



FREQUENTLY ASKED QUESTIONS BUILDING MATERIALS CONTAINING <1% ASBESTOS

What, if any, OSHA mandated requirements must be implemented if I plan to renovate or demolish the structure which contains only materials containing <1% Asbestos?

Building materials containing <1% asbestos do not meet the definition of asbestos containing materials (ACM) in OSHA's Construction Asbestos Standard 29 CFR 1926.1101. Hence, removal or disturbance of building materials <1% asbestos does not constitute Class I or II asbestos work. However, the OSHA Standard's definition of asbestos does not have a 1% cutoff; therefore building materials containing <1% asbestos are covered by the standard. Removal/disturbance of these materials is unclassified asbestos work.

Applicable provisions of the OSHA Standard for materials <1% asbestos include:

- 1. Regardless of the % of asbestos in the building materials:** Unclassified asbestos work is controlled by the following general work practices and engineering controls and prohibitions for this provision.
 - 1926.1101(g)(1)(i) requires HEPA vacuum use to cleanup ACM dust/debris
 - 1926.1101(g)(1)(ii) requires the use of wet methods to control employee exposures.
 - 1926.1101(g)(1)(iii) requires prompt cleanup and disposal of wastes and debris in leak-tight containers
 - 1926.1101(g)(3)(i) prohibits the use of high-speed abrasive disc saws without added controls.
 - 1926.1101(g)(3)(ii) prohibits the use of compressed air to remove ACM.
 - 1926.1101(g)(3)(iii) prohibits dry sweeping, shoveling or otherwise dry cleanup of ACM dust/debris
 - 1926.1101(g)(3)(iv) prohibits the use of employee rotation to reduce employee exposure.
- 2. Exposure-based requirements:** 1926.1101(f)(2)(i) requires a competent person to conduct an exposure assessment (perform air monitoring) before or at the initiation of operations which remove/disturb asbestos and develop a negative exposure assessment (NEA) for specific tasks. Monitoring results must be provided to the affected employees and recordkeeping maintained.

Note: Development of NEAs can use objective data, previous air monitoring results, or current air monitoring data. Until an NEA is prepared, the employer must provide protective equipment, respirators and training to the affected employees (as if the asbestos PEL standard is exceeded). Where current air monitoring data concludes the OSHA PEL/EL standard have been exceeded, the standard's requirements for establishing a regulated area and other work practice control procedures, engineering control methods, and prohibitions (not directed to ACM) are enforceable.

In summary, contractor/owner due diligence regarding asbestos does not cease when building materials are tested and found to contain <1% asbestos. Disturbance of these materials must be controlled and affected employees protected.

When you need professional help or advice, email Alan Sutherland, CIH, CHMM at 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.

Accredited Environmental Technologies, Inc.