

Version: 24.0	Asbestos Awareness	
	Effective Date	May 20, 2024
	Page	1 of 5

Brunel Energy, Inc.

Asbestos Awareness

Contents

1.	Purpose	2
2.	Applicability	2
3.	Definitions	2
4.	Responsibilities	3
5.	Requirements	4
6.	Procedure	4
7.	Training	4
8.	Reference	5

Version: 24.0	Asbestos Awareness	
	Effective Date	May 20, 2024
	Page	2 of 5

1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, the “Company,” has established a program compliant with OSHA to provide guidance in the proper maintenance, handling, removal, and disposal of asbestos-containing materials (ACM) or presumed ACM (PACM).
- 1.2. Proper control of asbestos fibers will minimize the potential for asbestos exposure-related illnesses such as lung cancer and mesothelioma. The requirements stated in this policy reflect EPA, OSHA, and DOT rules. In addition, Company facilities must follow applicable state and local regulations, which may be more stringent than federal regulations.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Definitions

- 3.1. **Asbestos** is a generic commercial name given to a variety of naturally occurring fibrous minerals that possess high tensile strength, flexibility, and resistance to chemical and thermal degradation. These minerals include chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and their chemically treated and altered forms. Once a common component of building materials, asbestos can release microscopic fibers that may remain suspended in the air for hours or days. Asbestos exists in either a friable or non-friable state. In its non-friable state, asbestos poses no immediate health hazard. See also Friable ACM; Non-friable ACM.
- 3.2. **Asbestos-containing material (ACM)** is any material containing more than 1% asbestos. The following are common ACM material sources:
 - 3.2.1. Surfacing Materials
 - 3.2.2. Fireproofing
 - 3.2.3. Acoustical plaster
 - 3.2.4. Finish plasters
 - 3.2.5. Thermal System Insulation (TSI)
 - 3.2.6. Equipment, piping, and fitting insulation

Version: 24.0	Asbestos Awareness	
	Effective Date	May 20, 2024
	Page	3 of 5

- 3.2.7. Boiler, breeching, duct, and tank insulation
- 3.2.8. Miscellaneous Materials
- 3.2.9. Pipe wrap (tar and felt paper)
- 3.2.10. Vinyl or asphalt flooring
- 3.2.11. Gaskets, seals, sealants
- 3.2.12. Vibration isolators
- 3.2.13. Lab tables and hoods
- 3.2.14. Cementitious board (Transite)
- 3.2.15. Packing inside electrical seal-offs (Chico)
- 3.2.16. Roofing material

- 3.3. **Friable** means that the material can be crumbled with hand pressure and is therefore likely to emit fibers. The fibrous or fluffy sprayed-on materials used for fireproofing, insulation, or sound proofing are considered to be friable, and they readily release airborne fibers if disturbed.
- 3.4. **Non-friable** are materials, such as vinyl-asbestos floor tile or roofing felts, that generally do not emit airborne fibers unless subjected to sanding or sawing operations. Asbestos-cement pipe or sheet can emit airborne fibers if the materials are cut, abraded, or sawed, or if they are broken during demolition operations.
- 3.5. **Operation and Maintenance Plan (O&M Plan)** is a formulated plan of training, cleaning, work practices, and surveillance to maintain asbestos-containing materials (ACM) within buildings in good condition.

4. Responsibilities

- 4.1. Manager(s) and HSE Supervisor(s) shall:
 - 4.1.1. Notify the following personnel of the presence, location, and physical condition of the ACM.
 - 4.1.2. Ensure employees are provided and use appropriate PPE.
 - 4.1.3. Ensure where there are multiple contractors or subcontractors working at the same job site that employees are protected from exposure.
 - 4.1.4. Distribute written notices, post signs or labels on ACM where employees can see them and make the O&M plan available to anyone who might work on or disturb the ACM. All warning signs and labels posted on areas containing asbestos must comply with OSHA regulations in 29 CFR 1910.1001(j) (3) and (4).
 - 4.1.5. Ensure contractors who may be exposed to ACM or PACM are aware of this material have reviewed the O&M plan and signed the Contractor Notification Form for Asbestos.
 - 4.1.6. Ensure ACM is monitored.

Version: 24.0	Asbestos Awareness	
	Effective Date	May 20, 2024
	Page	4 of 5

4.2. Employee(s) shall:

- 4.2.1. Alert supervisors if they notice any type of asbestos danger or possible asbestos hazard.

5. Requirements

5.1. Symptoms of Exposure

- 5.1.1. Exposure to asbestos has been shown to cause lung cancer, asbestosis, mesothelioma, and cancer of the stomach and colon.
- 5.1.2. The Company takes all preventative measures to reduce this risk to its employees. Training will include the health hazards from exposure to asbestos.

6. Procedure

- 6.1. Signs and labels will identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that Asbestos Containing Material (ACM) and/or Presumed Asbestos Containing Material (PACM) will not be disturbed. The Company will ensure that employees working in and adjacent to regulated areas comprehend the warning signs.

7. Training

- 7.1. The Company will provide Asbestos Awareness Training for all employees, temporary employees, and contractors who maintain, handle, remove, or dispose of asbestos containing materials and who manage Company facilities where asbestos-containing materials (ACM), presumed asbestos-containing materials (PACM), or suspect materials may be present.
- 7.2. The Asbestos Awareness Training is required for employees whose work activities may come into contact with Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM) and will inform employees not to disturb the ACM or PACM during their work activities. The training will be provided to employees not involved in asbestos abatement or removal operations but who have potential to be exposed in performance of their jobs.
 - 7.2.1. All employees must be trained upon initial assignment and annually thereafter.
 - 7.2.2. All training shall be documented.

Version: 24.0	Asbestos Awareness	
	Effective Date	May 20, 2024
	Page	5 of 5

8. Reference

- 8.1. OSHA 1910.134 - Respiratory Protection
- 8.2. OSHA 1910.132 - Personal Protective Equipment
- 8.3. OSHA 1910.95 - Occupational Noise Exposure
- 8.4. OSHA 1910.1200 - Hazard Communication
- 8.5. HEW Publication No. (NIOSH) 74-104 (1974)