

# **Environmental Remediation Business in USA**

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**POLICIES & PROCEDURES MANUAL**

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# A. Responsibilities

## 1. Management

At [COMPANY NAME], we will ensure that competent persons are supervised daily, with oversight provided in accordance with Title 8 of the California Code of Regulations, Sections §341.6-341.14, §31529, and §35144.

[REDACTED]

Management further commits to conduct regular site inspections, review work plans, monitor adherence to safety rules, provide necessary training, and take corrective or disciplinary action for any violations.

These responsibilities are also documented and cross-referenced in the Assurances of the Competent Person form(s), which affirm both C-Legacy Environmental's and the competent person's obligations under applicable law and policy.

## 2. Certified Supervisor

At [COMPANY NAME], the Competent Person plays a key role in carrying out asbestos work safely and in full compliance with Title 8 §1529 of the California Code of Regulations. Management hereby affirms that the Competent Person has both the authority and responsibility to carry out all duties described in company policies, procedures, and programs, and will be present during all asbestos-related work as required.

The Competent Person is authorized to enforce compliance, direct corrective actions, and ensure that all safety, health, and environmental requirements are met.

In accordance with Title 8 §1529, the specific duties of the Competent Person include:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

d. Performing or supervising the following duties (§1529(o)(3)(A)):

- i. [REDACTED]
- [REDACTED]

e. Determining whether Class II asbestos-containing material is intact prior to disturbance.

f. Ensuring regulated area entry is restricted to employees who have provided current fit test results, training certificates, and medical surveillance records to the Certified Supervisor.

g. Ensuring that the Certified Supervisor maintains current copies of employees' fit tests, training certificates, and medical surveillance records onsite, and that these are available to DOSH personnel during inspections or audits.

By fulfilling these responsibilities, the Competent Person ensures safe, compliant asbestos work and the protection of employees, the public, and the environment.

### 3. Injury & illness Prevention Program (IIPP)

The Injury and Illness Prevention Program (IIPP) presents strategies to identify, evaluate, and control workplace hazards. To ensure its effectiveness, enforcement mechanisms are essential for maintaining a safe and compliant workplace.

Our enforcement and hazard assessment mechanisms include:

[REDACTED]

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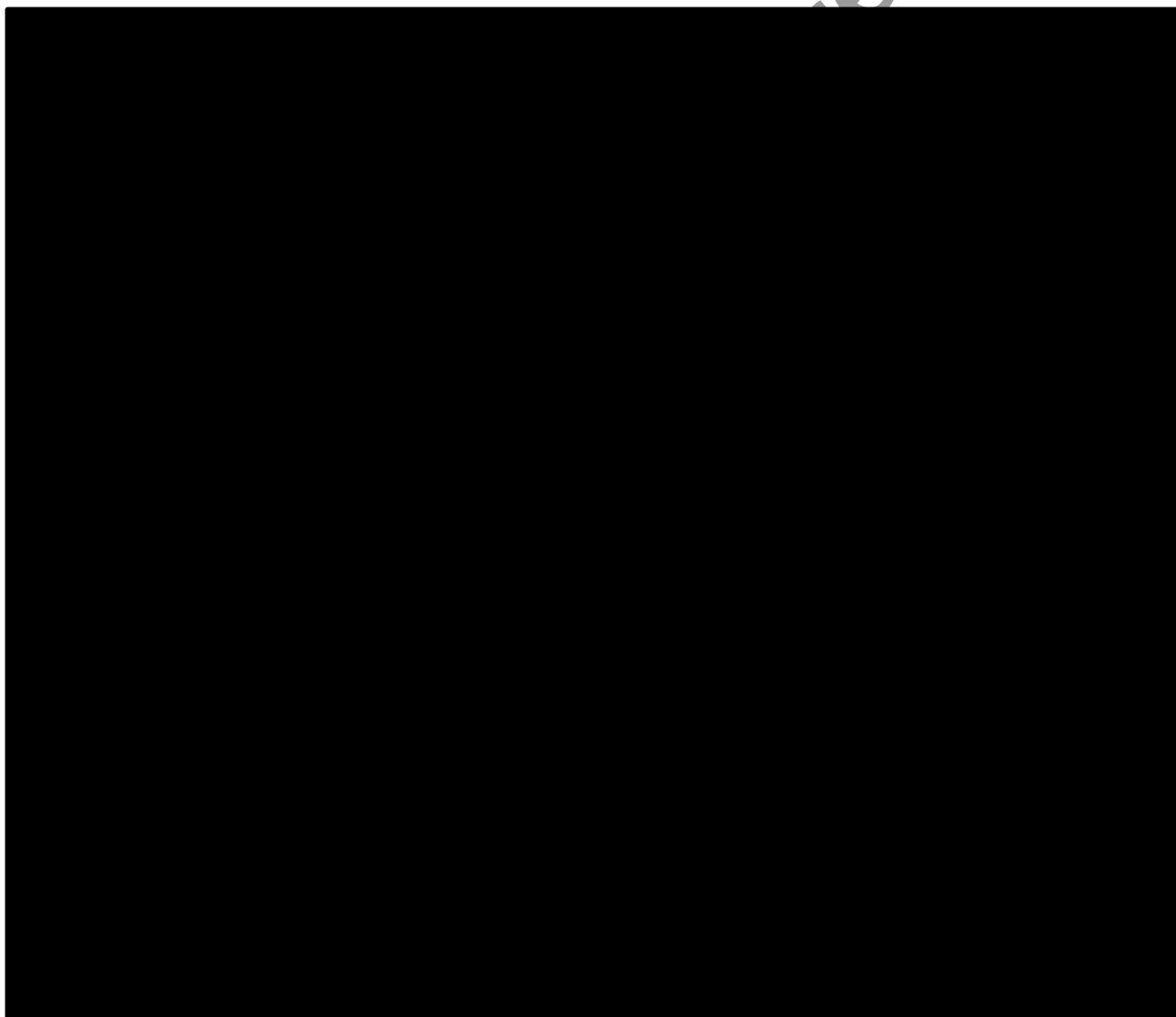
**FORM**

**Asbestos Removal Work Inspection Form**

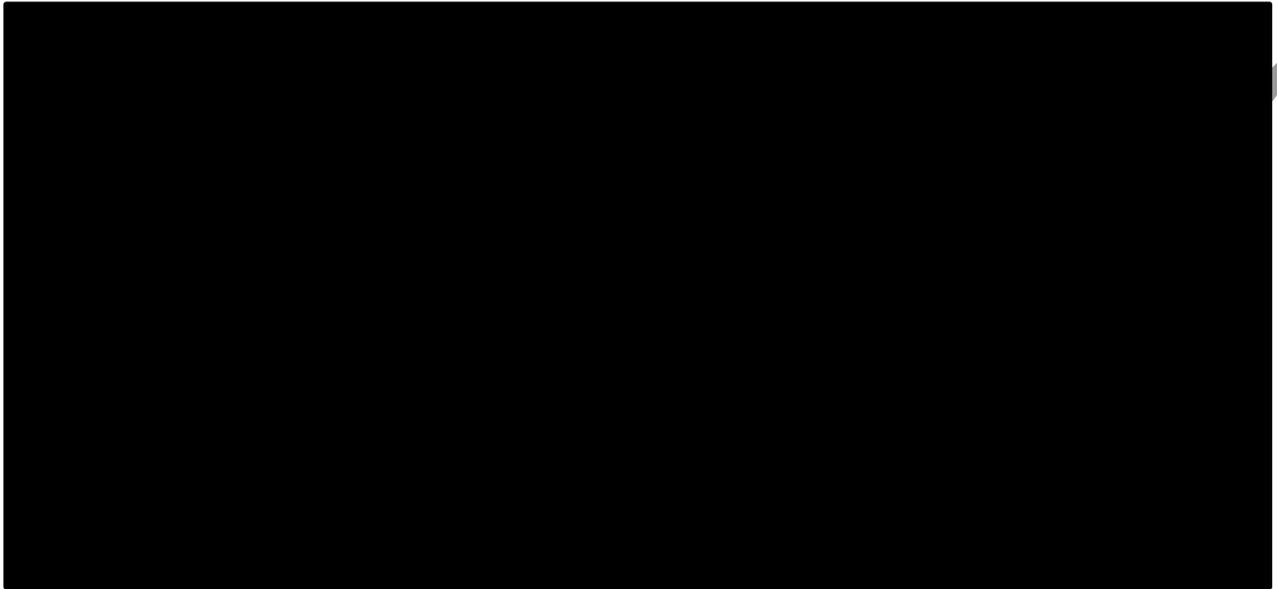
**Project Information**

- Project \_\_\_\_\_
- Address \_\_\_\_\_
- Start Date \_\_\_\_\_
- End Date \_\_\_\_\_
- Inspector \_\_\_\_\_
- Inspection Date \_\_\_\_\_

**Work Area Inspection**



**Documentation Review**



**General Observations and Recommendations:**

Four horizontal lines provided for writing general observations and recommendations.

**Signature:** \_\_\_\_\_ **Date** \_\_\_\_\_

## 4. Training

### POLICY

[COMPANY NAME] is committed to ensuring that all employees engaged in asbestos-related work are properly trained in accordance with Title 8 of the California Code of Regulations and DOSH requirements.

### Cost and Personnel

[COMPANY NAME] will bear the full cost of asbestos training for all employees performing asbestos-related work. Training will be delivered by qualified and certified asbestos trainers employed by or contracted through a DOSH-approved training provider.

### Types and Frequency of Training

[REDACTED]

### Verification of employee training records

[REDACTED]

All asbestos training, including initial and refresher courses, will be conducted only by DOSH-approved training providers to ensure compliance with California law and regulatory quality standards.

A copy of each employee's current asbestos training certificate will be maintained onsite in a designated location at every regulated area and will be readily accessible for inspection by DOSH personnel or other authorized parties. In addition, [COMPANY NAME] will maintain a centralized record system of all training certificates, logs, and medical surveillance records at its headquarters.

## B. Pre-job Procedures

### 1. Survey

The following preparations will be made for conducting asbestos-related work, in compliance with regulatory requirements outlined in §1529(k)(3)(A) and Labor Code section 6501.9:

1. If bulk sampling is conducted for bid purposes in residential construction (four units or fewer), only personnel who have successfully completed AHERA Asbestos Inspector training and who hold a current certificate from a DOSH-approved training provider are authorized to perform sampling.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. [COMPANY NAME] will obtain an asbestos survey from the building owner whenever possible to determine the presence, location, and quantity of asbestos-containing material (ACM), presumed asbestos-containing material (PACM), and asbestos-containing construction material (ACCM). The survey must have been conducted by a Certified Asbestos Consultant (CAC) or a Certified Site Surveillance Technician (CSST) under the supervision of a CAC who has signed the report.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

All survey results or presumptions will be made available to contractors and workers onsite as required by Labor Code §6501.9. For demolition, renovation, or other disturbance of building materials, a pre-demolition asbestos survey will be conducted. Any material that cannot be conclusively identified as non-asbestos will be treated as PACM.

### 2. Job Scope Description

For the initial site assessment and bid, an asbestos consultant or inspector conducts a survey or bulk sampling and drafts a general work plan outlining the scope, proposed practices, and estimated costs. Management then reviews this plan and formally communicates the job details to the designated competent supervisor, including the type of work to be performed, general control measures, and any applicable specifications or drawings. Management also ensures that required notifications (DOSH, Air Quality District) and permits are obtained prior to the start of work. The management will inform the competent person about the assigned project by completing the following form:

**FORM**

**Job Information and Instruction Form**

To ensure clear communication and accountability, this form serves to provide detailed information and instructions to the competent person.

Project Information

[Redacted]

Asbestos-Containing Material Information

[Redacted]

Proposed Work Practices

[Redacted]

Special Conditions and Safety Issues

[Redacted]

Exposure Potential Evaluation

[Redacted]

**Competent Person**

**Management**

[Redacted]

### 3. Notification- Prior to Work

[COMPANY NAME] will hold a pre-job safety conference prior to beginning any asbestos-related work. The conference will include the building owner or contracting entity, our management representatives, employees, and employee representatives. During the meeting, we will review our asbestos safety program, emergency procedures, and the specific equipment and work practices that will be used to provide a safe and healthy workplace.

Prior to work, we will notify building owners, our employees, and employers in adjacent areas about the measures we will implement to prevent asbestos exposure, the location and quantity of ACM/PACM identified on site, and the existence of, and requirements for, regulated areas. Notification will be provided in writing, supplemented with clear signage posted at the worksite. A copy of our current Cal/OSHA Asbestos Registration Certificate will be provided to the prime contractor (building owner) and other employers on site prior to the start of work.

We will post our current Cal/OSHA Asbestos Registration Certificate at the worksite, beside the required Cal/OSHA poster, where it will remain visible for the duration of the project.

### 4. Notification to the Division of Occupational Safety & Health

In compliance with Title 8 §341.9 and §5203(c), [COMPANY NAME] will provide written notice to the nearest District Office of the Division of Occupational Safety and Health (DOSH) prior to the commencement of any asbestos-related activity. Notification will be submitted on the DOSH-approved form unless otherwise specified.

In the event of an immediate abatement project, such as emergency conditions where asbestos poses an imminent risk to public health or safety, [COMPANY NAME] will notify DOSH as soon as practicable after abatement begins. This emergency notification will contain the same required information as a standard notice to the extent possible.

Our written notice to DOSH will include the information required by §341.9, including:

[REDACTED]

We will use the following standardized written notice form:

**FORM**

**Notification of Asbestos-Related Work Form**

Project Information

[Redacted]

Responsible parties

[Redacted]

Asbestos-Containing Material Information

[Redacted]

Work Practices

[Redacted]

Emergency Contact Information:

[Redacted]

**Signature of Authorized Representative**

Signature \_\_\_\_\_ Date \_\_\_\_\_

## 5. Initial Exposure Assessment

Before commencing any asbestos-related work, [COMPANY NAME] will conduct an initial exposure assessment to determine the necessary control measures and PPE for worker protection. This assessment will be based on:

[REDACTED]

The results of the assessment will guide the classification of the work, the selection of engineering controls (e.g., negative pressure enclosures, local exhaust ventilation), and the appropriate PPE required to ensure compliance with §1529.

## 6. Negative Exposure Assessment

[COMPANY NAME] will establish a Negative Exposure Assessment (NEA) only in compliance with the strict requirements of 8 CCR §1529(f)(2)(C). Any NEA documentation will be maintained on file and made available to a DOSH compliance inspector upon request.

[COMPANY NAME] recognizes that establishing an NEA requires rigorous documentation and representative data that typically exceeds routine daily air sampling capabilities. An NEA may only be established through one of three approved methods:

[REDACTED]

## 7. Notification After Completion

We have a duty to inform stakeholders of any remaining asbestos-containing material (ACM) or presumed asbestos-containing material (PACM) following completion of abatement.

Within 10 days of project completion, a qualified individual will conduct a final inspection to confirm the status of ACM/PACM at the worksite. Based on this inspection, written notification will be prepared and provided to the building owner and to employers of employees who will be working in the area. The notification will clearly state the current location and quantity of ACM/PACM that remains. Copies of the notification will be kept in project records and made available for regulatory review.

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## C. Asbestos Removal Procedures

### 1. Code of Safe Practices

[COMPANY NAME] follows the Code of Safe Practices, which emphasizes our commitment to providing a safe and healthy workplace. This code sets out the responsibilities of employees to follow safety procedures, report hazards and accidents, and participate in investigation processes.

### 2. General Practices

#### i. Requirement for Registration

##### Definitions

Asbestos-related work is defined in Title 8 CCR §1529(b) as any activity that disturbs or could disturb asbestos-containing material (ACM), including removal, encapsulation, demolition, maintenance, or repair.

Asbestos-containing construction material (ACCM) is defined in Title 8 CCR §1529(b) as any construction material containing more than 0.1 percent asbestos by weight.

Registration with the Division of Occupational Safety and Health (DOSH) is required under Title 8 CCR §341.6–§341.14 for any employer or contractor performing asbestos-related work involving more than 100 square feet of ACM/ACCM in a project. In addition, demolition or renovation projects may trigger registration requirements regardless of the quantity of material involved.

#### ii. Class of Work Definitions

As outlined in Title 8 §1529(b), asbestos work is categorized into three classes based on the potential for fiber release and the complexity of control measures required.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

### v. Alternative Control Methods

When the above traditional methods are not feasible or effective, alternative control measures can be implemented to minimize asbestos exposure.

#### Class I

Class I work may be performed using a control method which is not referenced in §1529(g)(5), or which modifies a control method referenced in §1529(g)(5), if the following provisions are complied with:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

#### Class II

Instead of the work practices and controls listed in §1529(g)(8)(A) through (E), [COMPANY NAME] may use different or modified engineering and work practice controls if the following provisions are complied with:

[REDACTED]

[REDACTED]

[REDACTED]

**vi. Waste Clean-up, Labeling and Disposal**

In compliance with §1529(g)(1)(C) and §1529(l)(2), [COMPANY NAME] will execute prompt clean-up and disposal of asbestos-containing debris and waste materials in sealed, leak-tight containers.

Labeling Requirements [§1529(k)(8)(C)]

[REDACTED]

Transportation and Disposal

[REDACTED]

Final Visual Inspection

Before releasing a work area, a thorough final visual inspection will be conducted by the competent person to ensure that:

[REDACTED]

**3. Initial Set-up Measures**

**i. Regulated Areas**

A regulated area will be established wherever asbestos-containing materials (ACM/PACM) are removed, disturbed, or handled, and whenever airborne fiber levels may exceed the

permissible exposure limits (PELs). Boundaries will be clearly marked using barriers, tape, or other visual indicators to separate the regulated area from adjacent spaces.

Warning signs will be posted at all entrances. Signs will include the required language: "DANGER – ASBESTOS – CANCER AND LUNG DISEASE HAZARD – AUTHORIZED PERSONNEL ONLY – RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA."

[REDACTED]

[REDACTED]

## ii. Critical Barriers

Critical barriers are physical barriers - such as insulating plastic sheeting - used to contain asbestos-containing materials and prevent the spread of asbestos fibers will be installed to cover openings such as doors, windows, and gaps in walls and floors to prevent asbestos from seeping through.

To create effective containment, heavy-duty 6-mil polyethylene sheeting will be used to seal off the work area, to securely tape seams and joints to prevent leaks, and ensure the integrity of the containment to prevent the escape of asbestos fibers.

To further enhance containment, alternative methods like negative pressure enclosures or local exhaust ventilation systems might be employed, depending on the specific circumstances of the asbestos removal project.

## iii. Three-Stage Decontamination Facility

A three-stage decontamination facility will be established whenever employees are exposed to asbestos fibers during removal, renovation, or disturbance of ACM/PACM:

1. The equipment room will be used for the storage, maintenance, and removal of contaminated tools, equipment, and protective clothing. It will be maintained in a clean and organized manner, with clearly marked containers for disposal of contaminated items.
2. The shower room will comply with §3366(f) requirements. It will include:

[REDACTED]

- 3. The clean room will provide a safe area for employees to store personal clothing and uncontaminated items. Personal belongings will be stored in sealed bags or lockers to prevent contamination. The clean room will remain free of asbestos fibers.

Where it is not feasible to place the shower or clean room adjacent to the equipment room, alternate decontamination methods (such as mobile units or sequentially arranged areas within the worksite) will be used to maintain equivalent protection.

**Entry/Exit Procedures**

[Redacted text block]

**iv. Decontamination Area**

For Class I work, a decontamination area is less than 25 linear or 10 sq.ft. While the complexity of the decontamination area will vary based on the size and scope of the work, for Class II & III work, it will at the least include a designated area for removing and storing contaminated PPE, a place for cleaning tools and equipment, and a designated area for disposal of contaminated materials.

**v. Protective clothing for each class of work**

- Class I and II Work:
  - [Redacted text]
  - [Redacted text]
  - [Redacted text]
  - [Redacted text]
  - [Redacted text]
- Class III Work:
  - [Redacted text]
  - [Redacted text]
  - [Redacted text]
  - [Redacted text]

For non-disposable clothing and PPE, the contaminated clothing will be contained in sealed bags and laundered separately from other clothing in facilities designated for contaminated clothing.

### Pre-cleaning procedures

Pre-cleaning will be conducted when the initial exposure assessment indicates that asbestos materials or nearby surfaces/objects may be contaminated. Surfaces will be cleaned using HEPA vacuums or wet methods (e.g., misting with water) to suppress dust and fibers.

Pre-cleaning will only occur under controlled conditions:

[REDACTED]

### vi. Other measures

Electrical safety will be ensured through lockout/tagout procedures and the use of ground fault circuit interrupters (GFCIs) in accordance with Title 8 §2340.11. Fire safety measures, including a no-smoking policy and readily available fire extinguishers, will be maintained at all times. Fall protection equipment will be used whenever employees are exposed to height-related risks.

Emergency procedures, including evacuation routes and first aid response, will be implemented and reviewed with all personnel. These requirements, along with other workplace protections, are outlined in our Code of Safe Work Practices, which provides overarching guidance for hazard identification, reporting, and control.

## 4. Class I work

### i. Negative Pressure Enclosures

Negative pressure enclosures are a required control measure for asbestos removal. By maintaining lower air pressure inside the work area than outside, they prevent asbestos fibers from escaping into surrounding spaces, as follows:

[REDACTED]

Negative pressure will be maintained continuously during operations, monitored by a manometer with recording capability and an alarm system, or overseen by a full-time attendant. Minimum air changes per hour (ACH) will be calculated using the formula:

$$\text{ACH} = (\text{Cubic Feet per Minute of Ventilation}) \div (\text{Volume of Enclosure})$$

Backup air movers will be available in case of equipment failure. Smoke tubes will be used to test for leaks and verify enclosure integrity.

All ventilation units will be inspected and tested to ensure they are functioning correctly and free of contamination. Each will be equipped with primary and secondary HEPA filters, which will be changed in accordance with manufacturer instructions and disposed of as asbestos waste. Equipment will be placed strategically to move contaminated air away from workers' breathing zones and toward HEPA filtration devices.

If the enclosure is breached or negative pressure drops, all work will stop immediately until containment is restored. Electrical circuits inside the enclosure will be deactivated unless protected by GFCIs in accordance with §2340.11.

[REDACTED]

## ii. Glovebags

Glovebags will be constructed of seamless, 6-mil thick plastic. When used on elbows or other connections, only glovebags designed for that purpose will be used, and no modifications will be made.

[REDACTED]

## 5. Class II work

In the context of Asbestos-Containing Materials (ACM), 'intact' means that the material remains in its original, undisturbed condition, is not friable, and cannot be crumbled, pulverized, or reduced to powder by hand pressure. An intact condition indicates that the material is not readily releasable into the air and therefore presents a lower risk of fiber release during handling.

Before initiating any Class II work, the competent person is responsible for making a thorough determination of the condition of the ACM. This assessment must verify whether the material is intact. If there is uncertainty about the condition, the competent person will treat the material as not intact until proven otherwise, ensuring conservative protective measures are in place.

[REDACTED]

[REDACTED]

### i. Class II flooring

Resilient flooring materials, including any associated mastic and backing, will be presumed to contain asbestos unless a qualified industrial hygienist confirms otherwise through recognized analytical testing. Floors will be cleaned using vacuums equipped with HEPA filters, disposable dust bags, and metal floor tools. Brushes will not be used, as they can disturb asbestos fibers.

When removing resilient sheet flooring, the material will be cut into manageable sections, with water applied at the snip points to keep the area wet. The material will also be wetted during delamination to suppress fiber release. Any residual adhesive or backing will be scraped using wet methods to minimize dust generation. Where applicable, Class I removal techniques referenced earlier may also be employed to ensure additional control.

[REDACTED]



#### iv. Gaskets

Gaskets that are visibly deteriorated and cannot be removed intact will be handled using glovebag techniques. This ensures that the material remains fully contained and that asbestos fibers are not released into the surrounding environment.

[REDACTED]

[REDACTED]

#### v. Other Class II Materials

To minimize asbestos exposure, Class II materials not otherwise specified will be thoroughly wetted with amended water prior to and during removal. Materials will be removed intact whenever feasible to reduce the potential for fiber release.

[REDACTED]

[REDACTED]

#### vi. Working with materials that contain less than 1% asbestos

Even when asbestos is present in concentrations of 1% or less, strict precautions will be taken to minimize exposure. Engineering controls such as local exhaust ventilation and HEPA-filtered equipment will be used to capture and contain any airborne fibers. Administrative measures, including restricting access to the work area and limiting the duration of worker exposure, will also be implemented.

[REDACTED]

[REDACTED]

[REDACTED]

All employees who may work with or around materials containing up to 1% asbestos will receive training on asbestos hazards, safe work practices, the proper use of PPE and respirators, and emergency procedures. Training will emphasize minimizing disturbance of materials, proper cleanup techniques, and recognizing signs of potential fiber release.

### **vii. Working with naturally occurring asbestos**

Company policy is to treat all Naturally Occurring Asbestos (NOA) containing asbestos concentrations greater than 1% as Class II asbestos work. As such, the same control measures, respiratory protection, protective clothing, decontamination procedures, and employee training requirements described above will apply.

## D. Respiratory Protection Program

At [COMPANY NAME], we follow a comprehensive respiratory protection program to protect employees from airborne contaminants, including asbestos, in accordance with Title 8, §5144 and §1529.

We select respirators based on the specific type of asbestos work and the level of protection required, and conduct fit testing to ensure that respirators fit properly and provide adequate protection. We also provide comprehensive training to employees on the proper use, care, and maintenance of respirators.

### 1. Program Administrator

In accordance with §5144(c)(3), [COMPANY NAME] will designate a qualified Program Administrator to oversee the respiratory protection program.

[REDACTED]

[REDACTED]

### 2. Selection

In compliance with §5144(d)(3)(A), respirators will be selected based on the specific hazards present, the nature of the work, and the exposure assessment conducted by the competent person. Only NIOSH-approved respirators, as required under §5144(d)(1)(B), will be issued for use.

As required by §5144(c)(4), [COMPANY NAME] will provide respirators, medical evaluations, and training to employees at no cost. Training will include proper use, limitations, fit testing, maintenance, and storage of respirators.

[REDACTED]

For Class II and III Work, respirator selection will be based on the specific material being removed, the exposure assessment, and the feasibility of intact removal. Appropriate respiratory protection will be provided to ensure compliance with applicable exposure limits.

[REDACTED]

### 3. Medical Evaluation

#### POLICY

In compliance with §1529(h)(2)(B), [COMPANY NAME] will ensure that all employees required to wear respiratory protection receive a medical evaluation prior to respirator fit testing or use. Our policy is to protect employee health by restricting individuals who do not obtain medical clearance from assignments requiring respirator use.

Medical evaluations will be conducted by a licensed physician or other licensed health care professional (PLHCP) prior to any fit testing or the assignment of a respirator. These evaluations will assess the employee's respiratory and cardiovascular health, as well as their general physical condition, to determine whether they can safely perform job duties while using a respirator. The evaluation process will follow the medical questionnaire and examination protocols required under 8CCR §5144(e).

[REDACTED]

[REDACTED]

### 4. Fit Testing

All employees required to wear tight-fitting respirators will undergo fit testing prior to initial use, whenever a different make, model, style, or size of respirator is used, and at least annually thereafter, in accordance with §5144(f)(2), (3), and (4). This ensures that each respirator provides the assigned protection factor and fits properly for the individual user.

All respirators must be fit tested to verify that they provide adequate protection for the wearer. Powered Air-Purifying Respirators (PAPRs) and Type C supplied-air respirators equipped with filter attachments will be qualitatively fit tested with the air supply turned off and the appropriate filters in place. This procedure ensures that they provide a minimum protection factor of 10 for escape purposes, as required by regulation.

Our company employs both Qualitative Fit Testing (QLFT) and Quantitative Fit Testing (QNFT) protocols. QLFT relies on the employee's ability to detect a test agent, such as saccharin or Bitrex, that indicates leakage around the respirator's face seal. QNFT uses specialized instruments to measure the actual concentration of a test agent inside the respirator compared to the ambient environment, providing a numerical fit factor. These protocols are applied depending on the type of respirator and work conditions.

Documentation of each fit test will be maintained using [COMPANY NAME]'s standardized fit test form, which contains all the information required under §5144(m). A copy of the current fit test record for each employee who enters a regulated area will be kept at the jobsite at all times for review and compliance verification.

## 5. Use

To ensure the effectiveness of respiratory protection in accordance with §5144(g)(1), employees must be clean-shaven in areas where the respirator facepiece contacts the skin. Facial hair, clothing, or any condition that interferes with the face-to-facepiece seal or valve function is strictly prohibited. Employees are responsible for reporting any medical or physical condition that may affect the proper fit or function of their respirator.

Before each use, employees will inspect their respirator for damage, missing components, worn parts, or deterioration as required by §5144(h)(3)(A)1. A respirator may not be used if it fails inspection, and any deficiencies must be reported for repair or replacement.

[REDACTED]

[REDACTED]

[REDACTED]

## 6. Maintenance & Care

### POLICY

In accordance with §5144(h) and Appendix B-2, all respirators will be properly cleaned, disinfected, stored, inspected, and repaired to ensure they remain effective and safe for employee use. Cleaning and disinfecting will occur after each use, or more often if contamination is visible. Respirators that are not maintained in a clean and serviceable condition will not be issued for use.

### PROCEDURES

[REDACTED]

Respirators will be stored in a clean, dry, and dust-free environment to protect them from contamination, sunlight, extreme temperatures, and physical damage. Each respirator will be placed in a sealed container or bag to prevent exposure to dust, moisture, or chemicals. Emergency-use respirators will be stored in designated, easily accessible locations and inspected frequently to ensure readiness.

[REDACTED]

[REDACTED]

## 7. Supplied Air

[COMPANY NAME] may use supplied air respirators, including self-contained breathing apparatus (SCBA), for specific operations where required by exposure levels or work conditions. The following policies and procedures govern their use:

Designated Personnel

[Name/Position] is responsible for maintaining all supplied air equipment, including compressors, SCBAs, cylinders, hoses, regulators, and related components. This individual has received manufacturer training and is qualified to perform inspections, maintenance, and repairs.

Inspection Procedures [§5144(h)(3)(C)]

All supplied air equipment will be inspected before each use and after each use. Inspections will be documented and include:

[Redacted inspection procedures]

SCBA Decontamination Procedures

After use in asbestos work areas, all SCBA equipment will be decontaminated before leaving the regulated area:

[Redacted decontamination procedures]

Breathing Air Quality and Use [§5144(i)]

[COMPANY NAME] will ensure that only Grade D breathing air or higher quality is supplied to respirators. Breathing air will meet the following specifications:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Compressed breathing air will be supplied from:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Compressor intakes will be located to prevent entry of contaminated air. Oil-lubricated compressors will include high-temperature or carbon monoxide alarms, or both, to warn of overheating or carbon monoxide buildup.

#### Cylinder Marking Requirements [§5144(i)]

All compressed air cylinders will be clearly marked to identify contents as "Breathing Air" or "Grade D Air." Cylinders will display:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Cylinders will be inspected per DOT requirements and manufacturer specifications. Cylinders past their hydrostatic test date will be removed from service immediately.

#### Inspection Documentation

Inspection tags will be attached to cylinders, compressors, and SCBA units. Tags will record:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Records of all inspections, maintenance, and repairs will be maintained and made available for review.

#### Manufacturer Instructions

All supplied air equipment will be used, maintained, and stored in accordance with manufacturer specifications and instructions. Manufacturer manuals will be kept on-site and made available to all users and maintenance personnel.

#### Training Requirements

Employees authorized to use supplied air respirators will receive comprehensive training covering:

- [REDACTED]

Training will be documented with the employee's name, date, trainer, and topics covered. Retraining will be provided annually or when equipment or procedures change.

## 8. Training & Information

In compliance with §5144(k), all employees required to use respirators will receive initial training before assignment and retraining annually, or more frequently if workplace changes, new hazards, or deficiencies in employee knowledge are observed.

Training will cover:

- The purpose of respiratory protection and the hazards it addresses.

[REDACTED]

Employees will be required to demonstrate understanding of the training material through practical exercises and verbal or written assessments. Supervisors and the Program Administrator will ensure that employees can use respirators effectively in actual workplace conditions.

Employees will be provided with user manuals specific to the respirators they are assigned, as well as access to [COMPANY NAME]'s written Respiratory Protection Program. For voluntary respirator use, employees will also be provided with the written information specified in Appendix D of §5144.

## 9. Program Evaluation

To ensure the continued effectiveness of the respiratory protection program, the Program Administrator will conduct regular evaluations of all program components. These evaluations will review the adequacy of respirator selection, the effectiveness of fit testing, the condition and maintenance of respirators, employee training outcomes, and the overall implementation of the program. Engineering and administrative controls will also be assessed to confirm that they are effectively reducing employee exposure to hazardous substances.

[REDACTED]

## 10. Recordkeeping for Respirators

In accordance with §5144(m), detailed records of all fit testing will be maintained. Each fit test form will include the date of the test, the name of the employee tested, the specific make, model, style, and size of the respirator used, the type of fit test performed, and the results of the test. These forms will serve as the official documentation of compliance with fit testing requirements.

[REDACTED]

Maintenance records for respirators, including inspection, cleaning, and repair logs, will also be documented and retained. These records will remain available at the jobsite for verification and to demonstrate that all respirators are maintained in safe, serviceable condition.

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## E. Exposure Monitoring Program

### 1. Permissible Exposure Limits

According to Title 8 §1529, there are two primary permissible exposure limits (PELs) for asbestos. The first is the 8-hour Time-Weighted Average (TWA), which is 0.1 fibers per cubic centimeter of air (f/cc), averaged over an 8-hour work shift. The second is the Short-Term Exposure Limit (STEL), which is 1.0 f/cc averaged over a sampling period of 30 minutes. Both values establish the maximum allowable exposure levels to protect employees from the harmful effects of asbestos.

To determine which personnel and procedures to monitor, tasks that have the potential to release asbestos fibers, such as demolition, renovation, or maintenance activities, will be identified. Additional considerations will include the effectiveness of engineering and administrative controls in reducing exposures, the adequacy of personal protective equipment (PPE), and historical exposure data from similar projects. The number of samples collected will be based on the size and complexity of the project, the number of employees exposed, and the variability of potential exposure levels. Representative sampling will be conducted to ensure accurate and reliable exposure assessments.

[REDACTED]

[REDACTED]

In accordance with Title 8 Section 5155 Appendix A, the denominator will always be 8 hours (480 minutes) regardless of the actual length of the work shift. This standardized calculation method ensures consistent evaluation of exposure levels across all work periods and allows for proper comparison to the 8-hour TWA PEL of 0.1 f/cc.

## 2. Frequency of Monitoring

The frequency of monitoring for asbestos-related work will be determined by the class of work being performed and the effectiveness of implemented control measures. For Class I work, initial monitoring will be conducted prior to the start of activities, during the performance of the work, and upon completion. Continuous or frequent monitoring will be conducted throughout the duration of Class I operations to ensure that exposures remain below the permissible exposure limit (PEL). Monitoring may be terminated only after the work is fully completed, and the area has been properly cleaned, decontaminated, and verified to be safe.

[REDACTED]

## 3. Methods of Monitoring

Air monitoring for asbestos will be performed using Phase Contrast Microscopy (PCM), following the sampling and analytical method outlined in Appendix A of §1529. Samples will be collected in locations where exposure is most likely, using either personal breathing-zone sampling or area sampling depending on the task. Sampling times will be selected to reflect either full-shift exposures for calculating the 8-hour TWA or 30-minute periods for short-term exposure assessment.

Mixed cellulose ester filters in 25 mm cassettes with a 50 mm cowl will be used, with pump flow rates maintained between 0.5 and 2.5 liters per minute. Enough air will be collected to ensure a measurable fiber count, and if filters appear overloaded, additional samples will be taken. For personal sampling, the cassette will be placed in the employee's breathing zone. At least 10% of all filters will be field blanks, with a minimum of two per sample set.

[REDACTED]

[REDACTED]

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Thank you,  
The Write Direction Team