1.0 Policy

Sunbelt Controls does not work with asbestos or in work areas where asbestos levels exceed the OSHA (State and Federal) Permissible Exposure Limit. Employees, who may work in areas which could contain non-friable asbestos, need to be trained as to the hazards and precautions to be taken to avoid friable asbestos.

2.0 Purpose

To ensure our employees, customers, subcontractors and others do not come into contact with asbestos in excess of the Permissible Exposure Limits (PEL).

3.0 Scope

This applies to all work activities within Sunbelt Controls including but not limited to the service department, pipe fitting, plumbing, sheet metal, sales and office.

4.0 Definitions

Asbestos – includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that has been chemically treated and/or altered. For purposes of this standard, "asbestos" includes presumed asbestos containing material (PACM), as defined below.

Asbestos-Containing Material (ACM) – any material containing more than one-percent asbestos

Class I Asbestos Work – activities involving the removal of TSI and surfacing ACM and PACM.

Class II Asbestos Work – activities involving the removal of ACM, which is not thermal system insulation, or surfacing material; this includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III Asbestos Work – repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed

Class IV Asbestos Work – maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

Disturbance – activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM; disturbance includes cutting away small amounts of ACM and PACM, no greater than the amount which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of ACM or PACM so disturbed exceed that which can be contained in one glove bag or waste bag which shall not exceed 60 inches in length and width.

Employee Exposure – that exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment

Friable Asbestos – asbestos that can be crushed or pulverized by hand; 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.

Intact – that the ACM has not crumbled, been pulverized, or otherwise deteriorated so that the asbestos is no longer likely to be bound with its matrix. "Presumed Asbestos Containing Material" means thermal system insulation and surfacing material found in buildings constructed no later than 1980. The designation of a material as "PACM" may be rebutted pursuant to Section Five [5] *Requirement* of this portion of the policy manual.

Presumed Asbestos Containing Material (PACM) **–** thermal system insulation and surfacing material found in buildings constructed no later than 1980; the designation of a material as "PACM" may be rebutted pursuant to Section Five [5] *Requirement* of this section.

Permissible Exposure Limit (PEL) – the maximum permitted 8-hour time-weighted average concentration of an airborne contaminant.

5.0 Requirement

5.1 Training

In the event a Sunbelt Controls employee could come into contact with asbestos, but not disturb it; they shall receive Class IV Asbestos Work training. The employees shall be notified of Sunbelt Controls policy not to work with or around friable asbestos. If respirators or other personal protective equipment are required, the employees shall receive the appropriate training in accordance of the company policies. Equipment and training will be provided at no cost to employees.

5.2 Working in Areas Contaminated by Asbestos

Any building built prior to 1980 shall be presumed to have asbestos unless through documentation and inspection conducted by a certified asbestos consultant has cleared the building. Employees shall not knowingly disturb asbestos. In the event of an accidental disturbance of asbestos, the affected employees shall report it immediately to their supervisor.

Sunbelt Controls will not work in an area that asbestos likely could be released. Therefore, work that requires training levels of Class I, II, or III, will not be performed. If there is an abatement or work that is ongoing that presents a likelihood of asbestos being disturbed, Sunbelt Controls shall plan its work to avoid exposure. This includes, but not limited to working after abatement is completed, scheduling work to avoid abatement conflicts, planning work to avoid disturbance of asbestos, or similar methods. In the event that the exposure cannot be avoided, then

the owner or general contractor will be requested to have certified asbestos contractor perform the work.

When employees work in areas where they come into contact, but do not disturb the asbestos, they shall receive at a minimum, 2 hours of awareness training as required by OSHA. For precautionary purposes, respirators and other protective gear can be given to the employees to ensure no contact with asbestos is made.

If air sampling is performed while our employees are in a work area, a request for a copy of the results will be made. These records shall be maintained in the employee's personnel record as required by law.

5.3 Signage

All asbestos related signage must be obeyed. Do not disturb materials asbestos containing material.

5.4 Class IV Work

Sunbelt Controls will not work in an area where asbestos is being removed or knowingly disturbed. If it is determined that that asbestos has been disturbed in an area where Sunbelt Controls employees are working, all Sunbelt Controls employees shall vacate the area and report it to the Safety Department and the Project Manager.

When work that involves the installation of equipment where asbestos-containing material has to be disturbed the owner and general contractor shall be notified to arrange for the proper abatement. This includes the removal of ductwork or piping that involves stripping of **mastic**, insulation or fireproofing that contains asbestos >1%.

5.5 Accidental Release of Friable Asbestos

In the event it is discovered that friable asbestos is present or asbestos is damaged or disturbed, work shall cease in the area immediately and the area shall be evacuated of all personnel and he owner of the building shall be notified.

Working near areas where class 1 (abatement) activities are taking place. Employees exposed to asbestos due to inadequate containment are to stop work remove themselves from the area and contact the safety department for further direction. Do not go back into the area without clearance from the Safety Department.

6.0 Frequently Asked Questions (FAQ)

6.1 Where can we typically find asbestos in building / industrial settings?

- Air Ducts
- Air Duct Vibration Dampers
- Pipe Insulation
- Roofing Materials
- Siding Materials
- Carbon Nanotube Materials
- Floor Tiles
- Paper Duct
- Transite Pipe Air Ducts
- Transite Pipe Chimneys & Flues
- Transite Pipe Water Supply Piping
- Urea Formaldehyde Foam Insulation UFFI

- Ceiling Tiles
- Fireproofing
- Vermiculite Insulation Containing Asbestos
- Floor Tiles

6.2 Why do we need to provide respirators for Class IV Work if we are not going to disturb the asbestos?

Anytime we are working in an area that has asbestos within, our intention is not to disturb it. Some of the work we may do in these areas may cause our employees to accidentally disturb the asbestos. Activities such as placing pipe or ductwork in close proximity to asbestos will warrant a respirator in case during the installation the asbestos in disturbed. Also, if other trades in the vicinity were performing work that might cause a disturbance, it would be advised to wear respirators. This is a judgment call to wear respirators based on the probability of asbestos being disturbed.

6.3 What are some of the health effects of asbestos?

Because it is so hard to destroy asbestos fibers, the body cannot break them down or remove them once they are lodged in lung or body tissues. They remain in place where they can cause disease. There are three primary diseases associated with asbestos exposure:

- **Asbestosis**
- **Lung Cancer**
- **Mesothelioma**

6.4 Are we precluded from performing a job if the customer requires class III training?

Not necessarily, some customers may require training above what the regulations require. We can provide our employees with Class III training but maintain Class IV exposure. As stated earlier, we will not work in an area where asbestos is in the process of being disturbed. The exposure can be avoided by scheduling the work to be performed after the abatement is complete.

6.5 What if we are not sure whether there is asbestos or not?

We can either presume it is asbestos containing material or send it a sample of it to a certified lab to determine whether it is asbestos containing material.

7.0 Preservation of asbestos records

7.1 Sunbelt Controls is required to procure all records that reflect our employees' exposure while working in or around asbestos containments.

7.2 The following documents will be maintained for thirty (30) years after the last employee leaves Sunbelt Controls.

- Personal Monitoring performed in areas where our employees are currently working
- Area Sampling in areas where our employees were working
- Medical exams associated the respirator and asbestos work.
- Personnel training records
- A list of all employees who worked on the project

- A summary of the scope of work
- Copy of any safety inspections performed
- Copy of any incident reports involving the release of asbestos containing material.
- Copy of any other pertinent information

8.0 Service Department

8.1 Services working in buildings when there is PACM or known ACM will be given Class IV training and respirator training and fit testing.

8.2 If a service technician sees disturbed asbestos or disturbs asbestos, they shall report it to the customer and to their supervisor immediately. A written report will be issued to the customer to follow-up and advising them to have it remediated prior to Sunbelt Controls continuing our work.