



**Berry Bros. General Contractors, Inc.
Corporate Policy Procedure**

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Approver: Joe Berry

**(HSE) Health, Safety & Environmental
Policies and Procedures Manual**

Section # 05

Doc # SWP 05

Revision: 1

ASBESTOS SAFETY


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SUBPART A - PURPOSE

It is the policy of our company to prevent unnecessary employee exposure to dangerous quantities of asbestos. Our employees are advised not to participate in any activities that involve the handling, including abatement of asbestos or asbestos-derived materials at any time.

If the TWA and/or excursion limit is exceeded, a written program to reduce employee exposure must be implemented. The host employer/client must inform the employee and BBGCI's HS&E Department as to the presence of materials containing asbestos within their facility to ensure that this policy is not violated.

This written plan is a supplement to the host employer's guidelines and is to be followed whenever employees are involved in operations that may expose them to potential hazards of asbestos.

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In addition, if our employees are working immediately adjacent to a class I asbestos job and are exposed to asbestos due to inadequate containment of such job, BBGCI will remove our employees from the area until the enclosure breach is repaired or perform an initial exposure assessment pursuant to 1926.1101(f).

The purpose of this plan is to:


- Create awareness among the workforce of the potential hazards of asbestos.
- Provide a consistent format for training employees on the proper procedures to be used when working with asbestos.
- Minimize the possibility of injury or harm to our employees who engage in operations that use asbestos.
- Demonstrate our company's compliance with all requirements regarding operations that use Asbestos.
- Ensure that engineering controls are in place in the event that asbestos is present to reduce/maintain the exposure levels below the TWA. Examples of some controls include but are not limited to the following:

- **Local Exhaust Ventilation**

Host employers shall use local exhaust ventilation and dust collection systems that are designed, constructed, installed, and maintained in accordance with good practices such as those found in the American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems, American National Standard Institute, ANSI Z9.2-1979.

- **Hand-operated and Power-operated Tools**

Host employers shall provide all hand-operated and power-operated tools which would produce or release fibers of asbestos, such as, but not limited to, saws, scorers, abrasive wheels, and drills, with local exhaust ventilation systems described above.

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- **Wet Methods**

Insofar as practicable, handle, mix, apply, remove, cut, score, or otherwise work asbestos in a wet state sufficient to prevent the emission of airborne fibers so as to not expose employees to levels in excess of the Time Weighted Average (TWA) and/or excursion limit, UNLESS the usefulness of the product would be diminished by doing so.

Prevent the release of airborne fibers by wetting, enclosing, or ventilating asbestos cement, mortar, coating, grout, plaster, or similar material containing asbestos PRIOR to removing them from bags, cartons, or other containers in which they are shipped.

- **Compressed Air**

Do not use compressed air to remove asbestos or materials containing asbestos UNLESS the compressed air is used in conjunction with a ventilation system, which effectively captures the dust cloud created by the compressed air.

- **Flooring**


Do not sand asbestos-containing flooring material.

SUBPART B - COMMUNICATION OF HAZARDS

Duties of Employers and Building and Facility Owners

Host employers must determine the presence, location, and quantity of Asbestos Containing Materials (ACM) and/or Potential Asbestos Containing Material (PACM) at the work site. Examples of possible locations include: manufacture of heat-resistant clothing, some building materials, soundproofing material, floor tiles, roofing felts, ceiling tiles, fire-resistant drywall, pipe and boiler insulation materials, pipeline wraps, sprayed on steel beams, etc.

Asbestos can be friable or non-friable; meaning that if is friable the material can be crumbled and made into a powder by hand pressure and is therefore more likely to emit asbestos fibers in the air. Examples include sprayed on materials

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containing asbestos, insulation, and soundproofing. Non-friable materials such as floor tiles or roofing felts are considered non-friable and generally do not release fibers into the air unless subjected to sanding or sawing operations.

It should be noted that no BBGCI employees are authorized or trained to work with or to work in areas that may expose them to asbestos and derivative materials.

SUBPART C - HEALTH RISKS

Asbestos poses health risks only when the fibers are present in the air that people breathe. Exposure to asbestos depends on:

- The concentration of asbestos fibers in the air.
- How long the exposure lasted.
- How often you were exposed.
- The size of the asbestos fibers inhaled.
- The amount of time since the initial exposure.

When inhaled in significant quantities, asbestos fibers can cause asbestosis (a scarring of the lungs which makes breathing difficult), mesothelioma (a rare cancer of the lining of the chest or abdominal cavity) and lung cancer. The link between exposure to asbestos and other types of cancers is less clear.


Smoking, combined with inhaled asbestos, greatly increases the risk of lung cancer.

SUBPART D - RESPIRATOR PROTECTION

A complete respiratory protection program is instituted in that, at a minimum, complies with the requirements of the OSHA Respiratory Protection Standard (29 CFR 1910.134).

The program includes respirator selection, an evaluation of the worker's ability to perform the work while wearing a respirator, the regular training of personnel; respirator fit testing, periodic workplace monitoring, and regular respirator maintenance, inspection, and cleaning.

Host employers/clients shall provide respirators for employees to use at no cost during:

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- Periods necessary to install or implement feasible engineering and work practice controls.
- Work operations, such as maintenance and repair activities, for which engineering and work practice controls are not feasible.
- Work operations for which feasible engineering and work practice controls are not yet sufficient to reduce exposure to or below the TWA and/or excursion limit.
- Emergencies.

Respirators shall also be used in the following 4 circumstances (per ISNetwork) work practice controls, work operations, to reduce exposure, & in emergencies. The respirator shall be provided at no cost to the employees and shall be chosen from those approved by NIOSH.

SUBPART E - PERSONAL PROTECTIVE EQUIPMENT


In instances where the exposure is above the TWA, PPE including but not limited to: coveralls, gloves, head coverings, foot coverings, face shields, vented goggles, etc. will be provided to the employee at no cost.

SUBPART F - REGULATED AREAS AND WORK AREA RESTRICTIONS

The company has established regulated areas wherever the airborne concentration of contaminants from asbestos operations exceeds, or can reasonably be expected to exceed, the permissible exposure limits (PEL). The company shall limit access to regulated areas for authorized persons only.

SUBPART G - SIGNS AND MARKINGS

When necessary, signs and markings shall be used to identify hazardous conditions and the materials relating to the use of asbestos throughout the facility and employees will abide by these signs so as not to disturb the ACM. The use of signs and tags is a supplemental means to prevent accidental injury or illness to employees who are exposed to hazardous or potentially hazardous conditions, equipment, or operations as they relate to the use of asbestos. In addition, the

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host employer will ensure that employees working in adjacent areas comprehend the warning signs.

SUBPART H - ASBESTOS WARNING SIGNS

Posting

The host employer shall provide warning signs. Display the warning signs at each regulated area. Post warning signs at all approaches to regulated areas so that an employee may read the signs and take necessary protective steps before entering the area.

Sign Specifications

Use warning signs that bear the following information:

- **DANGER**
- **ASBESTOS**
- **CANCER AND LUNG DISEASE HAZARD**
- **AUTHORIZED PERSONNEL ONLY**


SUBPART I - PERMISSIBLE EXPOSURE LIMITS (PELS)

Employees must be ensured that they are not exposed to an airborne concentration of asbestos in excess of:

- Fiber per cubic centimeter of air as an eight (8)-hour time-weighted average (TWA) as determined by the method prescribed in Appendix A of 1910.1001, or by an equivalent method.
- Fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes as determined by the method prescribed in Appendix A of 1910.1001, or by an equivalent method.

SUBPART J - EXPOSURE MONITORING

1. To determine employee exposure, breathing zone air samples are utilized in that are representative of the 8-hour TWA and 30-minute short-term exposures of each employee.
2. A determination must be made on the representative 8-hour TWA employee exposures on the basis of one or more samples representing full-shift

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exposures for each shift for each employee in each job classification in each work area.

3. A determination must be made on the representative 30-minute short-term employee exposures on the basis of one or more samples representing 30-minute exposures associated with operations that are most likely to produce exposures above the excursion limit for each shift for each job classification in each work area.

Initial Monitoring

Host employers shall perform initial monitoring of employees who are (or might be expected to be exposed to) airborne concentrations at or above the TWA permissible exposure limit and/or excursion limit.

If the host employer has monitored their facility after March 31, 1992, for the TWA permissible exposure limit and/or the excursion limit, and the monitoring satisfies all other requirements of 1910.1001, then the host employer may rely on earlier monitoring results to satisfy the initial monitoring requirements.


If the host employer has relied upon objective data that demonstrate that asbestos is not capable of being released in airborne concentrations at or above the TWA permissible exposure limit and/or excursion limit under the expected conditions of processing, use, or handling, then no initial monitoring is required.

Monitoring Frequency (Periodic Monitoring)

After the initial monitoring, perform sampling at such frequency and pattern as to represent with reasonable accuracy the levels of exposure of the employees.

Perform sampling at least every six months for employees whose exposures may reasonably be foreseen to exceed the TWA permissible exposure limit and/or excursion limit.

IF either the initial or the periodic monitoring statistically indicates that employee exposures are below the TWA permissible exposure limit and/or excursion limit, THEN you may discontinue the monitoring for those employees whose exposures are represented by such monitoring.

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Additional Monitoring

Institute the exposure monitoring (initial or periodic):

- Whenever there has been a change in the production, process, control equipment, personnel or work practices that may result in new or additional exposures above the TWA permissible exposure limit and/or excursion limit.
- When you have any reason to suspect that a change may result in new or additional exposures above the PEL and/or excursion limit.

SUBPART K - MONITORING METHODS


Personal samples are collected to satisfy the monitoring requirements following the procedures specified in Appendix A of 1910.1001.

All samples are evaluated using the OSHA Reference Method (ORM) specified in Appendix A of 1910.1001, or an equivalent counting method.

Equivalent methods to the ORM are ensured in that the method meets the following criteria:

- Replicate exposure data used to establish equivalency are collected in side-by-side field and laboratory comparisons.
- The comparison indicates that 90% of the samples collected in the range 0.5 to 2.0 times the permissible limit have an accuracy range of plus or minus 25 percent of the ORM results at a 95% confidence level as demonstrated by a statistically valid protocol.
- The equivalent method is documented and the results of the comparison testing are maintained.

The results of monitoring analysis performed by laboratories which have instituted quality assurance programs are used that include the elements as prescribed in Appendix A of 1910.1001 to satisfy exposure monitoring requirements.

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SUBPART L - EMPLOYEE NOTIFICATION OF MONITORING RESULTS

Affected employees of the results of any monitoring performed are notified:

- In writing, either individually or by posting of results in an appropriate location that is accessible to affected employees.
- Within 15 working days after the receipt of the results.

If monitoring results indicated that the TWA and/or excursion limit had been exceeded, then include the corrective action you are taking to reduce employee exposure to or below the TWA and/or excursion limit in the written notification.

SUBPART M - REGULATED AREAS

Host employers shall establish regulated areas wherever airborne concentrations of asbestos and/or PACM are in excess of the TWA and/or excursion limit. Demarcate regulated areas from the rest of the workplace in any manner that minimizes the number of persons who will be exposed to asbestos. Limit access to regulated areas to authorized persons or to persons authorized by OSHA regulations. Supply people entering a regulated area with and require them to use a respirator.

Host employers shall ensure that employees do not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in the regulated areas.

Host employers shall supplement them by the use of any combination of the following: respiratory protection that complies with the requirements of Asbestos - Action Nos. 08 and 09, work practices, and feasible engineering controls that will reduce employee exposure to or below the TWA and to or below the permissible excursion limit.

SUBPART N - TRAINING

Under no circumstances will our employees be involved in asbestos abatement operations. Awareness level training is provided only as a precaution and only on an as needed basis per job and will be documented as “Awareness Level Training Only”. The training will be provided to or at the time of initial assignment and least annually thereafter. This training will cover the following:



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- Types, properties and uses of asbestos.
- PPE (respirators, clothing, etc.) and their limitations.
- Ways to recognize asbestos.
- Hazards of asbestos fiber inhalation.
- Types of activities which could release asbestos fibers.
- Types of Signs and Postings.
- Limitations of PPE.

These written training topics will be readily available to any employee that may be exposed to asbestos.

Asbestos removal is and will always be contracted to licensed external firms who specialize in asbestos removal work. Berry Bros. requires that all such work be carried out in accordance with the requirements established by State and Federal regulations.

At all such projects the contractor will ensure that cleanup is properly completed and that all asbestos and asbestos contaminated material is collected, and disposed of in accord **with State and Federal regulations. The contractor will be required to submit air testing results to demonstrate that the cleanup has been carried out properly and the area can be reoccupied safely.**

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