

Program Subject: Asbestos Safety Policy

1. PURPOSE

- 1.1 To establish an Asbestos policy in compliance with 29 CFR 1910.1001 and 1926.1101 of the Occupational Safety and Health Administration (OSHA).

2. SCOPE

- 2.1 To all workers, students and visitors at workplaces managed or controlled by UW-Eau Claire.
- 2.2 All University work activities that involve:
 - 2.2.1 Demolition or salvage of structures where asbestos is present.
 - 2.2.2 Removal or encapsulation of materials containing asbestos.
 - 2.2.3 Construction, alteration, repair, or maintenance that disturbs materials that contain asbestos.
 - 2.2.4 Installation of products containing asbestos.
 - 2.2.5 Transportation, disposal, storage and housekeeping activities involving asbestos containing materials.
- 2.3 Asbestos-containing asphalt roof coating, cements and mastics are not within the scope of this policy.

3. RESPONSIBILITIES

- 3.1 Department of "Risk Management and Safety" (RM&S)
 - 3.1.1 Be responsible for ensuring the development and implementation of this policy.
 - 3.1.2 Provide necessary resources to carry out the program.
 - 3.1.3 Develop and implement this Asbestos Safety Policy.
 - 3.1.4 Conduct required annual Asbestos Awareness training.
 - 3.1.5 Coordinate with supervisors for asbestos abatement and information.
- 3.2 Supervisors
 - 3.2.1 Identify employees within their department that require asbestos training and ensure training is attended.
 - 3.2.2 Ensure a risk assessment has been completed before the commencement of any work activities with asbestos.
 - 3.2.3 Ensure that appropriate safe work practices are followed by shop employees.
 - 3.2.4 Ensure all appropriate personal protective equipment/clothing is provided and maintained within safety requirements.
- 3.3 Facilities Management Construction Project Coordinator
 - 3.3.1 Ensuring that projects which need to disturb Asbestos Containing Materials (ACM) identify this within the project plan.
 - 3.3.2 Carrying out more detailed survey work as necessary, where intrusive work is planned at any property.

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3.3.3 Employing, as necessary, a professional individual for coordinating and arranging removal and remediation work where there is insufficient in-house expertise, resources knowledge.

3.4 Employees

3.4.1 Attend annual Asbestos Awareness training.

3.4.2 Avoid disturbing asbestos containing building materials during performance of duties.

3.4.3 Do not store materials against asbestos containing materials or damage asbestos while moving furniture or other objects.

3.4.4 Report to their immediate supervisors if materials are suspected of containing asbestos where the materials has become disturbed and/or damaged.

3.4.5 Do not sweep or use conventional vacuum cleaners to clean up asbestos containing materials.

3.4.6 Do not eat, drink, smoke or store food in areas containing friable asbestos containing materials.

3.4.7 Follow all requirements of this policy that apply to them.

3.5 Competent Person: One employee at the Heating Plant has been properly trained and certified to be a competent person.

3.5.1 Evaluate known or suspected asbestos hazards and select appropriate control strategies or methods for elimination.

4. PROGRAM COMPONENTS

4.1 General

4.1.1 The goal of this plan is to control building occupant and employee exposure to asbestos fibers and minimize any potential hazard posed by asbestos containing materials during cleaning, maintenance, renovation and general operation activities.

4.1.2 Employee exposure to airborne concentrations of asbestos will be controlled using the procedures outlined in the remainder of this section.

4.2 Identification of Asbestos in University buildings

4.2.1 The Asbestos Risk Register

4.2.1.1 Information regarding ACM, based on building surveys completed by a competent person and past projects in campus buildings, is available for reference in room MCS 120 (Plan Room).

a. Information is specific to room locations and indicates the presence or absence of Asbestos and whether it is friable.

b. Ask the Risk Management & Safety or Planning Office Staff for assistance if necessary.

4.2.1.1 Information provided by the Wisconsin Asbestos and Lead Abatement Management System is also available at <http://walms.doa.state.wi.us/>

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(A password is needed to access this website, see Risk Management & Safety Specialist Senior if you need assistance)

Note: Use the Internet Explorer to be able to Logon.

- 4.2.2 Procedures for Asbestos Identification – The following Safety Precautions are to be followed when any suspicious loose friable materials are seen.
 - 4.2.2.1 Employees who observe suspicious material should immediately notify their supervisor of the location and general nature of the material.
 - 4.2.2.2 DO NOT attempt to clean the material up or in contact with the materials.
 - 4.2.2.3 Supervisor shall call 836-4412 to contact the Heating Plant’s supervisor and/or the employee at the Heating Plant who is certified to:
 - a. Analyze the material and determine the appropriate method for control or abatement.
 - 4.2.2.4 If the material is confirmed as containing no asbestos, no action need be taken other than timely repair and clean up.
- 4.3 General Industry Standard
 - 4.3.1 House Keeping – Custodial staff should use the following safe work practices to clean floors and other horizontal surfaces in areas that may contain asbestos (i.e. buildings built before 1980), unless the asbestos containing material has been removed.
 - 4.3.1.1 Use Wet Methods of cleaning floors made of vinyl asbestos tile.
 - a. Dry sweeping and dry buffing of unsealed floors and scraping of all floors should be avoided
 - b. Use low abrasion pads (at speed below 300RPM) and wet methods to strip finish
 - 4.3.1.2 Wet cleaning and/or HEPA vacuums should be used to clean mechanical room floors. If HEPA vacuums are used, they must be used and emptied in a manner that minimizes re-entry of asbestos fibers into the workplace.
 - 4.3.2 Miscellaneous tasks
 - 4.3.2.1 Repair tasks such as pounding a nail or installing a molly anchor into wall materials containing asbestos to hang a picture, bulletin board or clock, etc. that are easy or simple enough to not require that construction workers, maintenance persons, or repair persons perform the work is covered by the general industry standard instead of the construction asbestos standard. (See **Appendix A**, OSHA Standard Interpretation).
 - 4.3.2.2 Appropriate work practices such as use of wetting agents (shaving cream) should be used to prevent release of fibers into the air, and debris should be cleaned up promptly.

NOTE: If Repair tasks are difficult or complex enough to require a construction worker, maintenance person, or repair person to perform the work, the work is Class III Asbestos work and covered by the construction asbestos standard. See Section 4.4.3 for appropriate work practices.

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4.4 Asbestos Work covered by the Construction Standard

4.4.1 Asbestos Work Classifications

4.4.1.1 **Class I Asbestos Work** – Activities involving the removal of Thermal System Insulation (TSI) and surfacing Asbestos Containing Material (ACM) and Presumed Asbestos Containing Material (PACM).

4.4.1.2 **Class II Asbestos Work** – Activities involving the removal of ACM which is not TSI or surfacing material. This includes, but is not limited to, removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles and construction mastics.

Note: Class I and Class II asbestos work is contracted to competent and licensed contractors. It is not being performed by FM employees.

4.4.1.3 **Class III Asbestos Work** – Activities involving repair and maintenance operations, where ACM, including TSI and surfacing PACM, is likely to be disturbed, for example:

- a. TSI with asbestos containing material applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.
- b. Surfacing ACM that has been sprayed, toweled-on or otherwise applied to surfaces such as:
 - ✓ Acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes.

Note: Only qualified FM employees, or qualified asbestos contractors, are permitted to perform Class III Asbestos Work on campus.

4.4.1.4 **Class IV Asbestos Work** – Includes 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.

- a. Qualified FM employees, or contractors, cleaning up debris and waste in a regulated area where respirators are required shall wear respirators.
- b. Waste and debris in areas where friable TSI or surfacing materials is accessible shall be assumed to contain asbestos

4.4.2 Engineering and Work Practices Controls

4.4.2.1 Ventilation of the regulated area to move air from the employee's breathing zone toward HEPA filtered collection device or exhaust.

4.4.2.2 Enclosure or isolation of processes producing asbestos dust.

4.4.2.3 If the above is not sufficient to reduce employee exposure to or below the PELs, they shall still be used and supplemented with respiratory protection.

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- 4.4.3 Work Practice Controls for Class III and IV Asbestos Work
 - 4.4.3.1 Drilling, cutting, abrading, sanding, chipping, breaking of ACM should be performed using drop cloths and mini-enclosures or glove bag systems.
 - 4.4.3.2 Vacuum cleaners equipped with HEPA filters should be used for cleanup.
 - 4.4.3.3 Use of Wet Methods, wetting agents during asbestos handling, mixing, removal, cutting, application, and cleanup, unless infeasible due to creation of other hazards.
 - 4.4.3.4 Prompt disposal of wastes contaminated with asbestos in leak-tight containers.
 - 4.4.3.5 Respirators and other appropriate PPE shall be worn where TSI or surfacing material is involved.
- 4.4.4 Prohibited Methods or Procedures
 - 4.4.4.1 High-speed abrasive disc saws that are not equipped with point of cut ventilator or enclosures with HEPA filtered exhaust air.
 - 4.4.4.2 Compressed air to remove asbestos or ACM except (except by a qualified contractor in conjunction with an enclosed ventilation system).
 - 4.4.4.3 Dry sweeping, shoveling, or other cleanup of ACM or PACM dust and debris.
- 4.4.5 Communication of Hazards – Before work begins, the presence, location, and quantity of ACM/PACM must be identified (See Section 4.2), including all TSI and sprayed on/troweled-on surfacing materials in buildings, and resilient flooring material installed before 1981.
 - 4.4.5.1 The following persons must be notified before work begins at worksites:
 - a. Employees who work in or adjacent to areas containing asbestos.
 - b. Contractors who work in or adjacent to areas containing such materials.
 - c. Employees who will be performing housekeeping activities at locations where ACM and/or PACM may have contaminated the area.
- 4.4.6 Warning Signs and Labels – The signs shall be posted at an appropriate distance from regulated area. (See 1910.1001(j)(3)(4) for more information).
 - 4.4.6.1 Post at all approaches to regulated areas so that employee may read the signs and take necessary protective steps before entering the area.
 - 4.4.6.2 Post at entrance to mechanical rooms/areas that contain ACM and/or PACM to inform employees of which materials are affected.
 - 4.4.6.3 Posted warning signs demarcating the area must be easily readable and understandable. The signs must bear the following information:

DANGER
ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY
RESPIRATORY AND PROTECTIVE CLOTHING
ARE REQUIRED IN THIS AREA

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4.5 Respirators and Medical Surveillance

4.5.1 Respirator Program – Use of respirator during work activities (Class I & II for contractors, Class III & IV for qualified FM employees) must follow a Respiratory Protection Program in compliance with OSHA requirements.

4.5.2 Medical Surveillance – Must be instituted for employees who for a combined total of 30 or more days per year are exposed at or above a permissible exposure limit.

4.5.2.1 Any day in which a worker engages in Class II or III operations or a combination thereof on intact material for one hour or less on the removal operation and/or cleanup, while using appropriate work practices, shall not be counted. (See 1926.1101(m)(1)(i)(A)(B) for more information)

5. TRAINING – All employees such as custodians, electricians, mechanics, plumbers, locksmiths, etc. who may work in a building that contains “Asbestos Containing Building Material” (ACBM) must receive the following asbestos awareness training.

5.1 Asbestos Awareness training requirement include:

5.1.1 Training shall be provided prior to or at the time of initial assignment and at least annually thereafter.

5.1.2 New custodial and maintenance employees shall be trained within 60 days after commencement of employment to ensure that they understand the following:

5.1.2.1 The background information on asbestos and uses of asbestos.

5.1.2.2 The health effects associated with asbestos exposure.

5.1.2.3 Methods of recognizing asbestos and employee protection programs.

5.1.2.4 Recognition of damaged, deteriorated and delaminated ACBM.

5.1.2.5 Appropriate work practices to minimize exposure to asbestos and the location of ACM/PACM in the building.

5.1.2.6 Proper cleaning methods and techniques.

5.2 Operations and Maintenance (O&M) training – A special (O&M) training is required for qualified FM employees who perform Class III asbestos work should receive **14 hours** training necessary for them to perform their tasks safely from the off-site contractor:

5.2.1 The relationship between smoking and exposure to asbestos producing lung cancer.

5.2.2 The quantity, location, manner of use, release, and storage of asbestos, and the specific nature of operations which could result in exposure to asbestos.

5.2.3 Descriptions of the proper methods of handling ACM, including:

5.2.3.1 Appropriate and proper worker decontamination procedures.

5.2.3.2 Waste handling and disposal.

5.2.3.3 The engineering controls and proper asbestos-related work practices.

5.2.3.4 Protective clothing donning, use, and handling.

5.2.4 Regulatory requirements such as federal, state, and local asbestos regulations.

5.2.5 Requirements concerning signs and labels.

5.2.6 Class III work must include “hands-on” training such as glove bag work and HEPA vacuum use and maintenance.

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Appendix A. OSHA Standard Interpretation



U.S. Department of Labor
Occupational Safety & Health Administration



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Standard Interpretations

04/21/1998 - Class III asbestos work: training, medical surveillance, PPE, and surfacing materials.

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- **Standard Number:** [1926.1101](#)

April 21, 1998

Ms. Sally J. Lagomarisino
Supervisor Environmental Health and Safety
Clayton Environmental Consultants
1252 Quarry Lane
P.O. Box 9019
Pleasanton, CA 94566

Dear Ms. Lagomarisino:

This is in response to your letter of August 29, 1997, to Stephen Mallinger, former Acting Director, Office of Health Compliance Assistance, Occupational Safety and Health Administration (OSHA), requesting clarification of the applicability of the asbestos standard to certain work activities. We apologize for the delay in our response to you.

You ask if pounding a nail or installing a molly anchor into wall materials, such as, joint compound, finishing/texture material, wall plaster, or paint, that contain more than 1% asbestos, to hang a picture, bulletin board, or clock, etc. is considered to be work that is covered by tile construction asbestos standard (29 CFR 1926.1101). You also ask if installing a molly anchor or other fasteners into wall materials as described above or into floor materials such as asbestos-containing resilient floor tile or sheeting in order to seismically brace a file cabinet, bookcase, etc., is construction work that is covered by the construction asbestos standard. Such work must be evaluated case by case to determine whether it is covered by the construction asbestos standard. If the task is difficult or complex enough to require that construction workers, maintenance persons, or repair persons perform the work, then the work is Class III work covered by the construction asbestos standard. If the task is easy or simple enough to not require that construction workers, maintenance persons, or repair persons perform the work, then the work is covered by the general industry asbestos standard, 29 CFR 1910. 1001, instead of the construction asbestos standard.

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You seek clarification of what training must be provided employees performing that work described above that is Class III work covered by the construction asbestos standard. If the employees are employed at carrying out an operation and maintenance program for the building or facility, they require training equivalent to the Environmental Protection Agency's (EPA's) Operation and Maintenance (O&M) training as outlined in 40 CFR 763.92. On the other hand, if Class III work described in the preceding paragraph is the only Class III work conducted by the employees, the employer may rely on the competent person it uses for asbestos projects to determine whether the O&M-type course is appropriate for these employees. If the competent person determines that much of the curriculum in the O&M-type course is not relevant, the competent person may certify that the training contained in 29 CFR 1926.1101(k)(9)(viii) is more applicable and may opt to designate this training for the employees provided relevant engineering and work practice controls, other controls, and "hands-on" training will be adequately covered. Both initial training and annual refresher training must be provided. There is no specified minimum time that must be devoted to refresher training. The duration of the initial training will depend on the complexity and hazard of the operation, but it is likely that at least 4 hours will be required to cover the topics, methods, and hands-on portion.

As to your inquiry about medical surveillance for employees performing that work you describe above that is Class III work, an employee must be offered medical surveillance if there are more than 30 days per year the employee spends any amount of time performing the activities. Those days on which an employee spends less than an hour performing the work are not excluded from the count because the work produces asbestos-containing aerosols or shavings. The days on which an employee spends less than an hour on Class III (or Class II) work are excluded only if the asbestos-containing material stays intact while being disturbed (or removed).

You are correct that regardless of exposure levels, regulated areas must be established wherever Class III asbestos work is conducted. According to 29 CFR 1926.1101(e)(1), all Class III asbestos work must be conducted within a regulated area. Moreover, the regulated area is required even should a negative exposure assessment be produced. The regulated area shall be demarcated in any manner that minimizes the number of persons within the area and protects persons outside the area from exposure to airborne asbestos. Signs shall be provided and displayed pursuant to the requirements of 29 CFR 1926.1101(k)(7).

You are correct that until the employer produces negative exposure assessments for Class III asbestos work, the employees performing the work must be provided and must use respirators and protective clothing. If Class III asbestos work is not performed using wet methods, or if the Class III asbestos work is performed on asbestos-containing surfacing material, then respirators shall be used even after negative exposure assessments have been produced.

The protective clothing required for Class III asbestos work if a negative exposure assessment has not been produced is coveralls or similar whole-body clothing, and head coverings, gloves, and foot coverings. In those instances, where negative exposure assessments have been produced for Class III asbestos work, no protective clothing is required.

You end your inquiry into the requirements that pertain when pounding a nail or installing a molly anchor into a wall by asking whether the use of coveralls and a respirator, establishment of a regulated area, and posting of an asbestos warning sign are required just to hang a picture on a plaster wall or on a sheetrock wall coated with finishing material, even after a negative exposure assessment has been produced. As you will note from the answers we provide later in this letter to your questions about surfacing material, the project you ask about may not involve

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surfacing material. Also, as we stated earlier in this letter, if the task is easy or simple enough to not require that construction workers, maintenance persons, or repair persons perform the work, then the work is covered by the general industry asbestos standard, 29 CFR 1910.1001, instead of the construction asbestos standard.

If the work is covered by the general industry asbestos standard, then if a negative exposure assessment has been produced, no respiratory protection or protective clothing is required, and neither the establishment of a regulated area nor the posting of an asbestos warning sign is required.

You ask for the definition of "routine facility maintenance." OSHA has not defined the term with regard to its relationship to the Asbestos Construction Standard because the term has no special application to the standard.

You ask that OSHA provide examples of materials it considers surfacing materials besides acoustical plaster and fireproofing coatings for structural members. Decorative plaster with a honeycombed structure and loosely bound fibers is an example of another material that OSHA considers surfacing material.

You list several materials and ask if they are surfacing materials as defined by OSHA. We repeat each of the materials you list and comment on them.

- Wall/ceiling plaster (cementitious-type) that has been troweled onto wire lath, button board, or other substrate -- Unless the plaster is acoustical plaster as indicated by a honeycombed structure, or the plaster is decorative plaster with an appearance similar to acoustical plaster, it is not surfacing material.
- Stucco -- This is not surfacing material.
- Paint that has been sprayed on or otherwise applied to wall/ceiling or other building surfaces -- This is not surfacing material.
- Finishing material that has been troweled onto or spray-applied to wall/ceiling sheetrock, concrete, or other surfaces (e.g., "joint compound" that has been applied to a sheetrock wall/ceiling surface to provide a textured finish and covers the entire surface [not just the joints], or a skim coat application of a light cement finish coat that has been used to provide a smooth finish on sheetrock or concrete -- "Joint compound" used to provide a textured finish for the entire wall or ceiling is usually not surfacing material since usually any fibers it may contain are firmly bound. However, if the textured finish is not readily distinguishable visually from acoustical plaster, it is surfacing material within the meaning of the use of the term in the standard. Cement skim coats applied to sheetrock or concrete to provide a smooth finish are not surfacing materials.
- Floor leveling compound -- This is not surfacing material.
- Mastic that has been troweled onto a concrete floor surface to adhere resilient tile -- This is not surfacing material.

We appreciate the opportunity to clarify these matters for you. If you have further questions, please contact the Office of Health Compliance Assistance at (202) 693-2190.

Sincerely,

John B. Miles, Jr
Director
Directorate of Compliance Programs