

5. Thoroughly wash the brake support plate, brake shoes, and other parts before removing the old brake shoes
6. If your system uses a filter, wet the filter when it becomes full and before removal, with a fine mist of water, and place immediately in an impermeable container. Label the container and dispose of it as asbestos waste.
7. Immediately clean spills of asbestos-containing liquid or asbestos-containing waste material using a HEPA-filtered vacuum and/or wet methods. Properly dispose of waste as asbestos waste.
8. Dry brushing is prohibited.
9. The brake washer solution should be changed regularly for maximum efficiency of the unit.

Wet method

For shops that perform infrequent brake work and clutch repair work, OSHA allows the use of a **wet method** as a "preferred" method. Therefore, in facilities in which five (5) or fewer brake "jobs" (five brake "jobs" are equivalent to five vehicles) or 5 clutches, or some combination totaling 5, are inspected, disassembled, reassembled and/or repaired per week, the mechanic/technician may control potential asbestos exposure through the use of a spray bottle, hose nozzle, or any implement capable of delivering a fine mist of water or amended water at low pressure to wet down drum or clutch housing before removing it and to control asbestos fiber release during subsequent activities. However, any wastewater generated must be captured and properly disposed of without allowing it to dry on any surfaces. OSHA anticipates that using a spray bottle will adequately control dust without generating a large volume of wastewater.

The wet method requires the following steps:

1. Brake and clutch parts must be wetted with water or amended water before taking any other action.
2. Wipe the brake and clutch parts clean with a cloth.
3. Place contaminated cloth into an impermeable, properly labeled container, and then dispose of it as asbestos waste. Alternatively, the cloth can be laundered to prevent the release of asbestos fibers in excess of 0.1 fiber per cubic centimeter of air, expressed as an 8-hour time-weighted average.
4. Any spilled water or amended water or asbestos-containing waste material must be cleaned immediately with cloth or HEPA-filtered vacuum and not allowed to dry.
5. Do not dry brush.

The simplicity of the wet control does not eliminate the need for correct work practices. For example, holding the spray nozzle too close to the brake surface may cause asbestos fibers to become airborne. Brake components should be sprayed to saturate the parts as they are removed from the assembly.

Equivalent Methods

Like the preferred methods, an equivalent method must include a detailed description of the practices that must be followed when the method is used. An employer who uses such a method must have a written description of the method that contains sufficient detail that the method can be reproduced. The employer must provide information demonstrating that the exposures resulting from an equivalent method are equal to or less than exposures from the negative pressure enclosure/HEPA vacuum system method. For purposes of equivalency, employee exposures must not exceed 0.016 f/cc, as measured by the OSHA reference method and averaged over at least 18 personal samples. The following method, spray can/solvent system, may be used as an "equivalent" method. The spray can/solvent system may be used when proper work practices are followed. At a minimum, the spray can/solvent system method must follow detailed written procedures including the following:

1. Wet the brake and clutch parts with the spray can/solvent before taking any other action.
2. Wipe the brake and clutch parts clean with a cloth.
3. Place contaminated cloth into an impermeable, properly labeled container, and then dispose of it as asbestos waste. Alternatively, the cloth can be laundered to prevent the release of asbestos fibers in excess of 0.1 fiber per cubic centimeter of air, expressed as an 8-hour time-weighted average.
4. Immediately clean any spilled solvent or dispersed asbestos with a cloth or HEPA vacuum.
5. Dry brushing during spray can/solvent system operations is prohibited.

The solvents typically used in brake and clutch work are hazardous chemicals, which requires the employer to comply with the Hazard Communication standard. If the solvents are flammable, appropriate precautions against fire and explosion must be taken.

Best Practices