

Memorandum

San Francisco, CA
March 19, 1987

OSHA ASBESTOS STANDARDS
File: 126 Compliance Guideline
Asbestos

SF&H CONTACTS:

The Chevron Asbestos Compliance Guideline originally issued in October, 1986, has been revised in response to a new approach announced by OSHA for applying the two OSHA Asbestos Standards to manufacturing facilities. The revised Guideline contains the following changes from the original Guideline.

- ° **Scope:** The Asbestos Construction Standard (1926.58) now applies to all operations involving the removal of asbestos materials including all maintenance activities. The only activities at Chevron facilities which are covered by the Asbestos General Industry Standard (1910.1001) are brake and clutch repair jobs involving asbestos brakes or clutches. Under the original Guideline, some asbestos removal jobs fell under the General Industry Standard.
- ° **Regulated Areas:** All asbestos removal jobs which result in exposures above the PEL must now comply with the requirements for regulated areas under the Construction Standard; 1926.58 Section (e) parts (1) through (6) and Section (j) parts (1) and (2). Jobs which exceed the PEL but meet the exemption for short duration small jobs do not have to comply with these requirements. However, if the short duration small job exemption is claimed, Appendix G must be complied with. The criteria for short duration small jobs have also been changed in the revised guideline to reflect OSHA's new position. Only asbestos removal which is performed as part of another task (e.g. replacing a valve or a pipe) qualifies for the short duration small job exemption. Removal of asbestos insulation to replace it with non-asbestos insulation would not qualify for the exemption. The requirements of Appendix G are summarized in the revised Guideline - Part II, Detailed Outline Construction Standard. Appendix G was not included in the original Guideline.

The requirements for regulated areas and Appendix G do not apply to jobs which have been shown through exposure monitoring to be consistently below the PEL. This emphasizes the importance of exposure monitoring to document exposure levels and to support the decisions made regarding the techniques adopted for complying with the standard.

A copy of the revised Guideline is attached to this memo complete with the text of the two standards from the Federal Register. Please discard the original Guideline and use the revised Guideline in its place.

If you should have any questions on the revised Guideline, please contact Mr. J. S. Hatfield at (415) 894-5280.

S. L. DRYDEN 

JSH:lar/027
Attachment

cc: Industrial Hygiene Staff

Chevron BB
015668

EXECUTIVE SUMMARY
OSHA ASBESTOS COMPLIANCE GUIDELINE

The Chevron OSHA Asbestos Compliance Guideline details the requirements in the two new OSHA Asbestos Standards and how they apply to Chevron facilities. Under OSHA's recently announced approach for applying the two standards to manufacturing facilities, the Construction Standard will cover all maintenance activities involving asbestos removal. The only activities covered by the General Industry Standard are brake and clutch repair work. The major new impacts of the standards on Chevron facilities consist of the following:

- o Both standards contain a new Permissible Exposure Limit (PEL) of 0.2 fibers/cc and a new Action Level of 0.1 fibers/cc. Since the new PEL is a ten fold reduction from the old standard, asbestos exposures at Chevron facilities which previously were below the old PEL may exceed the new PEL.
- o New Employee Exposure Monitoring. Chevron facilities will need to perform employee exposure monitoring to meet the new monitoring requirements of the standards. The Construction Standard requires daily monitoring for employees working in regulated areas.
- o New Regulated Areas. The standards contain new requirements to establish regulated areas where exposures can exceed the PEL. The regulated areas require new provisions for signs, work practices, respirators and restricted access. The Construction Standard contains a special set of new requirements for asbestos removal, renovation or demolition activities which may result in exposures above the PEL.
- o New Training. The standards contain new training requirements for all employees exposed above the Action Level. This will require immediate action by Chevron facilities.
- o Respirator Protection Program. Under the standards, the disposable dust mask type of respirator currently used in most Chevron facilities is no longer acceptable, and respirator programs must contain other new provisions.
- o Medical Surveillance Program. The standards contain new requirements for medical surveillance exams which will require coordination with the Corporate Medical Department.
- o New Signs and Labels. Warning signs and labels on containers for asbestos waste will require new language emphasizing the cancer risk of asbestos exposure.
- o Hygiene Facilities. Chevron facilities will have to comply with new requirements for showers, change areas, and lunch rooms for employees exposed above the PEL.
- o Communication to Other Employers. Under the Construction Standard, Chevron facilities must communicate to any outside employers (i.e., outside personnel) present at the facility, where regulated areas have been set up and the precautions to follow.

ASBESTOS COMPLIANCE GUIDELINE

INTRODUCTION

This Guideline provides guidance and interpretation for Chevron facilities on how to comply with the two new OSHA asbestos standards; 1926.58 for Construction and 1910.1001 for General Industry. This guide consists of three parts. Part I presents an overall approach for applying these standards to Chevron facilities and a summary of the requirements. Part II contains a detailed outline of both standards with side by side interpretation of important sections. Part III describes how Chevron facilities should apply the standards to contractors.

PART I IMPLEMENTATION APPROACH

SCOPE

FED-OSHA CONSTRUCTION ASBESTOS STANDARD: This standard applies to all operations involving the removal of asbestos-containing materials including all maintenance activities, regardless of the size or duration of the job. It applies to large special construction/maintenance projects and to the removal of small amounts of asbestos insulation as part of a maintenance or operations activity. The Construction Standard covers these activities when they are performed by contractors for Chevron and by Chevron employees. Examples of jobs covered by this standard are as follows:

- Removing asbestos insulation from pipe and other equipment. The Construction Standard applies to this type of job regardless of the amount of insulation removed, the length of the job, or the circumstances for removing the insulation. All asbestos insulation removal is covered by the Construction Standard.
- A project to dismantle a vessel, tower or other structure which results in asbestos exposure as part of the job.
- Renovation activities in a building which result in asbestos exposures. The Construction Standard applies to these types of activities whether they involve only a few hours of work or consist of a major renovation of a whole floor.

FED-OSHA GENERAL INDUSTRY ASBESTOS STANDARD: This standard applies to all asbestos exposures not covered by the Asbestos Construction Standard including the manufacture of products containing asbestos, shipbuilding, and brake and clutch repair. At Chevron facilities, the only activities covered by the Asbestos General Industry Standard are brake and clutch repair jobs involving asbestos brakes or clutches. All other activities at Chevron facilities involving asbestos exposures are covered by the Asbestos Construction Standard.

GENERAL REQUIREMENTS

The following outline indicates the various general requirements under both standards which must be met if exposures exceed the action level of 0.1 fibers/cc, if exposures exceed the PEL of 0.2 fibers/cc, or for all exposure levels.

Exposures Exceeding 0.2 Fibers/cc as an 8-Hr. TWA

- Establish regulated areas. Construction Standard Only: Special requirements for asbestos removal, renovation or demolition jobs with exposures above the PEL.
- Compliance methods must be used to reduce exposures
- Establish respirator program to supplement other controls
- Use protective clothing
- Provide hygiene facilities
- Post signs
- Construction Standard Only: Communication with other employees on site
- General Industry Standard Only: Establish written compliance program
- Plus all requirements listed in the two sections below

Exposures Exceeding 0.1 Fibers/cc as an 8-Hr. TWA

- Medical surveillance: for employees exposed at least 30 days or more/year under the Construction Standard; no minimum frequency for the General Industry Standard
- Training
- Followup monitoring; the Construction Standard requires daily monitoring for employees in regulated areas
- Plus all requirements listed in the section below

All Exposures Levels (including exposures below the action level)

- Initial exposure monitoring
- Housekeeping and waste disposal
- Recordkeeping
- Employee access to records
- Employee notification of monitoring results
- Use warning labels on containers

COMPLIANCE DATES

The two standards have the schedule of compliance dates outlined below. These dates represent the deadlines for meeting the various parts of the standards.

Construction standard:	All requirements - January 16, 1987
General Industry:	July 20, 1986 for all parts (including the PEL) except the following:
Exposure monitoring:	October 20, 1986
Training	October 20, 1986
Respiratory Protection:	July 21, 1986 if exposures are above 2 fibers/cc November 17, 1986 if exposures are above 0.2 fibers/cc January 16, 1987 - powered air purifying respirators must be provided upon request
Regulated areas:	November 17, 1986
Medical surveillance:	November 17, 1986
Hygiene and Lunchroom:	January 16, 1987 - construction plans July 20, 1987 - construction finished

Compliance Program: —
Methods of Compliance:

July 20, 1987
July 20, 1988

SPECIFIC REQUIREMENTS FOR REGULATED AREAS

The two new asbestos standards require that regulated areas be established for two different situations. The first type of regulated area is required for any job which results in exposures above the PEL. The second type of regulated area occurs only under the Construction Standard for asbestos removal, renovation or demolition jobs which result in exposures above the PEL. Brake and clutch repair jobs which result in exposures above the PEL must only meet the requirements of the first type of regulated areas. Jobs involving the removal, renovation or demolition of asbestos containing materials which result in exposures above the PEL must meet the requirements of both the first and second type of regulated areas.

1. The first type of regulated area is required under both the General Industry and the Construction Standard for any work area where employee exposures are likely to exceed the PEL. The requirements for this type of regulated area are as follows:
 - a. Demarcate the area and restrict access
 - b. Prevent eating, drinking, smoking, chewing inside the area
 - c. Use respiratory protection in the area
 - d. Post warning signs in the area
 - e. Hygiene facilities and practices are required for the area
2. The second type of regulated area is required only under the Construction Standard for any area where asbestos removal, renovation, or demolition activities may result in exposures above the PEL. The requirements for this type of regulated area are as follows:
 - a. Use negative pressure enclosures whenever feasible
 - b. Designate a "competent" person to oversee the job
 - c. Establish a decontamination area - clean room, shower area and equipment room with entry and exit procedures

Exception The three requirements indicated above for this second type of regulated area are not required for "short-duration, small jobs". However, if the short duration, small job exemption is claimed, Appendix G of the standard becomes mandatory and must be complied with (see Appendix G of the Construction Standard). As a guideline, a short-duration, small job is an activity that meets the following criteria:

- It can be performed in less than a day involving only 1-2 employees.
- The asbestos removal is not the principal goal of the job but rather part of a maintenance or renovation task, e.g., removing asbestos insulation to replace a valve. Removing asbestos insulation to replace it with non-asbestos insulation would not qualify for the short duration small job exemption.
- The job involves a maintenance or renovation activity, but not a demolition activity. (See the definitions in the Construction Standard for renovation and demolition.)

- Note: Anytime a glove bag is used -- even if the job lasts more than one day -- the job can be considered a short duration, small job.

The requirements under Appendix G only apply to "short duration, small jobs" which result in exposures above the PEL. Jobs with exposures consistently below the PEL do not have to meet the requirements for the first or second type of regulated area nor Appendix G.

Examples of short-duration, small jobs given by OSHA are pipe repair, valve replacement, installing electrical conduit and other general building maintenance activities. It is not acceptable to divide a job lasting more than one day into a series of 1 day short-duration small jobs to avoid the three requirements above.

Negative pressure enclosures are physical constructions enclosing a regulated area (e.g., out of plastic sheet) in which a negative pressure can be created by means of mechanical ventilation. The following approach can be used as a guideline for deciding if a negative pressure enclosure is feasible. If it is difficult to set up a negative pressure enclosure due to other structures or equipment present which prevent sufficient room for an enclosure, and a glove bag, wet techniques and other controls are being used to control exposures, it can be considered infeasible. Also, if the negative pressure enclosure would create a greater hazard (e.g., the buildup of toxic gases within the enclosure), it can be considered infeasible. Asbestos removal inside of a building, or enclosed area would usually be an application in which a negative pressure enclosure is feasible. If a negative pressure enclosure is determined to be infeasible for a particular activity, exposure monitoring should be performed downwind of the regulated area (e.g., area samples) during the activity to document that levels downwind were below the action level.

INITIAL MONITORING

Chevron facilities must develop a set of initial monitoring data for activities involving asbestos exposure in order to comply with each of the two standards and to be used for the following:

- To determine which parts of the standard apply.
- To determine if additional monitoring is needed.
- To support the decisions made regarding the use of work practices, respiratory protection and other controls in the standards.
- To document employee exposure levels for the activities.

The data must be sufficient to represent all employee exposures associated with each activity involving asbestos exposure. Corporate Industrial Hygiene will assemble monitoring results from Chevron facilities to develop a set of data on exposure levels associated with specific activities. A copy of initial monitoring results obtained should be sent to Mr. J. S. Hatfield of Corporate Industrial Hygiene.

Previous personal asbestos monitoring results can be used to meet the initial monitoring requirement for the General Industry Standard only if the results were collected after December 20, 1985 for similar activities. Previous personal monitoring results can be used to meet the initial monitoring requirement for the

Construction Standard if the monitoring results were obtained for activities similar to those in question (e.g., the data is within the last 3 years and the job, work conditions, procedures and controls are similar). If previous monitoring results are not adequate, exposure monitoring must be performed.

After the initial monitoring results have been collected, no additional monitoring is needed if the exposures are consistently below the action level. If the initial monitoring results exceed the action level, follow-up monitoring must be performed at least every six months. Under the Construction Standard, daily monitoring is required for employees assigned to work in regulated areas i.e., removal, renovation or demolition jobs resulting in exposures above the PEL and any other job above the PEL. The daily monitoring may be terminated if the results show the exposures are below the action level. Daily monitoring is not required for employees in regulated areas using supplied air positive pressure respirators.