

Friability is a subjective determination. By definition, friable asbestos material is any material that contains more than one percent asbestos by weight and can be crumbled, pulverized, or reduced to a powder when dry, by average hand pressure. Notes as to friability and structural integrity of asbestos material and the surfaces to which it is attached should be made during the identification survey.

ASBESTOS CONTROL STRATEGY

Exposure to asbestos may cause lung disease and cancer after a long latency period. Further, there is a heated debate in the scientific community whether there is any safe threshold level at which asbestos does not cause cancer. Therefore, air samples are useful only to document present exposure levels and are of minimal use in determining an asbestos control strategy. The long-range objective of all facility plans should be the eventual complete removal of all asbestos materials. However, short- and mid-term goals should be based on immediacy of need and appropriate timing with other projects. The decision to remove, recover, encapsulate, or enclose shall be based on:

- . Friability and condition of the material
- . Exposed surface area
- . Occupancy and use
- . Control of the access to the area
- . Accessibility to the material
- . Deterioration, delamination from substrate, physical or water damage
- . Proximity to an air plenum or airstream
- . Proximity to high activity areas and subjection to physical damage by employees, equipment or vibration
- . Planned changes to the facility that will impact any of the above factors

If friable asbestos insulating material is in or near an air plenum or airstream, it shall be scheduled for removal as soon as possible. During the removal no airflow that could contaminate other areas of the facility can be allowed in this plenum. If asbestos is in an occupied high-activity area, is friable, damaged, and subject to further damage, it shall also be removed. In cases less severe than listed above, the occupancy, use, possible future friability, damage, and other factors that may contribute to causing asbestos fibers to become airborne on a continuous or peak basis shall be weighed before a decision is made on a plan of action for asbestos fiber control.

OSHA and the EPA are specific in their requirements relative to asbestos. These requirements include: pre-notification of EPA with removal of 260 linear feet or more of pipe insulation or 160 square feet or more of boiler or surface insulation; air monitoring; specific respiratory protective equipment; job-site enclosure; posting of warning signs; worker training and education; medical examinations; indefinite record-keeping; and proper disposal of asbestos-laden materials. In order to insure these requirements are met, each division and individual facility should designate an employee as Asbestos Control Program Coordinator.

Because of the involved requirements associated with asbestos control, it is desirable, where local labor agreements permit, to utilize outside contractors. These contractors should be selected on their ability to satisfy the following:

- o Remove, repair, recover, encapsulate, or enclose asbestos materials while meeting applicable OSHA and EPA standards. A copy of OSHA regulations 1910.1001 Asbestos, and EPA 40 CFR Part 61, Subpart B: National Emission Standard for Asbestos, shall be in the contractor's possession and available at the job site.