

TOOLBOX TALK: ASBESTOS AWARENESS

Job or site _____

Date _____

Led by _____

Open with this

How old is the building we are in? If the answer is 1980 or earlier, then some of what is in it is legally presumed to be asbestos until somebody proves otherwise, and that changes what today looks like.

The talk

Start with the presumption, because it is the part that decides what a crew does. Presumed asbestos containing material means thermal system insulation and surfacing material found in buildings constructed no later than 1980. That is a legal presumption, not a guess, and it stands until it is rebutted properly.

So pipe lagging and sprayed or troweled surfacing in a building of that age is treated as asbestos by default. Nobody has to prove it is asbestos. Somebody has to prove it is not, and that proof is a specific procedure, not an opinion from the man holding the saw.

The limits are small numbers and worth hearing out loud. No employee may be exposed above 0.1 fiber per cubic centimeter of air as an eight hour time weighted average, and no employee may be exposed above 1.0 fiber per cubic centimeter averaged over any thirty minute period. A fiber you can see is not the one that gets into the deep lung.

Work gets sorted into four classes. Class I is removing thermal system insulation and surfacing material, the worst. Class II is removing other asbestos containing material such as wallboard, floor tile and sheeting, roofing and siding shingles, and mastics. Class III is repair and maintenance where such material is likely to be disturbed. Class IV is cleaning up after the other three, or contacting the material without disturbing it.

Three controls apply to every operation covered by the standard, at any measured exposure level, with no exceptions for small jobs. HEPA filtered vacuums to collect all debris and dust. Wet methods or wetting agents during handling, mixing, removal, cutting, application and cleanup. Prompt cleanup and disposal in leak tight containers.

And four things are flatly prohibited, whatever the air monitoring says. High speed abrasive disc saws without a point of cut ventilator or HEPA filtered enclosure. Compressed air to remove the material, unless it is inside an enclosed ventilation system built to catch the cloud. Dry sweeping, shoveling or other dry cleanup. And rotating employees to spread the exposure around, which is the oldest trick there is and is named in the standard as banned.

All Class I work, including the setting up and running of the control system, is supervised by a competent person, and there is a threshold everybody should know: more than 25 linear feet or 10 square feet of thermal system insulation or surfacing material puts a Class I job into its own tighter set of requirements.

What this means on a normal day is simple. If the building is old and you are about to cut, drill, sand, break or sweep something you cannot identify, that is where the work stops and somebody makes a phone call. Nobody on this crew loses anything by stopping. The exposure is silent, there is no bad smell and no cough on the day, and the bill arrives thirty years later.

Point at these before anybody starts

- The age of this building, and whether anybody has produced a survey for it.
- Any pipe lagging, boiler insulation or sprayed ceiling anywhere in the work area.
- Floor tile, mastic, artex, soffit board, cement sheet, corrugated roofing on an old structure.
- Any broom on this site anywhere near material nobody has identified.
- The HEPA vacuum, if there is one, and whether the filter has ever been changed.
- Who the crew rings when something turns up, and whether that number is in a phone here.

The rules that apply

- Presumed asbestos containing material means thermal system insulation and surfacing material found in buildings constructed no later than 1980, and that designation may be rebutted only under paragraph (k)(5).
- No employee shall be exposed above 0.1 fiber per cubic centimeter of air as an eight hour time weighted average, or above 1.0 fiber per cubic centimeter averaged over thirty minutes.
- For all operations covered by the standard, regardless of exposure level: HEPA filtered vacuums to collect debris and dust, wet methods or wetting agents, and prompt cleanup and disposal of waste in leak tight containers.
- High speed abrasive disc saws without a point of cut ventilator or HEPA filtered enclosure are prohibited for work that disturbs asbestos containing or presumed asbestos containing material.
- Compressed air to remove asbestos is prohibited unless used with an enclosed ventilation system designed to capture the dust cloud, and dry sweeping, shoveling or other dry cleanup is prohibited outright.
- Employee rotation as a means of reducing exposure to asbestos is prohibited.
- All Class I work, including installation and operation of the control system, shall be supervised by a competent person.

Ask the crew

- What year is the cutoff for presumed asbestos containing material, and which two material types does it cover?

- Name the four work practices that are prohibited no matter what the air monitoring says.
- You pull a ceiling tile and find gray fibrous lagging behind it. What is the next thing you do?

Close with this

Nobody here is qualified by this talk to disturb any of it. Knowing when to put the tool down is the whole job.

Attendance

Everybody who was present signs, including subcontractors and anybody visiting the site.

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This talk is general safety information for a crew briefing, not legal advice and not a substitute for the training your employees are required to have. Standards are quoted for orientation only. Check the current text of the standard and your own state plan, which may be stricter than the federal rule.