



## **FREQUENTLY ASKED QUESTIONS ASBESTOS DECISION-MAKING TRAINING FOR MAINTENANCE/CUSTODIAL STAFF**

### **Am I required to train my building maintenance and custodial staff in *asbestos awareness* if my building contains asbestos?**

#### ***Schools***

*Yes, It's the Law!* EPA AHERA Regulation 40 CFR Part 763.92 "mandates training whether or not they are required to work with ACM. New Custodial and maintenance employees must also be trained within 60 days after commencement of employment".

#### ***Commercial Buildings***

*Yes!* OSHA's Asbestos Standard for General Industry - 29 CFR 1910.1101 requires employers to provide Asbestos Awareness Training to employees who will be performing housekeeping activities in the area containing ACM or PACM.

OSHA Construction Industry Standard for Asbestos 29 CFR 1926.1101(k)(9) Communication of Hazards mandates training for employees "who are likely to be exposed in excess of a PEL" and "employees who perform Class I through Class IV asbestos operations".

Class IV Asbestos work most likely resemble the duties performed by maintenance and custodial staff. Class IV asbestos work involves cleanup of debris and waste in a regulated area where respirators are required and cleanup of waste and debris in areas where friable thermal system insulation or surfacing materials are accessible.

#### ***Conclusion***

Most, if not all, of AET's commercial clients utilize licensed, training asbestos workers from outside contracting firms to complete Class IV work. Cleanup is performed by outside asbestos contractor personnel. Our clients maintenance or custodial workers do not wear respirators or have HEPA vacuums for cleanup. Remember, workers who wear respiratory protection must be evaluated first by a physician to ensure the employee can function properly while wearing the respirator.

#### ***Is training your maintenance and custodial staff a good idea?***

Absolutely! Your staff's knowledge of ACM locations and specific do's and don'ts procedures in your buildings is the key for stopping a fiber release episode and the contingent liabilities associated with a fiber release. Maintenance and custodial staff are building management's eyes and ears for any changes in ACM condition, potential ACM debris or outside trade personnel working around ACM.

#### ***Why AET for training?***

Because the best training is performed personally in small groups ensuring one-on-one contact. AET routinely custom designs and implements on-site asbestos awareness training for our clients. Our training not only meets the regulatory requirements defined by EPA and OSHA, but also includes a tour of your building identifying ACM locations in conjunction with the duties your maintenance and custodial staff complete on a daily and intermittent basis in these areas. Training is just 2 hours in duration and can cement the safe handling and management of ACM in your facility.

When you need professional help or advice, email Alan Sutherland, CIH, CHMM at [a.sutherland@aetinc.biz](mailto:a.sutherland@aetinc.biz) or call 610-891-0114. We provide nationwide services; phone consultations are free. Check out the full range of environmental contracting/consulting services we provide at our website [www.aetinc.biz](http://www.aetinc.biz).