 DEE CRAMER <small>HEATING / COOLING / SHEET METAL</small> <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
			Initial Issue Date	1/1/2017
			Revision Date:	2/20/24
	ASBESTOS AWARENESS		Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 1 of 7

Purpose

The purpose of this program is to provide basic precautions and protections for employees when working on single and/or multi-contractor worksites to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM).

Scope

This program applies to all Dee Cramer, Inc. employees. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers Dee Cramer, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

Managers/Supervisors

- Ensure owners or operators are notified of PACM.
- Prohibit Dee Cramer, Inc. employees from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee training is completed.
- Ensure that all requirements of this program are understood and followed by those working under his/her direction.
- Perform duties of the Competent Person for asbestos work.

All Employees


All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

Procedure

Hazard Assessment

Asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

Dee Cramer, Inc. shall cause an assessment to be made in writing of the exposure or likelihood of exposure of a worker to the inhalation or ingestion of asbestos. In causing the assessment to be made, Dee Cramer, Inc. shall consider and take into account such matters as the methods and procedures used or to be used in the processing, mining, use, handling, or storage of asbestos; the extent and potential extent of the exposure of a worker to the inhalation or ingestion of asbestos; and the measures and procedures necessary to control such exposure by means of engineering controls, work practices and hygiene practices, and facilities.

 DEE CRAMER HEATING / COOLING / SHEET METAL <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
			Initial Issue Date	1/1/2017
			Revision Date:	2/20/24
ASBESTOS AWARENESS			Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 2 of 7

Potential exposure to asbestos is assessed by Dee Cramer, Inc. to ensure exposure does not exceed occupational exposure limits. The potential for worker exposure to asbestos will be identified during the hazard assessment. Dee Cramer, Inc. must take all necessary measures and procedures by means of engineering controls, work practices, and hygiene practices and facilities to ensure that the time-weighted average exposure of a worker to any of the forms of airborne asbestos, individually or collectively, is reduced to ensure that a worker's exposure to asbestos is kept as low as reasonably achievable and in any case employees must not be exposed to airborne concentrations of asbestos in excess of 0.1 fibers per cubic centimeter of air (.1 f/cc) [over an 8 hour time period for Alberta operations]. Atmospheric testing results should be assessed before a worker is exposed.

Health Effects

Dee Cramer, Inc. will ensure that workers who are likely to be employed in an asbestos process or are likely to be exposed to asbestos dust are warned that the inhalation of asbestos may cause pneumoconiosis, lung cancer or mesothelioma and the risk of injury to health cause by the inhalation of asbestos is increased by smoking.

General

Dee Cramer, Inc. shall in consultation with the committee, develop an asbestos control plan that protects the health and safety of all workers in the event of the dispersal of asbestos dust into the atmosphere at a place of employment or worksite. A plan developed must be in writing and include emergency procedures to be used in case of an uncontrolled release of asbestos including the means to protect exposed workers, the methods to confine and control the release of asbestos and the decontamination procedures to be used, the asbestos processes that workers may undertake, the training of workers in any asbestos process the workers may be required or permitted to undertake, the methods to control the release of asbestos dust, the PPE workers may be required to use, decontamination procedure and the inspection and maintenance schedule for all asbestos-containing materials.

Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before Dee Cramer, Inc. employees disturbs that material. Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before Dee Cramer, Inc. employees are permitted to work.


Dee Cramer, Inc. must post signs at the boundaries of the restricted/designated work area indicating asbestos work is in progress, the hazards, and the precautions required for entering the work area and employees will abide warning signs and labels and will not disturb the Asbestos Containing Material.

Training

Workers are provided training on the possible locations (typically piping an hazards of asbestos and safe work procedures. Dee Cramer, Inc. must ensure all employees that are exposed to airborne concentrations undergo training applicable to the authority having jurisdiction. This includes site supervisors/superintendents who oversee other contractors performing this function to minimize the worker's exposure.

A certificate of training shall be provided and maintained.

Asbestos Exposure Control Program and Procedures

 DEE CRAMER HEATING / COOLING / SHEET METAL <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
			Initial Issue Date	1/1/2017
			Revision Date:	2/20/24
ASBESTOS AWARENESS			Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 3 of 7

This section includes measures to be used to prevent the uncontrolled release of asbestos and the procedures to be followed if there is an uncontrolled release.

Where workers have access to asbestos-containing materials Dee Cramer, Inc. shall ensure that the asbestos containing materials are clearly and conspicuously labeled with a placard as asbestos. A map or plan that is readily available to the workers must be available showing location of any asbestos-containing material.

If a worker is or may be exposed to potentially harmful levels of asbestos, Dee Cramer, Inc. must develop and implement an exposure control plan. To ensure adequate coordination of the overall plan, Dee Cramer, Inc. must ensure that it is administered by a properly trained person.

The qualified person must be an occupational health and safety professional with experience in the practice of occupational hygiene as it relates to asbestos management.

The asbestos procedures must address containment of asbestos operations where applicable, control of the release of asbestos fiber, provision, use and maintenance of appropriate personal protective equipment and clothing, means for the decontamination of workers, and removal of asbestos waste and clean-up of asbestos waste material. The procedures must provide a worker with task-specific work direction that addresses both hazards and necessary controls.


Asbestos exposure controls are designed to eliminate or minimize an employee's exposure to airborne asbestos fibers through the use of work practices and engineering controls. If the TWA and/or excursion limit is exceeded, a site-specific written Asbestos Exposure Control Program to reduce employee exposure shall be implemented containing means of engineering & work practice controls & the use of respiratory protection.

Prior to initiating any asbestos work the Competent Person must perform an asbestos exposure assessment. Subsequent to the exposure assessment, the engineering controls and work practices to be employed shall be identified.

Prior to commencement of work, the affected employees shall be briefed on the engineering controls and work practices designed to reduce/maintain the exposure below TWA for the asbestos work. This briefing shall be documented and maintained with the job documentation. Where engineering controls are not feasible work practices such as exhaust systems for hand tools, wet methods, clean-up procedures & PPE shall be used.

Wet methods will be employed for all asbestos work as a means to minimize potential airborne exposure wherever possible. ACM shall be wetted from the initiation of the maintenance or renovation operation and wetting agents shall be used continually throughout the work period to ensure that any dry ACM exposed in the course of the work is wet and remains wet until final disposal. Wetting agents, usually a surfactant (dish soap), are generally prepared by mixing 1 to 3 ounces of wetting agent to 5 gallons of water.

Where exhaust ventilation equipment used to contain asbestos dust Dee Cramer, Inc. shall ensure that the equipment is equipped with a HEPA filter, inspected regularly for defects, maintained and certified by a competent person at least once each year as being able to function safely and effectively.

 DEE CRAMER HEATING / COOLING / SHEET METAL <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
			Initial Issue Date	1/1/2017
			Revision Date:	2/20/24
ASBESTOS AWARENESS			Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 4 of 7

Control measures to prevent worker exposure to asbestos and procedures to be followed in the event of an uncontrolled release of asbestos it will be preloaded on a site-specific basis. The program must include site specific measures to be used to prevent the uncontrolled release of asbestos and the procedures to be followed if there is an uncontrolled release.

Restricted & Designated Areas

Where an asbestos process is undertaken, Dee Cramer, Inc. shall ensure that the area is effectively isolated or otherwise enclosed to prevent the escape of asbestos dust to any other part of the place of employment and that a warning notice is conspicuously displayed indicating that asbestos work is in progress.

Workers involved in asbestos abatement must complete an asbestos certification course. Dee Cramer, Inc. must ensure that a worker who enters a restricted area that is designated as a restricted area due to the presence of asbestos has successfully completed a course of instruction approved by a Director of Occupational Hygiene, and has in the worker's possession the original valid certificate of completion of the course issued to the worker.

All employees who perform work in regulated areas will be covered by this procedure. Employees who perform housekeeping activities during and after construction activities are also covered by this procedure.

Personnel Air Monitoring

Monitoring shall occur to ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) in 30 minutes.

An independent/third party air sampling person shall perform all required air sampling during contractor asbestos work and provide the results to the Dee Cramer, Inc. Competent Person. Note: Air sampling is not required for glove bag activities that are covered under a Negative Exposure Initial Assessment.


The air quality is to be determined from breathing zone air samples. The samples shall be representative of the 8-hour TWA and 30-minute short-term exposure. Measurements are required for documentation.

Affected employees and/or their designated representatives are to be provided the opportunity to observe asbestos exposure monitoring.

Where the asbestos exposure assessment (in the absence of quantitative personnel monitoring results) does not present objective, convincing data that indicates the ACM to be handled will not (under the worst circumstances) release airborne fibers, personnel air monitoring shall be performed to quantify exposure.

If personnel monitoring is considered necessary during the asbestos exposure assessment, to verify exposures would be maintained below the PEL/excursion limit, respiratory protection shall be utilized until such time that sufficient sampling results verify that respiratory protection is not required.

The Dee Cramer, Inc. Safety Director is to be consulted for advice and assistance in performing personnel air sampling activities.

 DEE CRAMER HEATING / COOLING / SHEET METAL <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
			Initial Issue Date	1/1/2017
			Revision Date:	2/20/24
ASBESTOS AWARENESS			Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 5 of 7

The number of samples necessary to be considered “representative” is dependent upon many factors and must be determined in consultation with the Dee Cramer, Inc. Safety Manager, certified Industrial Hygienist consultant, or a third-party air sampling professional.

Affected employees will be notified of monitoring results, which represent the employee’s exposure, as soon as possible following receipt of the monitoring results.

Employees shall be notified in writing either individually or by posting at a centrally located place that is accessible to affected employees.

Once representative sampling indicates that exposure levels for that particular activity are consistently below the established permissible limit and/or excursion limit, the requirement for respiratory protection may be waived.

It is imperative that accurate personnel air sampling records are maintained in order to justify any relaxation of respiratory protection requirements.

Results of air sampling data must be maintained in the asbestos job documentation.

Medical Surveillance Program


Workers exposed to asbestos are provided health assessments. The person with custody of the health assessment record must ensure that no person, other than the worker or health professional who conducts the health assessment, has access to the exposed worker’s health assessment unless the record is in a form that does not identify the worker, or the worker gives written permission for access by another person. Dee Cramer, Inc. must ensure that a worker undergoes a health assessment not more than 30 calendar days after the worker becomes an exposed worker, and every two years after the first health assessment. Exposed workers may refuse to undergo part or all of a health assessment by giving Dee Cramer, Inc. a written statement refusing it. Dee Cramer, Inc. must pay the cost of the health assessment and ensure that, if it is reasonably practicable, a health assessment is performed during normal work hours.

Respiratory Protection and Personal Protective Equipment

The use of approved respirators shall be at no cost to the employee and will be used in conjunction with work practice controls, work operations, to reduce exposure and in emergencies. Workers who may be exposed to asbestos dust during abatement activities must wear protective clothing. Dee Cramer, Inc. must provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from asbestos contamination, ensure that workers’ street clothing is not contaminated by asbestos, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

Dee Cramer, Inc. ensure each worker who may be exposed is provided with and use an approved respiratory protective device that is appropriate to the level of risk of the asbestos process and approved protective clothing that when worn, will exclude asbestos dust. All protective clothing is disposed of as asbestos waste after use or is kept, maintained and cleaned in a safe manner each time it is used.

Other PPE will include:

 DEE CRAMER HEATING / COOLING / SHEET METAL <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
			Initial Issue Date	1/1/2017
			Revision Date:	2/20/24
ASBESTOS AWARENESS			Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 6 of 7

- All persons within a restricted/designated work area wear protective clothing which is made of material resistant to penetration by asbestos fibers, fits snugly at the neck, wrists and ankles and as necessary to protect against the risk, covers the head and feet as well as the body.
- Protective coveralls, Gloves, Head coverings / Foot coverings, Vented goggles / Face Shields.
- And others based on the hazard.

Before a worker removes protective clothing and equipment, Dee Cramer, Inc. must ensure that the worker cleans this gear with a damp cloth or a vacuum cleaner equipped with a HEPA-filtered exhaust and ensure that a worker removes protective clothing and equipment before leaving the restricted/designated work area.

Waste Disposal

If a building is to be demolished, Dee Cramer, Inc. must ensure that materials with the potential to release asbestos fibers are removed first. Areas where asbestos abatement activities are in progress are isolated so other areas are not contained. If a building is being altered or renovated, materials in the area of the alterations or renovations that could release asbestos fibers are encapsulated, enclosed or removed.

Asbestos containing materials removed during abatement activities are adequately contained and labeled. Dee Cramer, Inc. must ensure that asbestos waste is stored, transported, and disposed of in sealed containers that are impervious to asbestos and asbestos and asbestos waste. Dee Cramer, Inc. must ensure that a container of an asbestos product and asbestos waste is clearly labeled. To identify the contents as an asbestos product and carcinogenic, and to warn handlers that dust from the contents should not be inhaled.

Bags or containers shall be imprinted and clearly labeled with the following asbestos hazard warning and address:

DANGER - CONTAINS ASBESTOS FIBERS -
AVOID CREATING DUST - CANCER AND LUNG DISEASE HAZARD
Dee Cramer – 4221 E. Baldwin Road, Holly, MI 48442

Asbestos waste or dust produced in a place of employment is cleaned away promptly and at least once each day, by vacuum cleaning equipment equipped with a HEPA filter to prevent the escape of asbestos dust into the air or where vacuum cleaning is not practicable, by wet methods.


Change in Process

Where a change is made in a process involving asbestos, or in the methods and procedures in the mining, use, handling or storage of asbestos and the change could result in a significant difference in the exposure of a worker to the inhalation or ingestion of asbestos, COMPANY shall cause a further assessment to be made.

Record Keeping

All records relating to any asbestos activity shall be maintained by Dee Cramer, Inc. permanently.

The records of the exposures of each worker to airborne asbestos at the workplace to be maintained as provided by the asbestos control program shall identify the worker, including the worker's date of birth, the worker's jobs or

 DEE CRAMER HEATING / COOLING / SHEET METAL <i>Dedicated People. Delivering Quality.</i>	Dee Cramer, Inc. Safety Management System		Doc No:	ASBAWARE
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			Revision Date:	2/20/24
ASBESTOS AWARENESS			Revision No.	1
			Next Review Date:	1/31/2027
Preparation: Safety Director	Authority: President	Issuing Dept: Safety	Page:	Page 7 of 7

occupations at the workplace, the results of monitoring for exposure to airborne asbestos in his or her work area, and the use by the worker of respiratory equipment and its type.