	Burnt Mountain Services Safety Management System	Initial Issue Date	11/28/2023
		Revision Date:	Initial Version
ASBESTOS MANAGEMENT / MAINTENANCE WORK		Revision No.	0

Purpose


To provide basic precautions and protections for employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM).

Scope

This program applies to all Burnt Mountain Services (the Company) employees. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers Company employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

- Asbestos – an incombustible, chemical-resistant, fibrous mineral used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters.
- Asbestos containing material (ACM) – any material containing more than 1% asbestos.
 - Friable Asbestos - used for fireproofing, insulation, or sound proofing are considered to be friable, and they readily release airborne fibers if disturbed.
 - Non- friable Asbestos - vinyl-asbestos floor tile or roofing felts are considered non-friable and generally do not emit airborne fibers unless subjected to sanding or sawing operations.
- Class I -Asbestos work - Activities involving the removal of thermal system insulation (TSI) and surfacing asbestos containing material.
- Class II - Asbestos work - Activities involving the removal of ACM that is not TSI or surfacing material. This includes removal of asbestos-containing gaskets, packing, wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
- Class III - Asbestos work - Includes repair and maintenance operations where ACM, including TSI and surfacing material, is likely to be disturbed to the extent that renders ACM friable or generates visible debris. Class III asbestos work is limited to cutting away small amounts of ACM, no greater than the amount which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of disturbed ACM exceed that which can be contained in one glove bag or waste bag measuring 60 inches in length and width.
- Class IV - Asbestos work - Includes custodial activities during which employees are involved in clean-up activities of waste and debris containing asbestos containing material.
- Competent Person - A designated Company employee who has the authority to take prompt corrective actions and has received training and certification equivalent to the EPA's Model Accreditation Plan and equivalent training as conducted by the National Asbestos Center, at the manager or supervisor level, and thereby is knowledgeable in:
 - Identifying asbestos hazards in the workplace.
 - Selecting appropriate control strategies for asbestos exposure.
 - The contents of the OSHA asbestos regulations.

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- Work practices for safe asbestos removal/clean-up.
- Presumed asbestos containing material (PACM) – thermal insulation and surfacing material found in buildings constructed no later than 1980.
- Surfacing material – material that is sprayed troweled-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).
- Thermal system insulation – ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

Key Responsibilities

Managers/Supervisors

- Ensure owners or operators are notified of PACM.
- Prohibit Company employees from working until the material in question is confirmed as non-asbestos or abated.
- Ensure proper employee training is completed.
- Ensure that all requirements of this program are understood and followed by those working under his/her direction.
- Perform duties of the Competent Person for asbestos work.

All Employees

All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

Procedure

Health Effects

Exposure to asbestos has been shown to cause lung cancer, asbestosis, mesothelioma, and cancer of the stomach and colon. Fibrotic Scarring of the lung tissue


General

Company employees shall not work or otherwise handle asbestos containing material designated as Class I, III, IV work. Class II work is limited to removal of asbestos containing gaskets and packing materials.

All asbestos abatement work, other than the limited scope of Class II work, shall be awarded to qualified asbestos abatement contractors.

Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before Company employees disturb that material.

Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before Company employees are permitted to work.

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Signs shall be posted, and employees will abide by warning signs and labels and will not disturb the Asbestos Containing Material.

Approved ACM or PACM Handling

The following procedures must be followed when removing gasket or packing materials (Class II asbestos work) containing or presumed to contain asbestos:

- All employees must fulfill appropriate training, respiratory protection and medical surveillance requirements to handle ACM or PACM.
- Class II asbestos work, which employees are permitted to perform, is limited to removal of asbestos gasket and packing materials, unless special training for other Class II work has been provided.
- Removal of gaskets and/or packing shall only be performed by employees that have been properly trained. When gaskets are visibly deteriorated, they are to be removed via wet methods and/or glove bagging.

Training

Employees are provided training on Asbestos. The training shall be provided prior to or at the time of the initial assignment and at least annually thereafter. The training program shall be done in a manner that the employee is able to understand and should include health effects associated with exposure to asbestos.

Training shall include:

- The ability to understand health effects associated with exposure to asbestos.
- Information on the relationship between smoking & exposure to asbestos producing lung cancer.
- The appropriate personal protective equipment (PPE) and its limitations (such as improper respirator fit) as described in the Company PPE Program and its associated training.
- The Asbestos Control Plan and any associated work practices.

A certificate of training shall be provided & maintained. Written materials relating to the employee training program will be readily available to affected employees, the assistant Secretary of Labor for Occupational Safety and Health and the director of the National Institute for Occupational Safety and Health. Training materials must be readily available upon request.


Contractors

Asbestos contractors shall be pre-screened and approved by the group responsible for contracting the work.

Contractors performing work shall comply with the requirements of this standard and all applicable OSHA and environmental regulatory requirements.

The following documents must be obtained at least 10 working days (or as soon as possible) prior to beginning the asbestos abatement work:

- Copy of the contractor's State Contractor's License (renewed annually)

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- SDS for material used for the abatement process
- Copy of all asbestos Notifications (if required)
- Copies of asbestos sample analysis (if performed by contractor)

The following are required upon completion of work by the contractor (If an asbestos project completion report is provided by the contractor, these items are often a part of it.):

- Work Summary Report, including daily work summaries.
- Results of all independent third-party air sampling, including asbestos material sampling, personnel air monitoring, clearance sampling results.
- Waste Shipment Records.

Every contracted asbestos job must have assigned a competent person to monitor asbestos work and to assure compliance with all applicable regulations and requirements.

An independent third party shall be contracted to perform all required air sampling for contracted asbestos removal.

Contractors who are not involved in ACM work, but who may be inadvertently exposed to ACM on Company property are to be informed of this potential and advised on proper methods to avoid exposure.

Asbestos Exposure Control


Asbestos exposure controls are designed to eliminate or minimize an employee's exposure to airborne asbestos fibers through the use of work practices and engineering controls. Where the TWA and/or excursion limit is exceeded, a written Asbestos Exposure Control Program to reduce employee exposure shall be established and implemented to reduce employee exposure to or below the TWA and to or below the excursion limit.

Prior to initiating any asbestos work the Competent Person must perform an asbestos exposure assessment. Subsequent to the exposure assessment, the engineering controls and work practices to be employed shall be identified.

Prior to commencement of work, the affected employees shall be briefed on the engineering controls and work practices designed to reduce/maintain the exposure below TWA for the asbestos work. This briefing shall be documented and maintained with the job documentation. This shall be done except to the extent that such controls are not feasible. Some of them may be exhaust systems for hand tools, wet methods, clean-up procedures and PPE shall be used.

Wet methods will be employed for all asbestos work as a means to minimize potential airborne exposure wherever possible. ACM shall be wetted from the initiation of the maintenance or renovation operation and wetting agents shall be used continually throughout the work period to ensure that any dry ACM exposed in the course of the work is wet and remains wet until final disposal.

Wetting agents, usually a surfactant (dish soap), are generally prepared by mixing 1 to 3 ounces of wetting agent to 5 gallons of water. A Pam type cooking oil spray is also an adequate wetting agent.

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Regulated Areas

Areas where asbestos abatement activities are in progress are restricted/regulated. The limit shall comply with that of the TWA and/or excursion limit. Access is limited to regulated areas.

Regulated asbestos areas shall be established with barriers, tape, OSHA approved warning signs and other physical controls when airborne concentrations of asbestos are present.

All employees who perform work in regulated areas shall be covered by this procedure. Employees who perform housekeeping activities during and after construction activities are also covered by this procedure.

If employees working immediately adjacent to a Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such job, the Company shall either remove the employees from the area until the enclosure breach is repaired; or perform an initial exposure assessment pursuant to 1926.1101(f).

Personnel Air Monitoring

Monitoring shall occur to ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) in 30 minutes.

An independent/third party air sampling person shall perform all required air sampling during contractor asbestos work and provide the results to the Company Competent Person. Note: Air sampling is not required for glove bag activities that are covered under a Negative Exposure Initial Assessment.

Potential exposure to asbestos is assessed to ensure exposure does not exceed occupational exposure limits. The air quality (safety) is to be determined from breathing zone air samples. The samples shall be representative of the 8-hour TWA and 30-min. short-term exposure. Measurements are required for documentation.


Affected employees and/or their designated representatives are to be provided with the opportunity to observe asbestos exposure monitoring.

Air sampling analysis shall be performed by an American Industrial Hygiene Association (AIHA) accredited laboratory.

Where the asbestos exposure assessment (in the absence of quantitative personnel monitoring results) does not present objective, convincing data that indicates the ACM to be handled will not (under the worst circumstances) release airborne fibers, personnel air monitoring shall be performed to quantify exposure.

If personnel monitoring is considered necessary during the asbestos exposure assessment, in an effort to verify exposures would be maintained below the PEL/excursion limit, respiratory protection shall be utilized until such time that sufficient sampling results verify that respiratory protection is not required.

The Company Safety Manager is to be consulted for advice and assistance in performing personnel air sampling activities.

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The number of samples necessary to be considered "representative" is dependent upon many factors and must be determined in consultation with the company Safety Manager, certified Industrial Hygienist consultant, or a third-party air sampling professional.

Affected employees shall be notified of monitoring results, which represent the employee's exposure, as soon as possible following receipt of the monitoring results.

Employees shall be notified in writing either individually or by posting at a centrally located place that is accessible to affected employees.

Once representative sampling indicates that exposure levels for that particular activity are consistently below the OSHA established permissible limit and/or excursion limit, the requirement for respiratory protection may be waived.

It is imperative that accurate personnel air sampling records are maintained in order to justify any relaxation of respiratory protection requirements.

Results of air sampling data must be maintained in the asbestos job documentation.

Medical Surveillance Program


All Company employees who for a combined total of 30 or more days per year are engaged in Class II asbestos work or who are exposed at or above the permissible exposure limit for a combined 30 days or more per year shall be included in the Company medical surveillance program.

Note: For purposes of this requirement, any day in which an employee is engaged in Class II or Class III work or a combination thereof for one hour or less and, while doing so, adheres fully to the work practices specified in this standard, shall not be counted. The medical surveillance program shall be made available according to the following schedules:

- Prior to assignment of an employee to an asbestos area where negative pressure respirators are worn.
- Where exposure to asbestos may be at or above the permissible exposure level for 30 or more days per year, or where employees are engaged in Class II asbestos work for 30 or more days per year, at least annually thereafter, as long as exposures exist.
- Asbestos medical examination must be given within ten (10) working days following the thirtieth day of exposure.
- If an examining physician determines that any of the examinations should be provided more frequently than specified, they shall be provided at the periodicity specified by the physician.

No asbestos medical examination is required when complete records of such examination, performed less than twelve months prior to commencement of asbestos work are available.

As part of the medical surveillance, the attending physician shall provide a written opinion of the results of the medical examination to the Company and the Contract Medical Surveillance Provider, who in turn will provide a copy to the affected employee within 30 days.

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In accordance with OSHA regulations, once employees are no longer exposed to asbestos their inclusion in the medical surveillance program is no longer required.

Respiratory Protection and Personal Protective Equipment

The use of approved respirators shall be at no cost to the employee and will be used in conjunction with work practice controls, work operations, to reduce exposure and in emergencies.

The respirator shall be provided at no cost to the employees and shall be chosen in accordance with the Company Respiratory Protection Program and shall be approved by NIOSH. Powered, air-purifying respirators shall be available when the employees choose to use this type or the hazard assessment process requires this type, or when the respirator will provide more adequate protection. Prerequisites for use of respiratory equipment, regarding asbestos, include:

- Successfully passing a respiratory physical.
- Successfully completing annual respiratory protection training.
- Successfully passing a respirator fit test.

When working above the TWA PPE shall include, but not be limited to protective coveralls, gloves, head coverings and foot coverings, vented goggles, face shields and others based on the hazard.

Waste Disposal

Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing shall be collected and disposed of in sealed, labeled impermeable bags of greater than 6 mils thickness or other closed, labeled, impermeable containers.


Bags or containers shall be imprinted and clearly labeled with the following OSHA asbestos hazard warning and address:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
Burnt Mountain Services
2517 1st Ave, Greeley, CO 80631
Contractor's Name
Contractor's Address

Bags/containers shall be clearly labeled, for DOT, as: RQ, Asbestos, 9, NA2212, PG III

Containers shall have a DOT number 9 diamond label on the container if the shipping container is greater than 66 pounds. For assistance with DOT labeling requirements, contact the Company Safety Manager.

An Asbestos Waste Shipment Record shall be utilized. Check with the landfill prior to shipping to see if they require their own shipping record or use a Waste Manifest – contact the Safety Director for copies.

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Asbestos shall be transported to an approved landfill that accepts asbestos. A licensed waste hauler may be used to transport the packaged ACM. Transport vehicles shall either be enclosed or covered. Do not use vehicles with compactors to transport ACM.

A shipping form shall accompany the ACM, during transport, to the landfill.

Record Keeping

All records relating to any asbestos activity shall be maintained by the Company permanently.

The following records shall be maintained:

- Exposure Assessments that are being relied upon to support a location's position that asbestos work (specific or generic) will not result in exposures above the PEL or excursion limit.
- Employee asbestos exposure records (personnel air monitoring).
- Medical Surveillance records.
- Training records.
- Shipping papers and disposal records.
- Copies of notification letters sent to Governmental agencies.
- Pre-project asbestos sampling results.
- Post-project clearance sampling results.
- Daily Work Summaries.
- Project Completion Closure Report, if provided.