State of Michigan
John Engler, Governor

Department of Consumer & Industry Services
Kathleen M. Wilbur, Director

Bureau of Safety & Regulation
Division of Occupational Health
Asbestos Program
P.O. Box 30671
Lansing, Michigan 48909-8171
Telephone: (517) 335-8246

June 24, 1999

TO: Michigan Approved Asbestos Trainers, Licensed Asbestos Abatement Contractors and Interested Parties

FROM: George Howard, Asbestos Coordinator
Occupational Health Division
Bureau of Safety and Regulation
Michigan Department of Consumer & Industry Services

SUBJECT: Training Guidelines for Asbestos Related Work Pursuant to 29 CFR 1926.1101

This document was complied from the August 10, 1994, United States Department of Labor, Occupational Safety and Health Administration (OSHA), Asbestos Construction Standard 29 CFR 1926.1101 and all subsequent amendments to that standard.

WORKER TRAINING

ALL CLASS I WORK: The training shall be 32 hours in length, equivalent to the Environmental Protection Agency (EPA) Model Accreditation Plan (MAP) asbestos workers training, and be provided by an EPA or Michigan approved training course provider.

NOTE: The Asbestos Program has interpreted glued-on style ceiling tiles as meeting the definition of a "surfacing material." Therefore, the removal of glued-on style ceiling tiles would require the 32-hour worker training.

CLASS II WORK WHERE CRITICAL BARRIERS (OR EQUIVALENT ISOLATION METHOD) AND/OR NEGATIVE PRESSURE ENCLOSURES ARE REQUIRED TO BE UTILIZED: The same as Class I requirements.

CLASS II WORK INVOLVING ROOFING MATERIALS, FLOORING MATERIALS, SIDING MATERIALS, LAY-IN STYLE CEILING TILES OR TRANSITE PANELS: The training shall include, at a minimum, all elements or paragraph (k)(9)(viii) and the specific work practices and engineering controls set forth in paragraph (g) which specifically relate to the category of the material being removed. The training shall be at least eight hours in length and include "hands-on" training. The training shall be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training be provided by an EPA or Michigan approved training provider.

NOTE: Federal OSHA, pursuant to the Roofing Industry Settlement Agreement and subsequent revisions to the standard, has stated that the roofing materials covered by Class II does not include flashings which contain asbestos fibers encapsulated or coated by bituminous or resinous compounds. These roofing materials are referred to as "incidental roofing materials." Under the agreement, when intact "incidental roofing materials" are the only asbestos-containing materials present on a roof, the job is no longer considered a Class II job. Instead, "incidental roofing materials" are regulated under paragraph (g)(11) and the training provisions specified by paragraph (g)(11)(ii) apply. Paragraph (g)(11)(ii) requires that all of the topics in paragraph (k)(9)(viii) be covered during the training, however, there is no minimum length of training specified. Additionally, there are no "hands-on" training requirements and no refresher training requirements pursuant to paragraph (k)(9)(viii). The required training shall be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training be provided by an EPA or Michigan approved training provider. As a result of the settlement agreement, the Class II roofing material designation is now limited to situations in which the main asbestos-containing roofing material being removed is either built-up roofing or shingles (transite or asphalt style), or where the "incidental roofing materials" are no longer intact.

CLASS II WORK INVOLVING MORE THAN ONE OF THE CATEGORIES OF THE MATERIALS SPECIFIED IN PARAGRAPH (k)(9)(iv)(A): The training shall cover, at a minimum, the specific work practices applicable for each category of material being removed and each removal method utilized. The training shall be a minimum of eight hours in length with additional time given to each other specific asbestos-containing building material being removed. This training shall include "hands-on" training for each category of material being removed and be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training be provided by an EPA or Michigan approved training provider.

CLASS II WORK NOT INVOLVING THE CATEGORIES OF BUILDING MATERIALS SPECIFIED IN PARAGRAPH (k)(9)(iv)(A): The number of training hours is not specified, however, pursuant to preamble clarifications, the training shall include, at a minimum, all elements included in paragraph (k)(9)(viii) and the specific work practices and engineering controls in paragraph (g) which specifically related to the type of material being removed and each removal method utilized. The preamble also states that this training shall include "hands-on" training. Furthermore, the training course would likely require at least four hours to cover the required topics, removal methods and the "hands-on" training. This training shall be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training be provided by an EPA or Michigan approved training provider.

CLASS III WORK: The training shall be consistent with EPA requirements for training of maintenance and custodial staff as set forth as 40 CFR 763.92(a)(2). The training shall be 16 hours in length, include "hands-on" training, and be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training be provided by an EPA or Michigan approved training provider.

RECYCLED PAPER

EXCEPTION:

If a well trained competent person determines that the 16-hour EPA training does not adequately cover all topics needed to perform a specific type of Class III work, the competent person may authorize an alternative training program. This has been clarified in the preamble to mean that the competent person can require training topics to be added to the 16-hour training course if the competent person believes the course does not adequately cover all of the necessary work practices and engineering controls needed to perform the specific task at hand. On the other hand, should the competent person deem the training too extensive for a specific type of Class III work, the competent person may require fewer than the 16 hours of training by specifically designing a training course which covers the limited type of Class III work to be performed. In either situation, the training shall include, at a minimum, all elements of Paragraph (k)(9)(viii) and the work practices and engineering controls in paragraph (g), which specifically relate to the category of material being removed and the removal method utilized. Additionally, "hands-on" training is required for these modified training courses.

CLASS IV WORK: The training shall be a minimum of two hours in length and be consistent with the EPA training requirements set forth at 40 CFR 763.92(a)(1). Class IV training does not require "hands-on" training.

TRAINING FOR EMPLOYEES WHO ARE LIKELY TO BE EXPOSED IN EXCESS OF THE PEL AND WHO ARE NOT OTHERWISE REQUIRED TO BE TRAINED UNDER PARAGRAPHS (k)(9)(iii) THROUGH (vi): The employees shall be trained pursuant to paragraph (k)(9)(viii).

All training must be provided prior to or at the time of initial assignment and at least annually thereafter (i.e., refresher training). Each training curriculum has specific refresher training requirements:

1. Refresher training for Class I workers, Class I competent person and Class II workers requiring the full 32-hour initial training, shall be eight hours in duration and equivalent to the refresher training provisions set forth at 40 CFR Part 763, Subpart C, Appendix C.

2. For all others trained under the standard, an annual refresher is required; however, the duration is not specified. Pursuant to preamble clarifications, OSHA believes that "hands-on" training is essential for both initial and refresher training. To cover all of the essential health information and the "hands-on" training, the duration of the refresher training for Class II and III worker is expected to be a minimum of two hours in length. Finally, although refresher training is required for Class IV work, the duration of this refresher training is not specified, and "hands-on" training is not a mandatory component of the training.

RECYCLED PAPER

COMPETENT PERSON TRAINING

All work required to be performed within a regulated area (i.e., Class I, II and III) must be supervised by a "competent person" as defined in paragraph (b). The specific on-site supervisory duties of the competent person are detailed in paragraph (o).

CLASS I AND II ASBESTOS WORK: The competent person shall be trained by attending a comprehensive training course for supervisors that meets the criteria of the EPA's Model Accreditation Plan (40 CFR Part 763, Subpart E, Appendix C). This course is a 40-hour training course and shall be conducted by an EPA or Michigan approved training provider.

EXCEPTIONS:

1. For Class II floor material removal projects where the compliant removal work practices are utilized and the material being removed remains "substantially intact" during removal, the training shall be a minimum of 12 hours in length and covers all of the topics specified in the Flooring Industry Settlement Agreements' Appendix A, Sections 1 through 14. This training shall be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training by provided by an EPA or Michigan approved training provider.

2. For all roof material projects (i.e., built-up roof materials, shingles and flashings) where the materials are determined to be "intact" prior to the start of the removal project and where compliant work practices are utilized, the training shall cover all of the topics specified in the Roofing Industry Settlement's Appendix A, Sections 1 and 2. This training is topic driven with no specified hour requirement, however, it shall be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training by provided by an EPA or Michigan approved training provider. This exemption also applies to asphaltic pipeline wrap.

NOTE: If the roof material is deemed "non-intact" prior to removal, the 40-hour trained competent person requirements apply.

CLASS III AND IV: The competent person shall be trained by attending a training course that is consistent with EPA requirements for the training of local education maintenance and custodial staff as set forth at 40 CFR 763.92(a)(2) or the equivalent in stringency, content and length. This training shall be 16 hours in length and shall be provided by "a knowledgeable person (such as a person who qualifies as a 'competent person' for the particular type of asbestos work addressed in the training)." It is recommended that this training by provided by an EPA or Michigan approved training provider.

NOTE: The Class III and IV competent person may also be trained pursuant to the more stringent requirements of paragraph (o)(4)(i) of the standard.

GEH:MDM:kaw

RECYCLED PAPER