

DOSH DIRECTIVE

Department of Labor and Industries
Division of Occupational Safety and Health
Keeping Washington Safe and Working

23.90

Respiratory Protection for Class I Asbestos Work

Date: April 26, 2022

I. Purpose

This Directive provides enforcement guidance to Safety and Health Officers enforcing WAC 296-62-077, Asbestos, tremolite, anthophyllite, and actinolite, regarding respiratory protection for Class I asbestos work.

Pressure-demand supplied-air respirators (SAR) with high efficiency particulate air (HEPA) egress filters are no longer available from manufacturers. Many asbestos abatement contractors have been attempting to maintain supply of the discontinued equipment; however, they are unable to replace damaged equipment, or obtain parts for repairs.

II. Scope and Application

DOSH is adopting this Directive to provide direction to our staff on enforcing respiratory protection for Class I asbestos work in light of the lack of availability of required respiratory protection equipment.

This Directive applies to all DOSH operations statewide, and replaces all previous instructions on this issue.

III. References

- WAC 296-62-077, Asbestos, tremolite, anthophyllite, and actinolite
- WAC 296-62-07715(4), Special respiratory protection requirements
- Chapter 296-842 WAC, Respirators

IV. Background

Since the 1980s, the department has required the use of supplied-air respirators for Class I removal of asbestos containing materials inside a negative pressure enclosure. This requirement was established under Washington State regulations prior to the existence of federal regulations for asbestos abatement. The requirement for supplied-air respirators has been retained in the Washington regulations based on previous stakeholder input as the department adopted regulations at least as effective as the federal regulations. Since the Washington regulations were

put into effect, the technology in powered air-purifying respirators (PAPR) have improved and are now assigned the same assigned protection factor (APF) as SAR. Washington is the only state that, until this time, has not moved to allow use of full-facepiece, tight fitting powered air purifying respirators (PAPR) for low exposure Class I asbestos work.

In late 2020, the department was informed that the manufacture of pressure demand supplied-air respirators with HEPA egress filters was being discontinued by the manufacturer. The only options for employers to comply with the Washington regulations was to maintain the existing SAR with HEPA egress, or use SAR with self-contained breathing apparatus egress, or SAR operated in continuous flow.

In early 2022, DOSH received increasing numbers of variance requests to consider allowing PAPR, as contractors were no longer able to maintain adequate quantities of SAR with HEPA egress.

V. Enforcement Policy

DOSH compliance staff will exercise enforcement discretion concerning WAC 296-62-07715(4), Special respiratory protection requirements, for Class I asbestos work, as long as employers comply with the following:

- A.** For all Class I asbestos work where a negative-exposure assessment is not available, but exposure levels do not exceed, or are not expected to exceed 10f/cc as an eight-hour time weighted average, the employer must provide, and require to be worn, one of the following:
 - 1. A tight-fitting, powered, air-purifying respirator (PAPR) equipped with high efficiency particulate filters;
 - 2. A full-facepiece SAR operated in pressure-demand mode equipped with an auxiliary positive pressure self-contained breathing apparatus.
- B.** For all Class I asbestos work where exposure levels exceed, or are expected to exceed 10f/cc as an eight-hour time-weighted average, the employer must provide, and require to be worn, a full-facepiece SAR, operated in pressure-demand mode equipped with an auxiliary positive-pressure self-contained breathing apparatus.
- C.** All other provisions of WAC 296-62-07715, Respiratory protection, still apply.

NOTE: Work on materials containing more than 30% amosite or crocidolite asbestos is expected to exceed 10f/cc as an eight-hour time-weighted average, unless daily and historical personal monitoring data indicates the concentration of asbestos fibers does not exceed 10f/cc.

VI. Point of Contact

If DOSH staff have questions, need additional guidance, or interpretive assistance, they are encouraged to contact the asbestos specialist in DOSH Technical Services.

VII. Review and Cancellation

DOSH will review this Directive for applicability within two years from the issue date, and it will remain effective until superseded or canceled.



Approved: _____
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Division of Occupational Safety and Health