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1. Purpose

1.1. This procedure is to provide basic precautions and protections for employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM) during removal and/or abatement work.

2. Scope

2.1. This Program applies to all Gallant Industrial Employees and subcontractors performing asbestos abatement work.

3. Responsibilities

3.1. Managers/Supervisors

3.1.1. Ensure owners or operators are notified of PACM.

3.1.2. Prohibit Gallant Industrial employees from working until material in question is confirmed as non-asbestos or abated.

3.1.3. Ensure proper employee training is completed.

3.1.4. Ensure that all requirements of this program are understood and followed by those working under his/her direction.

3.2. All Employees

3.2.1. All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

3.3. Clients

3.3.1. Clients are required to notify Gallant Industrial of the existence of any asbestos contained within the work scope area.

4. Procedure

4.1. General

4.1.1. All asbestos abatement work, other than a limited scope of Class II work, shall be awarded to qualified asbestos abatement subcontractors. Client-owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before Gallant Industrial employees disturb that material. Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before Gallant Industrial employees are permitted to work.

4.2. Signage

4.2.1. Signage will be used to identify regulated areas. Warning signs shall be provided and displayed at each regulated area. In addition, warning signs shall be posted at all approaches to regulated areas so that an employee may read the signs and take necessary protective steps before entering the area.

5. Asbestos Assessment Requirements

5.1. Potential exposure to asbestos is assessed to ensure exposure does not exceed occupational exposure limits

5.2. Assessments include visually for the existence of asbestos as well as from breathing zone air samples that are representative of the 8-hour TWA and 30-minute short-term exposures of each employee.
5.3. Gallant Industrial shall ensure no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter of air as an eight (8)-hour time-weighted average (TWA). Gallant Industrial shall ensure no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes.
5.4. An independent/third party air sampling person shall perform all required air sampling during contractor asbestos work and provide the results to Gallant Industrial.
5.5. Affected employees and/or their designated representatives are to be provided the opportunity to observe asbestos exposure monitoring.
5.6. Air sampling analysis shall be performed by an American Industrial Hygiene Association (AIHA) accredited laboratory.
5.7. The number of samples necessary to be considered "representative" is dependent upon many factors and must be determined in consultation with Gallant Industrial, certified Industrial Hygienist consultant, or a third-party air sampling professional.
5.8. Affected employees shall be notified of monitoring results, which represent the employee's exposure, as soon as possible following receipt of the monitoring results.
5.9. Employees shall be notified in writing either individually or by posting at a centrally located place that is accessible to affected employees.
5.10. Once representative sampling indicates that exposure levels for that activity are consistently below the OSHA established permissible limit and/or excursion limit, the requirement for respiratory protection may be waived.
5.11. It is imperative that accurate personnel air sampling records are maintained to justify any relaxation of respiratory protection requirements.
5.12. Results of air sampling data must be maintained in the asbestos job documentation.

6. Engineering Controls and Work Practices

6.1. Gallant Industrial shall use engineering controls and work practices to reduce exposure below the permissible exposure limit.
6.2. Engineering controls and work practices shall be used to reduce and maintain employee exposure to or below the TWA and/or excursion limit, except to the extent that such controls are not feasible. Wherever the feasible engineering controls and work practices are not sufficient to reduce employee exposure to or below the TWA and/or excursion limit, Gallant Industrial shall use them to reduce employee exposure to the lowest levels achievable by these controls and shall supplement them by the use of respiratory protective equipment.
6.3. Asbestos exposure controls are designed to eliminate or minimize an employee's exposure to airborne asbestos fibers using work practices and engineering controls. Where the TWA and/or excursion limit is exceeded, a written Asbestos Exposure Control Program to reduce employee exposure shall be established and implemented to reduce employee exposure to or below the TWA and to or below the excursion limit.
6.4. Prior to initiating any asbestos work the Competent Person must perform an asbestos exposure assessment. After the exposure assessment, the engineering controls and work practices to be employed shall be identified.
6.5. Prior to commencement of work, the affected employees shall be briefed on the engineering controls and work practices designed to reduce/maintain the exposure below TWA for the asbestos work. This briefing

shall be documented and maintained with the job documentation. This shall be done except to the extent that such controls are not feasible. Some of them may be exhaust systems for hand tools, wet methods, clean-up procedures and PPE shall be used.

6.6. Wet methods will be employed for all asbestos work to minimize potential airborne exposure wherever possible. ACM shall be wetted from the initiation of the maintenance or renovation operation and wetting agents shall be used continually throughout the work period to ensure that any dry ACM exposed in the course of the work is wet and remains wet until final disposal.

6.7. Wetting agents, usually a surfactant (dish soap), are generally prepared by mixing 1 to 3 ounces of wetting agent to 5 gallons of water.

7. Restricted/Regulated Areas

7.1. Gallant Industrial shall create restricted/regulated areas where asbestos abatement activities are in progress. Regulated areas shall be established wherever airborne concentrations of asbestos and/or PACM are in excess of the TWA and/or excursion limit. Regulated areas shall be demarcated from the rest of the workplace in any manner that minimizes the number of persons who will be exposed to asbestos. Access to regulated areas shall be limited to authorized persons.

7.2. Regulated asbestos areas shall be established with barriers, tape, OSHA approved warning signs and other physical controls when airborne concentrations of asbestos are present.

8. Medical Surveillance Program

8.1. All Gallant Industrial employees who for a combined total of 30 or more days per year are engaged in Class II asbestos work or who are exposed at or above the permissible exposure limit for a combined 30 days or more per year shall be included in the Gallant Industrial medical surveillance program.

Note: For purposes of this requirement, any day in which an employee is engaged in Class II or Class III work or a combination thereof for one hour or less and, while doing so, adheres fully to the work practices specified in this standard, shall not be counted. The medical surveillance program shall be made available according to the following schedules:

8.1.1. Prior to assignment of an employee to an asbestos area where negative pressure respirators are worn.

8.1.2. Where exposure to asbestos may be at or above the permissible exposure level for 30 or more days per year, or where employees are engaged in Class II asbestos work for 30 or more days per year, at least annually thereafter, if exposures exist.

8.1.3. Asbestos medical examination must be given within ten (10) working days following the thirtieth day of exposure.

8.1.4. If an examining physician determines that any of the examinations should be provided more frequently than specified, they shall be provided at the periodicity specified by the physician.

8.2. No asbestos medical examination is required when complete records of such examination, performed less than twelve months prior to commencement of asbestos work are available.

8.3. As part of the medical surveillance, the attending physician shall provide a written opinion of the results of the medical examination to Gallant Industrial and the Contract Medical Surveillance Provider, who in turn will provide a copy to the affected employee within 30 days. In accordance with OSHA regulations, once employees are no longer exposed to asbestos, their inclusion in the medical surveillance program is no longer required.

9. Respiratory Protection and Personal Protective Equipment

9.1. Respirators are provided to employees. Respirators must be used during:
- 9.1.1. Periods necessary to install or implement feasible engineering and work-practice controls.
- 9.1.2. Work operations, such as maintenance and repair activities, for which engineering and work-practice controls are not feasible.
- 9.1.3. Work operations for which feasible engineering and work-practice controls are not yet sufficient to reduce employee exposure to or below the TWA and/or excursion limit.
- 9.1.4. Emergencies.

9.2. Personal Protective Equipment (PPE) shall be used while working with asbestos. If an employee is exposed to asbestos above the TWA and/or excursion limit, or where the possibility of eye irritation exists, Gallant Industrial shall provide at no cost to the employee and ensure that the employee uses appropriate protective work clothing and equipment such as, but not limited to:
- 9.2.1. Coveralls or similar full-body work clothing.
- 9.2.2. Gloves, head coverings, and foot coverings, and
- 9.2.3. Face shields, vented goggles, or other appropriate protective equipment.

9.3. The respirator shall be chosen in accordance with the Gallant Industrial Respiratory Protection Program and shall be approved by NIOSH. Powered, air-purifying respirators shall be available when the employees choose to use this type or the hazard assessment process requires this type, or when the respirator will provide more adequate protection. Prerequisites for use of respiratory equipment, regarding asbestos, include:
- 9.3.1. Successfully passing a respiratory physical.
- 9.3.2. Successfully completing annual respiratory protection training.
- 9.3.3. Successfully passing a respirator fit test.

10. Waste Disposal

10.1. Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing shall be collected and disposed of in sealed, labeled impermeable bags of greater than 6 mils thickness or other closed, labeled, impermeable containers.

10.2. Bags or containers shall be imprinted and clearly labeled with the following OSHA asbestos hazard warning and address:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
GALLANT INDUSTRIALNAME
Site Address
Contractor's Name
Contractor's Address

10.3. Bags/containers shall be clearly labeled. An Asbestos Waste Shipment Record shall be utilized. Check with the landfill prior to shipping to see if they require their own shipping record or use a Waste Manifest.

10.4. Asbestos shall be transported to an approved landfill that accepts asbestos. A licensed waste hauler may be used to transport the packaged ACM. Transport vehicles shall either be enclosed or covered. Do not use vehicles with compactors to transport ACM. A shipping form shall Gallant Industrial the ACM, during transport, to the landfill.

11. Record Keeping

11.1. All records relating to any asbestos activity shall be maintained by Gallant Industrial permanently. The following records shall be maintained:

11.1.1. Exposure Assessments that are being relied upon to support a location's position that asbestos work (specific or generic) will not result in exposures above the PEL or excursion limit.

11.1.2. Employee asbestos exposure records (personnel air monitoring).

11.1.3. Medical Surveillance records.

11.1.4. Training records.

11.1.5. Shipping papers and disposal records.

11.1.6. Copies of notification letters sent to Governmental agencies.

11.1.7. Pre-project asbestos sampling results.

11.1.8. Post-project clearance sampling results.

11.1.9. Daily Work Summaries.

11.1.10. Project Completion Closure Report, if provided.

12. Training

12.1. Employees are provided with training on Asbestos. Employees who are exposed to airborne concentrations of asbestos at or above the PEL and/or excursion limit must be trained. Gallant Industrial shall institute a training program and ensure employee participation in the program. Training shall be provided prior to or at the time of initial assignment and at least annually thereafter. A copy of the standard should be made readily available to all affected employees.

12.2. Training shall be documented and maintained in the employee training file.