Guide for Asbestos Management (November 2020)

The following is a summary of the most significant revisions made to the latest version of the Guide for Asbestos Management (November 2020) which was released by Safe Work Manitoba. This is only a summary of new or significant changes to the existing guidelines. Please refer to the Safe Work Manitoba website at: https://www.safemanitoba.com/ for the most recent version of the guideline.

1. Page 7, Asbestos Management

The following Reference to the regulations flagging the need for control measures has been added:

All key components cited above should be undertaken with guidance from a competent person. In addition, the employer and owner must ensure control measures are in place to prevent the release of ACMs before proceeding with asbestos work as per part 37.8(1) of MR 217/2006.

2. Page 8, Asbestos Inventory

A paragraph has been added explaining the concerns and challenges commonly encountered when sampling vermiculite. It states the following:

Vermiculite containing asbestos – Insulation material that visually appears to be vermiculite is assumed to be ACM due to the high likelihood of contamination with asbestos. Detection of the asbestos contamination is challenging and even the competent person runs the risk of reporting a false negative. Note that any asbestos fibres (sometimes denoted as a trace amount, small amount, few fibres) observed in a vermiculite sample will confirm it is ACM. The competent person collecting bulk samples for analysis should know to ensure the selected, accredited (discussed below) laboratory reports trace amounts.

3. Page 9, Suspected ACM's

The regulation has different definitions of what is classified as an asbestos-containing material based on it's friability. Some products like plaster and stucco, are none friable when in good condition, but when deteriorate, or during renovation and demolition they may become friable. The following paragraph has been added to address this by referencing Part 36 of the regulation calling for a risk assessment when asbestos is detected in a material in quantities below the defined threshold:

Wherever building materials are suspected to contain asbestos or ACMs, they must be managed and handled as if they contain ACMs until analytical laboratory testing confirms they are asbestos-free. Materials that are NOT asbestos-free but are found to have asbestos content below the threshold to be defined as ACM, remain subject to Part 36 requiring an assessment of risk and appropriate control measures as non-friable materials that have, or may, become friable over time should be considered friable when considering risk and choosing appropriate control measures.

4. Page 14, Bulk Sample Collection

Item four of the Sampling Frequency Table has been updated to address a previous editing error and the following sentence has been added below the table regarding evaluation of homogeneous materials when sampling:

Each distinct material is sampled individually based on the evaluation of homogeneity made by the competent person. Additional sampling may be required to delineate areas with unclear homogeneity.

5. Page 15, Laboratory Analysis

The explanation of sample analysis options under “Paragraph d” has been expanded as follows:

d) Many laboratories will perform analytical variations of the EPA method cited above to address challenges with certain types of materials such as the Chatfield method for floor tile or the Cincinnati method for vermiculite attic insulation (600/R-04/004)[1]

6. Page 20, Periodic Inspection

The following line item, along with the form that was referenced has been deleted:

A sample form (Form 1) for recording the results of periodic inspection is included at the back of this guideline.

7. Page 31, Perimeter Air Sampling During Work

The bullet point on High Risk (Type 3) Work has been edited to say

“regular air sampling monitoring, as determined by a risk assessment conducted by a competent person, should be performed for asbestos fibre concentrations outside the perimeter of an enclosed work area, during asbestos work and cleanup. The asbestos fibre concentrations should be as close as possible to zero and not exceed background levels”

instead of

"intermittent air sampling for asbestos fibre concentrations outside the perimeter of an enclosed work area, during asbestos work and cleanup. The asbestos fibre concentrations should be as close as possible to zero and not exceed background levels."

The following bullet point on perimeter air monitoring on Moderate Risk (Type 2) abatement was deleted:

- For moderate risk (type 2) work, when work is done inside an enclosed containment area (enclosure or glove bag), intermittent sampling just outside the area, should be as close as possible to zero and not exceed background levels.

8. Page 31, Final air clearance sample after work

Glove Bag work has been added to the line regarding Type 2 clearances as follows:

A final air clearance post Type 2 abatement work (including glove bag work), is a measure of best practice prior to dismantling an enclosure."

The following sentence was also deleted:

In some circumstances, an assessment of risk may determine that a final air clearance be conducted following a type 2 asbestos work project before dismantling an enclosure.

These two edits more emphasis on the need for a clearance vs. it just being an option.

9. Page 34, Type 1 Work Activities

The following paragraph has been deleted:

4. removing or repairing an area of drywall, smaller than 1 square metre, when the drywall joint compound (DJC) contains asbestos, can be carried as Type 1 work in accordance with a risk assessment and if task-specific work procedures (e.g. use of water, HEPA vacuum, personal protective equipment) are developed by the employer

This means drywall with asbestos joint compound can no longer be removed following Type 1 procedures regardless of quantity.

10. Page 45, Air Monitoring for Glove Bag Work

The first line stating :

Intermittent area sampling (in the area of work) should be carried out during the glove bag work activities

Has been changed to :

Regular area sampling (in the area of work), **as determined by a risk assessment carried out by a competent person,** should be conducted during the glove bag work activities

The following paragraph has also been replaced

Monitoring **could be** carried out for long-term projects where glove bag activities occur over a period of time or for ongoing or intermittent maintenance activities where the same workers and procedures are used each time. In either of these cases, monitoring should be carried out occasionally to demonstrate that fibres are controlled when the work is done, but not necessarily each time a glove bag operation is performed

The new paragraph now states:

Monitoring **should be** carried out for long-term projects where glove bag activities occur over a period of time or for ongoing or intermittent maintenance activities where the same workers and procedures are used each time. In either of these cases, monitoring, **as determined by a risk assessment carried out by a competent person**, should be carried out to demonstrate that fibres are controlled when the work is done, but not necessarily each time a glove bag operation is performed.

This once again places a stronger emphasis on the need for air monitoring.

11. Page 45, Type 3 Work Activities

This now reads:

- removing, encapsulating or enclosing **areas 1 m^2** in size or greater of friable ACM during the repair, alteration, maintenance, demolition, or dismantling of a building, structure, machine, tool or equipment, or part of it.
- removing, encapsulating or enclosing **areas 1 m^2 in size or smaller** of friable ACM during the repair, alteration, maintenance, demolition, or dismantling of a building, structure, machine, tool or equipment, or part of it but where the job takes longer than **3 hours to complete**.

This places both size and time limits on what can and cannot be completed following Moderate Risk Type 2 procedures.

12. Page 55, Vermiculite

Sampling procedures for vermiculite now reference Section1.3 of the Guideline instead of Appendix D. Appendix D has been deleted from the Guideline.

Appendix D previously called for the collection of three 4 litre samples, which was excessive.

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