



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

MEMORANDUM

TO: Asbestos Abatement Contractors, Consultants, and Other Interested Parties

FROM: Ronald Skomro, Supervising Environmental Sanitarian
Asbestos Program
Environmental Health Services Division

DATE: August 26, 1994

SUBJECT: Applications for Approval of Alternative Work Practices

The Connecticut Department of Public Health and Addiction Services Standards for Asbestos Abatement regulation details required work practices for asbestos abatement projects and spot repairs. The use of alternative work practices may be approved by the Department of Public Health and Addiction Services under the provisions of Section 19a-332a-11 of the regulation.

Effective July 1, 1992, fees must now be submitted with proposed alternative work practice applications in the amount of \$100.00 for each application submitted. All proposed alternative work practice applications submitted without the required fee will be returned without review. Checks must be made payable to "Treasurer, State of Connecticut", separate checks must be submitted for alternative work practice applications and fees associated with asbestos abatement notifications.

The attached document is intended to outline alternative work practices which are generally acceptable to the Department of Public Health and Addiction Services. An application for approval of each alternative work practice must be submitted to the Department and approved in writing prior to its use. This document may be used as a reference when submitting an alternative work practice application. The approval of alternative work practices by the Department of Public Health and Addiction Services does not relieve the facility owner or asbestos abatement contractor from satisfying the requirements of any other federal, state or municipal regulation.

Please contact this office should you have additional questions concerning this matter.

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ALTERNATIVE WORK PRACTICE GUIDANCE DOCUMENT

The Connecticut Department of Public Health and Addiction Services Standards for Asbestos Abatement regulation details required work practices for the performance of asbestos abatement projects and spot repairs. The Department may approve alternative work practices for an asbestos abatement project or spot repair under the provisions of Section 19a-332a-11 of the Standards for Asbestos Abatement regulation.

Each proposed alternative work practice must be submitted in writing and in advance for review by the Department of Public Health and Addiction Services. The alternative work practice must provide an equivalent or a greater measure of asbestos emission control than the work practices prescribed by the Standards for Asbestos Abatement regulation. Outlined within this document are alternative work practices which are generally acceptable to the Department of Health Services. These reflect alternative work practices which are most commonly proposed to the department. An application for approval of each alternative work practice must still be made to the department. The decision on whether to approve or deny approval of an alternative work practice will be made on the basis of a review of each application. The applicant will be notified in writing by the department of the decision. A sufficient amount of time should be provided to allow the Department to review each application, including if necessary, the time to schedule an on-site inspection to evaluate the proposal. Typically, the application should be received by the Department a minimum of ten (10) days prior to the start of abatement activity. An asbestos abatement project utilizing alternative work practices should not commence unless written approval of the alternative work practice is granted by the Department of Public Health and Addiction Services.

A copy of the prescribed application form for approval of alternative work practices is attached. Each item on the form must be completed prior to submission to the Department. Item IX on the form requires that the regulatory citation be provided for each section and subsection of the Standards for Asbestos Abatement regulation for which approval of an alternative work practice is sought. Item X on the form must be completed to provide a description of the alternative work practice proposed. For each alternative work practice detailed below, the correct regulatory citation and acceptable alternative work practice are provided.

- I. Removal of Asbestos-Containing Material (ACM) Using A Glove Bag
 - A. Glove Bag with Single Layer Containment
The Department of Health Services will allow the use of glove bag procedure in conjunction with the establishment of single layer 6 mil polyethylene containment.

Item IX: Section 19a-332a-5(e)

Item X: In lieu of the requirements of Section 19a-332a-5(e), the asbestos-containing material shall be removed utilizing the glove bag procedure outlined in 29 CFR 1926.58, Appendix G of the Department of Labor, Occupational Safety and Health Administration regulation. In addition to the glove bag procedure, the work area is to be isolated from the non-work area by establishing an air-tight barrier of 6 mil polyethylene sheeting covering or composing the wall surfaces and covering the floor surface. In areas where this barrier does not extend to the ceiling, the layer of 6 mil polyethylene sheeting shall compose the ceiling of the air-tight enclosure.

The amount of material which can be abated utilizing this alternative work practice has not been restricted by the Department of Public Health and Addiction Services. This alternative means of isolating the work area from the non-work area is approved where the glove bag procedure is the sole means of removal of the asbestos-containing material. If a glove bag procedure other than the OSHA method is utilized, the procedure must be outlined in sufficient detail to determine equivalency. Except as noted, all other requirements of the Standards for Asbestos Abatement regulation are mandatory.

B. Glove Bag with "Critical Barriers"

The Department of Public Health and Addiction Services will allow the use of a glove bag procedure in conjunction with isolation of the work area from the non-work area by barriers as outlined in Section 19a-332a-5(c) of the Standards for Asbestos Abatement regulation. These barriers are commonly referred to as "critical barriers". Since the entire work area established by these barriers is subject to the post abatement reoccupancy criteria of the regulation, this alternative work practice is often utilized in smaller rooms. The Department of Labor - OSHA, federal or state as applicable, should be contacted prior to utilizing this alternative work practice. The Department of Labor may require that objective data be available to document that worker exposure does not exceed the permissible exposure limit when utilizing this alternative work practice.

Item IX: Section 19a-332a-5(e)

Item X: In lieu of the requirements of Section 19a-332a-5(e), the asbestos-containing material shall be removed utilizing the glove bag procedure outlined in 29 CFR 1926.58, Appendix G of the Department of Labor, Occupational Safety and Health Administration regulation. In addition to the glove bag procedure, the work area is to be isolated from the non-work area by barriers as outlined in Section 19a-332a-5(c) of the Standards for Asbestos Abatement regulation.

The amount of material which can be abated utilizing this alternative work practice has not been restricted by the Department of Health Services. This alternate means of isolating the work area from the non-work area is approved where the glove bag procedure is the sole means of removal of the asbestos-containing material. If a glove bag procedure other than the OSHA method is utilized, the procedure must be outlined in sufficient detail to determine equivalency. Except as noted, all other requirements of the Standards for Asbestos Abatement regulation are mandatory.

C. Spot Repairs

The Department of Public Health and Addiction Services Standards for Asbestos Abatement regulation defines a spot repair as meaning any asbestos abatement activity involving not more than three (3) linear or three (3) square feet of asbestos-containing material (ACM). An asbestos abatement project means any asbestos abatement activity involving more than three (3) linear or three (3) square feet of ACM.

The Department of Public Health and Addiction Services will allow activities which cumulatively involve more than three (3) linear or three (3) square feet of ACM to be performed as spot repairs. This may be done when the material is non-contiguous and there is a clear engineering reason why it would not be feasible to connect individual work areas. The work must then be performed as a spot repair or as an asbestos abatement project depending upon the amount of ACM present in each area. An asbestos abatement project should not be artificially sub-divided into several spot repairs to avoid the work practices and post abatement reoccupancy criteria associated with an asbestos abatement project detailed in the Standards for Asbestos Abatement regulation. As necessary, the Department of Public Health and Addiction Services will review each situation on a case-by-case basis.

In an area deemed to be a spot repair, the use of a glove bag procedure, such as that outlined in 29 CFR 1926.58, Appendix G is consistent with the requirements for spot repairs as outlined in Section 19a-332a-10 of the Standards for Asbestos Abatement regulation. Therefore, it is not necessary to seek approval of alternative work practices in this area.

II. Removal of Asbestos-Containing Floor Tiles and Mastic

A. Renovation Projects

The Department of Public Health and Addiction Services has allowed the use of a single layer of 6 mil polyethylene sheeting on walls where asbestos-containing floor tile and mastic are to be removed during renovations of a facility.

Item IX: Section 19a-332a-5(e)

Item X: In lieu of the requirements of Section 19a-332a-5(e), the work area is to be isolated from the non-work area by barriers as outlined in Section 19a-332a-5(c). Additionally, a single layer of 6 mil polyethylene sheeting shall be used to seal the wall surfaces in the work area.

The amount of material which can be abated utilizing this alternative work practice has not been restricted by the Department of Health Services. This alternate means of isolating the work area from the non-work area is approved where floor tile and mastic are the sole asbestos-containing materials to be removed. This approval does not apply where it is proposed that the single layer of 6 mil polyethylene sheeting compose the wall surface of the enclosure. Except as noted, all other requirements of the Standards for Asbestos Abatement regulation are mandatory.

B. Demolition Projects

The Department of Public Health and Addiction Services has allowed the use of barriers as outlined in Section 19a-332a-5(c) where asbestos-containing floor tiles and mastic are to be removed prior to demolition of a facility.

Item IX: Section 19a-332a-5(e)

Item X: In lieu of the requirements of Section 19a-332a-5(e), the work area is to be isolated from the non-work area by barriers as outlined in Section 19a-332a-5(c). The facility in which this work is to be performed is currently unoccupied and will subsequently be demolished without reoccupancy of the facility following completion of the abatement work.

The Department of Labor OSHA, federal or state as applicable, should be contacted prior to utilizing this alternative work practice. The Department of Labor may require that objective data be available to document that worker exposure does not exceed the permissible exposure limit when utilizing this alternative work practice.

The amount of material which can be abated utilizing this alternative work practice has not been restricted by the Department of Public Health and Addiction Services. This alternate means of isolating the work area from the non-work area is approved where floor tile and mastic are the sole asbestos-containing materials to be removed. Except as noted, all other requirements of the Standards for Asbestos Abatement regulation are mandatory.

III. The Use of A Remote Decontamination System

The use of a remote decontamination system is allowed for in Section 19a-332a-6(d) of the Standards for Asbestos Abatement regulation. A remote decontamination system may be utilized when the asbestos contractor determines it is not feasible to establish a contiguous decontamination system. The remote decontamination system must be operated in conformance with 29 CFR 1926.58, Appendix F (OSHA regulation).

The asbestos contractor shall provide written notification of the intent to utilize a remote decontamination system. The notification shall be made with the notification required under Section 19a-332a-3.

The use of a remote decontamination system operated in conformance with 29 CFR 1926.58, Appendix F, does not constitute an alternative work practice.

IV. Post Abatement Reoccupancy Air Sampling

The post abatement reoccupancy criteria for asbestos abatement projects involving friable asbestos-containing material are outlined in Section 19a-332a-12 of the Standards for Asbestos Abatement regulation. It is the interpretation of the Department of Public Health and Addiction Services that these criteria apply only when the facility is to be reoccupied following the completion of the abatement work. Following completion of the abatement project, any entry into the facility by individuals including but not limited to employees of the demolition contractor, public utility employees or representatives of the facility owner not associated with the performance of the abatement project shall constitute reoccupancy of the facility. It is required that no visible residue be observed in the work area in accordance with Section 19a-332a-5(g) of the Standards for Asbestos Abatement regulation.

The approval of an alternative work practice does not relieve the facility owner or asbestos contractor from satisfying the requirements of any other federal, state or municipal regulation. The Department of Public Health and Addiction Services reserves the right to rescind the approval of an alternative work practice should the Department determine on the basis of inspections or tests that the alternative work practice fails to provide an equivalent or a greater measure of asbestos emission control than the work practices prescribed in the Standards for Asbestos Abatement regulation. The facility owner shall be notified in writing should such a determination be made.

RS:jb(0361j)