

Appropriate Personal Protective Equipment During Asbestos Disposal Operations

329 IAC 10-8.1-12(e)(4)(D) requires that all personnel involved in off-loading or in covering asbestos waste use appropriate personal protective equipment (PPE) as necessary to prevent exposure to any airborne release of asbestos fibers during disposal operations. This guidance document is in response to the inquiries received regarding what constitutes appropriate personal protective equipment during asbestos disposal operations. The information in this guidance document is intended only to compliment relevant regulations and manufacturers' requirements. For more specific information, refer to the Occupational Safety & Health Administration (OSHA) standards collected in Title 29, Code of Federal Regulations (CFR), Parts 1900-1999.

With regards to respiratory protection, OSHA has established two permissible exposure limits (PEL) for asbestos. The 8 hour time weighted average PEL of 0.1 fiber/cubic centimeter of air and the 30 minute excursion limit PEL of 1 fiber/cubic centimeter of air. Simply put, employers should provide respirators to their employee's when asbestos exposure levels exceed either of these permissible exposure limits. When improperly wrapped friable asbestos waste is discovered during disposal operations it is possible the asbestos PELs will be exceeded and personal protection is required. If personal protection equipment is not provided and worn when the PEL's are likely to be exceeded, the landfill will be considered in violation of 329 IAC 10-8.1-12(e)(4)(D).

During most asbestos disposal situations, an air purifying respirator equipped with a "High Efficiency Particulate Air" (HEPA) filter cartridge will provide adequate respiratory protection. HEPA filter cartridges are identified by both labeling and the code color magenta. However, these types of respirators may not provide adequate protection in all asbestos disposal situations.

Landfill personnel engaged in asbestos disposal activities should also be provided with, and be required to use, protective clothing including coveralls or similar whole body clothing, head coverings, gloves, and foot coverings. Furthermore, eye protection should be worn during disposal activities where eye irritation may be experienced.

Keep in mind, personal protective equipment should not be used as a substitute for engineering, work practice, and/or administrative controls. PPE should be used in conjunction with these controls to provide for employee safety and health during disposal activities. PPE can be effective only if the equipment is selected based on its intended use, employees are trained in its use, and the equipment is properly tested, maintained, and worn.

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If you need additional information, or have any questions, please contact staff in the Compliance Branch, Office of Land Quality at 317/234-6923. The IDEM toll-free telephone number is 1- 800-451-6027.