	ASBESTOS AWARENESS PROGRAM	Document No.:	HSE-OP-032
		Department:	Operations
		Revision Date:	07 APR 2010
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Purpose

The purpose of Trinity Medical Management's program is to ensure the safety of employees who may be potentially exposed to Asbestos levels above permissible exposure levels.


Administrative Duties

The Training and Compliance Manager is the program coordinator/manager and is responsible for its implementation. Copies of the written program may be obtained in the Operations office.

Purpose

The purpose of this program is to inform interested persons, including employees that this company is complying with OSHA's asbestos standard:

- The air quality (safety) is to be determined from breathing air zone samples.
- No employee is exposed to an airborne concentration of asbestos in excess of 0.1 f/cc (fibers per cubic centimeter of air) as an eight-hour time-weighted average (TWA).
- No employee is exposed to an airborne concentration of asbestos in excess of 1.0 f/cc (excursion limit) as averaged over a sampling period of 30 minutes.
- We assess all asbestos operations for their potential to generate airborne fibers.
- Our designated competent person conducts an initial exposure assessment immediately before or at the initiation of an operation to document expected exposures, and that the assessment is completed in time to comply with requirements triggered by exposure data or the lack of a "negative exposure assessment."
- We perform periodic monitoring and additional monitoring when required.
- When required, we implement a medical surveillance program for all employees when for a combined total of 30 or more days per year engage in Class I, II, or III work or are exposed at or above the PEL, or when employees are required to wear negative-pressure respirators.
- We maintain objective data, monitoring, medical surveillance, training, and building owner notification records when required and for the time periods indicated in the asbestos rule.
- Our asbestos competent person is qualified, authorized, and has the proper training to ensure worker safety and health.
- Our respirator program is in place and in accordance with OSHA regulations.
- Our Class I, II, and III asbestos work, and all other operations where airborne concentrations of asbestos exceed or there is a possibility they may exceed a PEL, are conducted within regulated areas.
- We understand that the communication of asbestos hazards is vital to prevent further overexposure and that we have specific duties under the asbestos rule to communicate those hazards through written notifications, signs, labels and employee information and training.
- Our specific methods of compliance with the PEL and STEL are based on the regulation. We understand there are compliance methods that are required for most jobs, required

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for all jobs when exposure exceeds the PEL, and methods that are prohibited on all jobs. We also understand that most, but not all, asbestos jobs fall into one of the Class I - IV categories. For example, the installation of new asbestos-containing products does not carry a class designation.

- On multi-employer worksites, we will: (1) inform other employers on the site of the nature of our work, (2) relay information of the existence of regulated areas, and take correct measures to ensure employees of other employers are not exposed to asbestos.

General

Asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

Friable means that the material can be crumbled with hand pressure and is therefore likely to emit fibers. The fibrous or fluffy sprayed-on materials used for fireproofing, insulation, or sound proofing are considered to be friable, and they readily release airborne fibers if disturbed. Materials such as vinyl-asbestos floor tile or roofing felts are considered non-friable and generally do not emit airborne fibers unless subjected to sanding or sawing operations. Asbestos-cement pipe or sheet can emit airborne fibers if the materials are cut, abraded or sawed, or if they are broken during demolition operations.


This program applies to all work where one of our employees may be occupationally exposed to asbestos. Employees who perform housekeeping activities during and after construction activities are covered by the asbestos construction standard. The TCM is the program coordinator/manager and is responsible for its implementation. Copies of the written program may be obtained in the Operations office.

This is a General Asbestos Awareness Program for Trinity Medical Management. Site-specific plans will be developed and implemented for each individual project involving asbestos abatement activities.

If the TWA and/or excursion limit is exceeded, a written program to reduce employee exposure must be implemented. To reduce levels, this can be done by means of engineering and work practice controls and the use of respiratory protection.

Project activities will involve one or more of the following:

- Class I-The most potentially hazardous class of asbestos jobs. They involve the removal of thermal system insulation (TSI) and sprayed-on or troweled-on surfacing asbestos-containing materials or presumed asbestos-containing materials. Thermal system insulation includes asbestos-containing materials applied to pipes, boilers, tanks, ducts, or other structural components to prevent heat loss or gain. Surfacing materials include

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decorative plaster on ceilings, acoustical asbestos-containing materials on decking, or fireproofing on structural members.

- Class II-The removal of other types of asbestos-containing materials that are not thermal system insulation-such as resilient flooring and roofing materials containing asbestos. Examples of Class II work include removal of floor or ceiling tiles, siding, roofing, or transite panels.
- Class III-Includes repair and maintenance operations where asbestos-containing or presumed asbestos-containing materials are disturbed including thermal system insulation.
- Class IV-Includes custodial activities where employees clean up asbestos-containing waste and debris. This includes dusting contaminated surfaces, vacuuming contaminated carpets, mopping floors, and cleaning up asbestos-containing or presumed asbestos-containing materials from thermal system insulation. Installations of new asbestos-containing products (class specific requirements) do not apply.

Health Effects

Exposure to asbestos has been shown to cause lung cancer, asbestosis, mesothelioma, and cancer of the stomach and colon.


Training

Asbestos Awareness Training is required for employees whose work activities may contact Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM) but do not disturb the ACM or PACM during their work activities. Employee training should be provided prior to or at the time of initial assignment & at least annually thereafter. The training program should be done in a manner that the employee is able to understand & should include health effects associated with exposure to asbestos. The training should also include information on the relationship between smoking & exposure to asbestos producing lung cancer. A certificate of training should be provided & maintained.

Regulated areas

Signs and labels will identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that Asbestos Containing Material (ACM) and/or Presumed Asbestos Containing Material (PACM) will not be disturbed. The Company will ensure that employees working in and adjacent to regulated areas comprehend the warning signs.

When Class I, II or III asbestos work is being conducted at a site, it is therefore done within regulated areas. The limit should comply with that of the TWA and/or exclusion limit.

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Other operations, where airborne concentrations of asbestos exceed or there is a reasonable possibility they may exceed a PEL, are conducted within a regulated area.

Demarcation

The regulated area is demarcated in a manner that minimizes the number of persons within the area and protects persons outside the area from exposure to airborne asbestos. When critical barriers or negative pressure enclosures are used, they may demarcate the regulated area. Warning signs and labels are posted in accordance with the regulation

Access

Access to regulated areas is limited to authorized persons and to persons authorized by the OSHA Act or federal regulations.

Respirators

All persons entering a regulated area where employees are required to wear respirators are supplied with a respirator selected in accordance with the regulation.

Prohibited Activities

We make sure that our employees do not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in a regulated area.


Competent Persons

Our competent person will supervise all asbestos work performed within regulated areas.

Communication of Hazards

We understand the importance of communicating asbestos hazard information at this job site. Our plan to communicate those hazards follows the requirements of the regulation and contains information and procedures for the following elements:

- Duties of building and facility owners.
- Duties of employers whose employees perform work subject to this standard in or adjacent to areas containing ACM and PACM.
- Criteria to rebut the designation of installed material as PACM.
- Warning signs.
- Labels.
- Employee information and training.
- Access to training materials.

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Multi-Employer Worksite Arrangements

If employees working immediately adjacent to a Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such job, their employer shall either remove the employees from the area until the enclosure breach is repaired; or perform an initial exposure assessment pursuant to 1926.1101(f).

