

IOSHA Local Emphasis Program

IA/LEP 6

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- **Record Type:** Local Emphasis Program
 - **Directive Number:** IA/LEP 6
 - **Subject:** Local Emphasis Program (LEP) for Asbestos in Construction
 - **Issued:** May 20, 2011
 - **Revised:** Feb. 27, 2019, Feb. 10, 2026
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IOSHA IA/LEP 6

Iowa Department of Inspections, Appeals, and Licensing
Iowa Occupational Safety and Health (IOSHA)

ABSTRACT

- Purpose:** To establish and implement a Local Emphasis Program (LEP) for programmed health inspections of construction worksites to identify, evaluate, and control the hazards associated with exposure to asbestos.
- References:** Iowa OSHA Instruction 02-00-160 (FOM); OSHA Instructions CPL 04-00-002, CPL 02-00-025, CPL 02-00-155, CPL 02-00-170, and CPL 02-02-063
- Cancellations:** None
- Expiration:** This LEP is subject to re-evaluation to determine the continued need for the local emphasis program.
- Action Offices:** State of Iowa
- Originating Office:** State of Iowa
- Contact:** 515.350.7842

BY AND UNDER THE AUTHORITY OF

LUTHER DON PEDDY

IOSH ADMINISTRATOR

Revised by

Adam Lathrop

Labor Commissioner/IOSHA Administrator

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- I. **Purpose.** This notice establishes and implements a Local Emphasis Program (LEP) for programmed health inspections to identify, evaluate, and control the hazards associated with exposure to asbestos. This program affects worksites where exposures to asbestos are likely due to the work tasks performed.
- II. **Scope.** This Notice applies to construction worksites within the jurisdictional boundaries of the Iowa OSHA Enforcement program.
- III. **Action.** The IOSH Administrator shall ensure that the procedures established in this instruction are adhered to in the scheduling of programmed inspections.
- IV. **Expiration.** This Notice is effective until cancelled or Superseded.
- V. **References.**
 - A. Iowa OSHA Instruction 02-00-160 (02/11/2018), Field Operations Manual (FOM)
 - B. OSHA Instruction CPL 04-00-002 (11/13/2018), Procedures for Approval of Local Emphasis Programs (LEPs).
 - C. OSHA Instruction CPL 02-00-025 (01/04/1995), Scheduling System for Programmed Inspections.
 - D. OSHA Instruction CPL 02-00-155 (09/06/2013) Inspection Scheduling for Construction.
 - E. OSHA Instruction CPL 02-00-170 (07/18/2024), Enforcement Exemptions and Limitations Under the Annual Appropriations Act.
 - F. OSHA Instruction CPL 02-02-063 (11/03/1995), Inspection Procedures for Occupational Exposure to Asbestos Final Rule 29 CFR Parts 1910.1001, 1926.1101, 1915.1001, 1917, 1918, 1926, 1926.1101
 - G. Iowa Code Chapter 88B, Asbestos Removal and Encapsulation.
- VI. **Background.** Asbestos abatement, encapsulation, and demolition projects are construction activities that are continually being conducted in Iowa. Asbestos is

often times found in thermal system insulation (TSI), surfacing material, wallboard, floor tile, roofing and siding materials, and construction mastics. Construction activities involving these materials have the potential to liberate carcinogenic asbestos fibers. Asbestos exposure has been associated with asbestosis, lung cancer and mesothelioma.

Buildings that were built prior to 1981 have a substantial likelihood of having asbestos containing materials (ACM) present. Construction activities at these buildings present the opportunity for the ACM to be disturbed and employees to be exposed to fugitive asbestos fibers.

In addition, these construction sites often present electrical and fall hazards. By targeting employers who perform asbestos-related construction work, IOSHA will be able to reduce and/or eliminate exposure to life threatening hazards.

VII. [Program Procedures](#). This LEP includes two major activities: targeting/site selection, and inspections.

A. [Targeting/Site Selection](#)

1. Ten Day notice Construction Sites

Iowa Code section 88B.1 defines an “Asbestos project” as “an activity involving the removal or encapsulation of asbestos and affecting a building or structure.” “Asbestos project” includes “the removal or encapsulation of building materials containing asbestos from the site of a building or structure, renovation, demolition, or collapse.” Section 88B.1 defines a “Permit” as “an authorization issued by the department permitting a business entity to remove or encapsulate asbestos.” Asbestos permittees are required to provide the Department of Inspections Appeals and Licensing, and possibly the Iowa Department of Natural Resources with a ten-day notice prior to commencing asbestos work. The notice is to be provided ten working days before asbestos activity begins.

Iowa OSHA will evaluate the Ten-day notices for the purpose of inspection scheduling. Inspections will be scheduled based upon the best utilization of CSHO resources.

2. Pre-1981 Construction Sites

Iowa OSHA inspection personnel will be alert to construction sites when traveling to perform OSHA activities. If the construction site appears to involve a building built prior to 1981, an inspection may be initiated if time and resources allow.

Upon entry, OSHA inspection personnel will contact onsite construction staff and inquire about the history of the building. If it is determined that the building was constructed prior to 1981, an inspection will be initiated.

B. Inspections

1. This LEP will target all asbestos permittees who are Iowa Employers.
2. This LEP will target construction activities that are observed in buildings that have been built prior to 1981.
3. Inspections are to begin upon the effective date of this Instruction.
4. Each construction site selected for inspection shall receive a comprehensive health inspection. Any hazards in plain view safety will be addressed by the Senior Industrial Hygienist.

VIII. Recording in Salesforce.

- A. Inspections initiated under this LEP are to be created from the Salesforce Home tab and with an Initiating Type of "Program Planned". Special Emphasis Program "Asbestos" will be toggled to chosen under the Emphasis Programs section of the Casefile Inspection Tab.
- B. Inspections that are conducted as a result of a complaint, referral by another agency, or fatality/catastrophe will be coded as "Asbestos" under the Emphasis Programs section of the Casefile Inspection Tab.
- C. If it is determined that an inspection will not commence at a construction site selected due to no activity, the Scope of Inspection Field Inspection Details portion of the Casefile Inspection tab shall be coded "No Inspection".

Iowa OSHA Administrator/Deputy Labor Commissioner

Date

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