



P&P INSTRUCTIONS & CHECKLIST

INSTRUCTIONS & CHECKLIST FOR THE PREPARATION OF *POLICIES AND PROCEDURES FOR ASBESTOS-RELATED WORK*

Submitted on behalf of _____
(Name of organization applying for registration)

These written procedures are required-

8CCR §341.7(b)(4) requires that the registration application contain “*proof that the employer has knowledge of the applicable occupational safety and health standards*” and “*that the conditions, practices, means, methods, operations or processes used or proposed to be used will provide a safe and healthful place of employment and that the employer is proficient in and has the necessary equipment to safely perform asbestos-related work*”. To that end DOSH requires contractors and other employers to provide written policies, procedures and programs that describe how they will:

- Perform asbestos-related work in compliance with Title 8 California Code of Regulations (Title 8);
- Comply with Title 8 requirements that are particularly important in asbestos-related work operations.

The management officials responsible for the day-to-day supervision of the competent persons must be familiar with the contents of the Policies & Procedures for Asbestos Related Work (P&P), and sign a statement regarding its enforcement, as discussed below. These documents and statements provide some evidence of management’s knowledge of, and willingness to comply with the applicable occupational safety and health standards.

The purpose of the checklist

The checklist is intended to be used as a tool to assist applicants in developing and checking the P&P document which they submit to us. The checklist:

- Describes the content required for the P&P
- Serves as a guide to develop a P&P
- Enables the preparer to evaluate the procedures and determine whether or not they meet the requirements before submitting them to us.

Writing the procedures and completing the P&P Checklist-

1. Anyone in your company with the appropriate knowledge can write the P&P. We strongly suggest that they have taken the EPA-AHERA class for contractor/supervisor or one of the other management/professional level classes. To write the P&P, an individual must be quite familiar with how to conduct asbestos removal safely by following the applicable regulations from Title 8, including, but not limited to:

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- §341.6 - §341.14 (asbestos registration)
- §1529 (asbestos in construction)
- §5144 (respiratory protection)

If you choose to use a consultant, they must be a Cal/OSHA Certified Asbestos Consultant.

Be sure your submission is:

- Up to date;
- Tailored to fit your operation (in terms of your management structure, forms, use of respirators for other contaminants and supplied air respirators, removal work limited to, for example, roofing or flooring, other specific work practices, etc.);
- Understandable
- Submitted in Adobe Acrobat, Microsoft Word or other format that is easily reviewed and corrected (have a copy in an electronic format)

2. The preparer, or anyone within the company may be assigned to review the P&P document and the checklist, to determine whether or not they meet our requirements before submitting them to us. The checklist must be accurately completed and signed by the reviewer prior to submittal.

Note – We will not review a P&P submittal that is not accompanied by an accurately completed P&P checklist.

How we evaluate the submission

We check for inclusion of items, accuracy and, to some extent, readability. If it is out of date or contains omissions and errors we will reject it as deficient.

DOSH “approval” of the procedures and checklist

Our review and acceptance of the P&P document does not constitute an approval of every element as correct or applicable to every work situation. We are checking for inclusion of at least all of the items noted in the checklist.

You must keep the procedures up-to-date, and at each of your jobsites maintain a copy that is available to DOSH inspectors, the building owner, employees, and other employers.

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INSTRUCTIONS

We cannot review your submittal if you do not provide the requested P&P documents in the following format:

- Created in an electronic and editable format that allows you to easily revise them in response to our comments or, in the future, as regulations change
- **Numbered Pages**
- **Dated** (to determine time of revision) on the bottom of each page
- **Table of Contents**
- **Tabbed and with dividers** for each section and attachments. The checklist is formatted by sections and subsections. You are encouraged to use this same framework for your P&P if desired. .
- **With a P&P Checklist:**
 - Accurately completed
 - Providing, in the blank spaces, specific pages, paragraph numbers, for the locations of the items requested
 - With the printed name, signature, title, phone and email address of the person responsible for the accurate completion of the checklist so that they may be contacted to discuss our evaluation

A RESPONSIBILITIES

A.1 Management

Explanation: We want evidence of management accountability over the removal process. Designate the management official responsible for supervising the competent person(s) on a day-to-day basis. This manager must have:

- The authority and responsibility to discipline a competent person(s)
- Read and will enforce the requirements found in your organization's policies and procedures (P&P)
- An understanding of the regulations that apply to asbestos-related work. In small companies, this management official will often be the owner. For contractors, this person can be the CSLB qualifier, if they are involved on a day-to-day basis. This is often not possible when this person is the qualifier for other companies.

Write:

Section	Topic	Page(s)	Paragraph
A.1.1	State that the management person(s) is responsible for supervising the competent person(s) on a day-to-day basis and list their general duties, as described above. Refer to the Assurances of the Competent Person form(s).		

A.2 Certified Supervisor (e.g., Competent Person)

Explanation: The competent person plays a key role in carrying out the asbestos work safely. Title 8 gives them very specific duties. We require that management state these duties clearly and fully authorize the competent person to carry them out.

Write:

Section	Topic	Page(s)	Paragraph
A.2.1	State that the competent person has the authority and responsibility to carry out the duties described in your policies, procedures and programs and will be present during all asbestos-related work as required.		
A.2.2	List the duties of a competent person as described in §1529 and noted below:		
	a. Evaluating alternative controls. Allowed when there is less than 25 linear or 10-sq. ft. of TSI and surfacing (g)(6)(B)1. & for Class II work (g)(8)(F)2		
	b. Inspecting protective worksuits at least once per work shift for rips for tears and ensuring they are mended or replaced (i)(4)(A)		
	c. Performing on-site inspections (o)(3):		

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	i.	At least once during each work shift for Class I jobs		
	ii.	Frequently at sufficient intervals for other work		
	iii.	Always at the request of an employee		
	d.	Performing or supervising all the duties listed in (o)(3)(A):		
	i.	Set up the regulated area, enclosure or other containment		
	ii.	Ensure by on-site inspection the integrity of enclosure/containment		
	iii.	Set up procedures to control entry to & exit from regulated area		
	iv.	Supervise all employee exposure monitoring and ensure that it is conducted as required by §1529(f) Note: If the actual task of air monitoring is delegated to another, state who this is (name, profession, job class) and what their qualifications are		
	v.	Ensure that all employees working within the regulated area wear respirators and protective clothing as required by §1529(h) and (i)		
	vi.	Ensure through on-site supervision that employees set up, use, and remove engineering controls, use work practices and personal protective equipment in compliance with all requirements		
	vii.	Ensure that employees use the hygiene facilities and observe the decontamination procedures specified in §1529(j)		
	viii.	Ensure that, through on-site inspection, engineering controls are functioning properly, and employees are using proper work practices		
	ix.	Ensure that the notification requirements in §1529(k) are met		
	e.	For Class II work, to determine if the material is intact		
	f.	Ensuring that entry to the regulated area be granted only to those employees who have provided copies of their current fit test, training certificate, and medical surveillance records to the Certified Supervisor		
	g.	The Certified Supervisor will maintain copies of all of the employees' current fit test, training certificate, and medical surveillance records on-site, and make them available to DOSH personnel conducting inspections or audits		

A.3 Injury & Illness Prevention Program (IIPP)

Explanation: All employers operating in California must have an IIPP. The IIPP describes how you will enforce your policies through discipline, recognition, self-inspection and any other method. We will review two of its components, enforcement and hazard assessment.

Write:

Section	Topic	Page(s)	Paragraph
A.3.1	Provide a copy of the enforcement and hazard assessment portions of your IIPP		
A.3.2	Hazard Inspection and Correction for asbestos work- Aside from a general inspection policy for all worksites, either in your IIPP or elsewhere, you must have a policy calling for management initiated inspections of the asbestos worksite:		
	a. By managers other than the competent person for the particular job		
	b. At a specified frequency		
	c. Using an asbestos removal work inspection form that covers significant asbestos work practices and control measures and is referenced by name in your policy		
A.3.3	Provide a copy of the asbestos removal work inspection form		

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A.4 Training

Explanation: Depending on the work you perform and your registration type, you must provide training to anyone performing asbestos-related work.

Write:

Section	Topic	Page(s)	Paragraph
A.4.1	Your policy for providing asbestos training, in terms of cost and personnel;		
A.4.2	The types and frequency of training you must provide;		
A.4.3	How you verify employee-provided training records before allowing them to work;		
A.4.4	For work in California, the training provider must be DOSH approved;		
A.4.5	Your policy to maintain, at the job site, a copy of the training certificate for each employee who enters the regulated area.		

B. PROJECT PROCEDURES

Explanation: In general, provide step-by-step description of the preparations that are necessary to conduct asbestos-related work in compliance with the regulatory requirements.

B.1 Survey

Explanation: You must first determine what the scope and nature of the abatement job by identifying the presence, location and quantity of ACM (asbestos-containing material), PACM (presumed asbestos-containing material), and/or, ACCM (asbestos-containing construction material). See §1529(k)(3)(A) and Labor Code section 6501.9. Either:

- The building owner and you may presume the material is asbestos;
- You can get an asbestos survey from building owner; or,

One of your personnel may take up to 12 bulk samples in residential construction (a 4-plex or smaller residential building) for bid purposes (Business & Professions Code §7180(b)) if the person who samples has successfully completed AHERA Asbestos Inspector training and possesses a current certificate from a DOSH approved training provider.

Write:

Section	Topic	Page(s)	Paragraph
B.1.1	If you conduct bulk sampling for bid purposes on residential construction only, identify who conducts bulk sampling and provide their AHERA Building Inspector training certificate		
B.1.2	Your policy regarding obtaining surveys and/or assuming material to be PACM		

B.2 Job Scope Description

Explanation: The individual who initially views the site, evaluates existing surveys or performs bulk sampling, and provides a bid to the consumer is not always the competent person who will oversee the work. We want a process by which management lets the competent supervisor know what type of work will occur and what general measures they must take.

Write: Briefly describe the above process and supply a blank copy of the form you use to provide information and instructions about the scope of the job and removal measures to the competent person. Some of this information must also be provided to DOSH on the worksite notification form and is similar to those issues management must cover in the worksite inspections they conduct to check up on competent persons. You may also want to refer to other job-related information, including specifications & drawings, and provide reminders to obtain local permits and send the DOSH/Air Quality notifications.

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	Provide a copy of a job scope form, which includes at least the following:		
B.2.1	Amount, percentage, type and condition of asbestos-containing construction material. In actual use, you may attach survey documents you obtain from building owners or results for bulk sampling you perform. Assessments of condition may come from observations by certified asbestos consultants (CAC's) or could be your own judgement, made for health and safety purposes only, not as advice to the building owner.		
B.2.2	Proposed work practices- This begins with defining the class of work and then briefly noting general methods such as critical barriers, negative pressure enclosure, glove bag, 3-stage decontamination facility, protective clothing, respiratory protection, air monitoring, etc.		
B.2.3	Special conditions or safety issues (fall protection, electrical safety, fire, etc.).		
B.2.4	An evaluation of exposure potential- This may be decided separately by the competent person, but is required on the DOSH worksite notification form 24 hours ahead of time. A suggested format for the response could include noting if exposures are expected to be less than 0.1 f/cc; greater than 1 f/cc; in between these two values; or unknown.		

B.3 Notification- Prior to Work:

Explanation: Notifying others on-site is an important task for the competent person, as required at Title 8 §1529(d)(1)& (k)(3)(B), §341.10, §341.11.

Write:

Section	Topic	Page(s)	Paragraph
B.3.1	Your policy to hold a pre-job safety conference including building owner or contracting entity, the employer conducting the removal (you), employees and employee representatives. During the safety conference, you will review your safety program and the equipment and practices you will use to provide a safe and healthy workplace		
B.3.2	Describe how you will tell building owners, your employees and other employers in adjacent areas about:		
	a. Measures for the prevention of asbestos exposure		
	b. Location and quantity of ACM/PACM		
	c. The existence of and requirements for regulated areas		
B.3.3	Provide a copy of the registration certificate to the prime contractor (building owner) and other employers on site.		
B.3.4	Post the registration certificate at the work site beside the Cal/OSHA poster		
Notification to the Division of Occupational Safety & Health			
Write:			
B.3.5	State that you will provide written notice to the nearest District Office of DOSH prior to the commencement of any asbestos-related activity.		
B.3.6	State your conditions for "immediate" (e.g., emergency) abatement.		

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B.3.7	<p>Either say that you will use our notice, provide a sample of your own written notice or that of another agency that includes the following information (§341.9):</p> <ol style="list-style-type: none"> Address; Precise physical location; Projected starting and completion date Name of the certified supervisor/competent person and the qualified person (if different); Type of work- Include the material(s), % asbestos, if known, amount and, for Class II work, if intact or not; Work practices- Include Class of work, decontamination type, general control measures (critical barriers, wet methods, HVAC isolation, neg. pressure enclosure, mini enclosure, glove bag), personal protection (full-body coveralls, half mask respirator, PAPR), waste disposal and any other alternative method; Evaluation of the potential for exposure- Give one number or a range of expected levels such as less than 0.1 f/cc; 0.1 – 1.0 f/cc; greater than 1.0 f/cc; unknown). 		
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B.4 Initial Exposure Assessment

Explanation: §1529 has minimum control requirements and levels of protection triggered solely by the Class of work. However, you still must make an initial exposure assessment to decide on many aspects of control and PPE measures. You must base the assessment upon your training and experience, including past monitoring and other information, such as type, amount, and condition of materials you will remove/disturb.

Federal OSHA Interpretation CPL 2-2.63 (REVISED) states, "The assessment must review relevant controls, conditions and factors that influence the degree of exposure. These include, but are not limited to, quality of supervision and of employee training, techniques used for wetting the ACM, placing and repositioning the ventilation equipment and impacts due to weather conditions. The assessment must be based on a review of all aspects of the employer's performance performing similar jobs."

Write:

Section	Topic	Page(s)	Paragraph
B.4.1	Discuss the duty and method of performing an initial exposure assessment, as described above.		

B.5 Negative Exposure Assessment

Explanation: If you can prove, using accurate and appropriate air monitoring data or objective data, that all of the exposures will be below the PEL's, you can establish a negative exposure assessment (NEA) for this type of work. Remember that this is not a casual process. Obtaining and fully documenting the necessary representative air monitoring data is a difficult undertaking generally beyond what can be done in the course of routine daily air sampling. **Note:** In the future, if you apply/develop a NEA do not send it to us. You will have to supply it to a DOSH compliance inspector when they inspect your operations. §1529(f)(2)(C) requires that NEA's be based on one of the following:

- "Objective data" demonstrating that the material or product cannot cause exposures in excess of the 8-hour or 30 minute exposures limits under work conditions with the greatest potential for releasing asbestos
- Monitoring under conditions "closely resembling" those to which the NEA is intended to apply, and conducted within the prior 12 months.

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3. Results of initial exposure monitoring of the current job that are representative of the 8-hour TWA and 30-minute exposures of each employee covering operations most likely during the performance of the entire asbestos job to result in exposures over the PELs.

Write:

Section	Topic	Page(s)	Paragraph
B.5.1	Either state that you will not establish NEA'S, or detail how you will establish NEA's based on one or more of the three methods described above:		
B.5.1	Strict requirements must be met to establish a Negative Exposure Assessment as per 8CCR 1529(f)(2)(C)1., 2., or 3.		
B.5.2	When establishing an NEA based on objective data per 8 CCR 1529(f)(2)(C)1., the expertise that you will employ and the process by which you will prove that the material in question cannot cause exposures in excess of either of the PELs under those working conditions having the greatest potential for releasing asbestos.		
B.5.3	When establishing an NEA based on historical monitoring (within the prior 12 months) per 8 CCR 1529 (f)(2)(C) 2., the conditions of work, including such aspects as amount and condition of material, training, supervision, control methods and other relevant factors are the same as those existing when the NEA was established.		

B.6 Notification - After Completion:

Explanation: Within 10 days of the completion of the removal you must inform the building owner and employers of employees who will be working in the area of the current location and quantity of PACM and/or ACM remaining in the area.

Write:

Section	Topic	Page(s)	Paragraph
B.6.1	Describe this duty and how you will carry it out.		

C. ASBESTOS REMOVAL PROCEDURES

General Explanation: This is a crucial section to demonstrate your knowledge and provide a step-by-step procedural outline for your organization. We suggest that you begin with a general discussion for asbestos removal measures common to all (such as regulated areas and prohibitions) and follow with the procedures for Class I, II and III work. There are other formats that could make sense. However, we will not accept jumbled descriptions that employees could not use as a guide.

Code of Safe Practices: All employers in California with places of employment where the Construction Safety Orders apply must have a written Injury Illness Prevention Program (IIPP) and Code of Safe Practices (CSP) which addresses all of the hazardous conditions to which the employees are exposed, and this CSP must be kept onsite. Among these are hazardous conditions that are especially important in asbestos abatement operations. Although we do not ask for a copy of your company's IIPP or CSP, and will not review it if it is submitted. However, your IIPP and CSP should incorporate reference to your P&Ps for Asbestos Removal.

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C.1 General Requirements			
Requirement for Registration			
Describe the circumstances under which an employer or contractor must be registered with the Division in order to lawfully conduct asbestos-related work.			
Write:			
Section	Topic	Page(s)	Paragraph
Class of Work Definitions			
You can use the definitions in §1529(b) and add the types of materials these typically include:			
C.1.1	Define Class I asbestos work		
C.1.2	Define Class II asbestos work		
C.1.3	Define Class III asbestos work		
	a. For Class III work add the definition of "Disturbance"		
Prohibited Work Practices			
C.1.4	From §1529(g)(3)		
C.1.5	Blowing, shaking or brushing debris from protective clothing §1529(i)(1)		
C.1.6	Eating and other specified activities in the regulated area §1529©(5)		
C.1.7	Removing respirators in the equipment room §1529(j)(1)(c)		
General Work Methods			
C.1.8	HEPA vacuums as per §1529(g)(1)(A) & (I – Housekeeping)(1)		
C.1.9	Water and water amendments §1529(g)(1)(B)		
C.1.10	Enclosure or isolation of processes producing asbestos dust §1529(g)((2)(B)		
C.1.11	Ventilation of the regulated area to move contaminated air away from the breathing zone of employees and towards a filtration or collection device equipped with a HEPA filter §1529(g)(2)(C)		
C.1.12	Local exhaust ventilation equipped with HEPA filter collection systems, as necessary to keep below the PELs		
Alternative Control Methods			
As part of the class of work discussions or separately, discuss how you deal with situations where you must use alternative control methods such as for when the use of water is not effective feasible or dangerous as per §1529 for:			
C.1.13	Class I work (g)(6)		
C.1.14	Class II work (g)(8)(F)		
Waste Clean-up, Labeling and Disposal			
Use language from §1529, and you may add specifics for EPA/State transportation and waste rules			
C.1.15	Prompt clean-up and disposal in sealed, leak-tight containers (g)(1)(C) and (I - Housekeeping)(2)		
C.1.16	Labeling of wastes containing 1% or more of asbestos, (k)(8) (C) & (D)		
C.1.17	Final visual inspection of work area (here or within each Class of work)		

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C.2 Initial Set-Up Measures			
Section	Topic	Page(s)	Paragraph
Regulated Areas			
C.2.1	Triggers for establishing		
C.2.2	Demarcation		
C.2.3	Signage, including the specific language		
C.2.4	Limiting access		
C.2.5	Supervision		
C.2.6	Wearing a respirator in the regulated area when required by 1529(h)(1)		
Critical Barriers			
C.2.7	Definition		
C.2.8	Types of openings that are covered		
C.2.9	Discuss the materials/methods you will use		
C.2.10	Alternative methods to critical barriers, if you plan to use them		
Decontamination- Three-stage Decontamination Facility:			
C.2.11	Trigger for use		
C.2.12	Description of rooms:		
	a. Equipment Room		
	b. Shower- Include the requirements of §3366(f) for:		
	i. Hot and cold water feeding a common discharge line [e.g., shower head] for each ten employees showering during the same shift.		
	ii. Cleansing agents and clean towels		
	iii. When there are less than five employees, the same shower room may be used by both sexes if the shower room can be locked from the inside.		
	iv. Collecting and filtering the shower water so as to prevent contamination of the clean room and satisfy State and local discharge requirements.		
	c. Clean room, including storage of personal items		
C.2.13	Alternate methods for when it is not feasible to place a shower or clean room adjacent to the equipment room (you can combine these)		
C.2.14	Entry/exit procedures as in §1529(j)(1)(B) & (C). Include mention of how the respirator is cleaned and the disposal of cartridges. Note: Be aware that you cannot reuse most cartridges because you must wear the respirator while showering and the water can damage them. Some respirators may have NIOSH-approved assemblies or cartridges which make this feasible. The manufacturer's instructions should discuss this issue.		
Decontamination- Area			
C.2.15	For Class I work less than 25 linear or 10 sq.ft., and Class II & III work		
Protective clothing for each class of work			
C.2.16	Class I Work		
C.2.17	Class II Work		
If you intend to use non-disposable protective clothing, describe the procedure you will follow to handle and launder the contaminated clothing as required by §1529(i)(2).			
Pre-cleaning procedures			
C.2.18	Whether or not contamination exists is based on the condition of the asbestos materials and potentially affected surfaces and objects. This is		

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	determined during the initial exposure assessment. Describe when and how you may pre-clean surfaces and objects contaminated with asbestos.		
C.2.19	Briefly, the typical control preconditions for such work, including:		
	a. Regulated area established		
	b. Critical barriers in place		
	c. Impermeable drop cloths		
	d. Decontamination facility set up		
	e. General or local HEPA ventilation system operating to prevent the spread of contaminated air to the worker's breathing zone or outside of the regulated area		
	f. Workers in protective equipment and clothing		
	g. Air monitoring begun		
Other Measures			
C.2.20	Electrical lockout and use of ground fault circuit interruptors (GFCIs) per Title 8 §2340.11		
C.2.21	Here you can include or refer to non-asbestos measures for lockout/tagout, fire prevention, fall protection, emergency measures, etc. Although such procedures are required by different Title 8 regulations, including that of 1509(a) & (b), we will not review such procedures. At a minimum, you must at least refer to your Code of Safe Work Practices.		

C.3 Class I Work

Discuss removal methods from §1529(g), as well as the practical measures you must take, as follows:

Section	Topic	Page(s)	Paragraph
Negative Pressure Enclosures {§1529(g)(5)(A)}			
C.3.1	Set-up of plastic enclosure		
C.3.2	Bag out of wastes		
C.3.3	Final visual inspection, clearance air monitoring (your role) and tear down		
C.3.4	Negative pressure requirements:		
	a. Minimum air change and negative pressure requirements		
	b. Maintenance of negative pressure at all times during use of the enclosure, <u>including provision for constant monitoring and alert of failure</u> such as by use of a manometer with recording capabilities and an alarm or a full-time attendant.		
C.3.5	Calculation of air changes:		
	a. Formula for determining the minimum number of "air-movers" required		
NOTE: Provision should be made for one or more backup "air movers" in the event of mechanical failure.			
C.3.6	Testing of enclosure using smoke tubes		
C.3.7	Ventilation equipment details, including:		
	a. Inspection and testing to ensure lack of contamination or failure		
	b. Primary and Secondary filter change procedure		
	c. Placement so as to move contaminated air away from the breathing zone of employees and towards a filtration or collection device equipped with a HEPA filter		
C.3.8	Emergency measures when the enclosure is breached and/or the pressure drops		
C.3.9	Deactivate electrical circuits in the enclosure unless equipped with ground-		

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	fault circuit interrupters.		
NOTE: Special Safety Considerations for Negative Pressure Enclosures			
The following safety measures are required on all jobsites, but they are particularly important when Negative Pressure Enclosures are erected, as they often create an additional fire hazard and tend to slow the evacuation of personnel during an emergency. The following information, must be addressed in your company's Code of Safe Practices.			
C.3.10	Fire Extinguisher requirements regarding rating, location, quantity, and employee training from Title 8 §1922(a)(1), and §6151(g)		
C.3.11	Emergency Action Plan requirements from Title 8 §3220 describing the actions your company will take to ensure employee safety from fire and other emergencies.		
Glovebags {§1529(g)(5)(B)}			
C.3.12	Specifications:		
	a. 6 mil thick plastic and seamless at bottom		
	b. When used on elbows & other connections must be designed for the purpose		
	c. Used without modifications		
C.3.13	Work Practices:		
	a. Before beginning the operation, wrap and seal loose and friable material adjacent to glovebag with two layers of six mil plastic to render intact		
	b. Installed so that it completely covers the circumference of the pipe/structure being stripped		
	c. Smoke tested for leaks, and leaks sealed prior to use		
	d. Used only once, and may not be moved		
	e. Not used on surfaces whose temperature exceeds 150°F		
	f. Remove air/collapse with HEPA vacuum before removal and disposal		
	g. At least two persons shall perform Class I glovebag removal operations		
Negative Pressure Glovebag Systems {§1529(g)(5)(B) & (C)}			
C.3.14	In addition to the procedures for glovebag removal, negative pressure glovebag systems are kept under constant negative pressure using a HEPA vacuum or similar ventilation unit.		
Negative Pressure Glove Box Systems {§1529(g)(5)(B) & (D)}			
In addition to the procedures for glovebag removal, negative pressure glove box systems are:			
C.3.15	Kept under constant negative pressure using a HEPA vacuum or similar ventilation unit		
C.3.16	Constructed with rigid sides from metal or other material that can withstand the weight of the ACM/PACM and the water used during removal		
C.3.17	Fitted with gloved apertures, and a bagging outlet aperture at the base		
Mini-enclosures {§1529(g)(5)(F)}			
C.3.18	Specifications:		
	a. Accommodates no more than 2 persons		
	b. Material being disturbed/removed is completely contained by the enclosure		
	c. Constructed of 6 mil thick plastic or equivalent		

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	d. Enclosure is kept under constant negative pressure using a HEPA vacuum or similar ventilation unit		
C.3.19	Work Practices:		
	a. Smoke tested for leaks, and leaks sealed prior to use		
	b. Installed so that it completely covers the circumference of the pipe/structure being stripped		
	c. During use, direct air movement away from the employee's breathing zone		
C.3.20	Before reuse, the interior must be completely HEPA vacuumed, and washed with amended water		

C.4 Class II Work

Section	Topic	Page(s)	Paragraph
C.4.1	Definition of intact		
C.4.2	Duty of competent person to determine intact condition of asbestos materials prior to beginning work		
C.4.3	Critical barriers, and/or Class I methods shall be used for all indoor Class II jobs where:		
	a. A Negative Exposure Assessment has not been produced		
	b. Or the exposure may be above the PEL		
	c. Or where the ACM is not removed in an intact state		
Class II Flooring {§1529(g)(8)(A)}			
C.4.4	Procedures:		
	a. Resilient flooring material including associated mastic and backing shall be assumed to be asbestos-containing unless an industrial hygienist determines that it is asbestos-free using recognized analytical techniques		
	b. Vacuums equipped with HEPA filter, disposable dust bag, and metal floor tool (no brush) shall be used to clean floors. If you are also using a Class I method you can briefly mention and refer to earlier discussions.		
	c. Resilient sheeting removed by cutting while wetting at snip point and wetting the material during delamination		
	d. All scraping of residual adhesive and/or backing performed using wet methods		
C.4.5	Prohibitions:		
	a. Flooring or its backing shall not be sanded		
	b. Rip-up of resilient sheet floor material is prohibited		
	c. Dry sweeping is prohibited		
	d. Mechanical chipping unless performed in a negative pressure enclosure meeting the requirements of §1529(g)(5)(A)		
	e. Tiles shall be removed intact unless demonstrated that intact removal is not possible		
	f. When tiles removed intact by heating, wetting may be omitted		
Class II Roofing {§1529(g)(8)(A)}			
C.4.6	Roofing material removed intact to the extent feasible		
C.4.7	For roofing materials that are not intact or will become non-intact during removal, wet methods used unless it is not feasible or creates safety hazards		
C.4.8	Cutting machines constantly misted unless a competent person determines that misting substantially decreases worker safety		

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C.4.9	All dust resulting from use of power roof cutter will be collected by a HEPA dust collector, or by HEPA vacuuming along the cut line, or by gentle wet sweeping and wiping and immediately bagged/containerized		
C.4.10	Removed roofing material shall not be dropped or thrown to the ground		
C.4.11	Removed roofing material shall either be kept wet, placed in an impermeable waste bag, or wrapped in plastic sheeting while waiting to be lowered to the ground		
C.4.12	Removed roofing materials will be carried or passed to the ground as soon as is practicable, but in any event no later than the end of the work shift, by hand, crane, or hoist, or a covered dust-tight chute		
C.4.13	Upon being lowered, unwrapped roofing material shall be transferred to a closed receptacle in a manner so as to preclude the dispersion of dust		
C.4.14	Roof level heating and ventilation air intake sources shall be isolated, and/or the ventilation system shall be shut down		
Cementitious Siding, Shingles, and Transite Panels {§1529(g)(8)(C)}			
Work practices when removing cementitious siding, shingles, and transite panels from building exteriors other than roofs:			
C.4.15	Shall not be cut, abraded or broken unless it is demonstrated that methods less likely to result in asbestos fiber release cannot be used		
C.4.16	Each panel or shingle will be sprayed with amended water prior to removal		
C.4.17	Unwrapped or un-bagged panels or shingles shall be immediately lowered to the ground via covered dust-tight chute, crane or hoist, or placed in an impervious waste bag or wrapped in plastic sheeting and lowered to the ground no later than the end of the work shift		
C.4.18	Nails shall be cut with flat, sharp instruments		
Gaskets {§1529(g)(8)(D)}			
C.4.19	Gaskets that are visibly deteriorated and unlikely to be removed intact, shall be removed within a glovebag		
C.4.20	Removed gaskets shall be immediately placed in a disposal container		
C.4.21	Any scraping to remove gasket residue will be performed wet		
Other Class II Materials {§1529(g)(8)(E)}			
Work practices for removal of Class II material for which specific controls have not been listed:			
C.4.22	Thoroughly wetted with amended water prior to and during removal		
C.4.23	Removed intact unless demonstrated that intact removal is not possible		
C.4.24	Cutting, abrading or breaking the material is prohibited unless demonstrated that methods less likely to result in asbestos fiber release are not feasible		
C.4.25	Material removed, shall be immediately bagged or wrapped, or kept wetted until transferred to a closed receptacle, no later than the end of the work shift		
Working With Materials That Contain Less than 1% Asbestos			
Describe the procedures your company will follow when asbestos is present in concentrations less than or equal to 1%.			
If your company policy is to treat such material as if it were Class II, or Class I, then make that policy statement and write N/A in the spaces below.			
Otherwise, provide your policies, and include the following:			
C.4.26	Control measures		
C.4.27	Respiratory protection		
C.4.28	Protective clothing		
C.4.29	Decontamination		

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C.4.30	Employee training		
Working With Naturally Occurring Asbestos (NOA) That Contains Greater than 1% Asbestos			
Describe the procedures your company will follow when working with NOA containing asbestos in concentrations greater than 1%.			
If your company policy is to treat such material as if it were Class II, or Class I, then make that policy statement and write N/A in the spaces below.			
Otherwise, provide your policies, and include the following:			
C.4.31	Control measures		
C.4.32	Respiratory protection		
C.4.33	Protective clothing		
C.4.34	Decontamination		
C.4.35	Employee training		

D. RESPIRATORY PROTECTION PROGRAM

Explanation: You must provide us with a copy of your written respiratory protection program required by §5144. Our Checklist provides guidance for certain elements, relating to asbestos, that we look for in our review. This does not guarantee your program meets all the requirements of Title 8. You may need more information for your specific situation, particularly for non-asbestos hazards.

- Asbestos-specific regulations- While §5144 sets up a general respiratory protection program, for asbestos, §1529(h) mandates specific asbestos criteria. Selection is based upon Class of work and 1529(m) is the basis for clearing an employee for respirator use.
- Assistance – The Cal/OSHA Consultation Service has produced a publication entitled “*Respiratory Protection in the Workplace – A Practical Guide for Small-Business Employers*”. This publication may help you develop a respiratory protection program. It can be ordered or downloaded at the DOSH publications website: www.dir.ca.gov/dosh/PubOrder.asp.

D.1 Program Administrator			
Section	Topic	Page(s)	Paragraph
D.1.1	Designation of a Program Administrator as per 8CCR 5144(c)(3). <u>Describe and attach documentation</u> of qualifications by training or experience and their responsibilities.		

D.2 Respirator Selection			
Section	Topic	Page(s)	Paragraph
D.2.1	1) General requirements §5144(d)(3)(A)		
D.2.2	2) Provision of respirators, training and medical evaluations at no cost §5144(c)(4)		
D.2.3	3) NIOSH approval §5144(d)(1)(B)		
D.2.4	A description of the respirators you provide for Class I work, including set up, and other situations		
D.2.5	The minimum trigger conditions as in §1529(h)(3)(D) and (E)		
D.2.6	A description of the respirators you provide for Class II & III work		

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D.2.7	For §1529(h)(3)(D), if your choice is always a powered air-purifying respirator (PAPR) for Class I work, just state that you are using a tight-fitting PAPR for Class I work if there is not a negative exposure assessment and exposure levels are not above 1 f/cc.		
D.2.8	Procedures to implement when exposures are anticipated to be or greater than 1 f/cc. Either stop work until the problem is corrected or follow the requirement in §1529(h)(3)(D) for a full-face, supplied-air pressure demand respirator with an auxiliary SCBA.		
D.2.9	Provision for providing a PAPR to employees choosing to use this type of respirator if it will provide adequate protection per §1529(h)(3)(B)		

D.3 Medical Evaluation

Section	Topic	Page(s)	Paragraph
D.3.1	Your policy must include medical evaluations performed prior to respirator fit testing and issuing respiratory protection to employees, <u>and transfer requirements for those who do not obtain medical clearance as in §1529(h)(2)(B).</u> Provide the details of your policy here, or make reference to the section in your medical surveillance program where you have written the specific policy language.		

D.4 Fit Testing

Section	Topic	Page(s)	Paragraph
D.4.1	Frequency of fit testing and re-testing §5144(f)(2), (3) & (4)		
D.4.2	A statement that all respirators must be fit tested to assure the required protection factor. PAPR and Type C (with filter attachment) respirators must be at least qualitatively fit tested with the air off and the appropriate filters in place to ensure a protection factor of at least 10 for escape purposes.		
D.4.3	Names of the fit test protocols used by your company		
D.4.4	Provide copies of the fit test protocol(s) your company will use.		
D.4.5	Include a copy of your fit test form containing the information required in §5144(m)		
D.4.6	Include policy language stating that a copy of the current fit test form for each employee entering the regulated area will be kept at the jobsite		

D.5 Use

Section	Topic	Page(s)	Paragraph
D.5.1	Facepiece seal protection (facial hair and other conditions) §5144(g)(1)		
D.5.2	Inspection prior to use §5144(h)(3)(A)1.		
D.5.3	Negative and positive user seal checks prior to donning §5144(g)(1)(C). You can refer to §5144 Appendix B-1 and include a readable copy in the rear.		
D.5.4	Continuing respirator program effectiveness §5144(g)(2)		
D.5.5	Maintaining legible NIOSH approval labels on filters, cartridges and canisters §5144(j)		

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D.6 Maintenance & Care

You may refer to and attach a readable copy of §5144 Appendix B-2, and the respirator manufacturer's instructions. See §5144(h) and §5144 Appendix B-2 for specific requirements.

Include:

Section	Topic	Page(s)	Paragraph
D.6.1	Cleaning and disinfecting:		
	a. Policy		
	b. Procedures		
D.6.2	Storage		
D.6.3	Inspection (include flow checks for PAPR's)		
D.6.4	Repairs		

D.7 Supplied Air

If you expect to use supplied air respirators, you must discuss them. Otherwise, state you do not use them. See §5144(i) for specific requirements.

Include:

Section	Topic	Page(s)	Paragraph
D.7.1	Inspection procedures for mask, hoses, cylinders, compressors and all other equipment;		
D.7.2	Type, source, and purity of breathing air required to be used		
D.7.3	Marking requirements for cylinders		
D.7.4	Tags for recording inspections		
D.7.5	Any other use instructions, such as from the manufacturer		
D.7.6	Name/position of individual(s) who maintains the compressors and/or SCBAs		
D.7.7	Training description		

D.8 Training & Information

See §5144(k) for specific requirements.

Include:

Section	Topic	Page(s)	Paragraph
D.8.1	Training and retraining		
D.8.2	Training knowledge outcome and conduct		
D.8.3	Provision of written information for voluntary use (if applicable)		

D.9 Program Evaluation

See §5144(k) for specific requirements.

Include:

Section	Topic	Page(s)	Paragraph
D.9.1	Evaluations		
D.9.2	Consultation with employees		

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D.10 Recordkeeping for Respirators

See §5144(k) for specific requirements.

Include:

Section	Topic	Page(s)	Paragraph
D.10.1	Fit testing information		
D.10.2	Fit testing form		
D.10.3	Retention		
D.10.4	Maintenance and availability		

E. EXPOSURE MONITORING PROGRAM

E.1 Permissible Exposure Limits

Section	Topic	Page(s)	Paragraph
E.1.1	For the two different types of PELs for asbestos found in §1529 provide their name and numerical value including units and timeframes		
E.1.2	Explain how you select which personnel and procedures to monitor, and how many samples to collect in order to perform representative monitoring		
E.1.3	Explain how the sampling time period (full shift AND 30 minutes) is selected		
E.1.4	How to calculate the 8-hour time-weighted average (TWA) exposure, including:		
	a. Sampling and work time equal to or less than 8 hours		
	b. Sampling and work time more than 8 hours		
	c. The formula to be used to calculate the 8-hour TWA		

E.2 Frequency of Monitoring

Section	Topic	Page(s)	Paragraph
E.2.1	The frequency of monitoring by Class of work		
E.2.2	When you can terminate monitoring		
E.2.3	When you must conduct additional monitoring		

E.3 Methods of Monitoring

Provide a step by step monitoring procedure.

Section	Topic	Page(s)	Paragraph
E.3.1	Name of the sampling and analytical method used		
E.3.2	Items 1-7 and 11 from Appendix A, §1529.		
E.3.3	Calibration:		
	a. Requirements for the secondary standard you use in the field.		
	b. Description of how you use calibration curves		
	c. Current calibration records (attach)		
	d. Correction for temperature and pressure variations		
E.3.4	Form you use to document monitoring.		
	Include:		
	All the information required by 8CCR 1529(n)(2)(B)		
	Provide space to enter the ID's of the calibration device and the sampling pumps, as evidence of the accuracy of sampling. Note the need to attach current calibration curves.		

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	Have a field to enter both the results from the analytical lab and the final 8-hour TWA and Excursion Limit calculation. If the lab will calculate the 8-hour TWA, note this on your sampling form, make sure they state this on their report form and preserve as a permanent record.		
E.3.5	Perimeter monitoring methods- Only if you perform this in place of critical barriers or for purposes of alternate Class I methods, the EPA AHERA reference method in 40 CFR, Part 763, Subpart E, Appendix E. If not, just write "n/a" here.		

E.4 Methods of Analysis

Section	Topic	Page(s)	Paragraph
E.4.1	Refer to Appendix A or B and specify that you will only use laboratories that are currently accredited by the American Industrial Hygiene Association (AIHA) for analysis of asbestos air samples by phase contrast microscopy.		

E.5 Employee Notification of Air Monitoring Results

Section	Topic	Page(s)	Paragraph
E.5.1	State your policy. It must be consistent with 8 CCR 1529(f)(5)		

E.6 Employee Right to Observe Monitoring

Section	Topic	Page(s)	Paragraph
E.6.1	State your policy. It must be consistent with 8 CCR 1529(f)(6)		

E.7 Clearance Monitoring Prohibition

Section	Topic	Page(s)	Paragraph
E.7.1	Discuss how contractors are not allowed to perform clearance monitoring on behalf of a building owner. Only DOSH-Certified Asbestos Consultants can do so. See the Business & Professions Code §7180(b)(3) and §7187.		

E.8 Conflict of Interest by Certified Asbestos Consultants

Section	Topic	Page(s)	Paragraph
E.8.1	Discuss how conflict of interest provisions in the Business & Professions Code §7187 prevents Certified Asbestos Consultants (CAC's) hired by a building owner from having a "financial or proprietary interest in an asbestos abatement contractor hired for the same project." And how the contractor cannot hire the CAC as that establishes a conflict of interest.		

F. MEDICAL SURVEILLANCE PROGRAM

Explanation: Provide a policy for medical surveillance program. Use the language of the code altered to make your own policy based on the following sections of §1529.

Write:

Section	Topic	Page(s)	Paragraph
F.1	Coverage (m)(1)(A)- You can simply state that you provide an exam to everyone prior to work or use the code language altered to fit your policy		
F.2	Frequency (m)(2)(A)		
F.3	Exam content (m)(2)(B) - Describe and refer to the Table for X-ray frequency		

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F.4	Information provided to physicians (m)(3)		
F.5	Content of written opinion (m)(4)		
F.6	How results are given to employees within 30 days (m)(4)(C)		
F.7	State that you will verify the authenticity of any medical records presented to you by employees, and only accept authentic medical records.		
F.8	Include readable copies of the questionnaires		
F.9	A copy of the physicians opinion for each employee entering the regulated area will be kept at the jobsite		

G. RECORDKEEPING PROGRAM

Explanation: Provide a policy for all your asbestos removal recordkeeping in one place. If you also want recordkeeping language in the relevant P&P sections, duplicate the wording or just refer to this section.

Write:

Section	Topic	Page(s)	Paragraph
G.1	Your policy must include:		
	a. Objective data for NEA §1529(n)(1)		
	b. Exposure §1529(n)(2)		
	c. Medical surveillance §1529(n)(3)		
	d. Respiratory Protection §5144(m)		
	e. Training records §1529(n)(4)		
	f. Availability §1529(n)(7) Note: "Director" is of NIOSH		
	g. Transfer of records §1529(n)(8)		

H. LIST OF EQUIPMENT

Explanation: We want evidence that you have knowledge of some of the equipment commonly used to safely perform asbestos-related work and comply with requirements of §1529. If the company does not currently own the items listed below, they must be purchased or rented prior to the commencement of any asbestos-related work.

Write:

Section	Topic	Page(s)	Paragraph
H.1	Provide a list of the specific equipment (include the manufacturer and model except for those items starred *), that your company either currently owns or will obtain prior to the commencement of any asbestos-related work.		
Air filtration:		Protective Clothing:	
• Negative air machines		• Coveralls	
• HEPA vacuums		• Gloves (disposable/work)*	
• HEPA filters		• Safety goggles*	
• Manometer		• Hard hats*	
		• Rubber boots*	
Disposable Materials:		Respiratory Protection:	
• Plastic- 6 mil./fire-retardant		• Respirator make, model, style	
• Plastic waste bags		• Cartridge type	
• Glove Bags		• Fit-test equipment	
• Wetting agent/Surfactant		• Air compressor (if used)	
• Encapsulant		• Breathing air purification	
		Air Sampling:	
		• Pumps	
		• Calibration equipment	
		• Sampling media	
		Other Equipment:	
		• Portable shower system & water heater	
		• Water filtration unit	
		• Water sprayer	
		• HEPA Vacuum	
		• GFCI receptacle/boxes/panel	

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	system (if used)	
		• Bulk sampling equipment

J. CHECKLIST PREPARER STATEMENT

To be signed by the applicant listed in Form ACRU 186a.

Under penalty of perjury, I have reviewed this checklist and the Policies and Procedures for Asbestos-Related Work document to which they pertain. The checklist as completed, accurately reflects the pages on which the requirements noted appear in the Policies and Procedures

Print Name & Title	Signature	Date
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Company/Organization Name	Phone #	E-mail Address
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