protective clothing is generally available, though all asbestos abatement is performed by contractors. They supply their own equipment. Contact Safety section for any required equipment.

10.2 Materials

Materials such as glove-bags are not available. All asbestos abatement is performed by contractors.

11.0 ACM/ACBM Disposal Procedures

11.1 General Disposal Procedures

Per the *'Illinois Administrative Code Title 77'; Chapter I; Subchapter p; Part 855; Section 330 'Operations and Maintenance'; subsection (b) 'Repair Procedures'*: If ACBM needs to be drilled, cut, sanded, repaired, or friable ACBM needs to be cleaned, Department-licensed asbestos workers shall be utilized. If this occurs and/or ACM/ACBM needs to be disposed of, the following procedures shall be followed:

1. Heating, cooling, or ventilations systems must be shut down.
2. Openings in work area shall be sealed off with 6 mil polyethylene or equivalent sheeting and duct tape.
3. All persons shall wear respirators with high efficiency HEPA filters and NIOSH-approved.
4. All persons must wear disposable full body coveralls and head gear.
5. ACBM shall be wetted down with amended before further disturbance of ACM/ACBM.
6. Work area shall be cleaned up using wet rags, mops or sponges, leaving no visible residue.
7. Asbestos-containing waste shall be sealed in 6 mil labeled plastic bags and disposed of at an approved disposal site.
8. Maintenance or repair which results in the disturbance of ACBM shall be conducted in accordance with OSHA Regulations *29 CFR 1926.1101(e) and (g)*.

Currently, all ACM/ACBM waste shall be disposed of by an IDPH-licensed asbestos abatement contractor.

12.0 Periodic Surveillance

12.1 Physical Inspection

Per *40 CFR 763: 'Asbestos'; Subpart E: 'Asbestos-Containing Materials in Schools'; Section 92: 'Training and Periodic Surveillance'; sub-section (b): 'Periodic Surveillance'*, a periodic surveillance physical inspection must be conducted every 6 months after a management plan is in effect by performing a visual inspection and documentation.

12.2 Area Air Monitoring

Regular air monitoring requirements are not performed in-house. This would be contracted out. It is done during certain removals and not for ambient air.

13.0 Periodic Evaluation to O&M Plan

The O&M Plan shall be updated regularly as changes occur or at each regular inspection. Every 6-months, the O&M Plan shall be updated. Prior to the evaluation, the following information shall be gathered:

1. Changes in federal and state regulations
2. All area and personal air monitoring data
3. Periodic surveillance reports
4. Emergency reports
5. ACM/ACBM drawings for each building
6. Any new asbestos abatement project files
7. Any other relevant record keeping files

14.0 Recordkeeping

All records relevant to ACM/ACBM and asbestos abatement will be located in the S: drive; 'Asbestos'; 'Asbestos O&M Plan Records' with the exception of the AutoCAD drawings. The AutoCAD drawings will be located in the G: drive; 'Scans'; 'DWGFILES'; 'Asbestos'.

14.1 General Provisions

The General guidelines for records requirements is stated in [40 CFR; Part 763: 'Asbestos'; Subpart E: 'Asbestos-Containing Materials in Schools'; Section 94: 'Recordkeeping'](#). The following will be collected here:

[S:\zz-Troy's Reference Files\550 Danville HCS\03-Projects Section\07-ACM Operations Plan\03-Asbestos O&M Plan Records:](#)

1. 6-month surveillance records
2. PACM Sample Results
3. Air Samples
4. Other Documents

14.2 Building Managements' Employee Files

Occupational Health keeps records of employees who have asbestos exposure.

14.3 Operations and Maintenance Activities Files

Any relevant documentation from O&M activities regarding asbestos abatement or newly discovered asbestos will be used to update the AutoCAD files in the G: drive; 'Scans'; 'DWGFILES'; 'Asbestos'.

Attachment A: References

1. 29CFR 1910.1001: 'Occupational and Safety Health Standards'; 'Toxic and Hazardous Substances'; 'Asbestos'
2. 29CFR 1926.1101: 'Safety and Health Regulations for Construction'; 'Toxic and Hazardous Substance'; 'Asbestos'
3. MCM 001ESS-02: 'Asbestos Management Program'
4. MCM 11-45: 'Asbestos Medical Surveillance'
5. Illinois Administrative Code Title 77; Chapter I; Subchapter p; Part 855; section 330 Operations and Maintenance; subsection (b) Repair Procedures
6. VAIHCS 6 Month Asbestos Inspection Report, dated 17 August 2016

Attachment B: Contacts

1. Illinois Department of Public Health (IDPH)

Asbestos and Lead Programs
Ph: 217-782-3517

2. Illinois Environmental Protection Agency (Illinois EPA)

Bureau of Air; Asbestos Unit Field Operations Section
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3. Veterans Affairs Illiana Health Care System (VAIHCS)

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