



### **Asbestos Compliance Program for Construction**

NOTE: All regulation references are to 29 CFR 1926.1101 unless otherwise stated.

#### **Purpose**

The purpose of this program is to inform interested persons, including employees, that EMA is complying with OSHA's asbestos standard, Title 29 Code of Federal Regulations 1926.1101 by ensuring that:

- No employee is exposed to an airborne concentration of asbestos in excess of 0.1 f/cc (fibers per cubic centimeter of air) as an eight-hour time-weighted average (TWA).
- No employee is exposed to an airborne concentration of asbestos in excess of 1.0 f/cc (excursion limit) as averaged over a sampling period of 30 minutes.
- We assess all asbestos operations for their potential to generate airborne fibers.
- Our designated competent person conducts an initial exposure assessment immediately before or at the initiation of an operation to document expected exposures, and that the assessment is completed in time to comply with requirements triggered by exposure data or the lack of a "negative exposure assessment."
- We perform periodic monitoring and additional monitoring when required.
- When required, we implement a medical surveillance program for all employees when for a combined total of 30 or more days per year engage in Class I, II, or III work or are exposed at or above the PEL, or when employees are required to wear negative-pressure respirators.
- We maintain objective data, monitoring, medical surveillance, training, and building owner notification records when required and for the time periods indicated in the asbestos rule.
- Our asbestos competent person is qualified, authorized, and has the proper training to ensure worker safety and health as required by 29 CFR 1926.20.
- Our respirator program is in place and in accordance with 29 CFR 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m).
- Our Class I, II, and III asbestos work, and all other operations where airborne concentrations of asbestos exceed or there is a possibility they may exceed a PEL, are conducted within regulated areas. Our regulated areas comply with 29 CFR 1926.1101(e)(2) - (5).
- We understand that the communication of asbestos hazards is vital to prevent further overexposure and that we have specific duties under the asbestos rule to communicate those hazards through written notifications, signs, labels and employee information and training.
- Our specific methods of compliance with the PEL and STEL are based on the regulation. We understand there are compliance methods that are required for most jobs, required for all jobs when exposure exceeds the PEL, and methods that are prohibited on all jobs. We also understand that most, but not all, asbestos jobs fall into one of the Class I - IV categories. For example, the installation of new asbestos-containing products does not carry a class designation.
- On multi-employer worksites, we will: (1) inform other employers on the site of the nature of our work, (2) relay information of the existence of regulated areas, and take correct measures to ensure employees of other employers are not exposed to asbestos.

This program applies to all construction work where one of our employees may be occupationally

exposed to asbestos. All work related to construction, alteration, or repair, including painting and decorating, is included. EMA's Project Manager, is the program coordinator/manager and is responsible for its implementation. Copies of the written program may be obtained at our Main office or through the program coordinator/manager.

This written safety plan is designed to cover all of our job sites which may result in occupational exposure to asbestos or asbestos containing building materials.

### **Exposure assessment and monitoring (.1101(f))**

#### *Initial Exposure Assessment*

We understand we are required to evaluate all asbestos operations (some exceptions exist only when we are involved in Class IV work) for the purpose of predicting whether exposure levels during the planned asbestos work can be expected to exceed the PELs, and thus whether additional monitoring, and other precautions are required.

Our competent person will ensure the proper conduct all initial exposure assessments.

The initial exposure assessment requirement will be satisfied by one of two methods:

- A negative exposure assessment demonstrating that the activity involving the asbestos material is unlikely under all foreseeable conditions to result in concentration above the PEL (1926.1101(f)(2)(iii)).
- Initial exposure monitoring determined from breathing zone air samples that are representative of the 8-hour TWA and 30-minute short-term exposures of each employee conducted pursuant to .1101(f)(1)(iii).

#### *Periodic Monitoring*

We comply with OSHA requirements for periodic monitoring. For Class I, II, or III asbestos operation in progress, we monitor representative employees working in a regulated area daily unless a negative exposure assessment for the entire operation already exists and nothing has changed..

#### *Termination of Monitoring*

If periodic monitoring reveals that our employee exposure, as indicated by statistically reliable measurements, are below the permissible exposure (PEL) and short term exposure limit (STEL), we may discontinue monitoring of our employees. represented by the data.

If periodic monitoring reveals that our employee exposure, as indicated by statistically reliable measurements, are at or above the permissible exposure (PEL) and short term exposure limit (STEL), we will continue monitoring our employees.

#### *Employee Notification*

We notify employees in writing, personally or by posting at a central location, the monitoring results as soon as possible following receipt of those results.

## Medical Surveillance

We institute a medical surveillance program for all employees who for a combined total of 30 or more days per year are engaged in Class I, II, and III work or are exposed at or above the PEL.

When our employees are required by the standard to wear a negative pressure respirator, we make sure those employees are physically able to perform the work and use the equipment as determined by a physician.

We ensure that all medical examinations and procedures are performed by or under the supervision of a licensed physician, and are provided at no cost to the employee and at a reasonable time and place.

Our medical surveillance program includes the following requirements:

### *1. Medical examinations and consultations*

We make available medical examinations and consultations to each employee as required by and in accordance with 29 CFR 1926.1101(m):

- Prior to assignment of the employee to an area where negative-pressure respirators are worn.
- When our employee is assigned to an area where exposure to asbestos may be at or above the PEL for 30 or more days per year, or engage in Class I, II, or III work for a combined total of 30 or more days per year, a medical examination must be given within 10 working days following the thirtieth day of exposure; and at least annually thereafter.

### *2. Information provided to the physician*

- We provide the following information to the examining physician:
  - A copy of the asbestos standard including Appendices D, E, and I.
  - A description of affected employees' duties as they relate to their exposure.
  - The employees' representative exposure level or anticipated exposure level.
  - A description of any personal protective and respiratory equipment used or to be used.
  - Information from previous medical examinations that is not otherwise available to the examining physician.

### *3. Physician's written opinion*

The written opinion we receive from the examining physician containing the results of the medical examination includes:

- Whether our employee has any detected medical conditions that would place him or her at an increased risk of material health impairment from exposure to asbestos.
- Recommended limitations on the employee or on the use of personal protective equipment such as respirators.
- A statement that the employee has been informed by the physician of the results of the medical examination and of any medical conditions that may result from asbestos exposure.
- A statement that the employee has been informed by the physician of the increased risk of lung cancer attributable to the combined effect of smoking and asbestos exposure.
- We instruct the physician not to reveal in the written opinion given to the employer specific findings or diagnoses unrelated to occupational exposure to asbestos.

- We provide a copy of the physician's written opinion to the affected employee within 30 days from its receipt.

## **Record keeping**

### *Objective Data*

Where we rely on objective data that demonstrates that products made from or containing asbestos or the activity involving such products or material are not capable of releasing fibers of asbestos in concentrations at or above the permissible exposure limit and/or excursion limit under the expected conditions of processing, use, or handling to satisfy the requirements of 29 CFR 1926.1101(f), we establish and maintain an accurate record of objective data reasonably relied upon in support of the exemption. The record includes at least the following information:

- The product qualifying for exemption.
- The source of the objective data.
- The testing protocol, results of testing, and/or analysis of the material for the release of asbestos.
- A description of the operation exempted and how the data support the exemption.
- Other data relevant to the operations, materials, processing, or employee exposures covered by the exemption.

We maintain this record for the duration of the employer's reliance upon such objective data.

### *Exposure Measurements*

We keep an accurate record of all measurements taken to monitor employee exposure to asbestos as prescribed at 29 CFR 1926.1101(f).

Note: We may utilize the services of competent organizations such as industry trade associations and employee associations to maintain the records required by this section.

This record includes at least the following information:

- The date of measurement.
- The operation involving exposure to asbestos that is being monitored.
- Sampling and analytical methods used and evidence of their accuracy.
- Number, duration, and results of samples taken.
- Type of protective devices worn, if any.
- Name, social security number, and exposure of the employees whose exposures are represented.

We will maintain this record for at least thirty (30) years, in accordance with 29 CFR 1910.1020.

### *Medical Surveillance*

We have established and do maintain an accurate record for each employee subject to medical surveillance under 29 CFR 1926.1101(m), in accordance with 29 CFR 1910.1020.

- The record includes at least the following information:
  - The name and social security number of the employee.
  - A copy of the employee's medical examination results, including the medical history,

questionnaire responses, results of any tests, and physician's recommendations.

- Physician's written opinions.
- Any employee medical complaints related to exposure to asbestos.
- A copy of the information provided to the physician as required by paragraph (m) of this section.

We make sure that this record is maintained for the duration of employment plus thirty (30) years, in accordance with 29 CFR 1910.1020.

#### *Training Records*

We keep all employee training records for one (1) year beyond the last date of employment by this company.

#### *Data to Rebut PACM*

Where the building owner and we have relied on data to demonstrate that PACM is not asbestos-containing, we maintain such data for as long as they are relied upon to rebut the presumption.

#### *Records of Required Notifications*

Where the building owner has communicated and received information concerning the identification, location and quantity of ACM and PACM, we ensure that written records of such notifications and their content are maintained by the building owner for the duration of ownership and then transferred to successive owners of such buildings/facilities.

#### *Availability*

We will, upon written request, make all records required to be maintained by this section available to the Assistant Secretary and the Director for examination and copying.

We will, upon request, make any exposure records required by paragraphs (f) and (n) of the asbestos rule available for examination and copying to affected employees, former employees, designated representatives, and the Assistant Secretary, in accordance with 29 CFR 1910.1020(a) through (e) and (g) through (i).

We will, upon request, make employee medical records required by paragraphs (m) and (n) of this section available for examination and copying to the subject employee, anyone having the specific written consent of the subject employee, and the Assistant Secretary, in accordance with 29 CFR 1910.1020.

#### *Transfer of Records*

We comply with the requirements concerning transfer of records set forth in 29 CFR 1910.1020 (h). If we ever cease to do business and there is no successor employer to receive and retain the records for the prescribed period, we shall notify the Director at least 90 days prior to disposal and, upon request, transmit them to the Director.

## Competent Person Requirements

At the construction worksites covered by this plan, we have designated our Project Manager, or other AHERA certified/licensed supervisors as our competent person(s), having the qualifications and authorities for ensuring worker safety and health required by Subpart C, General Safety and Health Provisions for Construction (29 CFR 1926.20 through 1926.32).

### *Required Inspections by the Competent Person*

Section 1926.20(b)(2) requires frequent and regular inspections of job sites, materials, and equipment to be made by competent persons. We recognize and follow this requirement. We log these inspections and maintain the logs as records.

### *Additional Inspections*

In addition, our competent person makes frequent and regular inspections of the job sites to perform or supervise the duties listed below.

For Class I jobs, on-site inspections are made at least once during each work shift, and at any time an employee requests one.

For Class II, III, and IV jobs, on-site inspections are made at intervals sufficient to assess whether conditions have changed, and at any reasonable time an employee requests.

On all worksites where our employees are engaged in Class I or II asbestos work, our competent person will perform or supervise the following duties, as applicable:

- Set up the regulated area, enclosure, or other containment.
- Ensure (by on-site inspection) the integrity of the enclosure or containment.
- Set up procedures to control entry to and exit from the enclosure and/or area.
- Supervise all employee exposure monitoring required by this section and ensure that it is conducted as required by paragraph (f) of this section.
- Ensure that employees working within the enclosure and/or using glove bags wear respirators and protective clothing as required by paragraphs (h) and (i) of this section.
- Ensure through on-site supervision, that employees set up, use, and remove engineering controls, use work practices and personal protective equipment in compliance with all requirements.
- Ensure that employees use the hygiene facilities and observe the decontamination procedures specified in 29 CFR 1926.1101(j).
- Ensure that through on-site inspection, engineering controls are functioning properly and employees are using proper work practices.
- Ensure that notification requirements in paragraph 29 CFR 1926.1101(k) of this section are met.

### *Competent Person Training*

Our competent person has received the following training for Classes I and II asbestos work:

1. All aspects of asbestos removal and handling, including: abatement, installation, removal and handling.
2. The contents of the asbestos rule.

3. The identification of asbestos.
4. Removal procedures where appropriate.
5. Other practices for reducing the hazard.

Our competent person was trained in a comprehensive course for supervisors that meets the criteria of EPA's Model Accredited Plan (40 CFR part 763, subpart E, Appendix C) such as a course conducted by an EPA-approved or state-approved training provider, certified by EPA or a state or a course equivalent in stringency, content, and length.

Our competent person has received the following training for Classes III and IV asbestos work:

1. Aspects of asbestos handling appropriate for the nature of the work, to include procedures for setting up glove bags and mini- enclosures.
2. Practices for reducing asbestos exposures.
3. Use of wet methods.
4. The contents of this standard.
5. The identification of asbestos.

This training includes successful completion of a course that is consistent with EPA requirements for training of local education agency maintenance and custodial staff as set forth at 40 CFR 763.92(a)(2), or its equivalent in stringency, content, and length. Competent persons for Class III and IV work, may also be trained per the requirements of 29 CFR 1926.1101(o)(4)(i).

### **Regulated areas**

We have Class I, II or III asbestos work being conducted at this site, and is therefore done within regulated areas.

Other operations, where airborne concentrations of asbestos exceed or there is a reasonable possibility they may exceed a PEL, are conducted within a regulated area. Our regulated areas comply with 29 CFR 1926.1101(e)(2), (3), (4) and (5).

### *Demarcation*

The regulated area is demarcated in a manner that minimizes the number of persons within the area and protects persons outside the area from exposure to airborne asbestos. When critical barriers or negative pressure enclosures are used, they may demarcate the regulated area. Warning signs are posted in accordance with the requirements of 29 CFR 1926.1101(k)(7).

### *Access*

Access to regulated areas is limited to authorized persons and to persons authorized by the Osh Act or federal regulations.

### *Respirators*

All persons entering a regulated area where employees are required to wear respirators are

supplied with a respirator selected in accordance with 29 CFR 1926.1101(h)(3).

#### *Prohibited Activities*

We make sure that our employees do not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in a regulated area.

#### *Competent Persons*

Our competent person will supervise all asbestos work performed within regulated areas.

#### **Communication of Hazards**

We understand the importance of communicating asbestos hazard information at this job site. Our plan to communicate those hazards follows the requirements of 29 CFR 1926.1101(k) and contains information and procedures for the following elements:

- Duties of building and facility owners.
- Duties of employers whose employees perform work subject to this standard in or adjacent to areas containing ACM and PACM.
- Criteria to rebut the designation of installed material as PACM.
- Warning signs.
- Labels.
- Employee information and training.
- Access to training materials.

#### **Methods of Compliance**

Our methods of compliance set operation-specific and exposure-triggered work practices for conducting asbestos work. Each job is specific and the methods of compliance will include the following required and optional procedures.

The following basic engineering controls and work practices are a part of all asbestos operations at this jobsite regardless of the levels of exposure (except as provided in 29 CFR 1926.1101(g)(8)(ii)):

- Vacuum cleaners equipped with HEPA filters to collect all debris and dust containing ACM or PACM.
- Wet methods, or wetting agents, to control employee exposures during asbestos handling, mixing, removal, cutting, application, and cleanup, except where we demonstrate that the use of wet methods is infeasible due to for example, the creation of electrical hazards, equipment malfunction, and, in roofing.
- Prompt clean-up and disposal of wastes and debris contaminated with asbestos in leak-tight containers.
- In addition to the requirements noted above for all asbestos operations we use the following control methods to achieve compliance with the TWA permissible exposure limit and excursion (STEL) limit.
- Local exhaust ventilation equipped with HEPA filter dust collection systems.
- Enclosure or isolation of processes producing asbestos dust.
- Ventilation of the regulated area to move contaminated air away from the breathing zone of

- employees and toward a filtration or collection device equipped with a HEPA filter.
- Use of other work practices and engineering controls that the Assistant Secretary can show to be feasible.
  - Wherever the feasible engineering and work practice controls described above are not sufficient to reduce employee exposure to or below the permissible exposure limit and/or excursion limit we will use them to reduce employee exposure to the lowest levels attainable by these controls and shall supplement them by the use of respiratory protection.

### *Prohibitions*

We never use the following work practices and engineering controls for work related to asbestos or for work which disturbs ACM or PACM, regardless of measured levels of asbestos exposure or the results of initial exposure assessments:

- High-speed abrasive disc saws that are not equipped with point of cut ventilator or enclosures with HEPA filtered exhaust air.
- Compressed air to remove asbestos, or materials containing asbestos, unless the compressed air is used in conjunction with an enclosed ventilation system designed to capture the dust cloud created by the compressed air.
- Dry sweeping, shoveling, or other dry clean-up of dust and debris containing ACM and PACM.
- Employee rotation as a means of reducing employee exposure to asbestos.

### *Class I Requirements*

In addition to the required provisions of paragraphs (g)(1) and (2) of 29 CFR 1926.1101, we implement all other required engineering controls and work practices as required by 29 CFR 1926.1101(g)(4)-Class I Requirements, (5)-Specific control methods for Class I work, and (6)-Alternative control methods for Class I work.

All Class I work, including the installation and operation of the control system is supervised by our competent person.

### *Work Practices and Engineering Controls for Class II work*

All Class II work, including the installation and operation of the control system is supervised by our competent person. For all indoor Class II jobs, where we have not produced a negative exposure assessment, or where during the job changed conditions indicate there may be exposure above the PEL, or where we do not remove the ACM in a substantially intact state, we will use one of the methods in 29 CFR 1926.1101(g)(7)(ii)(A) - (C), to ensure that airborne asbestos does not migrate from the regulated area. We perform all Class II asbestos work using the work practices and requirements in 29 CFR 1926.1101(g)(1)(i) - (iii).

### *Additional Controls for Class II Work*

When performing the following types of Class II asbestos work, we comply with the work practices and controls designated for each type. We do understand that where more than one control method may be used, we may choose one or a combination of designated control methods. Class II work also may be performed using a method allowed for Class I work, except that glove bags and glove boxes are allowed if they fully enclose the Class II material to be removed. We ensure that the work practices as specified below are followed:

- For removing vinyl and asphalt flooring materials containing ACM or for which in buildings constructed no later than 1980 we have not verified the absence of ACM in accordance with 1926.1101(g)(8)(i), employees comply with the work practices in 1926.1101(g)(8)(i)(A)-(I), and that employees are trained in these practices in accordance with 1926.1101(k)(9).
- For removing roofing material which contains ACM under 1926.1101(g)(8)(ii)(A)-(H).
- When removing cementitious asbestos-containing siding and shingles or transite panels containing ACM on building exteriors (other than roofs, where 1926.1101(g)(8)(ii) applies) under 1926.1101(g)(8)(iii)(A)-(D).
- When removing gaskets containing ACM under 1926.1101(g)(8)(iv)(A)-(D).
- Any other Class II removal of asbestos containing material for which specific controls have not been listed in 29 CFR 1926.1101(g)(8)(iv)(A)-(D) under 1926.1101(g)(8)(v)(A)-(D).

#### *Alternative Work Practices and Controls*

Instead of the Class II work practices and controls listed in 1926.1101(g)(8)(i)-(v), we may use different or modified engineering and work practice controls. In those cases we will follow the provisions found in 1926.1101(g)(8)(vi)(A) & (B).

#### *Work Practices and Engineering Controls for Class III Asbestos Work*

We conduct Class III asbestos work using engineering and work practice controls which minimize the exposure to our employees performing the work and to bystander employees. This written plan reflects the procedures in 1926.1101(g)(9)(i)-(v) including:

- Wet methods.
- When feasible, local exhaust ventilation.
- Where the disturbance involves drilling, cutting, abrading, sanding, chipping, breaking, or sawing of thermal system insulation or surfacing material we will use impermeable drop cloths, and will isolate the operation using mini-enclosures or glove bag systems in compliance with 29 CFR 1926.1101(g)(5) or another isolation method.
- Where we do not have a "negative exposure assessment," or where monitoring results show the PEL has been exceeded, we will contain the area using impermeable drop cloths and plastic barriers or their equivalent, or shall isolate the operation using a control system in compliance with 29 CFR 1926.1101(g)(5).
- Our employees performing Class III jobs, involving the disturbance of thermal system insulation or surfacing material, or where we do not produce a "negative exposure assessment" or where monitoring results show a PEL has been exceeded, wear respirators selected, used and fitted in accordance with 29 CFR 1926.1101(h) and our Respiratory Protection Program

#### *Class IV Asbestos Work*

Employees trained in our asbestos awareness training program (29 CFR 1926.1101(k)(9)) will be allowed to work Class IV asbestos jobs. In addition, all Class IV jobs will conform to the requirements of 29 CFR 1926.1101(g)(1), mandating wet methods, HEPA vacuums, and prompt clean up of debris containing ACM or PACM. Our employees cleaning up debris and waste in a regulated area where respirators are required will wear respirators selected, used and fitted in accordance with 29 CFR 1926.1101(h) and our Respiratory Protection Program. When we have employees who clean up waste and debris in, or we are in control of areas where friable thermal system insulation or surfacing material is accessible, we will assume that such waste and debris contains asbestos.

*Alternative methods of compliance for installation, removal, repair, and maintenance of certain roofing materials*

When installing, removing, repairing, or maintaining intact pipeline asphaltic wrap, or roof cements, mastics, coatings, or flashings which contain asbestos fibers encapsulated or coated by bituminous or resinous compounds the following steps are taken:

- Before work begins and as needed during the job, our competent person who is capable of identifying asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure, and who has the authority to take prompt corrective measures to eliminate such hazards, conducts an inspection of the worksite and determine that the roofing material is intact and will likely remain intact.
- All employees performing work covered by this alternative method of compliance are trained in a training program that meets the requirements of 29 CFR 1926.1101(k)(9).
- The material is not sanded, abraded, or ground. Manual methods which do not render the material non-intact are used.
- Material that has been removed from a roof is not dropped or thrown to the ground. Unless the material is carried or passed to the ground by hand, it will be lowered to the ground via covered, dust-tight chute, crane or hoist. All such material will be removed from the roof as soon as is practicable, but in any event no later than the end of the work shift.
- Where roofing products labeled according to the labeling instructions in 29 CFR 1926.1101(k)(8) as containing asbestos are installed on non-residential roofs during operations covered in 29 CFR 1926.1101(g)(11), we will notify the building owner of the presence and location of such materials no later than the end of the job.
- All removal or disturbance of pipeline asphaltic wrap is performed using wet methods.

If during the course of the job the material does not remain intact, the provisions of 29 CFR 1926.1101(g)(8) apply instead of 29 CFR 1926.1101(g)(11).

### **Respiratory Protection**

We provide respirators and ensure they are used in the following circumstances:

- During all Class I asbestos jobs.
- During all Class II work when the ACM is not removed in a substantially intact state.
- During all Class II and III work not performed using wet methods, except for removal of ACM from sloped roofs when a negative exposure assessment has been made and the ACM is removed in an intact state.
- During all Class II and III asbestos jobs where we do not conduct a negative-exposure assessment.
- During all Class III jobs where TSI or surfacing ACM or PACM is being disturbed.
- During all Class IV work performed within regulated areas where employees performing other work are required to wear respirators.
- During all work covered by this section where employees are exposed above the TWA or excursion limit.
- In emergencies.

### *Respirator Selection*

Where respirators are used we select and provide, at no cost to our employees, the appropriate respirator. We ensure that the employee uses the respirator provided. We provide a tight fitting powered, air-purifying respirator in lieu of any negative-pressure respirator specified in Table 1

whenever: (a) an employee chooses to use this type of respirator, and (b) this respirator will provide adequate protection to the employee. In addition, we provide a half-mask air purifying respirator, other than a disposable respirator, equipped with high efficiency filters whenever our employees perform:

- Class II and III asbestos jobs where we do not conduct a negative exposure assessment.
- Class III jobs where TSI or surfacing ACM or PACM is being disturbed.
- Selection criteria when employees are in regulated area where Class I work is being performed, a negative exposure assessment of the area has not been produced, and the exposure assessment of the area indicates the exposure level will not exceed 1 f/cc as an 8-hour time weighted average, we provide the employees with one of the following respirators:

(A) A tight-fitting powered air-purifying respirator equipped with high efficiency filters;

(B) A full face piece supplied-air respirator operated in the pressure demand mode equipped with HEPA egress cartridges; or

(C) A full face piece supplied-air respirator operated in the pressure demand mode equipped with an auxiliary positive pressure self-contained breathing apparatus. A full face piece supplied-air respirator operated in the pressure-demand mode equipped with an auxiliary positive pressure self-contained breathing apparatus must be provided under such conditions when the exposure assessment indicates exposure levels above 1 f/cc as an 8-hour time weighted average.

### *Respirator Program*

When we are required to use respiratory protection, the program we institute is in accordance with 29 CFR 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m).

We have developed a respiratory protection program to satisfy the requirements of this asbestos-related project.

Note: See respiratory protection requirements under 29 CFR 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m). Other components of our respirator program include prohibiting the assignment of asbestos work that requires respirator use if, based on their most recent medical examination, the examining physician determines that the employee will be unable to function normally while using a respirator, or that the safety or health of the employee or other employees will be impaired by the employee's respirator use.

Those employees will be assigned to another job or given the opportunity to transfer to a different position, the duties of which they are able to perform with the same employer, in the same geographical area, and with the same seniority, status, and rate of pay and other job benefits they had just prior to such transfer, if such a different position is available.

### *Respirator Fit Testing*

We make sure that the respirator issued to each employee exhibits the least possible face piece leakage and that the respirator is fitted properly. We perform either quantitative or qualitative face fit tests:

- Before any of our employees are required to use any respirator with a negative or positive pressure tight-fitting face piece;
- Whenever a different respirator face piece (size, style, model, or make) is used;
- At least annually;
- Whenever the employee reports, or our company, the physician or other licensed health care professional (PLHCP), supervisor, or Program Administrator makes visual observations of, changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight; and
- When the employee, subsequently after passing a qualitative or quantitative fit test, notifies the company, Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable. That employee will be retested with a different respirator face piece.

See the Respiratory Protection Program for Details.

### **Protective Clothing**

We provide and require the use of protective clothing, such as coveralls or similar whole-body clothing, head coverings, gloves, and foot coverings for:

- Any employee exposed to airborne concentrations of asbestos that exceed the TWA and/or STEL.
- This site when a required negative exposure assessment is not produced.
- Any employee performing Class I operations which involve the removal of over 25 linear or 10 square feet of TSI or surfacing ACM and PACM.

### *Laundering*

We ensure that laundering of contaminated clothing is done so as to prevent the release of airborne asbestos in excess of the TWA or STEL. When we give contaminated clothing to another person for laundering we inform that person of the requirement in 29 CFR 1926.1101(j)(2)(i) to effectively prevent the release of airborne asbestos in excess of the TWA or STEL.

### *Contaminated Clothing*

Contaminated clothing is transported in sealed impermeable bags, or other closed, impermeable containers, and be labeled in accordance with 29 CFR 1926.1101(k).

### *Inspection of Protective Clothing*

Our competent person examines work suits worn by our employees at least once per work shift for rips or tears that may occur during performance of work. When rips or tears are detected while an employee is working, they will be immediately mended, or the work suit shall be immediately replaced.

### **Hygiene Facilities and Practices for Employees**

Our hygiene facilities and practices requirements for this job are for \* Employees performing Class I asbestos jobs involving over 25 linear or 10 square feet of TSI or surfacing ACM and PACM and follow the OSHA requirements in §1926.1101(j)(1).

### *Smoking in Work Areas*

We ensure that employees do not smoke in work areas where they are occupationally exposed to asbestos because of activities in that work area.

## **Housekeeping**

### *Vacuuming*

When we select vacuuming methods we always use HEPA filtered vacuuming equipment. The equipment is used and emptied in a manner that minimizes the reentry of asbestos into the worksite.

### *Waste Disposal*

Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing will be collected and disposed of in sealed, labeled, impermeable bags or other closed, labeled, impermeable containers except in roofing operations. Our roofing operation waste disposal procedures follow the requirements of 29 CFR 1926.1101(g)(8)(ii).

### *Care of Asbestos-Containing Flooring Material*

All vinyl and asphalt flooring material will be cared for in accordance with 29 CFR 1926.1101(g)(8)(l) unless the building/facility owner demonstrates, pursuant to 29 CFR 1926.1101(g)(8)(i)(l) the flooring does not contain asbestos.

Waste and debris and accompanying dust in an area containing accessible thermal system insulation or surfacing ACM/PACM or visibly deteriorated ACM:

- Is not dusted or swept dry, or vacuumed without using a HEPA filter.
- Is promptly cleaned up and disposed of in leak tight containers.

