ASBESTOS MANAGEMENT PROGRAM

Program Element R2-10-207(11)(h)

Each agency shall develop, implement, and monitor an Industrial Hygiene Program, which shall include an Asbestos Management Program element when applicable.

The Building/Facility Owner is responsible for determining the presence, location, and quantity of all asbestos containing materials (ACMs), and then ensures that its presence and concentrations are communicated and known by all Building/Facility tenants or contractors.

Asbestos is a known human carcinogen and can cause chronic lung disease. The latency period for asbestos related disease averages 30 years.

Definitions:

A written Asbestos Management Program establishes procedures for protecting people and the environment from the release of asbestos fibers during the operation, maintenance, renovation, and/or demolition of asbestos containing building materials that are installed within a facility or facility component.

For an understanding of asbestos-based definitions, follow these links: <u>EPA</u> and <u>OSHA</u> fact sheets.

Why do I need this program?

To protect employees from asbestos exposure and control environmental release of asbestos fibers. These regulations describe controls and safe work practices for safely occupying, operating, maintaining, renovating, or demolishing ACMs contained in facilities and/or facility components.

How do I know if this program applies to my agency and my specific job hazards?

Agencies are responsible for protecting their employees from exposure to asbestos. This is achieved by developing and managing the Asbestos Management Program when levels meet or exceed the following:

The OSHA Permissible Exposure Limits (PELs) of 0.1 fiber per cubic centimeter (f/cc) over an 8-hour TWA or 1.0 f/cc over a 30-minute excursion limit. (OSHA Regulations 29 CFR 1910.1001 and 1926.1101); or

 Friable ACM is that is present in local education agencies, grades K-12 (EPA, Asbestos Hazard Emergency Response Act (AHERA) Regulations).

All ACM demolition and renovation activities require a NESHAP Notification, 10 calendar days prior to ACM disturbance. Arizona's EPA NESHAP County regulations are often more stringent than the EPA State and Federal regulations. Be sure to check with your local NESHAP jurisdiction prior to the disturbance of any ACMs.

What are the minimum required elements and/ or best practices for an Asbestos Management Program?

The Asbestos Management Program contains procedures for identification, surveillance, mitigation, labeling/signage, worker training, notification, recordkeeping and work protocols. Procedures to ensure compliance with all applicable local, state, and federal law include:

- Provide worker protection and education
- Control worker exposure and environmental release of asbestos fibers
- Assess presence, location, and quantity of asbestos containing materials (ACM)
- Develop building owner and building tenant responsibilities
- Waste management
- Provide regulator notification
- Maintain records for training, exposure monitoring, and medical surveillance
- Provide hazard communication and demarcation with GHS warning signs

Are there any mandatory training requirements or best practices that must be developed by the agency?

Yes. Training requirements depend on the workplace exposure and classification. Training must be provided to all workers exposed at or above the PEL before work begins, and yearly thereafter. All training must be conducted in a manner and language in which the worker is able to understand.

At minimum, agencies must provide two hours of annual training for all employees who may potentially

disturb ACM and/or PACM. The employees must comprehend the following training topics:

- Health effects of asbestos
- Engineering controls and work practices associated with the employee's job assignment
- Presence, location, and quantity of ACM and PACM in the building/facility
- Custodians must be trained on locations of ACM flooring
- Recognition of ACM and PACM damage and deterioration, and the requirements in this standard relating to housekeeping
- Purpose, use, and limitations of respirators, if appropriate
- Proper response to fiber release episodes

For work on or abatement, it is recommended that agencies contract with qualified and licensed asbestos contractors and consultants. For this level of expertise, refer to the <u>EPA and OSHA training requirements</u> identified in this link.

NOTE: Employees that perform OSHA Class I, II, and III work, also must be included in the Agency's Respiratory Protection Program, per OSHA 29 CFR 1910.134. See the State Risk Program Element – Respiratory Program - R2-10-207(11)(I).

Are there specific requirements for documenting the program, training, etc...?

Yes. Employees who disturb ACM on agency facilities and/or facility components must conform to extensive OSHA and EPA recordkeeping requirements.

OSHA/EPA requires records to be kept:

- On exposure monitoring for asbestos, for at least 30 years; and worker medical surveillance records must be retained for the duration of employment plus 30 years.
- Training records must be kept for at least one
 (1) year beyond the last date of employment.
- The 2-Hour Asbestos Awareness training must be completed on an annual basis and all

employee-training records must be retained for three (3) years after the training was received.

Program documents, training materials, and attendance rosters should be maintained in accordance with the Arizona State Library, Archives and Public Records' general retention schedules; refer to LAPR - Retention Schedules.

Are there any resources available that can assist me in putting together an Asbestos Management Program?

Yes. Risk Management has developed an <u>Asbestos</u> <u>Management Program</u> template, which may be tailored to your agency's needs.

Loss Prevention Consultants are available that can assist managers and supervisors in identifying potential hazards, and guide agencies on the establishment of program elements.

Contact the building owner or management company to request information on ACM within the building.

A list of statewide asbestos contractors and consultants are available at https://procure.az.gov/bso/.

Other resources can be found at:

- www.osha.gov
- www.epa.gov
- www.niosh.cdc.gov
- www.atsdr.cdc.gov/asbestos
- www.eia-az.org