ASBESTOS GUIDANCE FOR THE RESTORATION INDUSTRY

FACT SHEET

Overview



Asbestos can be found in thousands of different materials in older buildings. It is considered one of the most regulated substances and was one of the first hazardous air pollutants regulated under the U.S. Federal Clean Air Act.

Restoration and renovation contractors may not be aware that there are asbestos-containing materials in buildings where they are working. During the course of emergency water or fire damage renovations, asbestos materials may be present and be accidentally disturbed, removed and disposed of without the knowledge of the building owner or the company performing the work. Removing these materials may create a **potential health hazard** and **pose a potential liability risk**. This sheet only addresses asbestos issues in restoration. A more detailed fact sheet can be found at www.restorationindustry.org.

Improper removal can have many legal implications. The U.S. Environmental Protection Agency (EPA) regulates removal activities, the Occupational Safety and Health Administration (OSHA) regulates worker exposure and safe work practices, the U.S. Department of Transportation (DOT) regulates the transport and disposal of asbestos, while state and local jurisdictions have their own regulations for asbestos activities. That means that **removing, transporting** and **disposing** of asbestos-containing materials can **violate**

multiple laws and regulations, and lead to substantial fines and prison time.

What is Asbestos?

Asbestos is a **fibrous** mineral that is naturally occurring in the earth. There are several fibrous mineral types. One of the most common is called **Chrysotile** (or white asbestos). Others include: **Amosite** (brown asbestos), **Crocidolite** (blue asbestos) and **Anthophyllite**, **Tremolite**, and **Actinolite**. These minerals were mined and added to building materials and textiles.

Health Issues

Asbestos fibers can cause serious health problems:

- The primary route of exposure is through the respiratory tract impacting the lungs.
- If inhaled, asbestos fibers can cause diseases which disrupt the normal functioning of the lungs.
- Three specific diseases asbestosis (a fibrous scarring of the lungs), lung cancer, and mesothelioma (cancer of the lining of the chest or abdominal cavity) have been linked to asbestos exposure.
- These diseases do not develop immediately after inhalation of asbestos fibers; it may be 10 to 20 years before symptoms appear.

The more asbestos fibers a person inhales; the greater the risk of developing an asbestos-related disease. Most cases of severe health problems resulting from asbestos exposure have been associated with workers in industrial jobs, e.g., mining, ship building, installation and fabrication of asbestos materials, where they were exposed to very high levels of asbestos in the air, without any respiratory protection.

Asbestos causes lung diseases and cancer

There is an increased concern for the health and safety of construction, renovation, and building maintenance personnel because of possible periodic exposure to elevated levels of asbestos fibers while performing their jobs.

The federal, state and local governments have promulgated regulations to protect workers and occupants from exposure to asbestos in buildings. They have developed acceptable exposure limits and created standards for managing and maintaining asbestos.



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The following is a list of some common materials in buildings that may contain asbestos:

- Pipe insulation
- Boiler insulation
- Gaskets boiler or ventilation system
- Floor tiles
- Linoleum flooring
- Mastics and glues
- Asbestos roofing materials
- Roofing tars and asphalt roofing materials
- Cement roofing and siding (cement panels or corrugated panels)
- Caulking
- Wall or ceiling plaster
- Gypsum board and spackle
- Textured ceilings (popcorn ceilings)
- Fire doors
- Blown-in insulation vermiculite insulation
- Sprayed-on fire-proofing coatings
- Fire blankets and clothes
- Cement pipes or boards (transite)
- Woven cloth wire insulation
- Ceiling tiles
- Laboratory countertops and sinks



Asbestos roofing materials





Glued on ceiling tiles with asbestos in the glue pods



Asbestos pipe insulation



Sink undercoating containing asbestos



Overhead pipes with asbestos insulation

Regulations

There are **many** regulations for asbestos handling, removal, transportation and disposal. These include **federal**, **state** and **local** regulations that apply depending on the location where one is working. Check with **state** and **city** departments of health and environmental protection offices to ensure the company follows appropriate requirements.

EPA – National Emission Standards for Hazardous Air Pollutants (NESHAP)

The Asbestos NESHAP (40 CFR 61, Subpart M) addresses milling, manufacturing and fabrication operations, demolition and renovation activities, waste disposal issues, and waste disposal sites. The main concern in the restoration industry involves demolition and renovation activities.

Under the NESHAP rule, the following work practices should be followed whenever demolition/renovation activities involving Regulated Asbestos-Containing Materials (RACM) occur:

- Notify EPA of intention to demolish/renovate.
- Have all RACM properly removed before being demolished or renovated or before any disruption activity begins.
- Keep RACM adequately wet before, during, and after removal operation.
- Conduct demolition/renovation activities in a manner which produces no visible emissions to the outside air.
- Handle and dispose of all RACM in an approved manner.

Occupational Safety and Health Administration (OSHA)

OSHA has two regulatory standards for asbestos: 1) Asbestos Standard for General Industry (29 CFR 1910.1001); and 2) the Asbestos Standard for the Construction Industry (29 CFR 1926.1101).

The OSHA asbestos standard for the construction industry regulates asbestos exposure for the following activities:

- Demolishing or salvaging structures where asbestos is present
- Removal or encapsulation of asbestos-containing materials
- Constructing, altering, repairing, maintaining, or renovating asbestos-containing structures or substrates
- Cleaning up asbestos spills/emergencies
- Transporting, disposing, storing, containing, and housekeeping involving asbestos or asbestos-containing products on a construction site

The OSHA standard establishes a classification system for asbestos construction work. Four classes of construction activity are matched with stringent control requirements.

EPA – Asbestos Hazard Emergency Response Act (AHERA)

Under this rule, local education agencies (LEAs) are responsible for ensuring compliance with AHERA and are required to have and maintain an up-to-date **Asbestos Management Plan (AMP),** conduct training for their staff, perform inspections of their buildings, identify the location and condition of asbestos-containing materials, and have documentation of such.

When a restoration contractor is responding to a school it is important to contact the AHERA-designated person. This individual should know if there are any asbestos-containing materials in the building and their location.

Classes of Asbestos Work

Class I Asbestos Work: The most potentially hazardous class of asbestos jobs – involving the removal of thermal system insulation and sprayed-on or troweled–on surfacing asbestos-containing materials. Thermal system insulation includes materials applied to boilers, pipes, tanks, ducts, or other components to prevent heat transfer. Surfacing materials include decorative plaster on ceilings, acoustical materials on decking, and fireproofing materials on structural members.

Class II Asbestos Work: Includes the removal of other types of asbestos materials that are not thermal system insulation, such as resilient flooring and roofing materials (floor tiles, ceiling tiles, siding, roofing, and transite cement panels).

Class III Asbestos Work: Includes repair and maintenance operations where asbestos-containing materials are disturbed.

Class IV Asbestos Work: Includes custodial activities where employees clean up asbestos-containing waste and debris, e.g., dusting contaminated surfaces, vacuuming contaminated carpets, mopping floors, and general cleanup around asbestos-containing materials.

Communication of Hazards

The communication of asbestos hazards is vital to prevent exposure to site workers or other personnel.

Before beginning work, building owners must identify at the work site all thermal system insulation, sprayed or troweled-on surfacing materials, and resilient flooring materials installed before 1981.



All employers discovering asbestos-containing materials on a work site:

- Must notify the building owner and other employers on site within 24 hours of its presence, location, and quantity.
- Should stop work and address the asbestos hazard in the appropriate manner. If the asbestos-containing materials are not to be disturbed, then make sure that all people involved are aware of the presence and location of the asbestos.
- Precautions should be taken to prevent the disturbance or removal of such materials.

Training

Training should include:

- Ways to recognize asbestos-containing materials or presumed asbestoscontaining materials
- Ways to recognize damage and deterioration
- Health issues associated with asbestos, and how to control and avoid hazards

Do's and Don'ts for Working Around Asbestos

Do's

- Perform an assessment of the work area and look for suspect asbestos containing materials
- □ Collect samples of materials to be sent to laboratory. Three (3) samples of each material is recommended.
- □ If asbestos is present, decide on what actions are to be taken and Inform others that the material is present.
- □ Contain the area. Use plastic barriers and in some cases set up negative air containment using HEPA filtration devices.
- □ Keep materials wet if they have been disturbed.
- Use only HEPA vacuums or wet methods to clean it up.
- Only workers trained/qualified should cleanup asbestos materials. Workers should also be protected with HEPA respirators, disposable suits and gloves.
- Contain the asbestos debris in a leak-tight container, such as 6-mil bag, sealed and labeled.
- □ Have the area professionally cleaned and document response action taken.
- □ Have third-party testing and inspection performed to confirm that the area was properly cleaned

Don'ts

- Do not use fans on materials if they are likely to release asbestos fibers.
- Do not dispose of materials as regular waste. Check with local agencies on disposal requirements.
- Do not handle asbestos-containing materials unless you are qualified to do so.

When there are asbestos-containing materials present, they need to **be handled, removed** and **disposed of properly**. Contact an asbestos professional or licensed asbestos abatement contractor in the area.

The asbestos contractor's duties include:

- Assess the quantities and location of the materials to provide a cost for abatement
- File notifications before removal
- File applications for permits and notifications to the local, state, and federal authorities
- Awareness that there is typically a 10-day notification time prior to the removal in a planned renovation or demolition

In some cases where there is an emergency cleanup, the asbestos contractor can file an emergency notification and proceed with the abatement immediately.

At the end of the asbestos abatement process, the area should be inspected and tested to document completion. The final air test results are typically reported in **fibers/cc**. In most regulations, the clearance level is **<0.01 fibers/cc**. When the results are acceptable, the containment and equipment can be removed. The client and/or property owner should request from the asbestos contractor copies of all **notifications, permits, licenses, waste disposal manifests,** and **final air tests**.

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Resources

The following are some resources which have been used in the creation of this document. They can be reviewed for further information on asbestos requirements and compliance. This guidance document has been based on the regulations and guidance documents from the U.S. EPA and OSHA. Regulations and standards may vary from state to state in the U.S. and may be different in other countries.

USEPA – U.S. Environmental Protection Agency (800) 368-5888 www.epa.gov/asbestos

OSHA – Occupational Safety and Health Administration <u>www.osha.gov/SLTC/asbestos</u>

ATSDR -Agency for Toxic Substances & Disease Registry www.atsdr.cdc.gov

AIHA – American Industrial Hygiene Association www.aiha.org

CPSC - Consumer Product Safety Commission www.cpsc.gov

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