



National Elevator Industry, Inc.

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ASBESTOS SAFETY

This position paper is written to assure a safe work place for the employees of companies engaged in work in the elevator industry and to assist them in complying with OSHA standards for General Industry (1910.1001 Including App. A through J and subpart C), General Safety and Health Provisions for Construction (29CFR 1926.20 and 1926.1101).

Employers in the elevator industry do not normally engage in asbestos abatement or removal. Such work is specialized and highly regulated. Employers should not accept contracts that place the responsibility for asbestos abatement or removal within the scope of work for the elevator contractor.

Employers should develop and implement a written Asbestos Awareness Program to provide a safe work place for their employees and to assure compliance with OSHA regulations (1910.1001 and 1926.1101). An Asbestos Awareness program should include: a Definition of terminology used by OSHA in the applicable standards; training requirements which should include Asbestos Awareness training for all employees who may come in contact with asbestos, a description of safe work practices while working around Asbestos; Medical surveillance requirements; Record Keeping requirements and Approved air monitoring procedures of any work area where asbestos may exceed or equal the personal exposure limits set by OSHA, Instructions to employees regarding procedures to follow should they encounter Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM) at a work site.

Employees should not perform any construction, maintenance, or repairs in, areas where there is a potential exposure to a PACM or ACM in excess of the Personal Exposure Limits or in regulated areas in the normal scope of their work with out first receiving the proper training and personal protective equipment for the type or class of work to be performed. If any employee is asked to enter such areas they should first contact their supervisor for instructions, before entering such areas. Employees must be instructed that they should not, under any circumstances intentionally disturb (e.g. drilling insulated doors, etc), remove or clean up asbestos containing material without first contacting their supervisor and following company policy.

Prior to a bid, building owners are required to notify all prospective contractors bidding work on a project that contains any ACM or PACM, that the project contains ACM or PACM.

After receipt of this notification, should an employer choose to bid on such work, they should be prepared to:

- Attain an exposure assessment by a competent person conducted in the areas where elevator work will be performed.
- Train employees in asbestos awareness.
- Follow the OSHA standards for personal protective equipment and safe work practices.
- Make the building owner aware that asbestos was found at the job site.
- Instruct employees that should they encounter any ACM or PACM the employees are to contact their supervisor immediately for instructions.

There are four (4) classes of asbestos work and each class has its own requirements, the requirements can be found in 1926.1101 (e) Regulated areas, (f) exposure assessments and monitoring, (g) methods of compliance.

The four classes are; 1926.1101 (b) definitions:

- **Class I** Class I asbestos work means activities involving the removal of TSI and surfacing ACM and PACM.
- **Class II** Class II asbestos work means activities involving the removal of ASM 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** Class III asbestos work means repair and maintenance operations, where “ACM”, including thermal system insulation and surfacing, is likely to be disturbed.
- **Class IV** Class IV asbestos work means maintenance and custodial activities during which employees contact ACM and/or PACM and activities to clean up waste and debris containing ACM and/or PACM.

Employers should provide as a minimum asbestos awareness training to a Class IV level for all employees involved in maintenance and repair activities, and training to a Class III level where required by the work to be performed [OSHA 1926.1101(k)(9)].

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NEII Safety Committee

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