

Your Asbestos Management Program: Til Death Do Us Part

If there is a multi-workplace committee, do we have a Minister's order, under section 9(3.1) of the Act, permitting this? If yes, where is the letter?

In either case, are we inspecting the workplace on a monthly basis as required by the Act?

Is there a process in place whereby concerns raised during the monthly inspections are addressed and answers communicated back to the workplace in a timely manner?

It's far better for you to recognize and initiate any required changes to your Joint Health and Safety Committee, rather than waiting until the Ministry arrives to inspect your committee system. Unapproved multi-workplace committees are considered a violation of the Act, as are workplaces under either committee structure not inspected on a monthly basis.

Visit www.esao.on.ca for general information and other related material.

Why would we bother writing an article on asbestos management in 2004? Wasn't this a problem identified and resolved in the '80s ... Or was it?

Many in the health and safety field can remember those days two decades or more ago, when the world began to recognize asbestos as a significant problem. To say that this realization was a culture shift, even a culture shock, would not be an exaggeration.

For much of the mid-1900s, the Ontario Building Code required asbestos as an essential component of building fire safety. The education sector, in particular, experienced a building boom in the 1960s and '70s. Literally hundreds of school, university and college buildings, as well as such public buildings as libraries, museums and art galleries were constructed with a liberal amount of asbestos throughout.

Asbestos was used as thermal insulation on steel beams, steel decks and ceilings. It was mixed into ceiling plaster. It was a component of ceiling and floor tiles, and it was the principal means of insulating hot water and steam pipe elbows and valves. There were also literally hundreds of non-structural uses. If your



Protection of the worker and the surrounding area is regulated by legislation.

building was erected during those decades in Ontario, it was a virtual certainty that asbestos was used in many, many places throughout the entire structure.

When the medical and epidemiological data became overwhelming and it was accepted that exposure to asbestos could lead to serious health problems, the government moved swiftly to enact legislation controlling its use. There was also legislation to control exposure to asbestos arising from maintenance or repair work involving material that contained asbestos.

During the 1980s, most education sector firms developed asbestos management programs. These programs included a complete asbestos inventory, establishment of work procedures, medical and exposure surveillance programs and, it was hoped, the development of a long-term asbestos management program.

Thus, many people believed the problem was solved some time around 1985. There are many who still remember the asbestos inventory, the sampling and testing program, asbestos removal projects and,

above all, the costs associated with these activities. They came to believe

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that all of the asbestos once in their workplace has since been removed.

Unfortunately, in most cases, that was really never an option. The majority of education sector firms removed asbestos that had deteriorated, or was in buildings slated for demolition, or on a project-by-project basis. For the majority of institutions, total removal would have been far too expensive and far too disruptive in terms of day-to-day operations. In most cases, the decision was made to manage the asbestos in place. For these reasons, asbestos continues to exist in buildings across Ontario and, in many instances, will stay there for the life of the building. Asbestos is not gone; it's just forgotten.

Managing asbestos in place doesn't automatically mean there's a problem; effective Asbestos Management programs can prevent exposures and minimize risk. But there are some requirements for asbestos management: One is keeping the asbestos inventory up to date. Another is monitoring the condition of identified asbestos on an on-going basis. There's increasing evidence that, in many workplaces, no on-going monitoring is being done.

According to Regulation 837 (Asbestos on Construction Projects and in Buildings and Repair Operations), which applies to virtually all education sector firms, the owner is required to prepare and maintain a detailed record of the location of friable asbestos. The owner is also responsible for providing training to those who work closely with asbestos, and for cleaning-up, sealing, enclosing or removing any fallen or deteriorated asbestos. The Regulation requires that this information be provided to the Joint Health and Safety Committee. Ministry of Labour inspectors have

noticed that fewer and fewer JH&SCs in the education sector receive regular information about the state of their Asbestos Management Programs. This is creating the impression among many committee members that asbestos management is no longer a problem in most workplaces.

Nothing could be further from the truth.

There are increasing indications, however, that institutional memory about the problem is being lost as more and more of the workers and supervisors involved in establishing Asbestos Management Programs retire. Nevertheless, the asbestos remains, and so does the legal obligation to manage it properly.



Many buildings have asbestos sprayed onto beams and decks as fireproofing.

If you're part of the senior administration at an educational institution, or a supervisor with specific responsibilities for facilities or for health and safety, ask yourself the following questions:

- Does our institution have a long-term Asbestos Management Program?
- Is the Asbestos Inventory kept up to date?
- Are new workers being trained in asbestos management procedures to

replace those who are retiring?

- Is the Asbestos Management Program reviewed at least annually by the Joint Health and Safety Committee?
- Has the Asbestos Management Program been revised to take into account changes in the Asbestos Inventory or other factors?

It is critically important that you know if you have asbestos in your workplace. If the answer is yes, you must manage it. An Asbestos Management Program is the first step in addressing your responsibilities.

For most institutions, ongoing asbestos management is just a fact of life, like any other aspect of the facilities management program. Plan it, fund it and review it on a regular basis. Be aware of one simple fact: for most institutions, asbestos in the workplace will be a problem for the next 50 years or more.

DIRECTIONS

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