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#### G6.1 Analysis of asbestos-containing material

Issued March 25, 2005; Editorial revision May 17, 2006; Issued November 21, 2006; Retired consequential to February 1, 2012 Regulatory Amendment

#### G6.1-1 Definition of qualified person

Issued consequential to February 1, 2012 Regulatory Amendment; Revised May 25, 2016; Editorial Revision December 15, 2017; Editorial Revision July 10, 2025

## Regulatory excerpt

Section 6.1 of the OHS Regulation ("Regulation") includes the following definition:

"qualified person" means a person who

- (a) has knowledge of the management and control of asbestos hazards through education and training, and
- (b) has experience in the management and control of asbestos hazards.

#### Purpose of guideline

This guideline provides information to describe the competencies necessary in a qualified person for Part 6 - Asbestos of the *Regulation*, and provides contact information to assist an employer to locate a qualified person.

### Competencies of a qualified person

Appropriate knowledge and experience in the management and control of asbestos hazards are the key competencies required of a qualified person under section 6.1 of the *Regulation*. It is not sufficient for a qualified person to simply demonstrate credentials that certain courses have been taken or certain experience has been obtained. The necessary knowledge and experience must be evident in the quality of the work undertaken. When evaluating the qualifications of a person who has prepared an asbestos inventory, risk assessment, work procedure, or work classification, the primary focus will be the quality and accuracy of the inventory, risk assessment, work procedure, and work classification rather than the person's credentials.

A deficient asbestos inventory, risk assessment, work procedure, or work classification may be an indication that the person selected was not qualified. When such situations arise, WorkSafeBC prevention officers will enquire what steps the employer took to assess the person's competencies as well as his/her credentials.

#### Credentials of a qualified person

In order to conduct inventory work under section 6.4, conduct risk assessments and activity classifications under section 6.6, or set out procedures under section 6.27, a qualified person must have the appropriate knowledge (through education and training) and experience in the management and control of asbestos hazards. For the purposes of sections 6.4, 6.6, and 6.27, appropriate credentials for qualified persons include the following:

- Certified industrial hygienist (CIH), registered occupational hygienist (ROH), certified safety professional (CSP), Canadian registered safety
  professional (CRSP), or professional engineer (P. Eng.), provided that the holders of these qualifications have experience in the recognition,
  evaluation, and control of asbestos hazards, or
- A combination of experience and education/training, as described in (a) and (b) below. Note that education and training, without extensive related experience, is not sufficient
  - (a) Extensive occupational health and safety experience within the asbestos abatement industry, as applicable to performing risk assessments, conducting inventories, and writing procedures for asbestos removal e.g.,
    - Experience applying the principles of occupational hygiene
    - Experience with specific elements or tasks related to asbestos abatement, such as the following:
      - Asbestos hazard identification and risk assessment
      - Preparation of asbestos work procedures
      - Collection of samples of materials suspected of containing asbestos
      - Collection of air samples during asbestos abatement projects
      - Preparation of inspection reports
      - Conduction of workplace inspections

(b) Knowledge obtained through completion of education and training courses in asbestos consultation and abatement.

#### Employer due diligence

Employers are responsible for selecting qualified persons and must exercise due diligence in the selection of the qualified person. This includes a review of the person's knowledge and experience as well as his/her accredited credentials. Reliance on a person holding a certification or licence specified herein would normally be considered reasonable as long as the employer also verifies that the person has the requisite experience described above.

## Contact with accrediting agencies

An accrediting agency will often maintain a website with contact information on accredited members. For example, the <u>Canadian Registration</u> <u>Board of Occupational Hygienists</u> maintains a list of persons with an ROH designation. A list of persons with a CIH designation can be found on the <u>Board for Global EHS Credentialing website</u>. The <u>Board of Canadian Registered Safety Professionals website</u> has a search tool to verify whether a person holds a CRSP certification.

#### As bestos Certification and Licensing

G6.2.1 Asbestos abatement work and asbestos certificates

Issued consequential to January 1, 2024 Regulatory Amendment

#### Regulatory excerpt

Section 6.2.1 of the OHS Regulation ("Regulation") states:

- (1) A person must not carry out asbestos abatement work unless the person holds a valid asbestos certificate for that type of asbestos abatement work.
- (2) A person who holds a valid asbestos certificate
- (a) must carry out asbestos abatement work in accordance with any conditions on the person's asbestos certificate, and
- (b) must, on the request of an officer, produce the asbestos certificate for inspection.

Section 1 of the Workers Compensation Act ("Act") states, in part:

"asbestos abatement work" means any of the following activities carried out for the purpose of the abatement of asbestos in relation to a building or in relation to any other thing or place prescribed by regulation of the Lieutenant Governor in Council:

- (a) identifying material that is or may be asbestos-containing material;
- (b) collecting samples of material that is or may be asbestos-containing material;
- (c) assessing the risk posed by material that is or may be asbestos-containing material;
- (d) assessing the risk posed by working with or near material that is or may be asbestos-containing material;
- (e) removing, repairing or transporting, or disposing of, material that is or may be asbestos-containing material;
- (f) any activity prescribed by regulation of the Lieutenant Governor in Council;
- (g) planning how an activity referred to in any of paragraphs (a) to (f) is to be carried out;
- (h) supervising an activity referred to in any of paragraphs (a) to (f)

## Purpose of guideline

The purpose of this guideline is to explain the meaning of "asbestos abatement work" and who is required to have a valid asbestos certificate to carry out that work.

This guideline also explains the types of asbestos certificates and the obligations for a certificate holder to follow the Terms and Conditions, including the Code of Practice, placed on that certificate.

## Asbestos abatement work

Asbestos abatement work referred to in sections 6.2.1, 6.2.2, and 6.2.3 of the *Regulation* has the same meaning as the "asbestos abatement work" defined in section 1 of the *Workers Compensation Act* ("Act").

## Who is required to have an asbestos certificate

Section 6.2.1 of the *Regulation* states that a person performing asbestos abatement work is required to have a valid certificate for the type of asbestos abatement work being carried out. The certification requirement applies to all persons, including independent operators, performing work for the purpose of abatement of asbestos in relation to a building. For clarity, this requirement is not limited to workers of licensed asbestos abatement contractors.

An asbestos certificate is not required by persons who are performing abatement of asbestos-containing materials that are not in relation to a building, such as outdoor tanks and pressure vessels, asbestos cement piping, or underground equipment and machinery. Also, persons who may disturb or work around asbestos-containing materials, but are not performing asbestos abatement work as defined, do not require asbestos certificates. For example, a person in the trades conducting repair and maintenance such as an electrician, plumber, HVAC contractor, or elevator technician, may occasionally disturb asbestos-containing building materials, but are not conducting asbestos abatement work. The existing asbestos requirements in Parts 5, 6, and 20 of the *Regulation* will continue to apply to protect workers performing this type of work from asbestos exposure.

For more information on who is required to have an asbestos certificate, refer to the WorkSafeBC publication <u>Asbestos licensing and certification</u> — Who is required to have a licence or certificate.

## Types of asbestos certificates

The asbestos certificates required by scope of practice are as follows:

	Scope of practice	Prerequisites
Level 1 Foundational Awareness	<ul> <li>General asbestos safety knowledge</li> <li>Transport of asbestos-containing materials</li> <li>Disposal of asbestos waste</li> </ul>	None
Level 2 Asbestos Safety	Perform abatement work	Level 1 (unless the course combines Level 1 and Level 2)
Level 3 Asbestos Safety Leader	<ul> <li>Perform abatement work</li> <li>Plan, oversee, and manage asbestos abatement sites</li> </ul>	Level 2
Level S Surveyor Safety	Perform asbestos surveys	Level 1 (unless the course combines Level 1 and Level S)

For more information about certificate types, refer to the information on the WorkSafeBC webpage — <u>Learn about certificates</u>.

## Certificate holders' obligations

Section 6.2.1(2) states that the certificate holder must carry out asbestos abatement work in accordance with any conditions on the person's asbestos certificate. There are <u>Terms and Conditions</u>, including the Code of Practice, that are agreed upon by the certificate holder following completion of their training and assessment. The certificate holder must also comply with the occupational health and safety (OHS) provisions of the *Act* and *Regulation*. Where there are reasonable grounds that the certificate holder has breached a term or condition of their certificate, or has violated an OHS provision of the *Act* or *Regulation*, their certificate may be suspended or cancelled.

For more information on suspension or cancellation of asbestos certificates, refer to OHS Guideline <u>G-P2-96-1 Suspension and cancellation of asbestos certificates.</u>

#### Inspection of a certificate

Section 6.2.1(2)(b) of the *Regulation* states that a certificate holder must produce the asbestos certificate for inspection upon request from a WorkSafeBC officer. An officer may request to see a person's asbestos certificate to verify that the certificate is valid for the type of abatement work being carried out. Although a person is not required to carry their certificate while actively performing abatement work, it is expected that they have it at the worksite so they can show it promptly to the officer for inspection.

G6.2.2(2) Details of the asbestos certificates

Issued consequential to January 1, 2024 Regulatory Amendment; Editorial Revision July 10, 2025

#### Regulatory excerpt

Section 6.2.2(2) of the OHS Regulation ("Regulation") states:

The employer must record the details of the asbestos certificate of each person who carries out asbestos abatement work at the workplace.

#### Purpose of guideline

The purpose of this guideline is to provide examples of the details regarding asbestos certificates that employers must record for each certified person who is carrying out asbestos abatement work.

#### **Details of asbestos certificates**

The information on certificates that must be recorded includes, but is not limited to, the following:

- The person's full name and worker ID number
- Asbestos certificate number
- Type of certificate held
- Expiry date of the certificate
- Terms and conditions, including any specific conditions on the certificate

Employers should demonstrate compliance by having the details of the asbestos training certificates in a form that can be shown to a WorkSafeBC prevention officer during an inspection.

Asbestos certificates are issued by WorkSafeBC to the person who has passed the approved training and assessment. The physical certificate belongs to the person who is "certified." The certified person has the regulatory obligation to produce the asbestos certificate for inspection upon request from a prevention officer as per section 6.2.1(2)(b) of the *Regulation*. The employer's obligation to record the details of asbestos certificates does not mean an employer should keep possession of a person's physical certificate.

#### Retention of records of asbestos training certificates

Section 6.32 of the *Regulation* states that employers must maintain records of instruction and training of workers regarding asbestos for at least 10 years, and this requirement includes asbestos training certificates.

#### **General Requirements**

G6.3 Exposure control plan for asbestos

Issued August 1, 1999

Section 6.3(1) of the OHS Regulation ("Regulation") states:

If a worker is or may be exposed to potentially harmful levels of asbestos, the employer must develop and implement an exposure control plan meeting the requirements of section 5.54.

Situations in which workers may potentially be exposed to asbestos include active or anticipated disturbance of friable asbestos or asbestos-containing materials or generation of dust from non-friable, asbestos-containing materials. For further information regarding the requirements of an exposure control plan, consult OHS Guideline G5.54-2, Elements of an Exposure Control Plan.

Some workplaces may already have an asbestos management program in place. Components of an asbestos management program include:

- coordination of subcontractors,
- identification, hazard assessment, purchasing policy,
- training,
- written procedures,
- transportation and waste disposal,
- · health monitoring, and
- review of program.

Some or all of these components may correspond to elements of an exposure control plan and may be accepted as complying with the required elements of an exposure control plan. Under <u>section 5.54(2)</u> of the *OHS Regulation*, the required elements of an exposure control plan are as follows: statement of purpose and responsibilities; risk identification, assessment and control; education and training; written work procedures, when required; hygiene facilities and decontamination procedures, when required; health monitoring, when required; and documentation.

The complexity of the exposure control plan will depend on such factors as the results of the risk assessment, the options available for asbestos abatement and control, whether these options are utilized, and the likelihood of actively disturbing asbestos and/or asbestos-containing materials.

Under section 6.3(2), a "properly trained person" must administer the overall exposure control plan. To comply with this requirement, the "properly trained person" should

- be familiar with the hazards and precautions required for handling and working around asbestos and asbestos-containing materials,
- be well versed in the components of the exposure control plan,
- be familiar with the factors used to assess risk associated with asbestos and asbestos-containing materials, such as friability, location, and damage to material,
- have received instruction and training in the administration of the exposure control plan from a health and safety professional with experience
  in the practice of occupational hygiene as it relates to asbestos management. Alternatively, the person may have completed a course from a
  widely recognized training program, which would impart equivalent information, methods, practices and procedures to the recipient, such as
  NIOSH or other similar training program.

Issued April 20, 2012; Revised December 14, 2012; Editorial Revision consequential to May 1, 2017 Regulatory Amendment; Editorial Revision consequential to August 22, 2022 Regulatory Amendment

#### Regulatory excerpt

Section 6.1 of the OHS Regulation ("Regulation") defines asbestos-containing material as:

"asbestos-containing material" means the following:

- (a) a manufactured article or other material, other than vermiculite insulation, that would be determined to contain at least 0.5% asbestos if tested in accordance with one of the following methods:
- (i) Asbestos, Chrysotile by XRD, Method 9000 (Issue 2, dated August 15, 1994) in the NIOSH Manual of Analytical Methods, published by the United States National Institute for Occupational Safety and Health, Centre for Disease Control;
- (ii) Asbestos (bulk) by PLM, Method 9002 (Issue 2, dated August 15, 1994) in the NIOSH Manual of Analytical Methods, published by the United States National Institute for Occupational Safety and Health, Centre for Disease Control;
- (iii) Test Method for the Determination of Asbestos in Bulk Building Materials (EPA/600/R-93/116, dated July 1993) published by the United States Environmental Protection Agency;
- (b) vermiculite insulation that would be determined to contain any asbestos if tested in accordance with the Research Method for Sampling and Analysis of Fibrous Amphibole in Vermiculite Attic Insulation (EPA/600/R-04/004, dated January 2004) published by the United States Environmental Protection Agency;

#### Section 6.4 of the *Regulation* states:

- (1) The employer and the owner must ensure that a qualified person
- (a) collects representative samples of the materials in the workplace that the qualified person suspects contain asbestos
- (b) determines whether each of the samples is asbestos-containing material in accordance with,
- (i) in the case of a sample that is not vermiculite insulation, one of the methods set out in paragraph (a)(i) to (iii) of the definition of "asbestos-containing material" in section 6.1, and
- (ii) in the case of a sample that is vermiculite insulation, the method set out in paragraph (b) of the definition of "asbestos-containing material" in section 6.1, and
- (c) prepares an inventory of all asbestos-containing materials in the workplace that includes the following information:
- (i) with respect to each representative sample collected under paragraph (a),
- (A) the specific location of the sample,
- (B) a description of the sample,
- (C) whether the sample is asbestos-containing material as determined under paragraph (b),
- (D) the method, set out in paragraph (a)(i) to (iii) or (b) of the definition of "asbestos-containing material" in section 6.1, used to determine if the sample is asbestos-containing material, and
- (E) if the sample is determined to be asbestos-containing material, the type of asbestos, as determined under paragraph (b), and the percentage of the sample that is comprised of that asbestos;
- (ii) with respect to each material that, under subsection (2), is treated under this Part as asbestos-containing material because it is inaccessible or not practicable to sample,
- (A) the specific location of the material or, if the specific location is not known, the presumed location of the material,
- (B) a description of the material, and
- (C) how it is determined that the material is inaccessible or not practicable to sample;
- (iii) the location of each of the asbestos-containing materials, including by using drawings, plans or specifications.
- (2) If a qualified person suspects that a material in the workplace contains asbestos but determines that the material is inaccessible or not practicable to sample, the material must be treated under this Part as asbestos-containing material unless a qualified person, in accordance with subsection (1), determines that the material is not asbestos-containing material.
- (3) The employer or the owner satisfies the employer's or owner's obligations under subsection (1) if the employer or the owner

ensures that an existing inventory of all asbestos-containing materials in the workplace meets the requirements of subsection (1).

- (4) The employer and the owner must
- (a) keep the inventory current, and
- (b) make a record of any changes made to the inventory.
- (5) The employer and the owner must provide each other with a copy of the inventory and record referred to in subsection (4) if the other does not already have a copy.
- (6) The employer must ensure that a copy of the current version of the inventory is readily available at the workplace.
- (7) The employer and the owner must retain
- (a) the current version of the inventory until all the asbestos-containing materials are removed from the workplace, and
- (b) the record referred to in subsection (4)(b).

## Purpose of guideline

This guideline describes the effect of the definition of asbestos-containing material on an employer's workplace inventory, due to the changes that occurred in 2012.

## Update of asbestos-containing materials' inventory

As of February 1, 2012, the definition of asbestos-containing material (ACM) for manufactured articles or other material, other than vermiculite insulation, includes materials that contain at least 0.5% asbestos, as determined by methods referenced in *Regulation* section 6.1. Vermiculite insulation containing any asbestos, as determined by the referenced method, is also asbestos-containing material.

As a result, some additional building materials and commercial products may need to be added to an employer's asbestos inventory and asbestos management program. The employer needs to update the inventory and management program to reflect the ACM definition. Suspect materials previously identified as containing <1% or trace amounts of asbestos need to be re-evaluated to either include them in the inventory or be analyzed to determine if they contain less than 0.5% asbestos.

The time frame for completing the update will depend on the number of buildings/locations surveyed and the overall size of the inventory. Large inventories may require a phased approach for re-evaluation and a longer time to complete. In this case, the employer should develop a plan for the update, in consultation with the joint occupational health and safety committee, and make it available for review if requested by a WorkSafeBC prevention officer.

In the absence of sampling results to the contrary, all suspected building materials must be considered asbestos-containing.

Vermiculite insulation containing any asbestos must be added to the asbestos inventory.

## G6.5 Identification

Issued August 1, 1999; Editorial Revision consequential to May 1, 2017 Regulatory Amendment

Section 6.5 of the OHS Regulation ("Regulation") states:

The employer and the owner must ensure that all asbestos-containing materials present in the workplace are identified by signs, labels or, when these are not practicable, other effective means.

#### Purpose of guideline

The purpose of this guideline is to provide identification means for all asbestos-containing materials present in the workplace.

## **Identification means**

Section 6.5 of the *Regulation* requires that the employer and the owner ensure that all asbestos-containing materials present in the workplace be identified by signs and labels. When the use of signs and labels is not practicable, "other effective means" may be used.

It may be impracticable to post signs and labels in situations where there are aesthetic concerns (such as in building lobbies or public areas) or where they might create an unreasonable level of concern amongst the general public. In these circumstances, "other effective means" could include colour or letter encryption coding, floor plan mapping, or signage placed behind access ways (provided that workers are not placed at risk upon entering the restricted areas).

Whatever the means of identification, it must be coupled with effective training and education of all affected workers. Refer to section 6.11 (Instruction and training). The guiding principle should be that the less information that is presented on signs or labels, the more education and training that will be required to communicate the hazards of and precautions for handling and working around asbestos.

Issued August 1999; Revised June 4, 2009; Revised consequential to February 1, 2012 Regulatory Amendment; Editorial Revision consequential to May 1, 2017 Regulatory Amendment

#### Regulatory excerpt

Section 6.6 of the OHS Regulation ("Regulation") states:

- (1) The employer must ensure that a risk assessment is conducted by a qualified person on asbestos-containing material identified in the inventory referred to in section 6.4(1)(c) or (3), as applicable, with due regard for the condition of the material, its friability, accessibility and likelihood of damage, and the potential for fibre release and exposure of workers.
- (2) The employer must ensure that a risk assessment has been conducted by a qualified person before any demolition, alteration, or repair of machinery, equipment, or structures where asbestos-containing material may be disturbed.
- (3) Before a work activity that involves working with or in proximity to asbestos-containing material begins, the employer must ensure that a qualified person assesses the work activity and classifies it as a low risk work activity, a moderate risk work activity or a high risk work activity.

#### Purpose of guideline

The purpose of this guideline is to explain the two-stage process involved in an asbestos risk assessment. This guideline also provides information regarding the requirement to conduct a risk assessment prior to any demolition, alteration, or repair of machinery, equipment, or structures where asbestos-containing materials may be disturbed.

#### Requirement to conduct an asbestos risk assessment

As required by <u>section 6.4</u> of the *Regulation*, an inventory of all asbestos-containing materials must be prepared and kept current. Under section 6.6(1), a risk assessment must be conducted by a qualified person on asbestos-containing material identified in the inventory. Assessment of the risk to workers from asbestos materials either used or present in the workplace relies on a two-stage process. The goal of this process is to prioritize materials for abatement control and to assist in selecting appropriate control options.

#### Risk assessment process – stage 1

The first stage of an asbestos risk assessment involves evaluating parameters that are indicative of the likelihood of worker exposure. The following parameters most commonly looked at include:

#### Accessibility

How easily will the asbestos fibres become airborne because of architectural design, location, and occupant activities? Are the fibres

- Totally enclosed, such as behind a fixed ceiling? If so, there is a minimal risk of exposure.
- Inaccessible, such as beyond the reach of the public? If so, there is a low risk of exposure.
- Accessible in a low-activity area? If so, there is a moderate risk of exposure.
- Accessible in a high-activity area, such as a hallway or stairway? If so, there is a high risk of exposure.

#### Condition

- Based on a visual examination, what is the existing state of the material?
- Is the material in good condition, showing no apparent damage at all? If so, there is a minimal risk of exposure.
- Does the material have mild damage? If so, there is a low risk of exposure.
- Does the material have moderate damage? If so, there is a moderate risk of exposure.
- Does the material have severe damage? For example, are areas missing, hanging loose, or water-damaged? If so, there is a high risk of exposure.

### Friability

- To what extent can the material be broken apart if a person or object makes contact with it?
- Is the material firmly bound? If so, it is not friable and there is a minimal risk of exposure.
- Is the material slightly friable? If so, there is a low risk of exposure.
- Is the material moderately friable? If so, there is a moderate risk of exposure.
- Does the material break apart easily? If so, it is very friable and there is a high risk of exposure.

#### Presence in return air plenum

• Is the asbestos-containing material present in the air moving system?

## Percentage of asbestos

• What is the percentage of asbestos contained in the material?

Other parameters that may be examined include the extent of water damage and the exposed surface area of friable material, activity, and movement (such as air movement, building vibration from machinery or other sources, and activity levels of workers).

## Risk assessment process – stage 2

During the second stage of the risk assessment process, each parameter is assigned a "score" to indicate the potential for exposure. These scores are then combined to derive an overall risk factor that is used to prioritize the control and abatement options to be implemented. Different approaches are used to assign scores to the parameters and to combine the scores into one overall risk factor.

Some examples are briefly described below.

- A numerical rating scale is used in a system developed by the U.S. Environmental Protection Agency (for example, "0" or "1" is assigned to parameters for which there is a low potential of exposure; "4" is assigned to those for which the potential of exposure is high). These scores are then combined using a mathematical formula. The range into which the overall score falls will determine what remedial action is recommended (for example, if the overall score is in the range of 5-9, then the recommended action is to review in two to three years).
- A numerical rating scale need not be used. For example, a different system is described in the Alberta Occupational Health and Safety publication <u>Alberta Asbestos Abatement Manual</u>. In this publication, the need for control is determined by consulting a decision flowchart.

## Risk assessment before demolition, alteration, or repair

Section 6.6(2) requires that a risk assessment be conducted "before any demolition, alteration, or repair of machinery, equipment, or structures where asbestos-containing material may be disturbed." This obligation is related to the requirements in section 20.112 of the *Regulation* dealing with hazardous materials on demolition or salvage of equipment, buildings, etc. before work begins. Refer to OHS Guideline G20.112 for further information.

#### **Further information**

Further details about asbestos management are provided in the WorkSafeBC manual <u>Safe Work Practices for Handling Asbestos</u>.

#### G6.6-2 Classification of risk

Issued August 1999; Revised June 4, 2009; Revised consequential to February 1, 2012 Regulatory Amendment; Editorial Revision consequential to May 1, 2017 Regulatory Amendment

#### Regulatory excerpt

Section 6.6 of the *OHS Regulation* ("Regulation") states:

- (1) The employer must ensure that a risk assessment is conducted by a qualified person on asbestos-containing material identified in the inventory referred to in section 6.4(1)(c) or (3), as applicable, with due regard for the condition of the material, its friability, accessibility and likelihood of damage, and the potential for fibre release and exposure of workers.
- (2) The employer must ensure that a risk assessment has been conducted by a qualified person before any demolition, alteration, or repair of machinery, equipment, or structures where asbestos-containing material may be disturbed.
- (3) Before a work activity that involves working with or in proximity to asbestos-containing material begins, the employer must ensure that a qualified person assesses the work activity and classifies it as a low risk work activity, a moderate risk work activity or a high risk work activity.

Section 6.1 of the *Regulation* states, in part:

"low risk work activity" means a work activity that involves working with or in proximity to asbestos-containing material if, at the time the work activity is being carried out, both of the following apply:

- (a) the asbestos-containing material is not being
- (i) cut, sanded, drilled, broken, ground down or otherwise fragmented, or
- (ii) disturbed such that the asbestos-containing material may release airborne asbestos fibre;
- (b) it is not necessary to use personal protective equipment or engineering controls in respect of that activity to prevent exposure of a worker to airborne asbestos fibre;

"moderate risk work activity" means a work activity, other than a high risk work activity, that involves working with or in proximity to asbestos-containing material if, at the time the work activity is being carried out, one or both of the following apply:

- (a) the asbestos-containing material is being
- (i) cut, sanded, drilled, broken, ground down or otherwise fragmented, or
- (ii) disturbed such that the asbestos-containing material may release airborne asbestos fibre;
- (b) it is necessary to use personal protective equipment or engineering controls, or both, in respect of that activity to prevent exposure of a worker to airborne asbestos fibre;

"high risk work activity" means a work activity that involves working with or in proximity to asbestos-containing material if a high level of control is necessary in respect of that activity to prevent exposure of a worker to airborne asbestos fibre;

#### Purpose of guideline

The purpose of this guideline is to provide information regarding the intent of the requirement in section 6.6(3) of the *Regulation* to classify work involving asbestos-containing material according to the level of risk to workers.

#### Classification of risk

Under section 6.6(3) of the *Regulation*, the employer must ensure that before the commencement of work involving asbestos-containing material, a qualified person assesses the work activity and classifies it as a low-, moderate- or high-risk activity. The intent of this requirement is to assess the likelihood of asbestos fibres being released during handling activities and to select appropriate work precautions, according to the level of the risk to workers.

Further details about asbestos management are provided in the WorkSafeBC manual <u>Safe Work Practices for Handling Asbestos</u>.

G6.6-3 Qualifications

Issued August 1, 1999; Editorial Revision October 2004; Revised June 18, 2008; Retired consequential to February 1, 2012 Regulatory Amendment

G6.7 Control of friable asbestos

Issued August 1999; Revised consequential to February 1, 2012 Regulatory Amendment

#### Regulatory excerpt

Section 6.7 of the OHS Regulation ("Regulation") states

The employer must ensure that all friable asbestos-containing materials in the workplace are

- (1) controlled by removal, enclosure or encapsulation so as to prevent the release of airborne asbestos fibre.
- (2) The employer must not allow any work that would disturb asbestos-containing material unless necessary precautions have been taken to protect workers.

## Purpose of guideline

The purpose of this guideline is to provide guidance on abatement and control options, specifically for drop ceilings.

#### **Control options**

Abatement and control options should eliminate or reduce all moderate- and high-risk factors identified in the risk assessment required under section 6.6. Drop ceilings are not an appropriate or effective system of permanently enclosing asbestos-containing materials as it does not eliminate access to the treated area and services are not likely to be removed to the outside of the ceiling system.

G6.8 Procedures for abatement of asbestos materials during house and building demolition/renovation

Issued July 5, 2002; Revised November 23, 2005; Editorial Revision January 1, 2009; Editorial Revision June 10, 2010; Revised consequential to February 1, 2012 Regulatory Amendment; Revised September 20, 2013; Revised April 30, 2015; Editorial Revision consequential to May 1, 2017 Regulatory Amendment; Editorial Revision December 1, 2023

## Regulatory excerpt

Section 6.8 (Procedures) of the OHS Regulation ("Regulation") states:

- (1) The employer must ensure that procedures for handling or using asbestos- containing material prevent or minimize the release of airborne asbestos fibres.
- (2) The employer must ensure that the procedures for control, handling or use of asbestos are in accordance with procedures acceptable to the Board.
- (3) The procedures must address
- (a) containment of asbestos operations where applicable,
- (b) control of the release of asbestos fibre,
- (c) provision, use and maintenance of appropriate personal protective equipment and clothing,
- (d) means for the decontamination of workers, and
- (e) removal of asbestos waste and cleanup of asbestos waste material.
- (4) The procedures must provide a worker with task-specific work direction that addresses both hazards and necessary controls.

#### Purpose of guideline

In the past, a wide variety of building materials contained asbestos. During renovation or demolition of buildings and other structures constructed of such materials, workers and other persons may be at risk of harmful exposure to airborne asbestos if safe work procedures are not followed.

This guideline provides information to assist with the development of task-specific work procedures required by section 6.8 of the *Regulation* during the renovation or demolition of a house, building, or similar structure involving asbestos-containing material ("ACM"). It also provides information on some of the other requirements in the *Regulation* for asbestos control, particularly in <u>Part 6 (Substance Specific Requirements — Asbestos)</u> and <u>Part 20 (Construction, Excavation and Demolition)</u>. Procedures meeting regulatory requirements and based on criteria and measures in the scenarios described in this guideline are acceptable to WorkSafeBC.

The requirements relating to asbestos in Part 6 apply to any workplace where a worker is or may be exposed to potentially hazardous levels of asbestos fibre including, but not limited to, the following:

- A workplace where ACM is present or is used
- An operation involving the abatement of ACM

The provisions of Part 6 are in addition to those in <u>Part 5 (Chemical Agents and Biological Agents)</u>, which, among other things, establishes the exposure limit for asbestos and general measures for control.

Part 20 applies to any construction project as defined in Part 20, including demolition, alteration, and repair. Provisions in Part 20 on notice of project (NOP) and hazardous materials are particularly applicable to asbestos control.

This guideline should be used with the WorkSafeBC manual, <u>Safe Work Practices for Handling Asbestos</u>, and other applicable <u>safety information on asbestos</u>.

#### Preplanning and notice of project

Renovation and demolition work involving materials containing asbestos requires proper planning. A risk assessment for asbestos must be done before demolition or other work begins, as required by section 6.6 of the *Regulation*.

In addition, an NOP must be submitted, as required by section 20.2.1(1), before beginning any work that involves either of the following:

- A work activity that involves working with or in proximity to ACM that is moderate-risk work activity or a high-risk work activity, as
  defined in section 6.1
- The alteration, repair, dismantling, or demolition of all or part of a building or structure in which ACM has been processed, manufactured, or stored

All employers responsible for the work activity and either the owner or prime contractor must ensure that WorkSafeBC receives the NOP at least 48 hours before starting the project, not just the day before the project and less than 48 hours before work is due to begin. NOPs can be sent to WorkSafeBC either by online form on the WorkSafeBC website or by fax to 604-276-3247.

In some emergency circumstances such as flooded or fire-damaged buildings that contain or are suspected of containing ACM, immediate work may be necessary to prevent injury to workers or other persons, the risk of occupational disease or damage to property. In such cases, section 20.2.1(6) of the *Regulation* permits work to begin as long as an NOP is submitted to WorkSafeBC as soon as possible. Section 20.2.1(6) of the *Regulation* does not relieve the employer of the obligation to comply with any other requirement of the *Regulation*, including the obligation to conduct a pre-demolition risk assessment for asbestos. Work must be done safely.

## Renovation and demolition scenarios

Ten common renovation and demolition scenarios are outlined in the Table "Guide for handling and removal of ACM during demolition and renovation." The scenarios range from removal of spray-on friable asbestos insulation within a structure to demolishing a structure using mechanical demolition equipment.

For each scenario, the Table provides information on the following five aspects of hazard control:

- The type of containment, from restricted access to partial or full containment
- Work area controls to minimize the generation of dust and to otherwise control it if present
- Personal protective equipment, particularly respiratory and body protection
- Personnel decontamination, ranging from simple wash-up to full shower provisions
- Site decontamination

The control measures outlined in the Table vary according to risk factors, and are intended to be consistent with the risk-based principles in the manual <u>Safe Work Practices for Handling Asbestos</u>.

One of the risk factors in the Table deals with whether or not the structure will be reoccupied. "Reoccupancy" refers to a circumstance where one or more workers or other building occupants without appropriate personal protective equipment will be returning into the abatement area following the abatement work. Reoccupancy involves a higher level of risk and typically a more stringent standard of work area control and decontamination.

For most scenarios a "Comments" section is included to outline the differences in control measures where no reoccupancy is expected or to provide further technical information.

There are several precautions when using the Table.

1. The Table does not include all possible scenarios. Sections 6.5 and 20.112 of the *Regulation* establish the employer's obligation to identify ACM at the work site. Section 6.6 requires that a risk assessment be done of any identified ACM and before any demolition, alteration, or repair of machinery, equipment, or structures where asbestos may be disturbed. It also requires that the level of risk be established, which will typically be high or moderate risk for renovation and demolition work. The assessment of ACM must be done by a qualified person. Refer to sections 6.6 and 6.1 of the *Regulation* and G6.1-1 Definition of a qualified person for information on qualifications.

Measures to identify and assess asbestos may reveal additional scenarios and types of ACM. For any scenario, <u>section 6.8</u> of the *Regulation* requires that proper procedures be in place.

#### 2. The measures in the Table are considered only to be a guide to the expected standard of protection.

- (a) There may be circumstances at a site where the assessment demonstrates a need to include additional or more stringent measures.
- (b) There may also be situations where the qualified person determines that effective exposure control can be maintained without following all the measures listed in the Table. These situations could include the following:
  - A small area of texture coat (no more than 2 or 3 square feet) must be removed from a ceiling to allow for repairs e.g., following a water leak
  - Texture coat is removed by removing large intact sections of the drywall substrate using a saw equipped with local exhaust ventilation

For these situations, an employer needs to contact a WorkSafeBC prevention officer who, if satisfied by the risk assessment rationale, can accept the control measures (by accepting the procedures). When considering acceptability of the procedures, the prevention officer will consider factors such as the following:

- A written risk assessment that includes consideration of at least the following factors:
  - Friability
  - Amount of disturbance during the work activity
  - Adhesion to a substrate
  - Proximity to unprotected workers
  - Asbestos content (%)
  - Air monitoring data provided by the employer for equivalent situations
  - Size and duration of the project
  - The applicability of new or emerging asbestos abatement technology or techniques
  - Reoccupancy versus demolition
- o Industry experience and compliance history of the contractor and supervisor
- Involvement of an independent third party consultant
- Matters required by section 6.8(3) of the Regulation

If the procedures are accepted, and prior to abatement work proceeding, the prevention officer will issue an inspection report which includes an acceptance of the work procedures for that project only.

- (c) In all cases, it is necessary to ensure that the control measures properly protect workers from exposure to asbestos. Measures must be in compliance with the *Regulation*.
- 3. The Table does not cover all aspects of asbestos controls required by the *Regulation*.

Several examples are provided below.

- **Air monitoring:** Air monitoring must be done if a worker may be exposed to asbestos, and in certain high-risk circumstances specified in the *Regulation*.
- Some procedures are prohibited: Examples include pressure spraying to remove asbestos, and dry sweeping or using compressed air for cleanup. Procedures such as sanding of asbestos-contaminated flooring and similar surfaces should be avoided where possible, given the requirement in section 6.8 of the Regulation to prevent or minimize the release of airborne asbestos. Any sanding is considered to be high risk and requires a corresponding high level of control.
- **Before starting work, all workers and supervisors must be properly trained:** Training is required on matters including the hazards of asbestos, the means of identifying asbestos-containing materials at the worksite, the correct use and maintenance of personal protective equipment, the operation of required engineering controls, and the site-specific work procedures to be followed. Workers must be properly supervised.

Table: Guide for handling and removal of asbestos-containing materials during demolition and renovation projects

Note: Explanations of the terms used in this Table are provided at the end of the guideline.

Work area desig- nation and contain- ment	Work area controls	Personal protective equipment (Refer to Note 1 at the end of the Table)	Personnel decontam- ination (Refer to Note 2 at the end of the Table)	Site decontamination comments and explanation (Refer to Note 3 at the end of the Table)
Scenario 1:	Spray-on friable asbestos in	sulation or fire-proofing m	aterials, with reoccupanc	y
Full contain- ment	Material saturation procedures designed to eliminate or reduce the release of dust before and during disturbance and handling of materials; and HEPA-equipped ventilation unit ("negative-air" unit)	11 1	Full shower decontamination facility	Impervious waste containers;  HEPA-equipped vacuum to ensure removal of all visible ACM (Wet wash-down also recommended); and  Fibre sealant on exposed surfaces after cleaning
Comment:  If there will be no reoccupancy, the above measures apply except that partial containment is acceptable as a means of work area containment. Also, the recommendation for wet wash-down would not apply as part of site decontamination as long as decontamination methods ensure removal of all visible ACM.				
Scenario 2:	Asbestos-containing texture	ed ceiling or wall removal, v	vith reoccupancy	

Full contain-	Material saturation	Powered air-purifying	Full shower decontam-	Impervious waste containers;
ment	procedures designed to	respirator with NIOSH 100	ination facility	
	eliminate or reduce the	Series filters;		HEPA-equipped vacuum to ensure
	release of dust before and			removal of all visible ACM (Wet
	during disturbance and	Protective clothing; and		wash-down also recommended);
	handling of materials; and			and
		Laceless rubber boots or		
	HEPA-equipped ventilation	other appropriate footwear		Fibre sealant on exposed surfaces
	unit	designed to be easily		after cleaning
	("negative-air" unit)	decontaminated		

If there will be no reoccupancy, the above measures apply except that partial containment is acceptable as a means of work area containment. Also, the recommendation for wet-wash down would not apply as part of site decontamination as long as decontamination methods ensure removal of all visible ACM.

## Scenario 3: Asbestos cement products, with reoccupancy

Designated	Material saturation	Half-facepiece dual	Wash-up decontam	Impervious waste containers, or
work area	procedures designed to	cartridge air purifying	ination facilities	polyethylene-lined disposal bin; and
	eliminate or reduce the	respirator with NIOSH 100		
	release of dust before and	Series filters;		HEPA-equipped vacuum to ensure
	during disturbance and			removal of all visible ACM (Wet
	handling of materials; and	Protective clothing; and		wash-down also recommended)
	Controlled manual	Laceless rubber boots or		
	procedures	other appropriate footwear		
		designed to be easily		
		decontaminated		

## Comment:

In some cases it may not be practicable to apply material saturation techniques. In such cases an alternative is to wet exposed surfaces of the ACM and mist the air during removal.

If there will be no reoccupancy then the above measures apply except that the recommendation for wet wash-down would not apply as part of site decontamination procedures, as long as decontamination methods ensure removal of all visible ACM.

## Scenario 4: Asbestos-containing joint tape or paper on ductwork, with or without reoccupancy

Designated	Glove bag and material	Half-facepiece dual	Wash-up decontamination	Impervious waste containers; and
work area		cartridge air purifying	facilities	The partitions where community, and
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	encapsulation (e.g., with duct			HEPA-equipped vacuum to ensure
	tape) designed to eliminate or			removal of all visible ACM
	reduce the release of dust	Series meets,		1 10112
		Protective clothing, and		
	disturbance and handling of			
		Laceless rubber boots or		
		other appropriate footwear		
		designed to be easily		
		decontaminated		
Scenario 5:	Asbestos-containing filling o	ompound on gypsum board	l, with reoccupancy	
Partial	Material saturation	Half-facepiece dual		Impervious waste containers; and
contain-	procedures designed to	cartridge air purifying	facilities; and	
ment;	eliminate or reduce the	respirator with NIOSH 100		HEPA-equipped vacuum to ensure
or Full	release of dust before and	Series filters; or powered	HEPA-equipped vacuum	removal of all visible ACM (Wet
contain-	during disturbance and	air purifying respirator with	1 11	wash-down also recommended)
ment	handling of materials;	NIOSH 100 Series filters;		·
(level of				
contain-	HEPA-equipped vacuum or	Protective clothing; and		
ment	ventilation unit			
dependent	("negative-air" unit);	Laceless rubber boots or		
on risk		other appropriate footwear		
assessment)	Use of hand tools, (e.g.,	designed to be easily		
	knives, hammers, crowbars);	decontaminated		
	or power tools equipped with			
	HEPA-filtered local exhaust			
	ventilation; and			
	Downer to also a			
	Power tools equipped with HEPA-filtered local exhaust			
	ll .			
	ventilation systems can only be used if supported by air			
	monitoring results			
	Indiamental results			

In some cases it may not be practicable to effectively apply material saturation techniques to joint filling material, for example, if water resistant paints or coatings had previously been applied to the material. In such cases an alternative is to wet exposed surfaces of ACM and mist the air during removal.

If there will be no reoccupancy then the above measures apply except that the recommendation for wet wash-down would not apply as part of site decontamination as long as decontamination methods ensure removal of all visible ACM.

## Scenario 6: Vinyl asbestos floor tile or vinyl asbestos sheet flooring - with asbestos in the matrix of the flooring or adhesive, with reoccupancy

Partial	Material wetting procedures	Half-facepiece dual	Wash-up decontam-	Impervious waste containers or
contain-	designed to eliminate or	cartridge air purifying	ination facilities	Polyethylene-lined disposal bin; and
ment	reduce the release of dust	respirator with NIOSH 100		
	before and during	Series filters;		HEPA-equipped vacuum to remove
	disturbance and handling of			all visible ACM
	materials;	Protective clothing; and		
	Use of hand tools (e.g.,	Laceless rubber boots or		
	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	other appropriate footwear		
	tools equipped with HEPA-	designed to be easily		
	filtered local exhaust	decontaminated		
	ventilation; and			
	Power tools equipped with			
	HEPA-filtered local exhaust			
	ventilation systems can only			
	be used if supported by air			
	monitoring results			

During renovation work avoid sanding asbestos-contaminated surfaces wherever possible. In some cases it may not be practicable to effectively apply material saturation techniques. In such cases an alternative is to wet the exposed surfaces and mist the air during removal.

If there will be no reoccupancy then the above measures apply except that the use of a HEPA-equipped vacuum in site decontamination is not necessary as long as decontamination methods ensure removal of all visible ACM.

Scenario 7:	Vinyl sheet flooring - with a	sbestos in backing or unde	rlay, with reoccupancy				
7a) Partial	Material saturation	Half-facepiece dual	Wash-up decontamination	If the back			

Sccilatio 7.	villy sheet hooring - with a	spestos in backing of unde	may, with reoccupancy	
7a) Partial	Material saturation	Half-facepiece dual	Wash-up decontamination	If the backing is difficult to remove
containment	procedures designed to	cartridge air purifying	facilities and HEPA-	or firmly adhered to the substrate,
(small areas	eliminate or reduce the	respirator with NIOSH 100	equipped vacuum	then full containment procedures
less than 10	release of dust before and	Series filters; or powered		must be used as per scenario 7b;
square	during disturbance and	air purifying respirator with		
metres,	handling of materials;	NIOSH 100 Series filters;		Impervious waste containers;
approx. 100				
square feet);	HEPA-equipped vacuum;	Protective clothing; and		HEPA-equipped vacuum to ensure
	and			removal of all visible ACM (Wet
		Laceless rubber boots or		wash-down also recommended);
	Use of hand tools only (e.g.,	other appropriate footwear		and
	scrapers, knives)	designed to be easily		
		decontaminated		Fibre sealant on exposed surfaces
				after cleaning
7b) Full	Material saturation	Powered air purifying	Full shower decontam-	Impervious waste containers;
contain-	procedures designed to	respirator with NIOSH 100	ination facility	
ment (areas	eliminate or reduce the	Series filters;		HEPA-equipped vacuum to ensure
greater than	release of dust before and			removal of all visible ACM (Wet
10 square	during disturbance and	Protective clothing; and		wash-down also recommended);
metres,	handling of materials;			and
approx. 100	_	Laceless rubber boots or		
square feet);	HEPA-equipped ventilation	other appropriate footwear		Fibre sealant on exposed surfaces
	unit ("negative-air" unit);	designed to be easily		after cleaning
		decontaminated		
	Use of hand tools (e.g.,			
	scrapers, knives); or power			
	tools equipped with HEPA-			
	filtered local exhaust			
	ventilation; and			
	Power tools equipped with			
	HEPA-filtered local exhaust			
	ventilation systems can only			
	be used if supported by air			
	monitoring results			
<u></u>	JL	JL	L	

#### Comment:

Where feasible, remove vinyl flooring and subfloor as a unit, without de-lamination. If this is possible then application of fibre sealant is not necessary. Also, if procedures involve immediate application of a new flooring surface on top of the subfloor then sealant would not be needed. During renovation work avoid sanding asbestos contaminated surfaces wherever possible.

If there will be no reoccupancy then the above measures apply except that the recommendation for wet wash-down would not apply as part of site decontamination as long as decontamination methods ensure removal of all visible ACM.

Scenario 8: Loose-fill vermiculite attic or wall cavity insulation containing asbestos, with reoccupancy

Designated	HEPA-equipped vacuum	Powered air purifying	Full shower decontam-	Impervious waste containers for
work area;	suction system (e.g., Vec	respirator with NIOSH 100	ination facility if manual	waste removal;
Partial	loader);	Series filters if manual	removal procedures are	
contain-		removal procedures are	used in attics and similar	HEPA-equipped vacuum to ensure
ment or Full	Wetting of vermiculite and air	used in attics and similar	spaces	removal of all visible ACM; and
contain-	misting if manual removal	spaces;		
ment (level	methods (e.g., scooping and			Fibre sealant on exposed surfaces
of contain-	bagging) are used; and	Protective clothing; and		after cleaning
ment				
dependent	For locations such as attics,	Laceless rubber boots or		
II I	maintain negative pressure to	11 1		
assess-	prevent fibre spread. Do not	designed to be easily		
ment)	use compressed air to blow	decontaminated		
	vermiculite			

Vermiculite itself does not contain asbestos. However, some vermiculite is contaminated with asbestos, typically tremolite or actinolite. Representative bulk sample collection and analysis of asbestos-contaminated vermiculite, by a qualified person, is needed to determine the type and amount of asbestos, and to establish any required safe work procedures for preventing harmful exposure.

For bulk sample collection, take samples from the top to bottom of the insulation. This is because any asbestos will likely be present in greater amounts at the bottom due to the settling out of asbestos fibers from the vermiculite particles. Sampling only the top of the vermiculite may result in a false negative analysis for asbestos.

While most vermiculite is likely to be found in attics and similar spaces, the product may also be found in locations such as hollow concrete block walls. In all cases, safe removal procedures are required. A heat stress assessment must be conducted if workers are or may be exposed to thermal conditions that could cause heat stress, for example, in enclosed attics.

If there will be no reoccupancy then the above measures apply except that site decontamination may not require the application of sealant. In such cases misting of surfaces may be an appropriate alternative. Also, the use of a HEPA-equipped vacuum may not be necessary in site decontamination as long as decontamination methods ensure removal of all visible ACM.

## Scenario 9: ACM asphalt roofing materials, with or without reoccupancy

	1 0		<u> </u>	
Designated	Controlled manual	Half-facepiece dual	Wash-up decontamination	Polyethylene-lined disposal bin; and
work area;	procedures, or HEPA-	cartridge air purifying	facilities	
or Partial	filtered local exhaust	respirator with NIOSH 100		Decontam-
containment	ventilation on equipment	Series filters; and		ination methods that will ensure the
where				removal of all visible ACM
required to		Protective clothing		
prevent wind				
dispersion				

# Scenario 10: Using mechanical demolition equipment (for example, a backhoe) to demolish all or part of a house, building, or other structure in proximity to publicly accessible areas

	r v v r v v					
Designated	Remove asbestos cement	Half-facepiece dual	Wash-up decontamination	Polyethylene-lined disposal bin; and		
work area	products and friable ACM;	cartridge air-purifying	facilities			
		respirator with NIOSH 100		Decontamination methods that will		
	Presoak remaining non-	Series filters; and		ensure the removal of all visible		
	friable ACM, and use water			ACM		
	dust suppression (a	Protective clothing for				
	residential watering hose	affected workers including				
	would not typically provide	equipment operators				
	sufficient water volume); and					
	Monitor wind and control					
	any potential for fibre spread					
	offsite					

In scenario 10, all friable ACM (for example, textured ceiling and wall material, and sprayed-on insulation or fireproofing) is to be removed before mechanical demolition of a structure. Containment of asbestos by enclosure or encapsulation is typically not an option. It is also appropriate to remove all asbestos cement products, which can become friable during demolition. Selective sorting of waste materials can significantly reduce the quantities of asbestos waste.

If the structure is in such a condition that it is dangerous to workers to undertake prior removal, the employer is expected to provide a risk assessment demonstrating such removal is unsafe and take necessary control measures that properly protect workers and others, including transportation and landfill personnel. Where the project involves removal of asbestos by means other than mechanical demolition equipment, then the applicable controls in scenarios 1-9 apply.

#### Notes to the Table

#### Note 1 — Personal protective equipment (PPE)

The equipment noted in the Table is for the protection against exposure to asbestos. Other hazards may also be present that require other PPE, for example, eyewear and hearing protection. One of the main issues in the selection of PPE for protection against asbestos is respiratory protection.

The selection of an appropriate respirator, including the facepiece, is based on the assurance that the maximum use concentration for that respirator is not exceeded (refer to section 8.34 of the *Regulation*; OHS Guideline G8.34-1).

Single use or disposable respirators sometimes known as "dust masks" are not acceptable for any work with asbestos materials. The half-facepiece dual cartridge air purifying respirator with NIOSH 100 Series filters is the minimum standard and is noted for some scenarios. In other scenarios with higher levels of risk, powered air purifying respirators (PAPRs) with NIOSH 100 Series filters or air supplied respirators are required.

The guidance on respiratory protection in the Table is based on the understanding that effective measures are in place to control the release of airborne asbestos. If the risk posed in a scenario is higher than anticipated in the Table, a more stringent level of protection is required.

For example, if exposure to asbestos-containing dust is expected to be substantial during the removal of drywall filling compounds, or if the removal of asbestos cement products generates substantial dust because of the methods used or condition of the material, then PAPRs may be required in place of half-facepiece cartridge respirators. In all cases, the employer must ensure the level of risk is properly assessed, and that protective equipment addresses that risk.

In some cases the risk may be lower than presumed in the Table. For example, if a mechanical method such as a Vec loader is used to remove vermiculite from wall cavities, a half-facepiece dual cartridge air purifying respirator may be sufficient. A lesser standard of respiratory protection may also be permitted in some other cases, if supported by the on-site risk analysis and application of section 8.34 of the *Regulation*. Risk depends on factors such as removal methods, extent of disturbance of material, and the amount and concentration of asbestos.

### Note 2 — Personnel decontamination facilities

The expectations for these facilities are based on estimates of typical conditions. There may be some variation in required facilities depending on the level of risk. In some cases more substantial facilities may be required. Examples include procedures that involve extensive overhead work to remove ACM, and circumstances where substantial dust can be generated, such as when pulverizing non-friable ACM. The need for a full shower decontamination facility in several scenarios is due to the anticipated ACM contamination inside protective clothing. In some cases a full shower facility may not be necessary if the hazard is sufficiently controlled. An example is scenario 8, if HEPA-vacuuming is used to remove vermiculite from hollow concrete block walls.

#### Note 3 — Site decontamination measures

For most of the scenarios in the Table, HEPA-vacuuming is noted as the appropriate means of site decontamination. This is because of its effectiveness. Where removal involves wet methods, it is good practice to HEPA-vacuum the surface after it has dried. In some cases, wet washdown is recommended as an additional measure, for increased assurance of protection.

All asbestos-containing and asbestos contaminated wastes generated are to be placed in impervious containers. The containers must be labeled as asbestos waste material. The employer must ensure that hazardous wastes are handled in compliance with the *Regulation* and the requirements of provincial and municipal authorities.

## Explanation of terms used in the table

## ACM (Asbestoscontaining material)

Section 6.1 of the Regulation states:

- (a) a manufactured article or other material, other than vermiculite insulation, that would be determined to contain at least 0.5% asbestos if tested in accordance with one of the following methods:
- (i) <u>Asbestos, Chrysotile by XRD, Method 9000</u> (Issue 2, dated August 15, 1994) in the NIOSH Manual of Analytical Methods, published by the United States National Institute for Occupational Safety and Health, Center for Disease Control;
- (ii) <u>Asbestos (bulk) by PLM, Method 9002</u> (Issue 2, dated August 15, 1994) in the NIOSH Manual of Analytical Methods, published by the United States National Institute for Occupational Safety and Health, Center for Disease Control;
- (iii) <u>Test Method for the Determination of Asbestos in Bulk Building Materials</u> (EPA/600/R-93/116, dated July 1993) published by the United States Environmental Protection Agency;
- (b) vermiculite insulation that would be determined to contain any asbestos if tested in accordance with the Research Method for Sampling and Analysis of Fibrous Amphibole in Vermiculite Attic Insulation (EPA/600/R-04/004, dated January 2004) published by the United States Environmental Protection Agency;

The potential for such conditions must be assessed. Safe work procedures and other necessary controls must be implemented to ensure asbestos fibre concentrations are controlled to levels at or as low as reasonably achievable below the Exposure Limit as per section 5.57(2) of the *Regulation*.

## Asbestos cement products

Include asbestos cement shingles, roofing tiles, siding (transite panels), and pipe, as well as non-friable cementitious stucco and plaster materials.

#### Asbestos waste

Any waste material generated on a worksite which meets the criteria for special waste set out by the Ministry of Environment or which contains 0.5% or more by weight of asbestos as determined by the required analytical procedures (refer to ACM - "Asbestos-containing material" above).

## Controlled manual procedures

Manual removal procedures that are designed to minimize or prevent breakage and disturbance of asbestos materials, and do not involve the use of powered equipment or power tools.

#### Designated work area

A work area that includes the following measures:

- (a) The boundaries of the work area identified by barricades, fences, or similar means, with signs posted at all entrances to the work area indicating that asbestos abatement work is in progress, the hazards of asbestos exposure, and the precautions that are required for entering into the work area.
- (b) The work area cleared of all moveable objects, equipment, and materials that are not required during the work.
- (c) Polyethylene drop sheets placed on the floor of the work area beneath the asbestos materials that are being removed, and over objects and materials that cannot be removed from the work area.
- (d) All windows, doorways, and other openings including ducts and vents sealed to prevent the release of asbestos fibres into areas beyond the boundaries of the work area.
- (e) Access to an Asbestos Abatement Work Area restricted to trained, authorized, and supervised workers wearing appropriate respiratory protection and protective clothing.

with due regard for the level of risk to workers of the employer and any other workers present at the workplace at which the employer's work is being carried out.

## Friable

Section 6.1 provides, in reference to asbestos-containing material, that friable means material that is crumbled or powdered or can be crumbled or powdered by hand pressure.

Note: Non-friable material, including asbestos cement products, can become friable as a result of deterioration, mechanical destruction, or abrasion forces.

#### **Full containment**

Involves all of the requirements of the "Designated Work Area," as well as the following:

- (a) Complete airtight isolation of the work area to prevent the escape of asbestos fibres by use of polyethylene sheeting (at least 0.15 mm (0.006 inch, or 6 mil)) thickness and duct tape, or similar impermeable materials.
- (b) All floors, walls, and other surfaces in the work area covered with polyethylene sheeting of the same thickness sealed with tape.
- (c) The work area containment inspected and repaired as necessary on at least a daily basis, and otherwise as required, to ensure that an airtight seal is maintained during asbestos abatement work.

## Full shower decontamination facility

The facility will include a physical connection to the containment, a shower facility and provision for the safe entry and exit of workers. It will also meet the applicable requirements of section 5.82(2) & (3) of the *Regulation*.

**HEPA filter** 

High Efficiency Particulate Aerosol filter that is at least 99.97% efficient at collecting an aerosol particle 0.3 micrometer in size.

HEPA-equipped local exhaust ventilation

Local exhaust ventilation with HEPA filter used for the control of contaminants at the source; for example, a HEPA-equipped vacuum mounted on a power tool. Note the requirements of section 6.19 of the *Regulation* to assess and maintain filters.

**HEPA-equipped vacuum** 

HEPA filter-equipped vacuum used for cleanup and decontamination procedures or for local exhaust ventilation where appropriate. Note the requirements of section 6.19 of the *Regulation* to assess and maintain filters.

HEPA-equipped ventilation unit or ("negative-air" unit) Portable ventilation unit equipped with HEPA filtration used to ventilate a containment and create a slight negative-air pressure differential that ensures net air movement from outside the containment into it. This air movement reduces the risk of asbestos-contaminated air moving out of the containment. Note the requirements of section 6.19 of the *Regulation* to assess and maintain filters.

Impervious waste container

Any container designed and made of a material which will contain all asbestos waste and will prevent the release of asbestos wastes and fibre during transport to and disposal at an approved disposal site. Examples include double sealed polyethylene plastic bags, each with a nominal thickness of at least 6 mil, and fibre barrels. Procedures that use thinner plastic bags are not procedures acceptable to WorkSafeBC under section 6.8(2) or 6.27(2)(a) of the *Regulation*.

The outside of the waste container must be labeled as asbestos-containing waste, as required by section 6.25 of the *Regulation*. Tight-fitting lids or other covers that seal the container must be used with rigid containers such as barrels and bins.

Disposal site operators may require specific types of containers or may have restrictions on the type of containers they will accept.

The requirement for double sealed plastic bags to be at least 6 mil is consistent with clause 40(2)(b)(i)(B) of the *Environmental Management Act Hazardous Waste Regulation* requirements for waste asbestos.

Laceless rubber boots or other appropriate footwear Appropriate footwear will be in compliance with <u>section 8.22</u> of the *Regulation*, which requires among other things that footwear be of a design, construction, and material appropriate to the protection required. Typically, wherever asbestos-containing dusts or debris are present, footwear is expected to be of a design that permits it to be easily decontaminated. Laceless rubber boots are an example of such a design.

If other risks are present, such as slipping, uneven terrain, crushing potential, or puncture hazards then the footwear must address those issues. Footwear must not create hazards greater than those it is intended to protect against.

Material saturation procedures

Procedures that involve the sufficient wetting of asbestos-containing material before and during removal to eliminate or substantially control airborne dust. Note that amended water containing surfactants (wetting agents) increases the capability for effective dust control, and is to be used particularly in high-risk operations. The obligation to wet materials is found in <a href="section 6.22">section 6.22</a> of the <a href="Regulation">Regulation</a>, and applies whenever such procedures are practicable

Mechanical demolition

Demolition methods and practices in which heavy machinery and equipment is used to tear down buildings and structures safely by use of a systematic plan of demolition.

#### Non-friable

Following from the <u>section 6.1</u> of the *Regulation* definition for friable, non-friable means material that is not crumbled or powdered nor can it be crumbled or powdered by hand pressure.

This term is used to describe any asbestos-containing material that binds the fibre into the composition matrix in a manner that prevents the release of the fibre under normal daily usage conditions.

Normal daily usage conditions do not include situations such as installation, alteration, maintenance, or removal practices. For example, floor tile can be walked on without changing its classification as non-friable, but removal may generate friable asbestos wastes.

## Partial containment

Involves all of the requirements of the "Designated Work Area," as well as isolation of the work area using polyethylene sheeting and duct tape or other impermeable materials to seal openings such as windows, doorways, stairways, elevators, heating ducts, and vents.

A partial containment will create an airtight work area that prevents the escape of asbestos fibres, without the complete draping of walls, floors, and ceilings as required by a full containment.

## Presoaking of nonfriable ACM

Presoaking of all non-friable ACM prior to mechanical demolition being done which may disturb the ACM, for example, by flooding asbestos-containing flooring material or other ACM.

## **Protective clothing**

Clothing which is made of a material resistant to penetration by asbestos fibres, fits snugly at the neck, wrists, and ankles, and as necessary to protect against the risk covers the head and feet as well as the body.

Disposable protective clothing is recommended. Reusable coveralls are to be cleaned and laundered as required by <u>sections 6.30</u> and <u>6.31</u> of the *Regulation*. Protective clothing is to be immediately repaired or replaced if torn. Street clothes are not to be worn under protective clothing if work is conducted inside a containment or in circumstances that require the use of full shower decontamination facilities. Heat stress potential must be considered and properly addressed.

#### Reoccupancy

A circumstance where one or more workers or other building occupants will be returning into the abatement area following the obstement work

following the abatement work.

#### Stationary drop sheets

Drop sheets taped in place to prevent lifting.

## Wash-up decontamination facilities

Facilities for wash-up and decontamination, with provision for soap and water, changed regularly after use to ensure cleanliness.

#### Water dust suppression

Use of water for dust suppression, for example, area water spraying to suppress dust during mechanical demolition procedures.

G6.9(3) Prohibitions - Pressure spraying

Issued July 23, 2014

#### Regulatory excerpt

Section 6.9(3) of the *OHS Regulation* ("*Regulation*") states:

Pressure spraying equipment of any type must not be used to remove asbestos insulation or other asbestos-containing material from buildings or structures.

## Purpose of guideline

The purpose of this guideline is to provide clarification regarding the difference between wetting for the purpose of saturating asbestos-containing material (ACM) with water versus pressure spraying to remove ACM.

## Pressure spraying

In the context of section 6.9(3) of the *Regulation*, pressure spraying equipment is any piece of equipment that sprays a liquid or water-ice with sufficient force that any ACM is removed from any surface. It does not refer to the application of water through misting or low pressure wetting procedures used to dampen ACM prior to removal.

While not inclusive, some of the reasons for the prohibition of pressure spraying to remove ACM include the following:

- Pressure spraying of ACM can result in increased contamination both inside and outside of abatement areas, as well as pose difficulties with the cleanup of contaminated water and slurry.
- Pressure spraying can produce large volumes of contaminated slurry and/or water that can be difficult to retain (can leak from the enclosure) and properly contain and remove from the site.
- Wet spray can degrade the seal along the edges of enclosures and force asbestos contamination outside of the enclosure into "clean" areas.

 Within abatement enclosures, asbestos contamination can be sprayed from the original source and forced into small areas that can be difficult to clean.

G6.10 Substitution

Issued August 1, 1999; Revised consequential to February 1, 2012 Regulatory Amendment

#### Regulatory excerpt

Section 6.10 of the OHS Regulation ("Regulation") states:

- (1) The employer must substitute material less hazardous than asbestos-containing material when practicable.
- (2) If such substitution is not practicable, the employer must document the reasons why less hazardous material cannot be substituted for asbestos-containing material, and make this documentation available to workers and to the joint committee or the worker health and safety representative, as applicable.

Section 5.55(2) of the *OHS Regulation* ("*Regulation*") states:

When selecting a suitable substitute, the employer must ensure that the hazards of the substitute are known, and that the risk to workers is reduced by its use.

#### Purpose of guideline

This guideline describes factors to consider when selecting a substitute for asbestos-containing material.

#### Selection of a substitute for asbestos-containing material

Section 6.10 of the *Regulation* requires that, when practicable, the employer must substitute asbestos-containing material with less hazardous material. In selecting a substitute, the requirements of section 5.55(2) of the *Regulation* apply. That is, the employer must ensure that the hazards of the substitute are known and that the risk to workers is reduced. In addition, the substitute should not create a significant hazard that the asbestos-containing product or material would otherwise abate or control. For example, some gaskets made of alternate material may blow out under certain conditions of use, thereby creating a safety hazard. OHS Guideline *G5.55 Type of Controls* contains a list of factors that should be considered when selecting a suitable substitute.

#### Designated Work Areas and containments

G6.12(2) Asbestos monitoring

Issued July 23, 2014; Revised April 30, 2015

## Regulatory excerpt

Section 6.12(2) of the OHS Regulation ("Regulation") states:

- (2) During a high risk work activity, except where glove bags are used as the containment, the employer must sample for airborne asbestos fibre in
- (a) areas outside of the containment but in its vicinity, at least daily if there are unprotected workers in the area,
- (b) the clean room, at least daily during removal and cleanup operations, and
- (c) contaminated areas inside the containment, as necessary during removal and cleanup to ensure that workers are adequately protected.

Section 5.53(4) of the *Regulation* states:

(4) Workplace exposure monitoring and assessment must be conducted using occupational hygiene methods acceptable to the Board.

## Purpose of guideline

The purpose of this guideline is to describe acceptable methods for keeping workers under observation when conducting airborne asbestos monitoring during high-risk work activities.

## Sampling strategy

Section 5.53(4) of the *Regulation* requires workplace exposure monitoring and assessment to be conducted using occupational hygiene methods acceptable to WorkSafeBC. As stated in OHS Guideline <u>G5.53-4 Occupational hygiene methods acceptable to WorkSafeBC</u>, WorkSafeBC accepts methods detailed in standard occupational hygiene references published by a number of agencies, including the National Institute for Occupational Safety and Health (NIOSH). Those acceptable methods include observing and sampling on the worker closest to the source of the hazardous material being generated, as this would be the worker presumed to have the highest exposure risk (refer to NIOSH's *Occupational Exposure Sampling Strategy Manual* for more information).

In order to properly monitor asbestos exposure during high-risk work activities, a technician will need to keep the worker under observation at all times. The technician may choose to enter and remain in the work area, or observe the worker from the outside. The technician will be educated and trained in the sampling methods used, and will not be the same person as the worker who is being monitored.

## **Entering the containment**

If the technician chooses to enter the containment as a means of keeping the worker under observation, the technician must wear the same personal protective equipment and clothing that workers in the containment are required to wear. The technician must also follow the employer's decontamination and housekeeping procedures required under section 6.8 of the *Regulation*.

## Observation from outside of the containment

If the worker will be kept under observation from the outside of the containment, one option is to use viewing windows. In that case, the containment (including negative pressure containments) will need to include at least one viewing window. Each viewing window should be sufficiently large (a minimum of two feet by two feet is recommended) and be made of a material, such as transparent polyethylene, that will allow a clear view inside the containment.

Existing sealed windows can also serve as viewing windows provided they are clean, undamaged, and allow a clear view of the containment. In the case of large containments, there should be a sufficient number of viewing windows to allow a clear view of all areas of the containment where there are workers.

Another option for keeping the worker under observation from outside of the containment is to use a live video system. The system can either be wired (in which case wires should be properly sealed where they enter or leave the containment) or wireless. The employer must ensure that the worker closest to the source of the hazardous material being generated is accurately being monitored. Also the worker should be in view of the camera during the entire sampling period.

## Sampling results

Whether the worker is observed from the inside or the outside of the containment, the name or job description of the worker should be recorded, as well as the activity the worker was undertaking during sampling. In addition, the technician is expected to provide an interpretation of the results (for example, those that are abnormally high or low).

G6.13 Authorized persons - Designated area

Issued August 1, 1999

Section 6.13(3) of the *OHS Regulation* provides that the employer must restrict entry into designated work areas to "authorized persons who are adequately protected against the level of risk within the designated work area."

In the context of this section, "authorized persons" are workers who are qualified to perform the work, have been designated by the employer as being permitted to do so, and are permitted to be present within the designated work area(s).

G6.16 High risk work

Issued August 1, 1999

For high risk work activities, section 6.16(2) of the *OHS Regulation* ("*Regulation*") provides that the employer must inspect a containment and a decontamination facility at least daily to ensure that their effectiveness is maintained. <u>Section 6.1</u> of the Regulation defines both high and low risk work activities.

Containment and decontamination facilities will be considered to be effective if they can be reasonably expected to confine asbestos materials and fibres within a contained and controlled area. In particular, the system should:

- be airtight in design (see section 6.14),
- be of substantial construction to support the anticipated stresses likely to be encountered in the course of work (see <u>section 4.2</u> of the *Regulation*), and
- utilize recognized design considerations common to the industry norms or follow reasonable parameters of control supported by occupational hygiene principles (e.g. good ventilation design, overlap of plastic poly sheet joints and water-resistant duct tape).

When evaluating compliance with this requirement, the system should be checked to see if it is under negative pressure. Smoke or air current tubes can be used for this purpose.

Additional information regarding procedures for removal or encapsulation of asbestos or asbestos-containing materials can be found in the WorkSafeBC publication <u>Safe Work Practices for Handling Asbestos</u>.

#### Ventilation

G6.19 Ventilation - Filter testing

Issued August 1, 1999; Editorial Revision April 2005; Editorial Revision February 1, 2008; Revised August 28, 2015.

#### Regulatory excerpt

Section 6.19(1) of the OHS Regulation ("Regulation") states:

The employer must assess the effectiveness of HEPA filters by DOP (dioctyl phthalate) testing or similar means at least annually, after a HEPA filter is replaced in a vacuum cleaner or ventilation system, and before use in high risk work activity.

Section 6.1 of the *Regulation* includes the following definition:

"high risk work activity" means a work activity that involves working with or in proximity to asbestos-containing material if a high level of control is necessary in respect of that activity to prevent exposure of a worker to airborne asbestos fibre.

Section 1.1 of the *Regulation* includes the following definition:

"HEPA" means, in reference to air filtration, a high efficiency particulate air filter meeting the specifications of a nuclear grade filter, providing a 99.97% filtration efficiency at a 0.3 micrometre particle size.

## Purpose of guideline

This guideline explains why it is necessary to assess HEPA filter effectiveness, describes how to assess effectiveness of a HEPA filter under section 6.19(1), and clarifies the requirement to test filters before use in a high risk work activity.

## **Purpose of HEPA filtration**

HEPA-filtered negative-air units (referred to as ventilation systems in section 6.19(1)) operate to reduce air pressure within a work containment and decrease the concentration of airborne particulate. The slightly lower air pressure maintained within the containment will act to prevent the accidental release of contaminants if the containment seal is not completely effective or if the containment material is damaged (e.g., perforated or torn). In addition, the HEPA units will remove particulate from the air and reduce potential worker exposure.

HEPA-filtered vacuum cleaners (called HEPA vacuums) may act as both negative-air machines for very small containments and vacuum cleaners during abatement work. Unlike HEPA-filtered negative-air units (which usually discharge filtered air to the outdoors), HEPA vacuums discharge air into occupied work areas or buildings. HEPA vacuums used within a high risk work area may release significant concentrations of contaminants into the containment if the HEPA filtration systems are not working properly. HEPA vacuums used for glove bag work typically exhaust into a moderate risk work area, where the respiratory protection worn by workers may not be adequate protection if the HEPA filter leaks. It is very important that employers ensure effectiveness of HEPA filter units.

#### Assessing effectiveness of HEPA filters

The fan in a negative-air or HEPA-vacuum unit draws air through a sequence of filters (including a HEPA filter) at low static pressure. Effectiveness of collection relies on intact and well-sealed filters. Damage to a filter/seal can occur during transportation from the contractor's equipment storage facility to a worksite or from worksite to worksite. The filters can come loose in the unit housing, or a projectile (e.g., rock, nail, or screw) can penetrate the filter material. Annual testing of the units is necessary but insufficient to assure that the units are working properly.

Section 6.19(1) of the *Regulation* requires the employer to *assess the effectiveness* of the HEPA filter. HEPA filters will be considered to be effective if the filter can pass a visual inspection of the filter media and seal, as well as a filter testing protocol. The visual inspection is intended to identify any apparent damage and to examine the integrity of the seal in the filter frame. The filter testing protocol must use dioctyl phthalate (DOP) or similar means. Where the HEPA unit(s) are moved, handled, or transported in a manner that could compromise the integrity of the HEPA filter, the units need to be tested in situ prior to any disturbance of asbestos materials (see also below, "*Before use in high risk work activity*"). The methods used for testing should be consistent with the HEPA filter leak test requirements of *National Sanitation Foundation (NSF) Standard 49-2002, Class II (Laminar Flow) Biohazard Cabinetry.* These requirements are found in Annex F of the NSF standard. Other requirements for testing include the equipment manufacturer's instructions for operation and calibration of the test equipment.

It is recommended that the following information be clearly posted (e.g., an affixed label) on the equipment following the test:

- Model and serial number of the tested unit
- Testing agency
- Name of the tester
- Date of testing
- Nature of the test (e.g., DOP, PAO)
- Results of the test

The employer is also required under  $\underbrace{\text{section 4.3(2)}}$  of the  $\underbrace{\text{Regulation}}$  to maintain all HEPA filters in ventilation systems and HEPA vacuums in accordance with manufacturer's instructions, or as specified by a professional engineer, to ensure that they remain effective.

#### When must HEPA filters be tested?

Section 6.19(1) of the *Regulation* requires the employer to assess the effectiveness of HEPA filters by DOP (dioctyl phthalate) testing or similar means at least as follows:

- Annually
- After a HEPA filter is replaced in a vacuum cleaner or ventilation system
- Before use in high risk work activity

The references to annual and filter-replacement testing are self-explanatory. The reference to testing before use in high risk work activity may require some explanation.

Before use in high risk work activity

The following guidance can be used to help determine when to perform DOP (or similar) testing before use in a high risk work activity.

To ensure maximum effectiveness of the test, DOP (or similar) testing needs to be conducted once the unit has been installed on-site, immediately before use in high risk work activity (i.e., just before the negative-air unit or HEPA vacuum is used on each worksite). Only if this is not practicable due to reasons such as a lack of local availability of testing contractors, the employer may be able to rely on the comprehensive HEPA equipment maintenance program outlined below. The employer must have demonstrated that the HEPA equipment is maintained, stored, handled, and transported in accordance with an effective, comprehensive, and written maintenance program. This program needs to be supervised by a qualified person and should consist of the following:

The detailed reasons why DOP (or similar) testing is not practicable at every worksite immediately prior to use of the equipment.

A qualified person, usually employed by the abatement contractor, who is responsible for arranging necessary inspection and service of the HEPA equipment to minimize the potential for filter failure, and is responsible for maintaining all written records regarding the equipment. This individual requires adequate education and training to understand the hazards from asbestos, how HEPA-ventilation equipment functions and malfunctions, and the techniques required for cleaning, inspecting, repairing, and maintaining the equipment.

Written inventory of HEPA-filtration equipment, including model, age, location (on-site or in storage), when last DOP tested, etc.

Written procedures for the proper storage, transportation, handling, and use of HEPA- filtration equipment. These procedures must address the potential for damage during transport on bumpy roads, or drops (e.g., from the bed of a truck, from platforms, down stairs) or during installation. They must also include detailed instructions for changing of the filter and the criteria for filter change.

Written procedures for visual inspection of HEPA-filtration equipment, including inspection of the exterior case, HEPA filter, and pre-filter for physical damage (e.g., dents, scrapes, holes). Rejection criteria for the removal of damaged equipment from service should be included. Visual inspections need to be performed immediately before use at the abatement worksite.

Worker training on the inspection and transportation procedures, rejection criteria, and operation of the units.

Written records of the above worker training, equipment use (equipment log, including dates and locations of use), visual and DOP inspection results (for both passed and failed units), filter change and maintenance. These records need to be available to WorkSafeBC prevention officers upon request.

If the above criteria are fully met it would be considered reasonable for the abatement contractor to have DOP tested the HEPA-filtration equipment off-site, and then safely stored the equipment until needed at a high risk work site. The utilization of the above criteria is not intended to imply the suitability of using a single DOP (or similar) test for more than one high risk abatement worksite. Each piece of HEPA-filtration equipment must be tested before use in each high risk work activity. However, the use of the maintenance program outlined above, if fully implemented, could allow employers to safely extend their understanding of the term "before use."

If the type of criteria above have not been fully met, or if there is any incident that could affect the filter seal or integrity (e.g., unit is dropped or if the on-site visual inspection detects any anomalies), the requirement to assess the effectiveness of HEPA filters by DOP (or similar) testing before use in high risk work activity refers to testing at the high risk worksite immediately prior to use of the HEPA equipment.

Other Means of Controlling Exposure to Asbestos

G6.24-1 Friction materials

Issued August 1, 1999; Revised consequential to February 1, 2012 Regulatory Amendment

#### Regulatory excerpt

Section 6.24 of the OHS Regulation ("Regulation") states:

If automotive service procedures may involve friction material that is asbestos-containing material or dust arising from such material, the employer must ensure that the following control measures are implemented:

- (a) dry removal of friction material dust from automotive assemblies using compressed air, brushes, or other similar means is prohibited;
- (b) service work areas where friction material is handled are posted with signs to advise workers of the hazards and required precautions;
- (c) suitable work procedures are followed to minimize the generation of airborne dust;
- (d) a worker handling equipment or assemblies contaminated with dust from friction material, outside of a HEPA-filtered vacuum enclosure system, wears suitable personal protective equipment, including disposable coveralls and at least a HEPA-filtered dual

cartridge half face respirator;

- (e) waste material that may be contaminated with asbestos is promptly collected and disposed of in accordance with applicable requirements;
- (f) contaminated tools, equipment and work surfaces are cleaned after work is completed.

#### Purpose of guideline

This guideline provides guidance regarding the application of this section of the *Regulation*.

#### Application of the requirements

Section 6.24 of the *Regulation* prescribes the control measures that an employer must implement in automotive service procedures involving asbestos-containing friction material or the dust arising from such material. This section applies primarily to the servicing of brakes and clutches involving (or potentially involving) asbestos-containing friction materials. For asbestos gaskets and muffler seals, other general duty requirements for controlling exposure to asbestos apply. Refer to relevant sections of <u>Part 6</u> of the *Regulation* for controlling exposure to asbestos, as well as the sections in <u>Part 5</u> on controlling exposure, ventilation, personal hygiene, and emergency washing facilities.

The term 'may involve friction material that is asbestos-containing material' in section 6.24 is intended to address the uncertainty associated with determining where asbestos-containing friction materials are or have been used. The automotive service industry is not expected to test every material for the presence of asbestos. This would clearly be impracticable. However, in situations where it is unclear whether the friction material contains asbestos, the industry is expected to implement control measures to protect workers from being potentially exposed to asbestos.

G6.24-2 Dry removal of friction material dust

Issued August 1, 1999; Revised consequential to February 1, 2012 Regulatory Amendment

## Regulatory excerpt

Section 6.24(a) of the OHS Regulation ("Regulation") states:

If automotive service procedures may involve friction material that is asbestos-containing material or dust arising from such material, the employer must ensure that the following control measures are implemented:

(a) dry removal of friction material dust from automotive assemblies using compressed air, brushes, or other similar means is prohibited;

## Purpose of guideline

This guideline provides guidance regarding the dry removal of friction material dust.

## Use of HEPA-filtered vacuum enclosure systems

Section 6.24(a) of the *Regulation* prohibits the dry removal of friction material dust from automotive assemblies using compressed air, brushes, or other similar means. This prohibition is intended to cover open shop procedures or methods of dry removal. It is not intended to prohibit the dry removal of friction material in HEPA-filtered vacuum enclosure systems. It is recognized that some systems specify the use of brushes and "controlled" compressed air within the enclosure systems. However, to ensure that the seal is not compromised, these systems must be used according to the manufacturer's instructions (see <a href="section 4.3">section 4.3</a> of the *Regulation*). Further information regarding HEPA-filtered vacuum enclosure systems is provided in <a href="G6.24-4">G6.24-4</a> "HEPA-filtered vacuum enclosure systems."

Examples of "other similar means" of dry removal include any practice, method, or procedure that is not designed to control the release and spread of dusts likely to contain asbestos fibre into areas where unprotected workers may be present.

G6.24-3 Suitable work procedures

Issued August 1, 1999; Revised consequential to February 1, 2012 Regulatory Amendment

#### Regulatory excerpt

Section 6.24(c) of the *OHS Regulation* ("*Regulation*") states:

If automotive service procedures may involve friction material that is asbestos-containing material or dust arising from such material, the employer must ensure that the following control measures are implemented:

(c) suitable work procedures are followed to minimize the generation of airborne dust;

## Purpose of guideline

The purpose of this guideline is to provide examples of suitable work procedures if automotive service procedures may involve friction material that is asbestos-containing material or dust arising from such material.

## Suitable work procedures

Section 6.24(c) of the *Regulation* requires suitable work procedures be followed to minimize the generation of airborne dust. NIOSH has published recommended procedures to minimize exposure to asbestos and asbestos-containing dust during servicing of motor vehicle brake and

clutch assemblies.

Suitable work procedures would include the following:

- Negative pressure enclosure/HEPA vacuum system methods (see OHS Guideline <u>G6.24-4</u>)
- Low pressure/wet cleaning methods
- · Wet methods.

For further information, refer also to OSHA Regulations <u>Standard 1910.1001 Appendix F: "Work practices and engineering controls for automotive brake and clutch inspection, disassembly, repair and assembly."</u> This 1995 document is available on the OSHA website.

G6.24-4 HEPA-filtered vacuum enclosure systems

Issued August 1, 1999

"HEPA-filtered vacuum enclosure systems" refer to any number of enclosure systems designed to effectively isolate brake assemblies inside a cabinet, which is continuously vented through a vacuum system. A HEPA-filtered vacuum enclosure system is acceptable if

- there is a tight-fitting collar or seal system, which provides a close fit around the brake assembly and wheel backing plate or rotor,
- an inward air flow through the system can be demonstrated,
- the vacuum filters have been tested as required under section 6.19 of the OHS Regulation,
- the manufacturers' instructions for the assembly, use, maintenance and repair of the system are followed, and
- workers are adequately instructed and trained in its use and operation.

#### Waste Handling and Disposal

**G6.25 Sealed containers** 

Issued September 20, 2013; Revised December 9, 2021

#### Regulatory excerpt

Section 6.25 of the OHS Regulation ("Regulation") states:

The employer must ensure that all asbestos waste and other waste contaminated with asbestos, including disposable protective clothing and cleanup equipment, is placed into sealed containers which are labelled as containing asbestos.

## Purpose of guideline

This guideline provides guidance for selection of sealed containers for asbestos-containing waste materials.

#### **Sealed containers**

For the purposes of section 6.25, a sealed container is any container designed and made of a material which will contain all asbestos-containing waste and will prevent the release of asbestos waste and fibre during transport to and disposal at an approved disposal site. Examples include double sealed polyethylene plastic bags, each with a nominal thickness of at least 6 mil (0.006 inches), and fibre barrels. Procedures that use thinner plastic bags are not procedures acceptable to WorkSafeBC under section 6.8(2) or 6.27(2)(a) of the *Regulation*.

The outside of the waste container must be labelled as asbestos-containing waste, as required by section 6.25 of the *Regulation*. Tight-fitting lids or other covers that seal the container must be used with rigid containers such as barrels and bins.

Disposal site operators may require specific types of containers or may have restrictions on the type of containers that will be accepted.

The requirement for double sealed plastic bags to be at least 6 mil is consistent with clause 40(2)(b)(i)(B) of the <u>Environmental Management Act</u>—<u>Hazardous Waste Regulation</u> requirements for asbestos-containing waste.

## During supply shortage of 6 mil asbestos waste bags

In times of extensive flooding or other emergency situations, there may be a supply shortage of commonly used 6 mil polyethylene asbestos waste bags. One way to reduce the number of 6 mil bags is for single-bagged 6 mil bags to be sealed in non-reusable containers such as bins, totes, or drums (metal, plastic, or polyethylene).

When these supply issues are critical, WorkSafeBC accepts the following alternatives as "sealed containers" that contain asbestos waste and fibres from being released during transport and disposal:

- Construct a "bag" from polyethylene sheet by placing the waste in the middle of a single sheet of at least 6 mil polyethylene and seal it in such a way that prevents asbestos waste and fibres from being released: bring all edges together, twist, and tightly tape together. Repeat this process to double-bag, or place the bag in another non-reusable sealable container.
- If a larger "bag" needs to be constructed:
  - 1. Tape two pieces of 6 mil polyethylene sheets together to form a larger piece to wrap the waste (two sheets are taped on both sides at the seam with at least 30 cm overlap to be adequately sealed) using sheathing tape or similar.
  - 2. Gather the edges, twist, and tightly tape together.

- 3. Repeat the process so that the seam of the inner bag and of the second bag are offset from each other.
- 4. Wrap and seal the bagged waste with a larger sheet of reinforced polyethylene (commonly used outside of asbestos enclosures) or place it inside a bag of reinforced polyethylene (e.g., forklift sandbag, disposal bin, disposal bin liner) to increase mechanical integrity.

If any of the above alternatives are used, the employer must ensure the following measures are followed:

- The method prevents the release of asbestos waste and fibre during transport to and disposal at an approved site.
- Workers have been instructed on the safe handling of the waste in alternative containers.
- Workers must visually inspect the sealed container to assess its integrity.
- All sealed containers are labelled as containing asbestos as required by the *Regulation*.
- The alternative container method is not to be used if the integrity of the alternative container is observed to be compromised. The employer must determine the cause and resolve the issue before continuing.
- The disposal site operator and the transporter are notified of these alternatives and that the waste is able to be accepted in this manner.

  Disposal site operators may have to change their dumping and covering procedures to accommodate these different types of packaging.

#### Disposal site operators and transporters

- The disposal site operator and transporter are to conduct a risk assessment for handling asbestos waste in alternative containers, and then conduct work using procedures based on the risk assessment.
- Disposal site operators and transporters are to inspect the loads to verify that asbestos waste is properly contained in sealed container and labelled appropriately. If upon arrival to the disposal site the containment has been observed to be compromised, the disposal site operator must investigate the matter to ensure worker health and safety. The originator of the waste is to be notified to rectify the issue.

A WorkSafeBC prevention officer may order an employer to cease the use of alternative methods of containment if the use of these methods is observed to be causing health and safety issues at a worksite.

In addition, the asbestos waste must be confined during handling, storage, and transportation in a manner that is compliant with the Hazardous Waste Regulation.

G6.27 Asbestos waste removal

Issued May 24, 2002; Editorial Revision October 2004; Editorial Revision October 26, 2011; Editorial Revision consequential to February 1, 2012 Regulatory Amendment

## Regulatory excerpt

Section 6.27 of the OHS Regulation ("Regulation") states:

- (1) Before any work involving asbestos takes place, the employer must ensure that procedures for the safe removal of asbestos dust and debris from the work area are set out in writing by a qualified person.
- (2) The written procedures must
- (a) comply with the requirements set out in section 6.8,
- (b) provide for removal of asbestos dust and debris from the work area
- (i) while work is in progress, at intervals necessary to eliminate or minimize the risk of exposure,
- (ii) at the end of each work shift, and
- (iii) at the completion of work involving asbestos, and
- (c) consider the nature of the asbestos dust and debris to be removed and provide specific direction regarding which of the following removal methods, or combination of the following removal methods, is most appropriate for safe removal of that asbestos dust and debris in relation to each of the times set out in paragraph (b) (i), (ii) and (iii);
- (i) using a vacuum cleaner, or similar device, that is equipped with a HEPA-filtered exhaust;
- (ii) wiping surfaces with a damp cloth or sponge to remove residual amounts of asbestos dust and debris;
- (iii) wet sweeping or wet mopping to remove larger amounts of asbestos dust and debris;
- (iv) using a shovel or similar device to place larger amounts of dampened asbestos debris into the sealed container required by section 6.25;
- (v) using another method that is acceptable to the Board.
- (3) The employer must ensure that

- (a) every worker who is engaged in asbestos dust and debris removal at the work area is adequately instructed and trained in the written procedures of the qualified person under this section, and
- (b) the written procedures of the qualified person are followed.

## Purpose of guideline

The purpose of this guideline is to provide guidance for situations where an employer wishes to use removal methods other than those listed in the *Regulation*.

#### Removal methods

When the *Regulation* refers to asbestos waste removal, this activity is expected to be carried out only in a controlled environment such as a designated work area or a containment area as described by section 6.13, with workers wearing the appropriate personal protective equipment.

Note that practices such as dry sweeping or dry dusting, blowing with compressed air, and washing with high-pressure water, are not acceptable means for asbestos waste cleanup and removal.

If employers wish to use removal methods other than those specified in section 6.27(2), they are to send their request to WorkSafeBC's Prevention Practice, Quality, and Engineering department for consideration. Only methods specified in section 6.27 or approved by the Prevention Practice, Quality, and Engineering department prior to the commencement of work may be used.

Further information on safe work practices for asbestos is provided in the WorkSafeBC publication <u>Safe Work Practices for Handling Asbestos</u> (BK27).

#### Personal Protective Clothing and Equipment

G6.31 Contaminated personal protective clothing - Information to laundry workers

Issued August 1, 1999

Section 6.31 of the *OHS Regulation* states:

The employer must ensure that workers who launder clothing contaminated with asbestos are informed of the hazards of asbestos and the precautions required for handling the clothing.

Under section <u>5.82(1)(b)</u> of the *OHS Regulation*, the employer is responsible for laundering protective clothing contaminated with asbestos (see OHS Guideline <u>G5.82</u>). However, before protective clothing contaminated with asbestos can be sent to an acceptable laundry facility, the employer must, under section <u>6.30(5)</u> of the *OHS Regulation*, ensure that it is cleaned with a vacuum cleaner, equipped with a HEPA-filtered exhaust, and placed in a water-soluble plastic bag. This plastic bag must be sealed and labelled. A commercial laundry or linen service would be considered an "acceptable" laundry facility if they are capable of handling contaminated laundry.

The requirements of sections <u>12.157</u> and <u>12.158</u> of the *OHS Regulation* also apply.

#### **Documentation**

G6.32 Documentation - types of records

Issued August 1, 1999; Retired consequential to February 1, 2012 Regulatory Amendment

G6.34-1 Exposure control plan

Issued August 1999; Editorial Revision July 2004; Editorial Revision February 2, 2006; Revised February 1, 2008; Editorial Revision to include February 1, 2011 regulatory amendment; Editorial revision April 9, 2019

## Regulatory excerpt

Section 6.34(1) of the OHS Regulation ("Regulation") states:

- (1) If a worker has or may have occupational exposure, the employer must develop and implement an exposure control plan, based on the precautionary principle, that meets the requirements of section 5.54 and that includes the following:
- (a) a risk assessment conducted by a qualified person to determine if there is a potential for occupational exposure by any route of transmission;
- (b) a list of all work activities for which there is a potential for occupational exposure;
- (c) engineering controls and administrative controls to eliminate or minimize the potential for occupational exposure;
- (d) standard or routine infection control precautions and transmission-based precautions for all work activities that have been identified as having a potential for occupational exposure, including

- (i) housekeeping practices designed to keep the workplace clean and free from spills, splashes or other accidental contamination,
- (ii) work procedures to ensure that contaminated laundry is isolated, bagged and handled as little as possible, and
- (iii) work procedures to ensure that laboratory or other samples containing a biological agent designated as a hazardous substance in section 5.1.1 are handled in accordance with the *Laboratory Biosafety Guidelines 3<sup>rd</sup> edition*, 2004, issued by the Public Health Agency of Canada;
- (e) a description of personal protective equipment designed to eliminate or minimize occupational exposure;
- (f) a program to inform workers about the contents of the exposure control plan and to provide them with adequate education, training and supervision to work safely with, and in proximity to, a biological agent designated as a hazardous substance in section 5.1.1;
- (g) a record of all training and education provided to workers in the program described in paragraph (f);
- (h) a record of all workers who have been exposed, while performing work activities, to a biological agent designated as a hazardous substance in section 5.1.1.

## Purpose of guideline

The purpose of this guideline is to provide some examples of workplaces which are likely to require an exposure control plan (ECP).

#### Occupational exposure

The requirement to develop and implement an ECP applies to all workplaces where a worker has or may have occupational exposure. "Occupational exposure," as defined in <u>section 6.33</u> of the *Regulation*, is the reasonably anticipated contact with a biological agent, that is designated as a hazardous substance in <u>section 5.1.1</u> of the *Regulation*, resulting from the performance of a worker's duties.

Most health care workers, lab workers, emergency responders, fire fighters and occupational first aid attendants in general industry, are likely to have occupational exposure.

In addition, some non-health-related or other occupations in high-risk areas may also have such exposure. These include some janitorial or custodial staff in hospitality industries, public utility or municipal workers with outside jobs, and social service agency workers.

Some workplaces in which workers typically have occupational exposure include, but are not limited to those listed below.

## Partial list of workplaces which are likely to require an exposure control plan

- · Physicians' offices
- Medical and dental laboratories
- Hospitals
- Hemodialysis centers
- Blood and tissue banks
- Nursing homes
- Home health care
- Fire and rescue
- Ambulance services
- Funeral homes and crematories
- Commercial laundries serving health care and public safety institutions
- Schools
- Workers employed in the woods involving potential exposure to ticks and Lyme Disease
- Workers who may have exposure to hantavirus when handling rodents or cleaning up dust contaminated with rodent urine and feces

- Dental offices
- Medical & dental equipment repair
- Outpatient facilities (including renal dialysis clinics and cancer treatment centers)
- Drug treatment centers
- Research labs
- Residential care facilities
- Hospices
- Law enforcement
- Correctional institutions
- Health clinics in industrial facilities
- Personnel services
- Removal of regulated waste or sewage
- Workers in agriculture where there is potential exposure to mouldy hay, or who are exposed to zoonotic diseases (for example,brucellosis)

Elements of an ECP are listed in <u>section 5.54</u> and section 6.34(1) of the *Regulation*. Required elements of an ECP will depend on the circumstances of the workplace and the outcome of the risk identification required by section 6.34(1)(a) of the *Regulation*.

Work procedures for a biological agent designated as a hazardous substance in section 5.1.1 of the *Regulation* must be in accordance with the manual titled *Laboratory Biosafety Guidelines 3rd edition, 2004*, issued by the Public Health Agency of Canada.

G6.34-2 Risk assessment, engineering and administrative controls, and personal protective equipment

Formerly issued as G6.35, G6.36(1), and G6.36(2); Issued as G6.34-2 February 1, 2008. (Note: Former G6.34-2 on pandemic influenza has been renumbered as G6.34-6.); Editorial Revision November 29, 2022

#### Regulatory excerpt

Section 6.34(1) of the OHS Regulation ("Regulation") states, in part:

- (1) If a worker has or may have occupational exposure, the employer must develop and implement an exposure control plan, based on the precautionary principle, that meets the requirements of section 5.54 and that includes the following:
- (a) a risk assessment conducted by a qualified person to determine if there is a potential for occupational exposure by any route of transmission;
- (b) a list of all work activities for which there is a potential for occupational exposure;
- (c) engineering controls and administrative controls to eliminate or minimize the potential for occupational exposure;

...

(e) a description of personal protective equipment designed to eliminate or minimize occupational exposure;

. . .

Section 5.55(3) of the *Regulation* states:

- (3) The use of personal protective equipment as the primary means to control exposure is permitted only when
- (a) substitution, or engineering or administrative controls are not practicable, or
- (b) additional protection is required because engineering or administrative controls are insufficient to reduce exposure below the applicable exposure limits, or
- (c) the exposure results from temporary or emergency conditions only.

## Purpose of guideline

The purpose of this guideline is to provide information on what should be included in a risk assessment required under section 6.34(1)(a) of the *Regulation*, and discuss ways to control risks using engineering and administrative controls under section 6.34(1)(c). The guideline also discusses appropriate personal protective equipment (PPE) under section 6.34(1)(e).

#### Risk assessment

The objective of the risk assessment is to determine the jobs, tasks, and procedures for which occupational exposure is anticipated and to evaluate the likelihood that such exposure would occur. The factors to be considered will be dictated by the circumstances of the workplace and the type of biological agents designated as hazardous substances that workers are potentially exposed to.

A qualified person is required to conduct the risk assessment. A qualified person may be a medical or non-medical professional. This could include infection control practitioners, registered nurses, physicians, occupational hygienists, microbiologists, or other individuals with specialized training in the area of biological agents designated as a hazardous substance under section 5.1.1 of the *Regulation*.

As part of the risk assessment, the job classifications should be reviewed within the workplace and categorized according to those jobs in which all workers have occupational exposure and those jobs in which some of the workers have occupational exposure. Where all workers have occupational exposure, such as scrub room nurses, clinical dental hygienists, and paramedics, it is not necessary to list individual work tasks, as long as it is made clear that all work activities have such exposure. Where only some workers have exposure, the specific tasks and procedures causing exposure need to be listed. All first aid attendants are considered to have occupational exposure.

When evaluating the potential for exposure, as well as the risk associated with exposure, the following sources of information should be considered:

- History of firm, including first aid records and accident and/or incident investigation reports
- WorkSafeBC claims records and statistics
- History of similar industries, similar exposure conditions, history of other firms in the same geographical area, and industries dealing with the same client group
- Information from other jurisdictions or agencies, such as Occupational Safety and Health Administration (OSHA) or National Institute for Occupational Safety and Health (NIOSH)

The potential for occupational exposure must be evaluated without regard to the availability or use of personal protective clothing and equipment. That is, the risk to an unprotected worker must be assessed.

If there is a question regarding the potential for exposure, the following should occur:

- Determine whether the worksite requires an exposure control plan (refer to OHS Guideline G6.34-1)
- Consult the employers' risk assessment to determine if the occupation or task has been identified
- Evaluate the risk of occupational exposure. If necessary, contact the WorkSafeBC occupational health physicians for assistance
- If there is a risk of occupational exposure, determine whether the risk has been minimized with any of the following:

- Engineering controls
- Administrative controls
- PPE
- Adequate training and supervision of the workers

#### **Engineering controls**

Section 6.34(1)(c) requires an employer to use either engineering controls or administrative controls to eliminate or minimize the potential for occupational exposure. Part 1 of the *Regulation* defines "engineering controls" as follows:

the physical arrangement, design or alteration of workstations, equipment, materials, production facilities or other aspects of the physical work environment, for the purpose of controlling risk;

Engineering controls for occupational exposure include, but are not limited to the following:

- Safety-engineered needles (e.g., syringes that include a needle retraction mechanism or other type of integral needle guard mechanism)
- Blunt tip sutures
- Needleless devices (devices that do not use a needle for the collection of body fluids, administration of medication or fluids, or any other procedures with potential exposure to a bloodborne pathogen; e.g., needleless intravenous connectors)
- Retracting lancets
- Automatic re-sheathing of disposable scalpels
- Puncture-resistant containers for sharps (sharps include anything that might produce a puncture wound that would expose a worker to blood or other potentially infectious material, such as broken glass, scalpels, contaminated ends of orthodontia wire, and suture needles)
- Splatter guards
- Biological safety cabinets
- Mechanical pipetting systems
- Negative pressure isolation, which is an isolation and ventilation control for biological agents that are transmitted via the airborne route and
  that pose an inhalation hazard. This involves isolating infectious patients in an isolation room under negative pressure through an independent
  air supply and exhaust system for the isolated area/room
- Triage stations isolating medical staff from potentially infectious persons requiring medical attention through installation of protective barriers

Engineering controls must be properly selected, used, inspected, maintained, and replaced as needed to ensure their effectiveness. Selected engineering controls must eliminate or minimize the risk of an exposure incident. Section 4.3 requires that each tool be selected, used, and operated in accordance with the manufacturer's instructions (if available), safe work practices, and the requirements of the *Regulation*.

For other engineering controls necessary in the laboratory, refer to sections 30.12 (Biological safety cabinets), 30.13 (Centrifuges), 30.16 (Transport of containers), and 30.17 (Personal protection) of the *Regulation*. For ventilation of isolation rooms refer to sections 4.72 to 4.78.

#### Administrative controls

Section 6.34(1)(c) requires an employer to use either engineering controls or administrative controls to eliminate or minimize the potential for occupational exposure. Part 1 of the *Regulation* defines "administrative controls" as follows:

the provision, use and scheduling of work activities and resources in the workplace, including planning, organizing, staffing and coordinating, for the purpose of controlling risk;

Administrative controls for occupational exposure include, but are not limited to the following:

- Adopting general infection control measures
- Washing hands with a suitable, non-abrasive cleansing agent and running water immediately after removal of gloves and as soon as possible after skin contact with blood or other potentially infectious material
- Disposing of contaminated needles immediately after use in a readily available sharps container specifically designed for such use
- Applying the "hands-free" method of passing scalpels during a surgical procedure, such as using a small hand tray to transfer scalpels and other sharps to and from the surgeon's hand
- Placing contaminated reusable sharps in containers that are puncture-resistant and leak-proof, such as stainless steel trays
- Using tongs or other suitable means, such as a dust pan and disposable brush, to pick up broken glass contaminated with blood
- Prohibiting the bending, manual recapping, or removing of contaminated needles
- Preventing the storage of food and/or drink in refrigerators or other locations where biological agents designated as hazardous substances under section 5.1.1 are present
- Keeping the number of workers potentially exposed to a biological agent to a minimum
- Restricting the number of visitors
- Restricting contact between workers and potentially infectious persons during an epidemic or pandemic outbreak refer to OHS Guideline G6.34-6
- Limiting and controlling patient transportation and/or transfers
- Isolating infectious persons once hospitalized
- Medical surveillance for persons entering a medical facility
- Quarantining exposed staff
- Worker education and training, including drills

#### Personal protective equipment

The *Regulation* does not dictate what kind of PPE should be used for a given circumstance. This decision rests with each employer and must be based on the specific exposure circumstances in the workplace. The results of the risk assessment required under section 6.34(1)(a) and Part 8 of the *Regulation* can help the employer to determine appropriate levels of protection. Under section 8.4, the workplace evaluation to determine appropriate PPE must be done, where practicable, in consultation with the occupational health and safety committee or the health and safety representative, as applicable and with the worker who will use the equipment.

Workers must use appropriate PPE to prevent occupational exposure. Appropriate PPE may include, but is not limited to gloves, gowns, lab coats, coveralls, booties, face shields, eye protection, and respirators. For airborne or aerosolized occupational exposure, an approved particulate respirator may be required (e.g., NIOSH or CSA-approved).

Appropriate PPE for occupational first aid attendants includes an approved particulate face piece respirator and latex or other waterproof gloves to prevent accidental contact with blood or body fluids.

To evaluate compliance, the following questions should be considered:

- Under normal conditions and time of use, does the PPE prevent a biological agent designated as a hazardous substance under section 5.1.1
  - Passing through a worker's work clothes, street clothes, undergarments?
  - Reaching an employee's skin, eyes, nose, mouth, or other mucous membranes?
  - Being inhaled into the respiratory tract?
- Has the PPE been selected and used in accordance with the manufacturer's instructions and recognized standards? Does it provide effective protection? See <a href="section8.3(1)(a)">section 8.3(1)(a)</a> of the Regulation
- Does the PPE in itself create a hazard to the wearer? Refer to section 8.3(1)(b)
- Does the PPE cause allergenic or other adverse health effects? Refer to section 8.2(3)

Some workers may be allergic to natural rubber latex gloves. The Laboratory Centre for Disease Control (a branch of Health Canada) considers disposable, good quality, non-latex gloves made of vinyl, nitrile, neoprene, copolymer, and polyethylene to be adequate barriers to bloodborne pathogens. Refer to the <u>Latex</u> page on worksafebc.com for further information

#### Additional resources

For additional information on the prevention of occupational exposure, refer to the WorkSafeBC website <a href="worksafebc.com/en/health-safety/injuries-diseases/infectious-diseases">worksafebc.com/en/health-safety/injuries-diseases/infectious-diseases</a> (e.g., this site contains information on common injuries and illnesses in the health care industry and a booklet entitled <a href="Controlling Exposure: Protecting Workers from Infectious Disease">Controlling Exposure: Protecting Workers from Infectious Disease</a>).

G6.34-3 Housekeeping and laundry practices

Formerly Issued as G6.36(3) and G6.36(4); Issued as G6.34-3 February 1, 2008

## Regulatory excerpt

Section 6.34(1) of the *OHS Regulation ("Regulation")* states:

- (1) If a worker has or may have occupational exposure, the employer must develop and implement an exposure control plan, based on the precautionary principle, that meets the requirements of section 5.54 and that includes the following:
- (d) standard or routine infection control precautions and transmission-based precautions for all work activities that have been identified as having a potential for occupational exposure, including
- (i) housekeeping practices designed to keep the workplace clean and free from spills, splashes or other accidental contamination,
- (ii) work procedures to ensure that contaminated laundry is isolated, bagged and handled as little as possible, and

## Purpose of guideline

The purpose of this guideline is to provide information on housekeeping and laundry practices.

#### Housekeeping practices

The requirements of section 6.34(1)(d)(i) of the *Regulation* apply to a broad range of fixed and non-fixed workplaces, including labs, operating rooms, accident scenes, ambulances, and refrigerated blood transfer vehicles.

To keep the workplace clean and sanitary, the employer must develop and implement appropriate methods of decontamination. This would include details on

- Location within the facility (indoor vs. outdoor)
- Type of surfaces to be cleaned
- Size of the spill (for example, gross, splatter, smear) or type of organism present

- Tasks or procedures to be performed, including
  - What kind of sterilant or disinfectant is to be used
  - How much should be used
  - How often it should be applied

Decontamination is the use of physical or chemical means to remove viable microorganisms from surfaces or materials. Three methods are available: sanitization, disinfection, and sterilization.

Sanitization: Reduces microbial contamination to levels judged safe by public health authorities.

Disinfection: Destroys specific infectious microorganisms. There are three levels of disinfection.

- **High:** Destroys all forms of microbial life except high numbers of bacterial spores
- Intermediate: Destroys Mycobacterium tuberculosis, vegetative bacteria, most viruses, and most fungi. It does not kill bacterial spores
- Low: Destroys most bacteria, some viruses, some fungi, but not Mycobacterium tuberculosis or bacterial spores

A high level of disinfection should be used for items that contact mucous membranes during use but do not usually penetrate normally sterile areas of the body. Intermediate and low level disinfection should be used for items that contact only intact skin during routine use.

**Sterilization:** Destroys all forms of microbial life including high numbers of bacterial spores. This method of decontamination should be used for items that routinely penetrate the skin or mucous membranes, enter normally sterile areas of the body or come into direct contact with recirculating body fluids, such as blood.

When used at recommended dilutions, chemical germicides approved for use as "hospital disinfectants" that are capable of killing *Mycobacterium tuberculosis* can be used to decontaminate spills of blood and other body fluids. Workers must ensure the recommended disinfectant is used according to the manufacturer's instructions. The frequency with which housekeeping practices are performed will vary depending on the nature of the spill and the type of organism and may be

- Immediate (for example, blood spilled on laboratory bench)
- After specific procedures involving patient care (for example, surgical operation)
- At the end of the work shift (for example, routine department cleaning)

#### Laundry

Section 6.34(1)(d)(ii) of the *Regulation*, requires worker exposure to contaminated laundry be prevented by isolating the laundry and minimizing manual handling. This section applies to all contaminated laundry whether provided by the employer or personal laundry (such as contaminated work clothes).

The material will be considered as "isolated" if laundry is

- Effectively bagged or containerized at the location of use
- Not sorted or rinsed in the location of use
- Handled as little as possible

When contaminated laundry is wet and there is a reasonable likelihood of soak-through or leakage, the laundry should be placed and transported in other leak-resistant bags or containers.

Bags and other containers containing laundry contaminated with a biological agent designated as a hazardous substance in  $\underbrace{\text{section 5.1.1}}_{\text{bound}}$  must be labelled according to section 6.37(1).

Where laundry contaminated with a biological agent designated as a hazardous substance in section 5.1.1 is sent for processing to a laundry or dry cleaning facility, the employer sending the articles (the supplier) and the employer receiving the articles (the operator) must follow the requirements of sections 12.157 and 12.158 of the *Regulation*.

G6.34-4 Program to inform workers of the exposure control plan

Formerly Issued as G6.38; Issued as G6.34-4 February 1, 2008; Editorial Revision April 6, 2020

## Regulatory excerpt

Section 6.34(1)(f) of the OHS Regulation ("Regulation") states:

(1) If a worker has or may have occupational exposure, the employer must develop and implement an exposure control plan, based on the precautionary principle, that meets the requirements of section 5.54 and that includes the following:

(f) a program to inform workers about the contents of the exposure control plan and to provide them with adequate education, training and supervision to work safely with, and in proximity to, a biological agent designated as a hazardous substance in section 5.1.1;

. . .

#### Purpose of the guideline

The purpose of this guideline is to provide information on what should be included in a program to inform workers about the exposure control plan, required under section 6.34(1)(f). This guideline updates content from former G6.38 *Education and training* following amendments to the *Regulation*.

## Program to inform workers about the exposure control plan (ECP)

Section 6.34(1)(f) of the *Regulation* requires the employer to inform workers about the contents of the ECP and to provide them with adequate education and training to work safely with and in proximity to a biological agent designated as a hazardous substance in section 5.1.1.

This section applies to any worker (including part-time, full-time, temporary, and casual) who has or may have occupational exposure. No worker with potential occupational exposure is exempt from this section. The instruction requirement for lab workers who handle biohazardous materials is covered under section 30.14 of the *Regulation*.

Education and training must be provided before a worker begins work with or in proximity to a biological agent designated as a hazardous substance in section 5.1.1. Specifically, training needs to be given when a worker is initially assigned to the task and when changes are made that affect a worker's occupational exposure, such as when a task is modified or new procedures are being instituted. Education and training is an element of an ECP, as required by section 5.54(2). To comply with the requirements of section 5.54(3) of the *Regulation*, the employer must review the ECP at least annually and update it as necessary. Consequently, the employer may need to provide refresher training annually or whenever the ECP is updated.

Education and training material must be appropriate to the educational level, literacy, and language of workers. The content will generally include discussion and explanation of the following items:

- Applicable sections of the *Regulation* applicable sections include section <u>3.19(1)</u>; sections <u>5.2</u>, <u>5.54</u>, and <u>5.55</u>; sections <u>6.33 to 6.41</u>; sections <u>8.2</u> and <u>8.3</u>; sections <u>12.157</u> and <u>12.158</u>; <u>Part 30</u>
- Applicable sections of the Workers Compensation Act including section 69 on incidents that must be investigated
- Definition of a biological agent designated as a hazardous substance in section 5.1.1
- Occupational exposure
  - How it occurs, such as modes of transmission
  - How to identify tasks and other activities, such as routine and emergency spills, that may involve worker exposure to a biological agent designated as a hazardous substance in section 5.1.1
  - Effects of exposure
  - · What to do in the event of exposure, such as emergency procedures to be followed, and post-exposure treatment
- Use and limitations of control measures to prevent or minimize exposure
  - Engineering controls
  - Work practice, or administrative, controls
  - Personal protective equipment (PPE). This element should address selection, care, use, storage, limitations, maintenance, inspection, decontamination, and availability of PPE
- Employer's ECP and where to access it
- Required labels and identification for a biological agent designated as a hazardous substance in section 5.1.1
  - When necessary, information on the vaccines required under section 6.40 of the Regulation

The training session should also include the opportunity for an interactive question and answer period.

The person providing the education and training must have knowledge about a biological agent designated as a hazardous substance in section 5.1.1, particularly in the context of workplace exposure and control. Trainers may be medical or non-medical professionals. Medical professionals could include infection control practitioners, registered nurses, and physicians. Non-medical professionals could include occupational hygienists or other individuals with specialized training in the area of biological agents designated as a hazardous substance in section 5.1.1. In some workplaces, such as medical and dental offices, the employer, who is often a physician, may do the training, provided the employer is familiar with exposure control measures.

To evaluate compliance with this section, it needs to be verified that education and training was provided before a worker was placed in a position where occupational exposure may occur. A WorkSafeBC prevention officer should, by observation and interviews, determine if workers work safely with and in proximity to a biological agent designated as a hazardous substance in section 5.1.1. Informed workers can be identified by their ability to answer the following questions:

- Do you work with biological agents designated as a hazardous substance? If so, what are they?
- What precautions are required for preventing exposure?
- What do you do in case of an emergency?
- Where would you go for further information?

#### G6.34-5 Record keeping requirements

Formerly Issued as G6.41-2 and G6.41-3; Issued as G6.34-5 February 1, 2008; Editorial Revision April 6, 2020

## Regulatory excerpt

Section 6.34(1) of the OHS Regulation ("Regulation") states:

(1) If a worker has or may have occupational exposure, the employer must develop and implement an exposure control plan, based on the precautionary principle, that meets the requirements of section 5.54 and that includes the following:

. .

- (g) a record of all training and education provided to workers in the program described in paragraph (f);
- (h) a record of all workers who have been exposed, while performing work activities, to a biological agent designated as a hazardous substance in section 5.1.1.

#### Purpose of the guideline

The purpose of this guideline is to provide information on what should be included in a record of training and a record of exposure referred to in section 6.34(1)(g) and (h) of the *Regulation*. This guideline consolidates and updates content from former G6.41-2 *Records of exposure* and G6.41-3 *Records of training* following amendments to the *Regulation*.

## Records of training

The intent of section 6.34(1)(g) of the *Regulation* is to provide a way to document compliance, to determine who attended each training session and, when necessary, to assess the adequacy of the training. Accurate and sufficiently detailed records of education and training should be maintained by the employer and should include

- Date(s) of training
- Content or a summary of the training sessions
- Type of education and training (for example classroom, video, interactive, or on-the-job)
- Names and qualifications of those conducting the training
- Names, job titles, and work locations (departments) of workers attending the sessions

Education and training records should be kept for at least three years after the training session. Unlike medical records, training records are not confidential and can be inspected and copied as required by a WorkSafeBC prevention officer.

## Records of exposure

Under section 6.34(1)(h), employers must keep a record of all workers who have been exposed to a biological agent designated as a hazardous substance under section 5.1.1. Incidents of occupational exposure may be documented in the following ways:

- Accident/incident reports (such as an incident report regarding a needlestick injury)
- First aid treatment records see section 3.19 of the Regulation
- Medical records (including documentation of post-exposure medical evaluation, treatment, and counselling, as well as records of hepatitis B and other vaccinations)
- Inspection reports of documented exposures
- Claim forms
- Worker complaints
- Results of the risk assessment performed in compliance with section 6.35
- Records required as part of the exposure control plan, as per section 6.34, regarding risk identification, assessment, and control

The employer must ensure that records are kept as required. A physician usually maintains such records (some large firms may have their own onsite occupational physician). Worker medical records are to be kept confidential and not disclosed or reported without the worker's written consent to any person within or outside the workplace except as required by law.

Records of vaccination and other exposure records should be kept for the period of employment plus 10 years or such earlier time if the employer ceases to do business. (Note that  $\underline{\text{section } 3.19(2)}$  of the *Regulation* specifies that the first aid record of an injury or illness must be kept for at least three years. First aid records are distinct from records of occupational exposure  $\underline{\text{section } 6.34(1)(h)}$ .)

Under section 75 of the *Workers Compensation Act*, a WorkSafeBC prevention officer has the authority to inspect and inquire with respect to health and safety matters at any workplace and may make inquiries and inspect documents considered necessary. Sections 3.19(3), (4), and (5) of the *Regulation* specify the conditions for access to first aid records and maintaining their confidentiality. A prevention officer should consult with a WorkSafeBC occupational health physician before any worker medical records are requested. Prevention officers must protect the confidentiality of such records or any other personal medical information received.

#### G6.34-6 Exposure control plan - Pandemic influenza

Issued February 8, 2007 as G6.34-2; Revised February 1, 2008 and renumbered as G6.34-6; Revised April 27, 2009; Editorial Revision to include February 1, 2011 regulatory amendment; Editorial revision April 9, 2019; Editorial Revision April 6, 2020

For some time, health authorities have advised of the possibility of an influenza pandemic arising from a mutated strain of a virus currently found primarily in birds (technically referred to as the H5N1 virus). WorkSafeBC has issued this guideline to assist with workplace planning in the event of such an influenza pandemic. It addresses the expectations for exposure control plans to protect workers from possible exposure to such a virus in B.C. workplaces.

The guideline has been developed following consideration of recent documents adopted by agencies such as the U.S. Center for Disease

Control and the World Health Organization. Also, it is intended to be consistent with the primary themes of the SARS Commission Report by Justice A. Campbell (January 2007), and with the report on the role of personal protective equipment on influenza transmission issued by the Council of Canadian Academies (December 2007).

This guideline was initially issued in February 2007 in consultation with workplace stakeholders and following a period of consultation with other parties. It was revised, primarily to reflect regulatory amendments that became effective on February 1, 2008 following public hearings. As is the case with other guidelines, it may be revised from time to time based on evolving evidence on the nature of the virus and appropriate means of control.

## Regulatory excerpt

Section 6.34(1) (Exposure control plan) of the OHS Regulation ("Regulation") states:

- (1) If a worker has or may have occupational exposure, the employer must develop and implement an exposure control plan, based on the precautionary principle, that meets the requirements of section 5.54 and that includes the following:
- (a) a risk assessment conducted by a qualified person to determine if there is a potential for occupational exposure by any route of transmission;
- (b) a list of all work activities for which there is a potential for occupational exposure;
- (c) engineering controls and administrative controls to eliminate or minimize the potential for occupational exposure;
- (d) standard or routine infection control precautions and transmission-based precautions for all work activities that have been identified as having a potential for occupational exposure, including
- (i) housekeeping practices designed to keep the workplace clean and free from spills, splashes or other accidental contamination,
- (ii) work procedures to ensure that contaminated laundry is isolated, bagged and handled as little as possible, and
- (iii) work procedures to ensure that laboratory or other samples containing a biological agent designated as a hazardous substance in section 5.1.1 are handled in accordance with the *Laboratory Biosafety Guidelines 3<sup>rd</sup> edition*, 2004, issued by the Public Health Agency of Canada;
- (e) a description of personal protective equipment designed to eliminate or minimize occupational exposure;
- (f) a program to inform workers about the contents of the exposure control plan and to provide them with adequate education, training and supervision to work safely with, and in proximity to, a biological agent designated as a hazardous substance in section 5.1.1;
- (g) a record of all training and education provided to workers in the program described in paragraph (f);
- (h) a record of all workers who have been exposed, while performing work activities, to a biological agent designated as a hazardous substance in section 5.1.1.

# Section 5.54 (Exposure control plan) states:

- (1) An exposure control plan must be implemented when
- (a) exposure monitoring under section 5.53(3) indicates that a worker is or may be exposed to an air contaminant in excess of 50% of its exposure limit,
- (b) measurement is not possible at 50% of the applicable exposure limit, or
- (c) otherwise required by this Regulation.
- (2) The exposure control plan must incorporate the following elements:
- (a) a statement of purpose and responsibilities;
- (b) risk identification, assessment and control;
- (c) education and training;
- (d) written work procedures, when required;
- (e) hygiene facilities and decontamination procedures, when required;
- (f) health monitoring, when required;
- (g) documentation, when required.

(3) The plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the joint committee or the worker health and safety representative, as applicable.

## Purpose of guideline

The purpose of this guideline is to discuss the application of the *Regulation* to the protection of workers in the event of an influenza pandemic. It provides background information on regulatory context, the nature of pandemic influenza, routes of transmission, and adverse health effects.

It also provides information on exposure control plans in the workplace, and guidance on specific types of controls, including engineering measures, work procedures, and personal protective equipment.

The guideline does not specifically address issues related to the health of the public and any medical procedures used for the treatment of patients, which are within the mandate of public health and medical authorities. Internet locations for accessing further information on pandemic planning, whether for the workplace or the community, are provided at the end of this guideline.

#### Regulatory context

Sections 6.34 and 5.54 of the *Regulation* are basic requirements that apply in the circumstances of a pandemic influenza. However, they operate in the context of other requirements.

For example, the OHS provisions of the *Workers Compensation Act* ("Act") and Part 3 of the *Regulation* address issues such as employer and worker responsibilities, occupational health and safety programs, correction of unsafe conditions, undue risk, and the procedures related to any work refusals. The general requirements for chemical and biological safety in Part 5 of the *Regulation* help round out the framework.

#### What is pandemic influenza?

Pandemics are worldwide outbreaks of disease such as influenza. Three outbreaks of pandemic influenza (as opposed to seasonal influenza) occurred in the  $20^{th}$  century: 1918 (Spanish influenza), 1957 (Asian influenza), and 1968 (Hong Kong influenza). One outbreak of pandemic influenza (2009 H1N1 influenza) has occurred thus far in the  $21^{st}$  century.

Predicting the impact of an influenza pandemic on people is difficult until the time the actual outbreak occurs. Some pandemics have had a relatively minor impact, usually affecting the very old and young, and immuno-compromised persons. Others such as the Spanish influenza pandemic have involved exceptionally high morbidity and death among normally healthy persons. The concern with a pandemic based on a virus such as the H1N1 or H5N1 variety is the possibility of a new and highly virulent form of the virus for which the general population has no immunity, capable of effective person-to-person transmission, and causing high morbidity and mortality.

The World Health Organization (WHO), Health Canada, and in British Columbia, the BC Centre for Disease Control (BCCDC), have recommended that all jurisdictions and workplaces develop influenza pandemic preparedness plans to reduce the potential for adverse effects arising from a pandemic. The WHO has advised that there is a risk of pandemic influenza that could cause widespread illness and death in humans.

Seasonal, pandemic, and avian influenzas can be differentiated as follows:

- Seasonal influenza A disease caused by influenza viruses carried and spread among humans, typically on a seasonal basis.
- Pandemic influenza A disease caused by a new strain (or subtype) of influenza virus that quickly spreads among humans worldwide because humans have little or no pre-existing immunity against it.
- Avian (Bird) influenza A disease caused by influenza viruses carried and spread among birds. There are some cases where the virus has been transmitted from birds to humans.

There are a number of phases that a pandemic is likely to go through, as shown in the following Table.

**Table 1: Pandemic influenza phases** (adapted from the WHO global Pandemic Influenza Preparedness and Response 2009 guidance document)

Phase	Characteristics			
Phase 1 - Pre- Pandemic	No animal influenza virus circulating among animals has been reported to cause infection in humans.			
Phase 2 - Pre- Pandemic	An animal influenza virus is known to have caused infection in humans and is therefore considered a specific potential pandemic threat.			
Phase 3 - Pandemic Alert	An animal or human-animal influenza virus has caused sporadic cases or small clusters of disease in people, but has not resulted in human-to-human transmission sufficient to sustain community-level outbreaks.			
Phase 4 - Pandemic Alert	Human-to-human transmission of an animal or human-animal influenza virus able to sustain community level outbreaks has been verified.			
Phase 5 - Pandemic Alert	The same identified virus has caused sustained community level outbreaks in two or more countries in one World Health Organization region. 1			

Phase 6 - Pandemic	In addition to the criteria defined in Phase 5, the same virus has caused sustained community level outbreaks in at least one other country in another WHO region.			
Post-Peak Period	Levels of pandemic influenza in most countries have dropped below peak levels.			
Possible New Wave	Level of pandemic influenza activity in most countries is rising again.			
Post- Pandemic Period	Levels of influenza activity have returned to levels seen for seasonal influenza in most countries.			

<sup>&</sup>lt;sup>1</sup>World Health Organization regions can be found at <a href="http://www.who.int/about/regions/en/">http://www.who.int/about/regions/en/</a>.

# What are the symptoms of pandemic influenza?

The effects of a future pandemic influenza are expected to be much more severe than for seasonal influenza, due to a lack of immunity to the virus. Seasonal influenza affects people to varying degrees, with symptoms including headache, fever, fatigue, sore throat, and runny nose. In some cases, secondary infections such as pneumonia may develop. Symptoms of pandemic influenza are likely to include high fever (higher than 38 degrees Celsius), chest pain, and difficulty breathing.

In its materials on pandemic influenza, the BCCDC advises influenza is communicable for 24 hours before onset of symptoms, and 3-5 days afterwards (but may be longer in some children and some adults).

## How can pandemic influenza be spread?

Pandemic influenza would be spread in the same way that seasonal influenza is spread, typically by exposure to ill persons or contact with surfaces that an infected person has handled or touched.

Exposure to a pandemic influenza virus may occur in a variety of ways such as the following:

- Breathing airborne droplets or particles containing influenza viruses (generated, for example, from coughing, sneezing, and aerosol-generating medical procedures used with infected patients)
- Infectious droplets (from a coughing or sneezing infected person) landing in the eye or onto the mucosa (moist inner surface) of the nose or mouth
- Shaking hands with an infected person or touching a surface contaminated with the virus followed by touching one's eyes, nose, or mouth
- Sharing food items or utensils with an infected person

## Is there a vaccine or a treatment for pandemic influenza?

At present, there is no vaccine for the prevention of a future pandemic influenza. It is only possible to develop a vaccine after the actual pandemic influenza virus has been identified. In addition, it typically requires 4-6 months to produce a new influenza vaccine.

Antiviral drugs (that slow down or kill the virus) have been shown to be beneficial against seasonal influenza. However, their effectiveness against a pandemic influenza virus is not known. There is evidence that some of these products can reduce or stop influenza viruses from spreading throughout the body and improve the prospects of survival.

## What is "occupational exposure" to pandemic influenza?

"Occupational exposure," as defined in section 6.33 of the *Regulation*, is the reasonably anticipated contact with a biological agent that is designated as a hazardous substance, resulting from the performance of a worker's duties. A pandemic virus is likely to be a hazardous substance under section 5.1.1 of the *Regulation*.

The possibility of contact varies depending on the specific organism and its route of transmission. For a virus causing pandemic influenza, contact resulting from the performance of a worker's duties may occur, for example, when caring for, or having other close contact with a person who has pandemic influenza. Examples of workplaces where contact may occur include hospitals, community care facilities, group homes, private homes, and ambulances.

# What do you need in an exposure control plan (ECP)?

An ECP is a plan for preventing harmful exposure of workers to a pandemic influenza virus in the workplace.

Section 6.34 of the *Regulation* requires that if a worker has or may have occupational exposure, then an exposure control plan must be developed and implemented, based on the precautionary principle.

The precautionary principle, as defined in section 6.33 of the *Regulation*, means adopting provisional precautions covering all routes of transmission, based on a higher level of protection when the identity, causation, or routes of transmission of the biological agent designated as a hazardous substance have not been established. *The use of this principle was one of the key recommendations of the Justice Campbell* SARS Commission Report *released in January 2007*. *The Commission recommended that in any future infectious disease crisis including pandemic influenza, the precautionary principle should guide the development, implementation, and monitoring of the means of protecting workers. In practical terms, the application of the precautionary principle to the protection of workers in an influenza pandemic will mean that in some cases respirators meeting an N95 standard or equivalent will need to be worn.* 

The ECP must incorporate the applicable elements outlined in section 5.54 of the *Regulation*, and be consistent with the provisions listed in section 6.34. In many workplaces of lower risk, the ECP may involve relatively few types of protective measures, such as provision and use of hand washing facilities and use of cough/sneeze etiquette. More extensive measures will be required for protection of workers in higher risk circumstances, such as health care personnel involved in direct patient care, emergency response personnel, and first aid attendants.

### Elements of the ECP

An ECP will need to incorporate the following elements, as specified in section 5.54 of the Regulation:

- A statement of purpose and responsibilities
- Risk identification, assessment, and control
- Education and training
- Written work procedures, when required
- Hygiene facilities and decontamination procedures, when required
- Health monitoring, when required
- Documentation, when required

Section 5.54(3) of the *Regulation* requires that the ECP be reviewed at least annually and updated as necessary by the employer, in consultation with the joint OHS committee or worker health and safety representative, as applicable. To assist with communication and understanding, it is recommended the employer consult with workplace parties in the initial development of the ECP.

The elements of the ECP are discussed below.

- 1. **Statement of purpose and responsibilities:** While individual workplaces may state the purpose of this ECP in different ways, an underlying purpose of the ECP is to prevent harmful exposure of workers to a pandemic influenza virus in the workplace. Assignment of responsibilities for implementation of the ECP in a small workplace is likely to be straightforward, typically involving one person. In a larger workplace, there may be some division of responsibilities for implementing aspects of the ECP.
- 2. **Risk identification and assessment:** The extent of control measures included in the ECP will depend on the level of risk to worker health and safety. Thus a key step in assembling the exposure control plan is the proper identification and assessment of risk.

Section 6.34(b) of the *Regulation* requires that the risk assessment be conducted by a qualified person to determine the potential for occupational exposure by any route of transmission. Under <u>section 1.1</u> of the *Regulation* "qualified" means being knowledgeable of the work, the hazards involved, and the means to control the hazards, by means of education, training, experience, or a combination.

Risk identification and assessment for exposure to the pandemic influenza virus should be based on factors such as routes of transmission, work activities, and workers who may be at risk.

- **a. Routes of transmission by which the virus can infect a worker:** In the case of pandemic influenza it is anticipated there will be three primary routes of transmission, all of which need to be controlled. Based on the use of traditional terminology, the routes are as follows:
  - Airborne transmission: Airborne (inhalable) particles can be generated from coughs and sneezes. They can also be generated from some medical procedures such as endotracheal intubation, bronchoscopy, nebulizer treatment, or airway suctioning.
    - Both coughs and sneezes produce large droplets and smaller airborne particles. The smaller particles remain suspended in air for longer periods, and can be inhaled. In addition, large droplets can evaporate quickly to form inhalable particles. As the distance from the person coughing or sneezing increases, the risk of infection from airborne exposure is reduced, but can still be a concern in smaller, enclosed areas, especially where there is limited ventilation. As the number of infected people in a room increases, all things equal, the risk of infection can increase.
  - Droplet transmission: Large droplets may be generated by an infected person through coughing or sneezing, and also through
    medical procedures such as cough induction. Droplets travel a short distance through the air and can be deposited on inanimate
    surfaces, or in the eyes, nose, or mouth.
  - Contact transmission, both direct and indirect: Direct contact involves direct skin-to-skin contact, such as when a worker performs patient care or emergency response activity that requires direct personal contact (such as turning or bathing a patient).
     Indirect contact involves a worker's contact with a contaminated intermediate object such as a contaminated table top, door knob, or a computer keyboard used by an infected worker and then touching the eyes, nose, or mouth. Contact transmission is important to consider because influenza viruses can persist for minutes on hands and hours on surfaces.

Note: The above discussion is based on the use of traditional terminology to describe routes of transmission. While the terms have general utility, it should be noted that a report of the Council of Canadian Academies report titled "Influenza Transmission and the Role of Personal Protective Respiratory Equipment: an Assessment of the Evidence" issued in December 2007 advises that it may be useful to update terminology. For example, the report notes that the diameter of a particle determines its ability to enter the respiratory tract. It advises that particles/droplets with diameters up to 100 µm (0.1 mm) can be inhaled, terming these as "inhalable particles." Particles larger than 100 µm are considered non-inhalable, and are termed "ballistic particles." The report also concludes that the current weight of evidence suggests that transmission of influenza by inhalation is more probable than by indirect contact.

b. Work activities that may result in exposure: The potential for workplace exposure will vary from sector to sector, and will also depend on work activities in a sector. For example, in the health care sector, direct patient care involves a higher potential for exposure to

the virus than activities which involve work at a distance, such as delivery of supplies, or maintenance in areas where patients are not present. In the former case, all routes of transmission are possible; in the latter, the routes are more likely to be restricted to avenues such as indirect contact.

Note: Section 6.34(b) of the *Regulation* requires that a list be assembled of all work activities for which there is a potential for occupational exposure.

- **c. Identification of the workers at risk of exposure:** Appropriate protective measures will vary according to the kinds of activities the workers perform and the relationship of those activities to routes of transmission and proximity to sources of infection.
- 3. **Risk control:** The required controls may range from simple hand washing and cough/sneeze etiquette, to more extensive measures requiring administrative and engineering controls as well as personal protective equipment (PPE). Control measures need to address all possible routes of transmission. Exposure controls must meet the requirements of sections 6.34(c), (d), and (e) of the *Regulation*.

Engineering and administrative controls: Section 6.34(c) requires engineering and administrative controls to eliminate or minimize the potential for occupational exposure. An example of an engineering control in a hospital could include a well-ventilated isolation room with a directed airflow that ensures the safety of workers. An example of an employer's administrative work practice control is a policy of encouraging sick workers to remain at home. Work practices would also include the procedures established in the workplace to eliminate or minimize the potential for exposure. Such work practices may be substantial in higher-risk workplaces (refer to Table 2).

Standard precautions: Section 6.34(d) requires the implementation of both standard infection control and transmission-based precautions, to address issues such as housekeeping practices to keep the workplace free from accidental contamination, as well as measures to ensure safety when handling laundry or samples of biological agents. Ensuring the workplace is free from accidental contamination is a fundamental measure for protection against the pandemic influenza virus. Procedures for safety with laundry or diagnostic samples will be needed where applicable, for example, in health care facilities that provide such services.

Personal protective equipment (PPE): Section 6.34(e) requires a description of PPE designed to eliminate or minimize occupational exposure. Depending on the circumstances of risk and the effectiveness of other controls, required PPE may include respirators, gloves, gowns, goggles, surgical masks, and face shields. The proper donning, fit checking, doffing, and disposal of the PPE and training in these practices must also be considered. Requirements for PPE are also found in Part 8 (Personal protective clothing and equipment) of the Regulation. Table 2 at the end of this guideline provides information on basic measures related to personal hygiene and PPE for several types of work circumstances.

4. **Education and training:** Under section 6.34(f) of the *Regulation*, the employer must ensure that workers are informed about the content of the ECP and provided with adequate education, training, and supervision to work safely with, and in proximity to, the pandemic influenza virus. Information provided should ensure an understanding of the means of transmission of the virus and applicable control measures. Information on the use of PPE should include instruction on the means of donning and doffing the equipment.

Supervisors need to ensure that instruction has been provided to workers in procedures, and that procedures are followed, including the use of PPE. Where PPE is required, supervisors need to lead by example.

5. Written procedures, hygiene and decontamination facilities, health monitoring, and documentation: Section 5.54 of the *Regulation* requires these elements of the ECP where necessary to protect workers. In the event of a pandemic influenza, the expectations are as follows:

Written procedures would be required if the complexity of the procedure and risks involved, or the size of the workplace merit instructions being written. For example, written procedures might be required for a hospital isolation ward, but not in a small workplace of low risk as long as worker education and training addresses basic issues of worker protection.

**Hygiene facilities** to permit proper hand washing whenever needed are a basic expectation under all ECPs. **Decontamination procedures** will be needed in some higher-risk workplaces, for example, when cleaning reusable personal protective equipment such as gowns, aprons, face shields, and goggles.

In all workplaces workers should be **monitored** for possible symptoms of pandemic influenza. If a worker develops symptoms, appropriate measures should be taken to minimize exposure of other workers, and the worker should be referred to the appropriate medical authority.

Sections 6.34(g) and (h) of the *Regulation* establish requirements for **documentation** of worker training and education, and of exposure to the virus when performing work activities. It is expected that documentation of the job positions that would involve exposure to the pandemic influenza virus coupled with the identity of workers who are in those positions will meet the intent of the requirement for records of worker exposure.

# Where to get more information

Both WorkSafeBC and various public health authorities have web sites with further information on infectious diseases, pandemic planning, and protection from exposure.

- WorkSafeBC worksafebc.com
- The BC Centre for Disease Control bccdc.ca

- The Public Health Agency of Canada phac-aspc.gc.ca
- The World Health Organization who.int
- The U.S. Centers for Disease Control cdc.gov

Table 2: Personal protective measures for pandemic influenza

This Table provides basic information for personal protection of workers in some but not all types of work situations. A risk analysis will need to be done in all cases, including those covered by this Table, to ensure that control measures properly protect workers. The Table focuses on PPE and personal hygiene, but does not address work procedures or engineering controls, which also need to be considered in the exposure control plan.

	Low risk: Workers who typically have no contact with pandemic influenza-infected persons <sup>2</sup>	Moderate risk: Workers who may be exposed to infected persons from time to time in relatively large, well ventilated workspaces <sup>3</sup>	High risk: Workers who may have contact with infected patients, or with infected persons in small, poorly ventilated workspaces <sup>4</sup>
hygiene	of hand wines that contain effective	Yes (washing with plain or antimicrobial soap and water; or use of hand wipes that contain effective disinfectant)	Yes (washing with plain or antimicrobial soap and water; or use of hand wipes that contain effective disinfectant)
Disposable gloves	Not required	Not required (unless handling contaminated objects on a regular basis)	Yes in some cases- e.g., when working directly with pandemic influenza patients
Apron, Gown, or similar body protection	Not required	Not required	Yes in some cases- e.g., when working directly with pandemic influenza patients
Eye protection - Goggles or Face shield	Not required	Not required	Yes in some cases- e.g., when working directly with pandemic influenza patients
Airway Protection - respirators	Not required	Not required (unless likely to be exposed to coughing and sneezing)	Yes (minimum N95 respirator or equivalent)

- 1. For example, lab work is an activity not covered by the Table. Lab workers will require appropriate hand, body, and eye protection when handling specimens that are or may be contaminated with the pandemic influenza virus. Also, approved respiratory protection would be required where there may be exposure to contaminated aerosols.
- 2. This category would typically apply to workers who do not have contact with the public, for example, in locations such as production facilities or administrative clerical areas.
- 3. This category would typically include workers who routinely deal with the public, some of whom may be infected with the pandemic influenza virus, in circumstances where typically the contact is of a short duration, and the workspace is relatively large and well ventilated. Examples include cashiers, tellers, receptionists, and sales persons. Protective measures may be required if workers handle, on a regular basis, objects that may be contaminated (e.g., money, paperwork, or ticket stubs), or are exposed to coughing or sneezing.
- 4. High-risk activities typically involve workers (e.g., health care, first aid, and emergency response) who treat patients with pandemic influenza, or who do other work in isolation wards, rooms, or home settings where such patients are present. They may also include other circumstances where there is extensive contact with the public in small enclosed areas where ventilation is poor.

### G6.36(1.1) Safety engineered needles

Issued January 1, 2007; Editorial Revision October 2, 2007; Editorial Revision February 1, 2008; Editorial Revision April 6, 2020

# Regulatory excerpt

Section 6.36(1.1) of the OHS Regulation ("Regulation") states:

- (1.1) On and after January 1, 2008, a needleless device or safety-engineered hollow bore needle must be used for the following procedures performed to care for or treat a person:
- (a) withdrawal of body fluids;
- (b) accessing a vein or artery;
- (c) administration of medications or fluids;
- (d) any other procedure involving the potential for an exposure to accidental parenteral contact for which a needleless system or safety-engineered hollow bore needle system is available.

### Purpose of guideline

This guideline explains the implementation period under section 6.36(1.1) and provides some examples of workplaces where the s. 6.36 requirements apply.

## Implementation period

The requirements of sub-section 1.1 as well as the requirements in sub-sections 1.3, 1.4, 1.5, and 1.6 that apply to subsection 1.1, are effective on and after January 1, 2008, to provide sufficient time for employers to commit funds, adopt safety-engineered devices, change workplace policy and practices, and educate and train workers.

# Definition of "workplace"

Section 13 of the *Workers Compensation Act* defines a workplace as any place where a worker is or is likely to be engaged in any work and includes any vessel, vehicle, or mobile equipment used by a worker in work. Some examples of workplaces where section 6.36(1.1) may apply include, but are not limited to

- Hospitals
- Ambulances
- Homecare sites where a community health nurse visits
- Blood collection clinics
- Correctional institutes
- Dental offices
- Medical and dental laboratories
- Health clinics, including those located in industrial facilities
- Outpatient facilities (including renal dialysis clinics and cancer treatment centers)
- Hemodialysis centers
- Drug treatment centers
- Blood banks
- Hospices
- Residential care facilities
- Assisted living residences
- · Physicians' offices
- Naturopaths' offices
- Acupuncture clinics
- Tattoo parlours

G6.36(1.3) Not clinically appropriate

Issued October 2, 2007; Editorial Revision February 1, 2008; Revised March 7, 2011; Revised May 17, 2012

# Regulatory excerpt

Sections 6.36(1.1) to (1.3) of the OHS Regulation ("Regulation") state:

- (1.1) On and after January 1, 2008, a needleless device or safety-engineered hollow bore needle must be used for the following procedures performed to care for or treat a person:
- (a) withdrawal of body fluids;
- (b) accessing a vein or artery;
- (c) administration of medications or fluids;
- (d) any other procedure involving the potential for an exposure to accidental parenteral contact for which a needleless system or safety-engineered hollow bore needle system is available.
- (1.2) On and after October 1, 2008, any medical sharp used to care for or treat a person must be a safety engineered medical sharp.
- (1.3) Subsections (1.1) and (1.2) do not apply if
- (a) use of the required device, needle or sharp is not clinically appropriate in the particular circumstances, or
- (b) the required device, needle or sharp is not available in commercial markets.

And section 6.36(1.6) of the Regulation states:

Safe work procedures and practices relating to the use of a safety-engineered hollow bore needles and safety-engineered medical sharps must be developed and implemented before use of these devices.

And section 6.33 of the Regulation states:

"medical sharp" means a needle device, scalpel, lancet, or any other medical device that can reasonably be expected to make parenteral contact;

"safety-engineered medical sharp" means a medical sharp with a built-in safety feature or mechanism that eliminates or minimizes the risk of accidental parenteral contact while or after the sharp is used;

And section 6.34(1)(c) of the Regulation states:

5.54 and that includes the following:

. . .

(c) engineering controls and administrative controls to eliminate or minimize the potential for occupational exposure

#### Purpose of guideline

The purpose of this guideline is to clarify the meaning of the term 'not clinically appropriate', and the application of this exemption under section 6.36(1.3) of the *Regulation*.

### Not clinically appropriate

Under section 6.36(1.3) of the *Regulation*, the requirement to use a safety-engineered medical sharp under section 6.36(1.1) does not apply if the sharp is not clinically appropriate for a specific step in a medical or dental procedure.

### Factors to be considered

A safety-engineered medical sharp is considered not clinically appropriate if the use of that device will unreasonably compromise patient safety or the success of a specific medical or dental procedure. For example, the safety-engineered mechanism may in some instances restrict:

- a device (e.g. scalpel) from reaching a tight space (e.g. nasal cavity, ear canal, or a deep cavity, such as a hip joint); or
- a clinician's line of sight.

The use of a safety-engineered medical sharp may necessitate the modification of steps of a medical procedure. This does not necessarily mean that the use of a safety-engineered medical sharp will compromise patient safety or the success of a specific medical or dental procedure. It may be clinically appropriate to use a safety-engineered medical sharp even though its use requires modification of procedural steps.

If a specific safety-engineered medical sharp is determined to be not clinically appropriate for a particular step in a procedure, all other commercially available safety-engineered medical sharps for that specific step in the procedure need to be assessed for clinical appropriateness.

#### Making a determination

The employer's determination of whether the use of a safety-engineered medical sharp is not clinically appropriate should include persons who are knowledgeable of:

- performing the procedure in question;
- assessments by others performing the procedure in question; and
- the safety-engineered medical sharps that are commercially available and their applicability to the procedure.

The employer should document the reasons why the use of a safety-engineered medical sharp required under section 6.36(1.1) of the *Regulation* is not clinically appropriate. The documented reasons should, at a minimum, include the following information:

- the safety-engineered medical sharp(s) assessed;
- the non-safety-engineered medical sharp currently used;
- the part of the procedure where the use of a safety-engineered medical sharp has been deemed to be not clinically appropriate;
- the reason(s) why the safety-engineered medical sharp would compromise patient safety or the success of a specific medical or dental procedure;
- additional safe work procedures used to minimize the risk of injury to workers (if appropriate);
- the name(s) of the person(s) who approved the use of the non-safety-engineered medical sharp; and
- the date of decision.

This documentation should be readily available to workers who procure, prepare and use medical sharps.

# Periodic review

The approval to use a non-safety-engineered medical sharp should be reviewed when new technology becomes commercially available, and at least annually.

## In situ determinations

Following a determination that a safety-engineered medical sharp is clinically appropriate for a particular medical or dental procedure, there may be individual cases where the use of the safety-engineered medical sharp is not clinically appropriate.

In these unique cases, the person making that determination should document that situation, including the medical procedure, the safety-engineered medical sharp, and reasons why the safety-engineered medical sharp would compromise patient safety or the success of the specific medical or dental procedure. The documentation should be included as part of the periodic review of determinations about the use of non-safety-engineered

medical sharps.

#### Safe work practice controls

The use of safety-engineered medical sharps is only one part of the employer's overall exposure control plan. Section 6.34(1)(c) of the *Regulation* requires that engineering controls and work practice controls be established to eliminate or minimize the potential for occupational exposure.

For further information on other engineering and work practice controls that may be appropriate for use under section 6.34(1)(c), refer to OHS Guideline G6.34-2 Risk assessment, engineering and administrative controls, and personal protective equipment.

G6.36(1.4) and (1.5) Highest level of protection

Issued October 2, 2007; Editorial Revision February 1, 2008; Editorial Revision April 6, 2020

## Regulatory excerpt

Sections 6.36(1.4) and 6.36(1.5) of the OHS Regulation ("Regulation") state:

- (1.4) If more than one type of safety-engineered hollow bore needle or safety-engineered medical sharp is available in commercial markets, the needle or sharp that provides the highest level of protection from accidental parenteral contact must be used.
- (1.5) For purposes of subsection (1.4), an employer must make a determination of the highest level of protection available based on information provided by manufacturers, independent testing agencies, objective product evaluation, or other reliable sources.

Regulation section 6.33 includes the following definitions:

"medical sharp" means a needle device, scalpel, lancet, or any other medical device that can reasonably be expected to make parenteral contact;

"parenteral contact" means piercing of mucous membranes or the skin;

"safety-engineered medical sharp" means a medical sharp with a built-in safety feature or mechanism that eliminates or minimizes the risk of accidental parenteral contact while or after the sharp is used;

#### Purpose of guideline

The purpose of this guideline is to discuss the requirements and considerations for selecting safety-engineered medical sharps (SEMS), including safety-engineered hollow bore needles, that provide workers the highest level of protection. The guideline also highlights some of the obligations of suppliers of these devices.

# Considerations for "highest level of protection"

SEMS with similar or different engineering controls may provide comparable levels of protection. However, where evidence suggests that one device provides a higher level of protection than another in a particular circumstance, the employer is required to select the SEMS affording the highest level.

To determine which SEMS provides the highest level of protection, consideration should be given to

- Evidence that other devices would reduce accidental contact in that workplace and for that task more effectively
- Consideration and review of the different types of engineering controls that are commercially available for the relevant devices
- Information provided by manufacturers, independent testing agencies, "objective product evaluation" (see below), or other reliable sources, as specified in section 6.36(1.5)
- Conducting a periodic review to ensure that the devices selected are appropriate based on the most current scientific knowledge of
  protection from sharps injuries. For example, a review may identify technological developments that may eliminate or reduce exposure to a
  biological agent designated as a hazardous substance under section 5.1.1, as well as any new information on the efficacy of the selected
  devices.

Note: Review of exposure control plans

- Section 6.34 requires the employer to develop and implement an exposure control plan (ECP) meeting the requirements of section
   5.54 if a worker has or may have occupational exposure.
- Section 5.54(3) requires the employer to review the ECP at least annually and update the ECP as necessary in consultation with the joint health and safety committee or the worker's health and safety representative as applicable.
- Section 5.54(2)(b) requires that the ECP incorporates the element of risk control, which includes the selection of devices under section 6.36(1.5) where applicable.

#### **Objective product evaluation**

Section 6.36(1.5) allows an employer to make a determination of the highest level of protection available based on an objective product evaluation. An objective product evaluation should enable the employer to assess the extent to which the SEMS eliminates or minimizes the risk of parenteral contact while or after the device is used. An objective product evaluation should assess the factors that are relevant to determining the effectiveness of SEMS and be applicable to the groups of devices and procedures under consideration. Anecdotal evidence alone is not sufficient to determine that a device provides the highest level of protection.

The following are examples of criteria for employers to consider when using an objective product evaluation to determine which SEMS provide the highest level of protection:

- The device includes built-in protection of the needle or other sharp
- The user can easily tell whether the safety feature is activated
- The device performs reliably
- The device is easy to use and is self-evident
- The safety feature is in effect before disposal and remains in effect after disposal

Sample evaluation forms for safety engineered needles and IV systems were developed through the training for Development of Innovative Control Technologies (TDICT) Project and are available at <a href="http://www.osha.gov/">http://www.osha.gov/</a>. Type in the search term "TDICT" and click on the document noted as the 2001 -- 11/27/2001 CPL 02-02-069 [CPL-2-2-69] - Enforcement Procedures for the Occupational Exposure to Bloodborne Pathogens.

# Consideration of both "highest level of protection" and "clinically appropriate"

Section 6.36(1.3) recognizes that the use of SEMS affording the highest level of protection to a worker may not be clinically appropriate for certain clinical situations.

Consider the following example where an employer is initially considering three SEMS for use in a procedure:

	What level of protection from accidental parenteral contact does the SEMS provide the worker?	Is the SEMS clinically appropriate for the procedure in question?
SEMS #1	High	No
SEMS #2	Medium	Yes
SEMS #3	Low	Yes

In this case, although SEMS #1 may provide the highest level of protection to the worker, it has been determined that it is not clinically appropriate to use it in the procedure in question. Therefore, for the purposes of section 6.36(1.4), SEMS #2 must be used because it provides the highest level of protection among those SEMS that are commercially available and clinically appropriate to use in the procedure in question.

# Suppliers' OHS obligations and highest level of protection

Section 26 of the Workers Compensation Act ("Act") places obligations on suppliers. For example, section 26 requires that every supplier must

Ensure that any tool, equipment, machine, or device, or any biological, chemical, or physical agent, supplied by the supplier is safe when used in accordance with the directions provided by the supplier and complies with the OHS provisions and the regulations

Provide directions respecting the safe use of any tool, equipment, machine, or device, or any biological, chemical, or physical agent, that is obtained from the supplier to be used at a workplace by workers

For example, if a supplier fails to provide directions respecting the safe use of SEMS, then the supplier is in contravention of section 26. In this case, even if the SEMS could potentially provide the highest level of protection, the workers may not receive the highest level of protection because they are without adequate directions from the supplier.

Health Canada is the federal regulator that administers the <u>Medical Devices Regulations</u>, issued under the <u>Food and Drugs Act</u>. The <u>Medical Devices Regulations</u> apply to the sale and advertising for sale of a medical device and the importation of a medical device for sale or use on individuals. Under the <u>Medical Devices Regulations</u>, manufacturers have obligations regarding the safety and effectiveness of the devices.

Manufacturer's compliance with this regulation alone does not guarantee that the use of the device provides the highest level of protection in general or in particular circumstances.

## G6.40 Medical evaluation

Issued August 1999; Revised February 1, 2008

#### Regulatory excerpt

Section 6.40 of the OHS Regulation ("Regulation") states:

If a worker may have been exposed to the human immunodeficiency virus (HIV), hepatitis B virus or any other biological agent designated as a hazardous substance in section 5.1.1, the employer must advise the worker to seek immediate medical evaluation.

#### Purpose of guideline

The purpose of this guideline is to provide suggested management protocol in the event a worker is exposed to HIV, hepatitis B, or other biological agent designated as a hazardous substance under section 5.1.1. The guideline also provides information about the confidentiality of test results.

## Management protocol

In the event that a worker has been, or may have been, exposed to HIV, hepatitis B, or any other biological agent designated as a hazardous substance in section 5.1.1, the management protocol typically will include immediate first aid, reporting, and documentation of the incident, followed by medical assessment at a hospital emergency department as soon as possible. The times in which a worker should receive a medical

assessment for various types of occupational exposure should be included in the exposure control plan under section 6.34(1). For HIV, for example, this would be preferably within two hours of the incident.

#### **Confidentiality**

Medical personnel need informed consent in writing before blood tests are taken and before results regarding either the source or the exposed worker can be released. Blood tests include those for HIV, hepatitis B and C, and/or liver function status. Because all results are confidential, a WorkSafeBC prevention officer must respect the confidentiality of any information received in this regard from any source.

G6.42 Cytotoxic drugs - Definition

Issued August 1, 1999; Editorial Revision October 2004; Retired consequential to December 1, 2023 Regulatory Amendment

This guideline has been retired consequential to the December 1, 2023 Regulatory Amendment.

G6.43 Cytotoxic drug - Exposure control plan

Issued August 1, 1999; Retired consequential to December 1, 2023 Regulatory Amendment

This guideline has been retired consequential to the December 1, 2023 Regulatory Amendment.

G6.45 Risk assessment - Grouping of hazardous drugs

Issued consequential to December 1, 2023 Regulatory Amendment

#### Regulatory excerpt

Sections 6.45(1) and (2) of the OHS Regulation ("Regulation") state:

- (1) An employer must ensure that a qualified person prepares a written risk assessment for the hazardous drugs identified in the list developed under section 6.44.
- (2) A risk assessment must consider at least the following:
- (a) information about the hazardous properties of the hazardous drug, including any information provided by manufacturers, suppliers or pharmacists, or in scientific publications, with respect to
- (i) the active ingredients of the hazardous drug and the concentration of those ingredients,
- (ii) the potential harmful health effects of exposure to the hazardous drug, including both acute and chronic effects and reproductive effects,
- (iii) whether exposure to multiple hazardous drugs may increase the risk of harmful health effects, and
- (iv) any special precautions a worker is advised to take;
- (b) the scope, circumstances and nature of the work activities related to a hazardous drug, including
- (i) the classification, formulation and quantity of the hazardous drug,
- (ii) the frequency and duration of exposure to the hazardous drug,
- (iii) whether the potential for exposure may increase if the form of the hazardous drug is altered during a work activity by crushing, dissolving, piercing or mixing that hazardous drug or by opening a container or package that holds that hazardous drug, and
- (iv) whether another worker in the same work area may be at risk of exposure to the hazardous drug,
- (c) the effectiveness of existing and planned control measures to eliminate or minimize exposure to the hazardous drug, taking into account, if applicable,
- (i) information respecting a spill, uncontrolled release or accidental exposure, and
- (ii) environmental monitoring or exposure monitoring data;
- (d) any additional information relevant to the risk from the hazardous drug.

#### Purpose of guideline

The purpose of this guideline is to provide information about the requirements for a qualified person performing risk assessments on a group of similar hazardous drugs.

The employer must ensure that the risk assessment is prepared by a qualified person. Under section 1.1 of the Regulation, "qualified" means being

knowledgeable of the work, the hazards involved, and the means to control the hazards, by way of education, training, experience, or a combination.

The qualified person does not necessarily have to be one individual. A qualified person may be a team of people who bring different areas of knowledge about the *Regulation*, the hazardous drugs used, the various work processes that may expose workers to a hazardous drug, and the means to control exposure.

# Grouping of hazardous drugs

For some employers, the grouping of similar hazardous drugs for the purpose of preparing their risk assessment may be useful. For workplaces using a large number of hazardous drugs, it may be helpful to group them by nature of the work activities and degree of risk of exposure. This type of assessment may allow a more efficient process than assessing one drug at a time.

While the *Regulation* uses the singular form "the hazardous drug" in section 6.45(2), this wording allows for the plural form in its interpretation. This means section 6.45 of the *Regulation* permits a risk assessment on a group of hazardous drugs providing a qualified person can demonstrate a rationale for the grouping (e.g., the drugs have similar toxicological profiles, and the forms of administration are the same) and can adequately assess the risk of exposure.

The grouping must be based on information gathered by the qualified person about the hazardous drugs and their use in the workplace, as outlined in section 6.45(2).

For more information on risk assessments, qualified person, and other related topics, refer to the WorkSafeBC publication, <u>Safe Work Practices</u> for <u>Handling Hazardous Drugs</u>.

G6.50(3) Mixing, preparing, and priming of specific hazardous drugs

Issued July 10, 2025; Editorial Revision October 20, 2025

## Regulatory excerpt

Sections 6.50(2) and (3) of the OHS Regulation ("Regulation") state:

- (2) This section applies to the following hazardous drugs:
- (a) a hazardous drug that is identified in the NIOSH list as being antineoplastic;
- (b) a hazardous drug for which the manufacturer recommends ventilated engineering controls;
- (c) a hazardous drug that is classified by the IARC Monographs as a Group 1 or Group 2A carcinogen.
- (3) An employer must ensure that all of the following work activities are performed in a ventilated enclosure that meets the requirements set out in subsection (4):
- (a) mixing a hazardous drug to which this section applies;
- (b) preparing a hazardous drug to which this section applies;
- (c) priming an intravenous administration set with a solution containing a hazardous drug to which this section applies.

### Purpose of guideline

The purpose of this guideline is to provide further information on the meaning of mixing, preparing, and priming activities related to a specific set of hazardous drugs that are to be conducted in a ventilated enclosure under section 6.50(3) of the *Regulation*.

When this guideline refers to a "hazardous drug," it is referring to those drugs covered under section 6.50(2) of the *Regulation*.

# Mixing, preparing, and priming of hazardous drugs

The intent of section 6.50 of the *Regulation* is to ensure that, due to the inherent nature of the hazardous drugs covered under section 6.50(2), mixing, preparing, and priming these hazardous drugs are conducted in a ventilated enclosure. This helps ensure the exposure risk is minimized to as low as reasonably achievable for these work activities with a higher potential to generate aerosols and vapours.

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For the purpose of section 6.50(3):

Mixing a hazardous drug includes the act of combining ingredients into a single formulation.

Preparing a hazardous drug includes activities that alter the formulation (i.e., changing physical form, concentration, dosage) of active pharmaceutical ingredient(s) to make a hazardous drug.

Priming an intravenous (IV) administration set with a hazardous drug refers to the act of running a hazardous drug through the IV tubing to remove the air prior to attaching the IV tube to a patient.

Priming IV administration sets for hazardous drugs with a saline solution or other solutions not containing the hazardous drug is permitted outside of the ventilated enclosure.

The use of a closed system in priming IV sets with a hazardous drug is not a substitute for a ventilated enclosure.

#### Point-of-care activities

Mixing, preparing, and priming activities of hazardous drugs under section 6.50(3) of the *Regulation* is not intended to apply to point-of-care activities commonly performed by health care workers shortly before administration of a hazardous drug to a patient at a nursing station or at the bedside of the patient.

Examples of common point-of-care activities include the following (this is not an exhaustive list):

- Removal of external packaging of a hazardous drug prior to administration
- Pouring a liquid form of a hazardous drug into juice for a patient
- Reconstituting a hazardous drug powder with a diluent in a pre-filled syringe or vial shortly before administering into a patient
- Dissolving a tablet form of a hazardous drug into a non-hazardous liquid for a patient
- Withdrawing a syringe from a vial prefilled with a hazardous drug for administration

#### Other reasons for the use of a ventilated enclosure

A risk assessment under <u>section 6.45</u> of the *Regulation* is required for all work activities involving any hazardous drugs, and not restricted to the hazardous drugs included in section 6.50(2) and activities under section 6.50(3).

The risk assessment must consider, among other sources, any information provided by the drug manufacturer, including any special handling precautions. The findings in the risk assessment will determine how to ensure the risk of worker exposure is kept as low as reasonably achievable, as outlined in section 6.48 of the Regulation. Eliminating or controlling exposure can be achieved through elimination, substitution, engineering controls (e.g., ventilated enclosure), administrative controls, and personal protective equipment.

For more information on risk assessments, control measures, and best practices, refer to the WorkSafeBC publication, <u>Safe Work Practices for Handling Hazardous Drugs.</u>

G6.53(1) Biological safety cabinets (BSCs)

Issued August 1, 1999; Editorial revision May 17, 2006; Retired consequential to December 1, 2023 Regulatory Amendment

This guideline has been retired consequential to the December 1, 2023 Regulatory Amendment.

G6.53(2) Safe work procedures

Issued May 17, 2006; Retired consequential to December 1, 2023 Regulatory Amendment

This guideline has been retired consequential to the December 1, 2023 Regulatory Amendment.

G6.60 Lead - Exposure control plan

Issued August 1, 1999; Editorial Amendment October 2004; Editorial revision consequential to May 1, 2017 Regulatory Amendment

# Regulatory excerpt

Section 6.60 of the OHS Regulation ("Regulation") states:

- (1) If a risk assessment indicates that a worker is or may be exposed to lead dust, fumes or mist, the employer must
- (a) ensure that a qualified person develops an exposure control plan meeting the requirements of section 5.54 and subsection (3) of this section, and
- (b) implement the exposure control plan.

## Purpose of guideline

This guideline provides some explanation of when an exposure control plan is required for lead dust, fumes or mist.

# Determining whether an exposure control plan is required

Section 6.60 of the *Regulation* requires the employer to develop and implement an exposure control plan meeting the requirements of section 5.54 and 5.57(2) of the *Regulation* if a worker is or may be exposed to lead. The International Agency for Research on Cancer (IARC) has categorized inorganic lead as group 2A (probably carcinogenic to humans). Inorganic lead is a designated substance under section 5.57 of the *Regulation*.

This requirement for an exposure control plan is primarily intended to address exposure from two routes of entry — inhalation and ingestion.

Exposure to lead via inhalation can be quantitatively assessed in the field by air sampling and this monitoring is useful in the determination of control

measures. Refer to section 6.61 of the Regulation.

Exposure to lead via ingestion can be assessed in the field by inspection and surface sampling. Items that should be evaluated include, but may not be limited to, the following:

- Housekeeping procedures
- Location of lunchrooms in relation to production areas
- Personal hygiene and habits of workers (such as use of washing facilities, change of clothing, nail biting, and smoking),
- Effectiveness of local exhaust ventilation
- Cleanliness of personal protective equipment

There are no WorkSafeBC regulatory limits for lead on surfaces. However, other jurisdictions have developed acceptable levels for lead on various surfaces and these levels can be useful in helping determine whether a worker is or may be exposed to lead. A summary of these values can be found in the WorkSafeBC publication <u>Safe Work Practices for Handling Lead</u>.

Further information on the elements of an exposure control plan can be found in the OHS Guidelines for section 5.54 of the Regulation and in *Safe Work Practices for Handling Lead*.

G6.61.1 Exception to monitoring requirements - Objective air monitoring data and associated record-keeping

Issued consequential to May 1, 2017 Regulatory Amendment

## Regulatory excerpt

Section 6.61.1 of the OHS Regulation ("Regulation") states, in part:

- (2) Despite section 6.61, an employer is not required to monitor the concentration of airborne lead if a qualified person determines that
- (a) existing control measures are effective in keeping worker exposure as low as reasonably achievable below the exposure limit, and
- (b) the employer
- (i) has previously monitored for airborne concentrations of lead during equivalent work operations and there is no reason to believe that the results of the previous monitoring would not continue to apply, or
- (ii) has objective air monitoring data that was collected during equivalent work operations through industry surveys or peer-reviewed or scientific studies that use sampling and analytical methods, referred to in section 6.61(2).
- (3) An employer must keep, for at least 10 years, a record documenting the following, as applicable:
- (a) the previous monitoring data used for the purpose of subsection (2)(b)(i);
- (b) the source of the objective air monitoring data, and the data itself, referred to in subsection (2)(b)(ii).

Section 6.61(2) of the "Regulation" states:

- (2) Acceptable sampling and analytical methods for the purpose of subsection (1) are as follows:
- (a) a method detailed in a standard occupational hygiene reference published by
- (i) the National Institute for Occupational Safety and Health, or
- (ii) the Occupational Safety and Health Administration;
- (b) another method acceptable to the Board.

# Purpose of guideline

This guideline provides an example of how to comply with the requirement to rely on objective air monitoring data for airborne lead, and the necessary retention of associated records.

### Objective monitoring data

Section 6.61.1(2) describes an exception to the requirement for an employer to perform workplace air monitoring if a qualified person has determined that the employer has objective air monitoring data. The data must have been collected

- During equivalent work operations through industry surveys or peer-reviewed or scientific studies
- Using sampling and analytical methods referred to in section 6.61(2)

Equivalent work operations are activities that closely match the lead processes, types of materials, products or coatings, work practices, control measures, and environmental conditions that are present in the employer's current work operations.

WorkSafeBC has published recommended control measures and personal protective equipment (PPE) for work activities involving lead in paints and other coatings. These measures and PPE are specified in Part 3 of the WorkSafeBC publication <u>Safe Work Practices for Handling Lead</u>. The control measures and PPE are based on objective monitoring data from reliable scientific sources; this is further explained in the WorkSafeBC publication.

If a qualified person verifies that the employer's work operations and activities are equivalent to those described in Part 3 of *Safe Work Practices* for *Handling Lead*, then the employer will have relied on appropriate objective monitoring data and will be in compliance with the intent of section 6.61.

In order for section 6.61.1(2) to be satisfied, a qualified person must have also determined that the control measures are effective in keeping worker exposures as low as reasonably achievable below the exposure limit. If the risk assessment and the exposure control plan are properly completed by a qualified person, this requirement for effectiveness will be satisfied.

Note that the control measures and PPE described in Part 3 of the publication are only for paints and other coatings and do not apply to work activities involving other lead-containing materials.

Employers are not required to follow the example of compliance described in this guideline. An employer can choose to perform air monitoring as per section 6.61, can rely on previous monitoring under section 6.61.1(2)(b)(i), or can use other objective air monitoring data as described in section 6.61.1(2)(b)(ii).

# Record keeping

Section 6.61.1(3) of the Regulation specifies that the source of the objective exposure monitoring data, and the data itself, must be kept for at least ten years. When a qualified person has made the necessary determinations under section 6.61.1 relying on the WorkSafeBC publication *Safe Work Practices for Handling Lead* as the source of objective monitoring data, this information should be documented and retained for ten years. This will satisfy the employer's obligation under section 6.61.1(3)(b).

G6.67 Health protection

Issued August 1, 1999; Editorial Revision April 14, 2022

#### Regulatory excerpt

Section 6.67 of the OHS Regulation ("Regulation") states:

The employer must develop and implement an effective health protection program, in a manner acceptable to the Board, if a worker is exposed to potentially hazardous levels of lead.

### Purpose of guideline

The purpose of this guideline is to establish the manner acceptable to WorkSafeBC for developing and implementing an effective health protection program if a worker is exposed to potentially hazardous levels of lead.

#### Health protection program

If an exposure control plan is required, as determined by section 6.60(1) of the *Regulation*, then sections 5.54, 5.57(2), and 6.60(3) must be met.

The development and implementation of a health protection program in keeping with the guidance in OHS Guideline <u>G5.54-5 Health monitoring</u> are acceptable to WorkSafeBC.

G6.68 Records

Issued August 1, 1999: Editorial Revision October 26, 2011

# Regulatory excerpt

Section 6.68 of the OHS Regulation ("Regulation") states:

The employer must

- (a) maintain records of risk assessments, worker exposures and worker training, and
- (b) ensure that health monitoring records are maintained in a manner acceptable to the Board.

## Purpose of guideline

The purpose of this guideline is to establish the manner acceptable to WorkSafeBC for maintaining health monitoring records.

### Record keeping

Section 6.68 of the *Regulation* requires that the employer maintain records of risk assessments, worker exposures, worker training, and health monitoring. Health monitoring records maintained in keeping with the guidance in OHS Guideline <u>G5.54-5</u> and in keeping with the instructions of an occupational health physician or nurse are acceptable to WorkSafeBC.

If the employer wishes to keep records in any other manner, they are to send their request to the OHS Practice and Engineering

#### Support department for consideration.

No other manner may be used until written acceptance has been given by that department.

G6.70 Pesticides — Definitions

Issued August 1999; Revised March 31, 2010; Revised consequential to September 1, 2021 Regulatory Amendment

### Regulatory excerpt

Section 6.70 of the OHS Regulation ("Regulation") states, in part:

"toxic" in reference to a pesticide, means a formulation or a pesticide containing active ingredients that, by oral or dermal routes of entry, have acute mammalian toxicities expressed as the Lethal Dose 50% (LD<sub>50</sub>), and, for this purpose, a pesticide is considered to be

- (a) very toxic, if the LD<sub>50</sub> is less than 500 mg/kg,
- (b) moderately toxic, if the LD<sub>50</sub> is 500 mg/kg or more but less than or equal to 1 000 mg/kg, and
- (c) slightly toxic, if the LD<sub>50</sub> is more than 1 000 mg/kg but less than or equal to 2 000 mg/kg;

## Purpose of guideline

The purpose of this guideline is to assist stakeholders in obtaining the acute mammalian toxicity information expressed as LD50 to determine whether the toxicity category for a pesticide is "very toxic," "moderately toxic, or "slightly toxic." This information is required to apply the requirements of sections 6.77, 6.80, 6.85, 6.87, 6.89, and 6.91 of the *Regulation*.

### Sources of information

Section 6.70 of the *Regulation* defines certain terms relating to toxicity, including the terms: "slightly toxic," "moderately toxic," and "very toxic." These terms relate to a pesticide "containing active ingredients which have acute mammalian toxicities expressed as the Lethal Dose 50% (LD<sub>50</sub>) ..."

The Pest Management Regulatory Agency (PMRA), a part of Health Canada, provides information on pesticide labels as signal words which corresponds to the relative Lethal Dose 50% and the toxicity descriptor as slightly toxic, moderately toxic, or highly toxic.

### **Current PMRA Hazard Categories**

Lethal Dose - 50%	Descriptor	Primary Display Panel Label Signal Words
Oral Toxicity (mg/kg bw)		
< 500	Highly accutely toxic	DANGER POISON
500 - 1000	Moderately acutely toxic	WARNING POISON
1000 - 2000	Slightly acutely toxic	CAUTION POISON
> 2000 (commercial)	Low acute toxicity	[no labelling required]
> 2000 (domestic)	L avy aguta tavigity	a) CAUTION POISON
2000 (dollesuc)	Low acute toxicity	b) [no labelling required]
Dermal Toxicity (mg/kg bw)		
< 500	Highly accutely toxic	DANGER POISON
500 - 1000	Moderately acutely toxic	WARNING POISON
1000 - 2000	Slightly acutely toxic	CAUTION POISON
> 2000	Low acute toxicity	[no labelling required]

Reference: Health Canada - Quidance for Waiving or Bridging of Mammalian Acute Toxicity Tests for Pesticides - December 2013

For example, if a pesticide label states "DANGER POISON," then the  $LD_{50}$  for that pesticide is less than 500 mg/kg and will be considered to be very toxic under section 6.70 of the *Regulation*.

Typically, safety data sheets (SDSs) for chemicals contain toxicity information such as LD50. However, because pesticides are covered by other federal legislation, pesticides are exempt from WHMIS requirements for SDS. The PMRA advises registrants of pesticides to develop SDSs and make them available to the public. Section 6.75 of the *Regulation* requires employers to make readily available to workers an SDS or its equivalent for all pesticides used at the workplace (refer to  $\underline{OHS}$  Guideline  $\underline{G6.75}$ ). The LD<sub>50</sub> information on an SDS can also be used to determine the toxicity level of pesticides.

Although toxicity is defined by reference to active ingredients, this does not mean that other ingredients can be ignored. The employer will have to consider all ingredients in fulfilling the general requirements under <u>section 5.2</u> of the *Regulation*, as well as the requirements for controlling

exposure under sections 5.48 to 5.59.

G6.74 Good practices for applying pesticides

Issued September 21, 2012

### Regulatory excerpt

Section 6.74 of the OHS Regulation ("Regulation") states:

The employer must ensure that a pesticide for use in the workplace is used in accordance with the requirements stated on the label and with good application practice.

## Purpose of guideline

This guideline lists some sources of good application practice for pesticides.

## **Good application Practice**

For information on pesticide application practices refer to the following:

- Standard Practices for Pesticide Applicators, BK35 published by WorkSafeBC
- · Handbook for Pesticide Applicators And Dispensers, published by the BC Ministry of Environment
- BC Integrated Pest Management Act and regulations under it
- Pest Control Products Act (Canada) and regulations under it

For information on antisapstain application practices refer also to the following:

Recommendations for the Design and Operation of Wood Preservation Facilities, published by Environment Canada

G6.75 Safety data sheets (SDS)

Issued August 1999; Editorial Revision consequential to August 4, 2015 Regulatory Amendment

# Regulatory excerpt

Section 6.75 of the OHS Regulation ("Regulation") states:

The employer must make readily available to workers an SDS or its written equivalent for all pesticides used at the workplace.

# Purpose of guideline

The purpose of this guideline is to set out the minimum information that an SDS written equivalent should contain.

## Regulatory requirements

For all pesticides used at the workplace, section 6.75 of the *Regulation* requires the employer to make an SDS or its written equivalent readily available to workers. Because pesticides are covered by other legislation, pesticides are exempt from WHMIS requirements for labels and SDS. However, pesticides cannot be sold or used in Canada unless registered by Health Canada, a requirement of the federal *Pest Control Products Act*. Health Canada advises registrants to make an SDS available.

#### Written equivalent

At a minimum, the "written equivalent" of an SDS should contain the following:

- Trade name (such as the manufacturer or selling agent's name for the product)
- Use (for example herbicide, insecticide) and classification (permit-restricted, restricted, commercial, domestic or exempted)
- Registration number
- Product identification number (PIN)
- Formulation or net content, indicating total pesticide formulation
- Guarantee which identifies the active ingredient and concentration
- Directions for pesticide use (where to be used and rates of application)
- Precautionary symbol (such as toxic, flammable, explosive or corrosive)
- Precautions to be taken during use to prevent worker exposure and environmental contamination
- First aid requirements
- Toxicological information
- Disposal requirements
- Name and address of the pesticide manufacturer or selling agent

 ${\bf G6.77~Mixing, loading, and~applying~pesticides -- Qualifications}$ 

Issued August 1, 1999; Revised consequential to February 1, 2012 Regulatory Amendment; Revised consequential to September 1, 2021 Regulatory Amendment

## Regulatory excerpt

Section 6.77 of the OHS Regulation ("Regulation") states:

- (1) The employer must ensure that a worker or applicator who mixes, loads or applies a moderately or very toxic pesticide for use in a workplace or who cleans or maintains equipment used in the operations
- (a) is 16 years of age or over, and
- (b) holds a valid pesticide applicator certificate issued under the *Integrated Pest Management Act*.
- (2) Subsection (1)(b) does not apply to any of the following:
- (a) the use of biocides or slimicides in pulp and paper operations,
- (b) antisapstain materials;
- (c) the use of a pesticide by an assistant applicator within the meaning of, and in accordance with, the *Integrated Pest Management Act* and the regulations made under it.
- (3) Workers involved in training for the purposes of obtaining a valid pesticide applicator certificate who are directly supervised by a qualified person are exempt from the requirement of subsection (1) (b) during the training period.

## Purpose of guideline

The purpose of this guideline is to clarify the meaning of the term "qualified person" as in section 6.77 of the *Regulation*.

#### **Assistant applicator**

This section permits a worker or applicator who meets the "assistant applicator" qualifications in accordance with the provincial *Integrated Pest Management Act* (IPMA) and its regulation to mix, load, or apply a moderately or very toxic pesticide for use in a workplace; or may clean or maintain equipment used in the operations, if permitted as an assistant applicator under the IPMA and its regulation.

Assistant applicators work under the supervision of a certified applicator and must undergo training as prescribed by the BC Ministry of Environment and Climate Change Strategy. They are restricted from performing certain activities, such as mixing pesticide concentrates, handling or using furnigants, or using permit-restricted or restricted class pesticides.

Detailed explanation and qualifications of an assistant applicator under the IPMA are found on the BC Ministry of Environment and Climate Change Strategy website.

#### "Qualified person" under section 6.77(3)

Under section 6.77(3), workers who are being trained to obtain a valid pesticide applicator certificate are exempt from section 6.77(1)(b) for the duration of the training period, provided they are directly supervised by a "qualified person" as defined by section 1.1 of the *Regulation*.

"Qualified person" in the context of this section means a person who

- Meets the requirements of sections 6.77(1)(a) and (b)
- Is responsible for the proper instruction of the trainees, as well as ensuring their work is performed without undue risk
- Will be in compliance with sections 46 and 59.3 of the Integrated Pest Management Regulation
- Along with other requirements, the qualified person must supervise the trainees by:
  - Being physically present when the service is provided (in the federal *Pesticide Control Act Regulation*, "service" means a service involving the use of pesticides)
  - Either by performing the use of the pesticides or supervising no more than four uncertified assistant applicators at one time
  - Being not be more than 500 m from and maintaining continuous visual or auditory contact with the uncertified assistant applicators

Refer to the <u>Integrated Pest Management Regulation</u> for the full explanation of the supervisor's requirements.

 ${\bf G6.79\ Health\ protection-Manner\ acceptable\ to\ WorkSafeBC}$ 

Issued August 1999; Editorial Revision June 8, 2011

## Regulatory excerpt

Section 6.79 of the OHS Regulation ("Regulation") states:

Where, in the opinion of the Board, it is necessary to provide health monitoring for workers exposed to pesticides, employers and workers must participate as required by the Board, and records must be maintained in a manner acceptable to the Board.

# Purpose of guideline

The purpose of this guideline is to establish the manner acceptable to WorkSafeBC under which records must be maintained.

#### Record keeping

Where WorkSafeBC deems it necessary that health monitoring be provided for workers exposed to pesticides, section 6.79 of the *Regulation* requires that employers and workers participate in such programs, as required by WorkSafeBC. Records of the health monitoring program must

be maintained in a manner acceptable to WorkSafeBC.

As prescribed by section 5.54(2)(f) of the *Regulation*, health monitoring may be a required element of an exposure control plan. Health monitoring is discussed in OHS Guideline G5.54-5. Health monitoring records maintained in accordance with the guidance in OHS Guideline G5.54-5 and in keeping with the instructions of an occupational health physician or nurse are acceptable to WorkSafeBC.

Records may not be kept in any other manner without the written acceptance of WorkSafeBC. The Prevention Practice, Quality, and Engineering department is the contact for acceptance of alternative record keeping methods.

G6.80 Rescue

Issued August 1, 1999

# Regulatory excerpt

Section 6.80 of the OHS Regulation ("Regulation") states:

If a worker applies a moderately or very toxic pesticide in a greenhouse or similar enclosed space and the worker may be incapacitated during the application, the work must be done in such a manner that a rescue can be effected by another worker equipped and able to do so.

### Purpose of guideline

The purpose of this guideline is to outline the requirements of a rescue as stated in section 6.80 of the *Regulation*.

## Evacuation and rescue requirements

The requirements of <u>Part 32 Evacuation and Rescue</u>, as well as sections <u>4.13 to 4.18 Emergency preparedness and response</u> and sections <u>5.97 to 5.102</u>, also apply. In accordance with sections 4.13 and 32.1, the employer must conduct a risk assessment to determine the need for rescue when pesticides are applied in enclosures. Workers designated to provide rescue must be adequately trained and equipped, as per sections <u>32.2</u> and <u>32.3</u>.

### **Provision for rescue**

During the application of pesticide in an enclosure, provision for rescue will likely be required when:

- Required on the label or by available hazard information
- Very and moderately toxic pesticides are applied
- The pesticide can be absorbed through the skin (this is a factor for exposure to organophosphate, carbamate, dithiocarbamate, organochlorine, and nitrophenol pesticides)
- The formulation consists of emulsifiable concentrates and wettable powders that increase the potential for skin contact
- The formulation consists of fogs, fine dusts, wettable powders, or gas or vapour furnigants that increase the potential for inhalation
- High pressure spraying that produces fine particles and increased drift is used
- There is the potential for accidental spillage, rupturing of containers or equipment failure due to worn pipe couplings, hose lines or hose connections
- Ventilation of an enclosure during pesticide application is not possible or is inadequate
- There is frequent body contact with treated surfaces because of limited space
- There is the potential for failure of a respiratory protective device due to improper facial seal, cartridge breakthrough, or disruption of the apparatus providing breathing air to a respirator facepiece
- A worker could potentially be overcome by thermal stress as a result of wearing protective clothing
- There is the possibility of entrapment or engulfment

**G6.82 Fixed stations** 

Issued August 1999; Revised February 11, 2004

### Regulatory excerpt

Section 6.82 of the OHS Regulation ("Regulation") states:

- A fixed pesticide mixing, loading or application station must have
- (a) openings on tanks secured as necessary to prevent accidental worker entry,
- (b) shut-off devices at the discharge end of hoses and pipes leading from mixing tanks, and
- (c) when required by the Board, a closed system for the mixing, loading or transferring of pesticides.

# Purpose of guideline

This guideline provides the required features of a fixed pesticide mixing, loading, or application station as stated in section 6.82 of the Regulation.

# Closed pesticide mixing systems

When required by WorkSafeBC under section 6.82(c), the fixed station must have a closed system for mixing, loading, or transferring pesticides.

Closed pesticide mixing systems are recommended under the following conditions:

- When required on the pesticide labels or by available hazard information
- If the pesticide can be absorbed through the skin (this is a factor for exposure to organophosphate, carbamate, dithiocarbamate, organochlorine or nitrophenol pesticides),
- when very toxic and moderately toxic pesticide formulations (refer to section <u>6.70</u> of the *Regulation* for the definitions of "very toxic" and "moderately toxic" pesticides) that are easily inhalable are handled (for example from exposure to dusts, fogs, gas furnigants, and wettable powders in their dry form)
- When emulsifiable pesticide concentrates are diluted with volatile diluents
- When volatile liquid pesticides are handled in poorly ventilated enclosures
- If the pesticide is a designated substance, or if the pesticide formulation contains an "inert" or "adjuvant" substance that is a designated substance. Designated substances are identified under <u>section 5.57(1)</u> of the *Regulation* and in the <u>Table of Exposure Limits for Chemical and Biological Substances</u> by any of the following notations, abbreviations, or endnotes:
  - ACGIH A1 or A2, or IARC 1, 2A, or 2B carcinogen
  - ACGIH reproductive toxin
  - ACGIH sensitizer
  - ACGIH L endnote

G6.83 Equipment — Mobile equipment

Issued August 1999; Retired March 10, 2022

This guideline has been retired as it contained outdated or redundant material.

G6.84 Safe application practice

Issued August 1999; Editorial Revision July 15, 2019

### Regulatory excerpt

Section 6.84 of the OHS Regulation ("Regulation") states:

- (1) The employer must ensure that a pesticide is applied in a manner that controls the risk of adverse health effect or injury to any person.
- (2) Before a pesticide is applied, the employer must ensure that all workers in the area that is to be treated and who are not required for the application of pesticides are moved to a safe location.
- (3) If practicable, the employer must schedule a pesticide application in a building for a time when the building is unoccupied.

# Purpose of guideline

This guideline provides further explanation for section 6.84(3) of the *OHS Regulation* where it requires that, where practicable, the employer schedule a pesticide application in a building for a time when the building is unoccupied.

## Pesticide application

Pesticide application should be conducted in unoccupied areas following termination of work such as in the evenings, and during weekends and holidays. Advance precautions, such as moving or storing personal items or protecting office surfaces, should be taken. For assistance in scheduling pesticide application in buildings, the employer should refer to municipal, regional and district legislation and bylaws, as well as pesticide labels and available hazard information.

Under section 6.76 of the *Regulation*, the employer must inform workers or occupants of the intent to use the pesticide, the hazards associated with its use, and any precautions required during the application. In addition, the employer should advise workers or building occupants of the application schedule, as well as the relevant re-entry intervals.

Areas adjacent to a building section where a pesticide is applied may be occupied if the following occurs:

- The pesticide label and available hazard information permit this practice
- A hazard assessment by a qualified applicator considers it safe
- The occupied area is protected from the pesticide application by physical barriers or other effective means
- The ventilation system in the application area is isolated from the central HVAC system
- Signs are posted outside the treatment area to restrict access
- The "re-entry interval" is of sufficient duration to ensure occupants and other building areas do not become contaminated with pesticide residue

**G6.85 Posting warning signs** 

This guideline has been retired as it contained outdated or redundant material.

G6.86 Design of warning signs — Prescribed posting period

Issued August 1999

## Regulatory excerpt

Section 6.86 of the OHS Regulation ("Regulation") states:

Warning signs must be of a design, construction and durability to be clearly identifiable for the prescribed posting period, and must provide information in a manner that can be readily understood by workers.

## Purpose of guideline

This guideline provides that warning signs be "of a design, construction and durability to be clearly identifiable for the prescribed posting period, and must provide information in a manner that can be readily understood by workers" and defines the "prescribed posting period" pursuant to section 6.86 of the *Regulation*.

## Prescribed posting period

The "prescribed posting period" in this section refers to the "restricted entry interval." It does not refer to the "days-to-harvest interval." This interval, which is intended to protect consumers, represents the time that must elapse between pesticide application and crop harvest to allow pesticide residue to fall below a specific tolerance level. The restricted entry interval, on the other hand, is intended to protect workers. It represents the time that must elapse after the pesticide is applied, before an unprotected worker is permitted to enter the treated workplace (or portion of the workplace). Restricted entry intervals are addressed under section 6.89 (refer to OHS Guideline G6.89).

G6.89 Restricted entry intervals

Issued August 1999; Revised February 11, 2004; Revised April 9, 2019; Revised consequential to September 1, 2021 Regulatory Amendment

#### Regulatory excerpt

Section 6.70 of the OHS Regulation ("Regulation") states, in part:

"restricted entry interval" means the length of time representing a period of precaution that must elapse after the application of a pesticide, before an unprotected worker may be authorized to enter the treated area;

Section 6.89 of the *Regulation* states:

- (1) Except as permitted under section 6.90, an employer must ensure that a person does not enter a treated area until the restricted entry interval has expired.
- (2) The length of the restricted entry interval required by subsection (1) is as follows:
- (a) if the label of the applied pesticide states a single restricted entry interval, the time period stated on the label;
- (b) if the label of the applied pesticide states different restricted entry intervals for different activities, the time period stated on the label for the activity most closely resembling the activity being conducted;
- (c) if more than one pesticide is applied and the labels of each state different restricted entry intervals, the longest time period stated;
- (d) if the label of an applied pesticide does not state a restricted entry interval,
- (i) 24 hours if the pesticide is classified as slightly toxic, or
- (ii) 48 hours if the pesticide is classified as moderately or very toxic or is part of a mixture in which a moderately or very toxic pesticide is present;
- (e) if more than one pesticide is applied and the label of at least one pesticide does not state a restricted entry interval, the longer of
- (i) the longest time period stated on any label of the other pesticides, and
- (ii) the time period required by paragraph (d)(i) or (ii), as applicable.
- (3) An employer must ensure that, in addition to not entering a treated area until the applicable restricted entry interval has expired, workers comply with all safety information, including user directions and safety precautions, stated on any label of the pesticides being applied.

# Purpose of guidelines

The purpose of the guideline is to provide an overview of restricted entry intervals and their use in protecting workers.

# Restricted entry interval

Unless entry is permitted under sections 6.90 or 6.91, section 6.89(1) of the *Regulation* ("*Regulation*") requires the employer to ensure that no one enters a treated area where a pesticide has been applied until the restricted entry interval (REI) has expired. This requirement is to allow residues and vapours to dissipate to safe levels for work to be performed in the treated area.

Section 6.89(2) of the *Regulation* explains how to apply the REI on the label for various situations such as where multiple REIs are found on labels, where multiple pesticides are applied, or if a label does not state an REI for a pesticide.

The term "restricted entry interval" is defined in <u>section 6.70</u> of the *Regulation*. Entry to treated areas by unprotected, unauthorized workers is prohibited during the REI because of the hazards associated with entering a treated area that has been applied with certain pesticides or furnigants. Entry into treated areas by authorized protected workers may be permitted under certain circumstances, such as an emergency to prevent or mitigate injury to persons or substantial damage to crops or property as described in section 6.90. Also, section 6.91 details an exemption for certain structural applications from the REI requirements.

A Health Canada webpage provides an overview of REIs: <u>Understanding Restricted-Entry Intervals for Pesticides</u>. This overview also explains the difference between an REI and a preharvest interval (PHI), which is the minimum amount of time between the last application of a pesticide and when the crop can be harvested. It is important to read the pesticide label to follow the REI and the PHI.

On a rare occasion, an REI may not have been assigned for a conventional pesticide as it may be currently under review by Health Canada (Pest Management Regulatory Agency). For those situations, section 6.89(2)(d) of the *Regulation* prescribes REIs if a label does not state an REI. Unless specified on the label, REIs do not apply to biopesticides such as microbials, pheromones, or other semiochemicals and non-conventional pesticides.

#### Pesticides as designated substances under section 5.57

Some pesticides may be designated by the American Conference of Governmental Industrial Hygienists (ACGIH) as a carcinogen, reproductive toxin, or a sensitizer. For these pesticides, section 5.57 would apply for employers to replace the pesticide with a safer alternative, if practicable. If it is not practicable to substitute the pesticide, the employer must develop and implement an exposure control plan, in accordance with sections 5.57(2) and (3) of the Regulation, and implement necessary control measures. For example, pesticides such as dichlorvos and formaldehyde have the potential to cause skin sensitization as listed in the Table of Exposure Limits for Chemical and Biological Substances (refer to OHS Guideline G5.48-2). In those cases, additional measures may be necessary to protect worker health and safety, in addition to following the REI. For further information, refer to OHS Guidelines G5.54-2, G5.54-3, G5.55, and G5.57.

G6.90 Authorization to enter - Qualified person

Issued August 1999; Revised April 9, 2019; Revised consequential to September 1, 2021 Regulatory Amendment

#### Regulatory excerpt

Section 6.90 of the OHS Regulation ("Regulation") states:

- (1) In this section:
- "emergency" means any sudden occurrence or set of circumstances
- (a) that an employer could not have anticipated,
- (b) over which an employer has no control, and
- (c) that requires a worker to enter a treated area during a restricted entry interval because no alternative practices would prevent or mitigate
- (i) injury to persons, or
- (ii) substantial damage to crops or property;
- "hand labour activity"
- (a) subject to paragraph (b), means an activity or task performed by hand or using hand tools that causes a worker to have substantial dermal contact with plants or parts of plants, soil or a surface that may contain pesticide residues, and
- (b) does not include operating, moving or repairing
- (i) irrigation or watering equipment, except hand-set irrigation, or
- (ii) other equipment that is not directly used to apply pesticides.
- (2) If an employer authorizes a worker to enter a treated area before the restricted entry interval expires, the employer must ensure all of the following:
- (a) that the worker

- (i) does not enter the treated area earlier than 4 hours after the pesticide application is completed,
- (ii) is not in the treated area for more than one hour in a 24 hour period, and
- (iii) does not perform a hand labour activity until the expiry of the restricted entry interval;
- (b) that hazards to the worker have been assessed by a qualified person;
- (c) that the treated area is effectively ventilated using either natural or mechanical means, and
- (i) the atmosphere has been tested, if practicable, or
- (ii) evaluated by a qualified person and declared safe to enter;
- (d) that the worker is provided with, wears and uses correctly personal protective clothing and equipment appropriate to the hazards assessed under paragraph (b);
- (e) that the worker follows safe work procedures;
- (f) that, if the worker may be incapacitated after entry, provision has been made for rescue in a manner that meets the requirements of section 6.80.
- (3) If an employer authorizes a worker to enter a treated area during an emergency before the restricted entry interval expires, the employer must ensure all of the following:
- (a) that the requirements of subsection (2)(b) to (f) are met;
- (b) that emergency washing facilities as required under section 5.85 are available.

## Purpose of guideline

The purpose of this guideline is to set out the competencies of the qualified person who will perform the hazard assessment under section 6.90 of the *Regulation* when the employer authorizes a worker to enter a treated area.

## Restricted entry interval (REI)

Section 6.89(2) of the *Regulation* prescribes the REIs for pesticides. A "restricted entry interval," as defined in section 6.70 of the Regulation, is the length of time representing a period of precaution that must elapse after the application of a pesticide, before an unprotected worker may be authorized to enter the treated area. The intent of an REI is to define a period of time after a pesticide has been applied during which restrictions on entry are in effect, to protect workers from potential exposure to hazardous levels of pesticide residue and vapours. However, entry into treated areas is permitted in certain situations and may be necessary under special circumstances as long as all of the requirements of section 6.90 of the Regulation have been met.

### Qualified person under sections 6.90(2)(b) and (c)(iii)

Under sections 6.90(2)(b) and (c) of the *Regulation*, entry into treated areas requires that the hazards to workers have been assessed by a qualified person, and the ventilated treated area has been evaluated by a qualified person.

In order to be considered *qualified*, a person must be knowledgeable of the work, the hazards involved, and the means to control the hazards by reason of education, training, experience, or a combination thereof, as defined in section 1.1 of the *Regulation*. The qualified person who assesses the hazards under section 6.90(3)(b) and evaluates the treated area after ventilation under 6.90(2)(c) of the *Regulation* will need to be able to read, understand, and implement all information and instructions provided on the pesticide label. This includes the hazards involved with entering the area where the pesticide has been applied, first aid, required personal protective equipment (PPE), and re-entry procedures. A person with a valid pesticide applicator certificate will typically meet this requirement.

**G6.91 Exemptions** 

Issued August 1999; Retired consequential to September 1, 2021 Regulatory Amendment

 ${\bf G6.95\ Personal\ hygiene-Wash\ and\ shower\ facilities}$ 

Issued August 1999; Revised February 11, 2004

## Regulatory excerpt

Section 6.95 of the OHS Regulation ("Regulation") states:

- (1) The employer must supply and maintain adequate wash facilities and, if there is the risk of body contamination, shower facilities as required by section 5.82, to all workers when
- (a) mixing, loading or applying pesticides, or handling concentrates or wet-treated lumber,
- (b) cleaning, maintaining or handling equipment, materials or surfaces contaminated with pesticide residues, or

- (c) entering fields where pesticides have been applied and where contact with pesticide residues may contaminate protective clothing and body areas.
- (2) The wash and shower facilities required by subsection (1) must be in close proximity to the places where pesticides are used or handled, but must be separate from food preparation, lunchrooms and eating areas.

### Purpose of guideline

The purpose of this guideline is to describe when adequate wash facilities must be maintained, and if applicable, when shower facilities are required pursuant to section 6.95 of the *Regulation*.

# Adequate wash facilities

Section 6.95 of the Regulation requires the employer to supply and maintain adequate wash facilities. This section applies to all workers who

- Mix, load or apply pesticides
- Handle concentrates or wet-treated lumber
- Clean, maintain or handle equipment, materials or surfaces contaminated with pesticide residues
- Enter fields where pesticides have been applied and where contact with pesticide residues may contaminate protective clothing and body areas

#### Shower facilities

If there is the risk of body contamination, shower facilities must be provided in accordance with <u>section 5.82</u> of the *Regulation*. Heated shower facilities are required under section 5.82(2) if the work process is "high hazard." The following may be helpful in determining whether an operation involving pesticides is high hazard, and, therefore, whether heated shower facilities need to be considered.

- Mixers and loaders are at risk of contacting a pesticide through spills or splashing and through contact with contaminated equipment. The
  hazard of being splashed with a pesticide is higher during open mixing. The potential for skin contact increases with pesticide formulations
  that use emulsifiable concentrates and wettable powders.
- Applicators are at risk of contacting a pesticide as it is being sprayed and while the pesticide remains airborne. Spray pressures in excess
  of 200-275 kPa (30 psi) for herbicides and 500-2100 kPa (75-300 psi) for insecticides and fungicides generate fine spray particles that
  remain airborne for long periods and increase the potential for skin contact. Body areas may also become contaminated with pesticide
  through contact with surfaces of equipment and plants.
- Body contact with pesticides by applicators may increase during application in poorly ventilated enclosures. Depending on the application, inadequate ventilation may exist when cross-sectional velocity is less than
  - 15.24 metres/min (50 feet/minute) outdoors
  - 30.48 metres/min (100 feet/minute) through an area of less than 14 square metres (150 square feet)
  - 15.24 metres/min (50 feet/minute) through an area of greater than 14 square metres (150 square feet)

High hazard activities include:

- Any mixing (open or closed) or applying of pesticides that can be absorbed through the skin. (Substances that can contribute to exposure by skin absorption are identified in the <u>Table of Exposure Limits for Chemical and Biological Substances</u> with the designation "SKIN." Refer to Guideline <u>G5.52</u> for further information on the "SKIN" notation.) This may include any work involving organophosphorus, carbamate, dithiocarbamate, organochlorine, and nitrophenol pesticides.
- Any open mixing or applying in an enclosure of pesticides that can irritate the skin. This includes phenoxy, benzonitrile, bipyridine, organonitrogen, and inorganic pesticides and furnigants.
- Any open mixing or applying in an enclosure of corrosive pesticides.

## **Emergency washing facilities**

Because a worker's eyes or skin may be exposed to harmful or corrosive materials or other materials which may burn or irritate, the employer must also consider the requirements for emergency washing facilities provided under sections <u>5.85 to 5.96</u> of the *Regulation*.

G6.96 Worker cleanup

Issued August 1999; Editorial Revision April 6, 2020

### Regulatory excerpt

Section 6.96 of the OHS Regulation ("Regulation") states:

A worker must immediately cleanse any body area contaminated with pesticide.

## Purpose of guideline

This guideline provides that a worker must immediately cleanse any body area contaminated with pesticide pursuant to section 6.96 of the *Regulation*.

# Compliance

Employers may ensure workers appropriately cleanse any contaminated areas of the body by providing training on safe work procedures for decontamination. For compliance, WorkSafeBC prevention officers may determine whether the employer

- Has fulfilled the responsibility to adequately train and instruct workers in the required procedures (The development and implementation of safe work procedures are required under section 6.78 of the *Regulation*. Training and instruction of workers are required under section 21 of the *Workers Compensation Act*.)
- Provided an acceptable level of supervision to ensure that established safe work procedures are followed
- Implemented disciplinary action to further discourage the use of unacceptable work procedures, where necessary

Further, workers should be able to respond to the following questions:

- Do you work with pesticides?
- What precautions are required to prevent or minimize exposure?
- What do you do to remove pesticides from your skin or clothing?
- Where are the wash and/or shower facilities?
- Are there any consequences of not following safe work procedures or of not cleansing any body area contaminated with pesticide?

G6.103 Antisapstain applications — Substitution

Issued August 1999

#### Regulatory excerpt

Section 6.103 of the OHS Regulation ("Regulation") states:

An employer must investigate antisapstain materials and, whenever practicable, substitute an alternate material for a material in use, if

- (a) the hazards of the substitute are known, and
- (b) the risk to workers is reduced.

#### Purpose of guideline

This guideline provides that an employer must investigate antisapstain materials and, wherever practicable, substitute an alternative material for a material in use, if the hazards of the substitute are known and the risk to the workers is reduced pursuant to section 6.103 of the *Regulation*.

### **Substitutes**

Refer to OHS Guideline G5.55 for a list of factors that should be considered when selecting a suitable substitute. For pesticides, a suitable substitute may have one or more of the following characteristics: low toxicity, low vapor pressure of the active ingredient or diluent, water-based or chlorinated (as opposed to a volatile organic) diluent, is pre-mixed and requires no preparation, and/or does not persist in the environment.

To demonstrate compliance with this requirement, the employer should

- Provide documentation indicating whether or not substitutes are available
- Specify the criteria used to identify a suitable antisapstain agent
- Specify why a substitute is not practicable for their application purposes

G6.111 Control of rock dust

Issued August 1, 1999; Revised February 11, 2004; Retired consequential to May 1, 2017 Regulatory Amendment

G6.112.4(2) Exception to monitoring requirements - Objective air monitoring data, the silica control tool, and associated record-keeping

Issued consequential to May 1, 2017 Regulatory Amendment

# Regulatory excerpt

Section 6.112.4 of the *OHS Regulation* ("Regulation") states, in part:

- (2) Despite section 6.112.3, an employer is not required to monitor the exposure of workers to RCS dust if a qualified person determines that
- (a) existing control measures are effective in keeping worker exposure as low as reasonably achievable below the exposure limit, and
- (b) the employer
- (i) has previously monitored for RCS dust exposure during equivalent work operations and there is no reason to believe that the results of the previous monitoring would not continue to apply, or
- (ii) has objective air monitoring data that was collected during equivalent work operations through industry surveys or peer-reviewed or scientific studies that use sampling and analytical methods referred to in section 6.112.3(2).
- (3) An employer must keep, for at least 10 years, a record documenting the following, as applicable:

- (a) the previous monitoring data used for the purpose of subsection (2)(b)(i);
- (b) the source of the objective air monitoring data, and the data itself, referred to in subsection (2)(b)(ii).

### Purpose of guideline

This guideline provides an example of how to comply with the requirement to rely on objective air monitoring data for silica levels, and for retention of the associated records.

## Objective monitoring data

Section 6.112.4(2)(b)(ii) describes an exception to the requirement for an employer to perform workplace air monitoring if a qualified person has determined that the employer has objective air monitoring data. The data must have been collected as follows:

- During equivalent work operations through industry surveys or peer-reviewed or scientific studies
- Using sampling and analytical methods referred to in section 6.112.3(2)

Equivalent work operations are activities that closely match the silica processes, types of materials, work practices, control measures, and environmental conditions that are present in the employerâ©TMs current work operations.

The BC Construction Safety Alliance has developed an <u>online silica control tool</u>. The tool relies on scientific studies and research data collected from many jurisdictions around the world by the UBC School of Population and Public Health at the Faculty of Medicine.

If a qualified person verifies that the employer's work operations and activities are equivalent to those described in the silica control tool, then the employer will have relied on appropriate objective monitoring data and will be in compliance with the intent of section 6.112.3.

In order for section 6.112.4(2) to be satisfied, a qualified person must have also determined that the control measures are effective in keeping worker exposures as low as reasonably achievable below the exposure limit. If the risk assessment and the exposure control plan are properly completed by a qualified person, this requirement for effectiveness will be satisfied.

Employers are not required to follow the example of compliance described in this guideline. An employer can choose to perform air monitoring as per section 6.112.3 or can rely on previous monitoring under section 6.112.4(2)(b)(i).

#### **Record keeping**

Section 6.112.4(3)(b) of the *Regulation* specifies that the source of the objective exposure monitoring data, and the data itself, be kept for at least ten years. When an employer appropriately uses the online silica control tool published by the BC Construction Safety Alliance, the employer should retain the created exposure control plan summary for ten years. This will satisfy the employer's obligation under section 6.112.4(3)(b).

Note that there are further requirements for an exposure control plan prescribed in section 6.112.1 of the *Regulation*. This guideline focuses on the use and retention of objective monitoring data.

G6.113 Rock drills

Issued August 1, 1999; Revised February 11, 2004; Editorial Revision consequential to May 1, 2017 Regulatory Amendment

# Regulatory excerpt

Section 6.113 of the OHS Regulation ("Regulation") states:

A rock drill, other than a manually-powered rock drill, must be equipped with a dust suppression system, acceptable to the Board, that

- (a) uses water jet, spray, or other equally effective means to suppress drilling dust effectively, and
- (b) operates whenever the drill is in use.

### Purpose of guideline

This guideline describes how an employer can check for compliance.

# **Dust suppression**

Under section 6.113 of the *Regulation*, rock drills must be equipped with a dust suppression system that is acceptable to WorkSafeBC. This requirement for a dust suppression system does not apply to manually powered rock drills.

To determine if an effective dust suppression system is available, the employer should consult with an equipment supplier. A system will be considered to be "effective" if it maintains dust levels at or below the exposure limits listed in the Table of Exposure Limits for Chemical and Biological Substances (see OHS Guideline <u>G5.48-2</u>).

Personal exposure monitoring may be required to ensure that worker exposure to designated substances (e.g., crystalline silica) is maintained as low as reasonably achievable below the exposure limit.

Issued August 1, 1999; Editorial Revision May 2005

#### Regulatory excerpt

Section 6.116 of the OHS Regulation ("Regulation") states, in part:

"enclosure" means a room, cabinet or separation designed to contain equipment, machinery and vessels and to isolate accidental releases of toxic gas;

## Purpose of guideline

This guideline is intended to clarify the application of the definition of "enclosure."

#### **Enclosure**

Section 6.116 of the *Regulation* defines enclosure to mean "a room, cabinet or separation designed to contain equipment, machinery and vessels and to isolate accidental releases of toxic gas." This definition is distinct from that of "confined space," which is provided in <u>section 9.1</u> of the *Regulation*. The requirements for enclosures are found under <u>section 6.122</u> of the *Regulation*. Refer also to OHS Guideline G6.122.

G6.116-2 Definition of "toxic process gas"

Issued May 25, 2005; Editorial Revision consequential to August 4, 2015 Regulatory Amendment

## Regulatory excerpt

Section 6.116 of the OHS Regulation ("Regulation") states, in part:

"toxic process gas" means a gas which

(a) meets the HPR Health Hazard Class - Acute Toxicity, Categories 1, 2 and 3 or the categories set out in the following table:

HPR Health Hazard Classes		Hazard categories					
Skin corrosion/irritation		1A	1B	1C	2		
Serious eye damage/irritation						2A	2B
Respiratory or skin sensitization		1A	1B				
Mutagenicity		1A	1B		2		
Carcinogenicity		1A	1B		2		
Reproductive toxicity		1A	1B		2		
Specific organ toxicity (repeated exposure)	1				2		

and

- (b) is used for purposes of
- (i) an industrial process in which a precursor is changed into a product,
- (ii) refrigeration by means of a piped installation, or
- (iii) treatment of materials, for example, in a disinfection system.

### Purpose of this guideline

This guideline is intended to clarify the application of the definition of "toxic process gas."

# Basic explanation of the definition of toxic process gas

To be considered a toxic process gas in Part 6 of the *Regulation*, the gas and the nature of its use must meet the criteria in paragraphs (a) and (b) of the definition.

Paragraph (a) refers to the gas meeting certain WHMIS toxicity criteria. To be considered a toxic process gas, the gas must also be used in a manner described in paragraph (b) of the definition. Ammonia used in refrigeration systems; chlorine, ethylene oxide, or ozone used in disinfection systems; and chlorine dioxide in pulping systems are examples of toxic process gases.

G6.118 Risk assessment

Issued August 1999

#### Regulatory excerpt

Section 6.118 of the OHS Regulation ("Regulation") states:

The employer must ensure that a risk assessment is conducted for toxic process gases.

#### Purpose of guideline

This guideline provides that a risk assessment must be conducted for toxic process gases pursuant to section 6.118 of the Regulation.

#### Purpose of guideline

The general factors that must be considered when performing a risk assessment are provided in OHS Guideline <u>G5.54-3</u>.

G6.122-2 Exhaust ventilation

Issued August 1999

#### Regulatory excerpt

Section 6.122(b) of the OHS Regulation ("Regulation") states:

Where practicable, the employer must locate equipment and machinery such as tanks and compressors, handling toxic process gases in a separate enclosure that is

(b) provided with exhaust ventilation to ensure an effective inward air flow into the enclosure at all times,

## Purpose of guideline

This guideline provides that an enclosure be provided with exhaust ventilation to ensure an effective inward flow of air at all times pursuant to section 6.122(b) of the *Regulation*.

#### At all times

In the context of this section, "at all times" means at all times that the system is in normal operation. However, the system must be designed to exhaust discharging toxic process gases directly to the outdoors in a safe manner. Refer to section 6.124 of the Regulation and OHS Guideline G6.124.

## Ventilation systems

It is not necessary for employers to install high volume ventilation systems to comply with this section. So long as the system maintains adequate negative pressure, the employer will be in compliance. WorkSafeBC prevention officers can use smoke tubes to evaluate whether the system is under negative pressure. The requirements for ventilation systems are provided in section 6.124 of the *Regulation*. Refer to the WorkSafeBC publications for the toxic process gas of interest, including ammonia, ozone, and chlorine.

Ammonia in Refrigeration Systems
Ozone Safe Work Practices
Safe Work Practices for Chlorine

G6.122-3 Access and egress

Issued August 1999

# Regulatory excerpt

Section 6.122(c) of the OHS Regulation ("Regulation") states:

Where practicable, the employer must locate equipment and machinery such as tanks and compressors, handling toxic process gases in a separate enclosure that is

(c) provided with a safe means of entry and exit,

# Purpose of guideline

This guideline provides that an enclosure must be provided with a safe means of entry and exit, in accordance with section 6.122(c) of the *Regulation*.

# Safe means for entry and exit

Depending on the size of the enclosure, it may be necessary to have more than one door. Building design criteria, including the required number of doors, are listed in manuals published by WorkSafeBC. Refer to the WorkSafeBC publication for the toxic process gas of interest, including ammonia, ozone, and chlorine.

Ammonia in Refrigeration Systems
Ozone Safe Work Practices
Safe Work Practices for Chlorine

#### Regulatory excerpt

Section 6.122(d) of the OHS Regulation ("Regulation") states:

Where practicable, the employer must locate equipment and machinery such as tanks and compressors, handling toxic process gases in a separate enclosure that is

(d) designated as a restricted work area limited to entry by authorized personnel, and

# Purpose of guideline

This guideline provides that requires the employer designate the enclosure as a restricted work area, with entry limited to authorized personnel pursuant to section 6.122(d) of the *Regulation*.

# Authorized personnel

In the context of this section, "authorized personnel" are workers who are qualified to perform the work, have been designated by the employer as being permitted to do so, and are required to be present within the designated work area(s).

G6.123 Testing

Issued August 1999

### Regulatory excerpt

Section 6.123 of the OHS Regulation ("Regulation") states:

The employer must provide a safe means to check and test conditions inside an enclosure before entry by authorized workers.

#### Purpose of guideline

This guideline provides that before authorized workers are permitted to enter an enclosure, they must be provided with a safe means to check and test conditions inside an enclosure, in accordance with section 6.123 of the *Regulation*.

### Checking and testing conditions inside an enclosure

One way employers may comply with this requirement is to install continuous monitoring systems that "...effectively determine work conditions within the restricted access area," where practicable pursuant to section 6.128(1).

There are other safe means to check and test conditions inside an enclosure before entry by workers, such as the use of portable instruments in some cases. It is the responsibility of the employer to implement a method for workers to check and test conditions inside an enclosure before entry that are appropriate for their workplace.

G6.124 Ventilation

Issued August 1999

# Regulatory excerpt

Section 6.124 of the OHS Regulation ("Regulation") states:

The employer must

- (a) ensure that ventilation systems are designed to exhaust toxic process gases directly to the outdoors in a safe manner,
- (b) ensure that grilles providing makeup air from adjacent occupied areas are equipped with gas-rated, back-draft dampers,
- (c) monitor critical parts of the ventilation systems, such as fan, motor and air flow, to ensure that workers are alerted to a malfunction of the system,
- (d) ensure that ventilation ducting is vapour proof, dedicated and resistant to corrosion by the gas it carries, and
- (e) where practicable, locate the fans on the outside of the building or structure to maintain the duct work within occupied work areas under a negative pressure differential.

# Purpose of guideline

This guideline provides that the employer must ensure that "ventilation systems are designed to exhaust toxic process gases directly to the outdoors in a safe manner" pursuant to section 6.124(a) of the *Regulation*.

# Discharge

Care must be taken to avoid discharging toxic process gases into adjacent occupied areas such as work areas, evacuation routes, schools, private homes, or shopping areas. The risk assessment conducted under section 6.118 of the Regulation may help to identify the most appropriate location for putting the discharge.

When evaluating compliance with this section, the following factors should be considered:

- Whether the ductwork is under negative pressure (to prevent leaks)
- The location of the exhaust fan and stack heights
- The proximity of the system to heating, ventilation and air conditioning intakes
- The potential for other occupied areas to be contaminated by the discharge

The requirements of sections <u>5.60 to 5.71</u> of the *Regulation* for industrial ventilation also apply. Contaminated exhaust air discharged to the outdoor air is subject to the requirements of the BC Ministry of Environment and Climate Change Strategy. Ambient air quality standards are to be considered when determining the applicable limit that will be applied to the discharge air stream.

For a summary of federal and provincial authorities having jurisdiction for air quality, refer to OHS Guideline <u>G5.70</u>. For additional information, contact the appropriate authority in your region. For assistance, contact the BC Ministry of Environment and Climate Change Strategy. In the Greater Vancouver Regional District (Metro Vancouver), contact Parks and Environment Department; outside Metro Vancouver, contact the Environmental Protection Branch of Ministry of Environment and Climate Change Strategy.

**G6.127 Personal protective equipment** 

Issued August 1999

### Regulatory excerpt

Section 6.127(3) of the *OHS Regulation* states:

A worker entering a restricted access enclosure must wear or carry an escape respirator.

### Purpose of guideline

The purpose of this guideline is to outline that a worker is required to wear or carry an escape respirator when entering a restricted access enclosure pursuant to section 6.127(3) of the *Regulation*.

# **Emergency escape respirators**

The requirements for emergency escape respirators are provided in <u>section 8.36</u> of the *Regulation*.

<u>Section 6.120(1)</u> of the *Regulation* requires that the employer prepare written work procedures. These work procedures should identify those circumstances where a worker will require an escape respirator as a condition of entry to the enclosure. These procedures must be readily available to the workers.