



Ken Rayner:

Asbestos remains one of the most dangerous materials still present in many Ontario workplaces, especially in construction and renovation projects. That's why proper training for workers and supervisors is not just the best practice, it's the law. And we know there's some confusion out there about what training is required when working with asbestos. And today's episode is all about setting the record straight.

Announcer:

It's time for the *IHSA Safety Podcast*.

Ken Rayner:

Welcome to the *IHSA Safety Podcast*. I'm your host, Ken Rayner. Joining me once again is Michele Beckstead-Jackson from Ontario's Ministry of Labour, Immigration, Training, and Skills Development. Michele, welcome back to the podcast.

Michele Beckstead-Jackson:

I'm happy to be back. Thanks, Ken.

Ken Rayner:

And I'm happy you're here because there's no way I could talk about asbestos by myself. So I'm really glad that you're here to provide a lot of clarity on this topic. And as we've mentioned before, hey, this is not as straightforward as a lot of other training that's required, particularly in the construction industry in Ontario. So I'm very glad that you are here to really, as I said, set the record straight and make sure there's clarity when it comes to what is required for what instance.

So let's go back, Michele, if I could, because on podcast episode 99, we discussed the importance of asbestos awareness and training in Ontario workplaces to ensure that workers and supervisors are well-equipped to recognize the dangers of asbestos and know how to safely control the hazard. So let's go back to episode 99, Michele, and maybe just remind our listeners of the mandatory training that you referenced in that podcast episode.

Michele Beckstead-Jackson:

Yeah, I'm happy to do that actually. And it's, I think, a great segue into today's podcast. So the general awareness training that we talked about in episode 99 is to be provided by a competent person, and it's required regardless of whether a worker is doing Type 1, Type 2, or Type 3 operations. General training very much differs from Type 3 training, because it focuses on every worker in the workplace who may come in contact with asbestos. The employer has a responsibility to deliver general training and for those workers to receive it.

In addition to this training as well, the workers and supervisors must complete an *Asbestos Abatement Worker 253W* and *Asbestos Abatement Supervisor 253S* training that is approved by the ministry before they can do or supervise any Type 3 asbestos abatement work. So you've got the general training that's required for all types, and you also then have the very specific training, the 253W and the 253S for anyone who is going to be doing Type 3 work.

Ken Rayner:

Perfect. Thank you for that clarity. So as you said, great segue into today's topic because today we're going to help our audience better understand how 253W training certificate that you just referenced compares to another program called the *Hazardous Materials Worker 253H* and that training, and to clear up any confusion that may presently exist between these two programs. So to start us off, maybe you could tell us what is the *Hazardous Materials Worker* program, 253H, and whether it's seen as equivalent to the *Asbestos Abatement Worker* program, 253W.

Michele Beckstead-Jackson:

So absolutely. So the 253H that you mentioned, it's an actual apprenticeship program. It is very separate from the asbestos abatement worker, 253W, and the asbestos supervisor, 253S, modular programs, the hazardous materials worker, your 253H, the other important piece to that is it's not required by law.

When you look at the asbestos abatement worker certificate, it is not an apprenticeship program, it's a modular program for all workers doing specifically Type 3 work, and it's not just for apprentices. The 253W and the 253S are required for asbestos Type 3 abatement worker under the *Occupational Health and Safety Act (OHSA)* and its regulations. The 253W and the 253S are mandatory training as outlined in *O. Reg. 278/05: Designated Substances – Asbestos on Construction Projects and in Buildings and Repair Projects* and that is what we enforce, and that's specifically what we enforce. By law, we are looking for people who are doing Type 3 to have both of those courses if they are working in it or if they're supervising in it.

The short answer with regard to the 253H, is it equivalent, is it an equivalent certificate? No, it is not an equivalent certificate. The requirement to do Type 3 asbestos removal can only be done upon completion of the 253W and the 253S if it's a supervisor, and they're referred to as certificates of completion as per the law.

Ken Rayner:

Okay, so got that answer. 253H, the *Hazardous Materials Worker* program is not equivalent to *Asbestos Abatement Worker* program, 253W. Got it. Okay.

Now, we do have two programs, and I'm sure there are some similarities and differences between them. Maybe we can expand on how the asbestos related training for the 253H is different and similar to the 253W training, Michele.

Michele Beckstead-Jackson:

Yeah, on the surface they are similar, there is some overlap in the in-school component between the two programs as the 253H was actually built using the 253W as a model. However, the 253H requires

meeting learning outcomes, where the 253W requires meeting both learning outcomes and specific learning objectives. And those are very different.

So outcomes, they result in having kind general knowledge, where learning objectives result in learning all the very specific measures and procedures that must be followed to achieve those outcomes. So in addition, these courses are different as they were created for very different purposes and very different audiences.

In addition, 253W, the course, is a modular program specific to asbestos abatement workers, and it is 100 per cent focused on preparing and qualifying workers to do exactly that Type 3 asbestos abatement.

The 253W and the 253S, again, are modular programs, they cover a broader spectrum of workers, whether those workers are new or experienced construction workers, they're workers from other industry sectors or apprentices engaging in type three asbestos abatement.

For the hazardous materials worker, 253H, it's an apprenticeship program, so not a modular program, but an apprenticeship program. It has a more generic focus, and it has been created to ensure apprentices specifically receive overall basic training to equip workers to deal with a variety of hazard materials in the workplace. And asbestos happens to be one of those that they cover. So it does not cover all the same content to prepare a worker to specialize in Type 3 abatement work. The developers of the program, the developers of the 253H also never intended it to replace or to be equivalent to 253W and the 253S programs.

So to obtain an asbestos abatement worker certification, a worker must register with the ministry in the 253W modular program and complete the in-class training, and same with the 253S. The worker must also pass an asbestos abatement worker certification test. And without the 253W certificate of completion card, a worker, by law, cannot do Type 3 asbestos abatement.

The process for registering with the ministry for the asbestos abatement worker 253W and the asbestos abatement supervisor, it's a very different process, and it has a separate tracking system from the 253H apprenticeship program. This 253W must be completed before taking the 253H, is another important note that I want to emphasize. Most unions are ministry approved as a signing authority to deliver 253W and 253S asbestos modular programs.

But presently, only two of 11 unions are registered with the ministry to actually deliver 253H training officially. However, this does not preclude really any employer from covering some or all of the 253H content as part of their onboarding of apprentices. So it's about wanting to emphasize that there are very different systems that track the 253W and S compared to the system that tracks 253H. And the two shall never meet, they are very separate. And unless you're registered in the 253W and S system, you're not registered as being able to do Type 3 abatement work.

Ken Rayner:

Got it. So let's just get into the regulation per se and just make sure we're checking the boxes as we go in terms of what is similar to what here. So let's get into the regulation. Does the hazardous materials worker training 253H, does it meet the requirements under Regulation 278/05? I guess that would be Section 20. And then are there any circumstances where the hazardous materials worker training 253H meets the requirements of Regulation 278/05?

Michele Beckstead-Jackson:

So the 253W and the 253S training standards, they do not reference 253H qualification as an equivalency for meeting the training requirements as outlined, by law, under Section 20 of Regulation 278/05 because this program does not meet the requirements in Section 20 of the asbestos rights.

The only equivalency granted in the 253W and the 253S standards is for workers coming in from out of province who have a signing authority already here in Ontario that can attest that that worker has taken an equivalent course to our training standard and has completed 1,000 hours of Type 3 abatement work endorsed by their previous employer. In that case, and in that case only, the worker can take a challenge exam once the ministry is made aware, and they'll have a chance to take that exam once and pass. If they don't pass, then they will be asked to retake, even if they're out of province or if they're out of province, they will be asked to retake our course here in Ontario. So they have one shot, one kick at the can.

When the specific asbestos abatement module is covered in 253H, then it could be seen as satisfying, for instance, Section 19 of Reg. 278/05 for every worker to receive a general training for Type 1, Type 1, and Type 3. Regarding hazards of asbestos exposure, it'll talk about that general training, would address personal hygiene, work practices, and some of the limitations of equipment, and maintenance of their equipment and proper fitting as well. Again, that general training though that would satisfy Section 19 is insufficient for Type 3 asbestos abatement, but it would be considered adequate for Type 1 and Type 2 work.

Ken Rayner:

Okay. And Michele, I'd like to go back to something you said just a little while ago talking about prerequisites. So did I hear you say that the 253W, is that a prerequisite for hazardous materials worker training, 253H?

Michele Beckstead-Jackson:

Yes, it is. The 253H hazardous materials training standard clearly states actually right in it that the worker must have completed 253W asbestos abatement as a component of 253H. So always carrying the ministry issued 253W certification on the job is crucial, and it's obviously not a stretch in any way for them to not have that card because they have to have completed it before they really even do their 253H.

So an individual who has completed the schooling portion of a 253W asbestos abatement program, they may be exempt from repeating the same in-class portion asbestos training within the 253H because they've already taken it. And as I mentioned, because it's a prerequisite, they should always be able to have on them the 253 certificate completion card.

Ken Rayner:

And I'm going to also ask you to go back to something else that you talked about just a little while ago. You were talking about the different... you were mentioning union halls in particular, I think you said 11 of them, but in Ontario, Michele, who generally delivers the hazardous materials worker training 253H program to whom? And is the content quality controlled?

Michele Beckstead-Jackson:

Well, I'm glad you asked that. So the 253H is apprenticeship training, and it's generally delivered by unions. Presently, it's being delivered by, as I mentioned earlier as well, two local unions when the worker is hired as part of their onboarding training. Not all unions or apprentices presently even receive that training for starters. This program is voluntary for workers to offer, and it's not a legally required program, the 253H. Not all workers taking 253H will be working in any type of abatement or be required to even work in close proximity to asbestos where it may be disturbed. Therefore, the instructor may, for instance, in that 253H class, they could potentially skip over the asbestos content entirely, which can happen, or cover it to a lesser degree, providing only general high level knowledge, and hence why 253W is a prerequisite for 253H and key to the content of the content quality control basically.

Ken Rayner:

Okay. Now, you've already covered a lot about what's similar and different about the 253H and the 253W. What about what we would refer to as evaluation methodology? So you're getting to the end of a particular section, you're getting into the course, and the participants are being evaluated or tested on their knowledge at the conclusion of the course. Is it different, Michele, when the evaluation methodology between the asbestos abatement worker, 253W, and the hazardous materials worker 253H?

Michele Beckstead-Jackson:

Yeah, they are very different. So at the end of... And let me just take a few minutes to explain. So at the end of each 253H course, it's the in-house instructor's choice as to whether or not they administer an after-course knowledge test or quiz, and what the content of that test or quiz would be because it's created by them. This is not a standard test that must measure a pass or fail grade, but more an acknowledgement that the worker has completed the apprenticeship course.

At that point, they receive a certificate of apprenticeship from the ministry. The registered apprentice must also complete the required benchmark hours on the job training. So by taking the 253H, they can achieve a certificate of apprenticeship. But if they take it the next step, so to be recognized as actually having a 253H certificate of qualification from the ministry, that is voluntary for them to choose to do or not, and it's an extra cost for the worker.

So if the worker chooses this path, they must be a completed apprentice, which I talked about, a certificate of apprenticeship, and they will be required to then pass an exam. The exam tests the worker's knowledge on a variety of hazards at a general level, of which asbestos is just one of them. And the Skills Trade Ontario, if they pass that, will then issue an official certificate of qualification.

But again, there's no requirement for that worker to take that additional step or go for their certificate of qualification. Where in contrast, the 253W, the asbestos abatement worker, requires this, and it's not optional, the worker to take a quality controlled, standardized, and monitored tests that's administered by one of the designated college testing centres. And that's done through the College of Applied Arts and Technology solely on their asbestos Type 3 abatement knowledge.

So there is a fee for that task. And once passed and communicated to the ministry through their signing authority, which is the only one that can do that. And again, just to repeat, a signing authority. To become one, the employer must actually register to become a signing authority for the asbestos abatement courses. Once they've passed the test, it's communicated again to the ministry through the signing authority, and then the worker is issued an official 253W or 253S certificate of completion from the ministry to perform officially Type 3 abatement work.

Ken Rayner:

Okay. So I'm clear with everything up to what are the programs, if you compare the two, what are the similarities and differences, how does someone get registered, how are they then evaluated or tested? How about now, let's assume that the workers have their training card, so they've got the records of training, and now they're starting to do the work, and if they are having some interactions with an inspector, what they might need to have on them to be able to demonstrate that they've been adequately trained?

So let me ask you this, Michele, will a Ministry of Labour, Immigration, Training, and Skills Development inspector accept a hazardous materials worker training certificate 253H of qualification from the ministry for a worker who's just doing type one or type two work?

Michele Beckstead-Jackson:

So that's a good question. The inspector could and should accept a 253H certificate card as complying with Section 19 of Reg. 278/05, which is your general awareness training for Type 1 and Type 2 work. And basically it acknowledges that you have that general awareness training.

However, what is important to also note is, and I think this is a good place to mention it, that there are certain operations, for example, like a glove bag operation, and that's a specific method used to remove insulation, that is asbestos-containing material from pipe or ducts or similar structure. Also, it would need to be more than one square metre of friable asbestos material that is actually being removed via this method. But if that is the case, the operation changes classification from a Type 2 to a Type 3 operation as per a particular section actually, Section 12(3)(9) of Reg. 278/05. And in this scenario, once it's then been designated as a Type 3 operation, a 253 card would not be accepted by an inspector.

Ken Rayner:

The 253H card?

Michele Beckstead-Jackson:

Yeah, would not be accepted...

Ken Rayner:

253H, okay. Gotcha.

Michele Beckstead-Jackson:

...In that case. So it's accepted in the case where they're doing Type 1 or Type 2 and that satisfies that general awareness, then they potentially would accept that 253H. Anytime they're doing any kind of Type 3 operation, and I was just giving you an example of a particular case where, at first glance, a glove bag operation may be a Type 2. If it meets the criteria of removing more than one square metre of friable asbestos, it becomes a type 3, and then it basically falls under the same category as all other Type 3 operations, in that a 253H would not be accepted for that type of work.

Ken Rayner:

Okay. So my last question, I'm believing after everything you've taught me so far, not only on this podcast, but the last one as well, that I've got an understanding already before I even ask you this what your answer is going to be. So we shall see how I do, but just to clarify one more time because I think this is really important in terms of when we move into Type 3, how things are different, will a ministry inspector accept a hazardous materials worker training certificate 253H for a worker engaged in Type 3 abatement work?

Michele Beckstead-Jackson:

Absolutely not.

Ken Rayner:

Yes, that was my answer.

Michele Beckstead-Jackson:

You are correct.

Ken Rayner:

Yes, thank you. All right, so perfect. That's very, very clear. Michele, thanks again. This is not an easy topic to get into and to cover, and I really appreciate your expertise and help navigating this for our listeners so they've got clarity on what's required from a training perspective when they're working with asbestos in all the different aspects in which they can in the workplace. So thank you so much for being with us again, Michele.

Michele Beckstead-Jackson:

Oh, you're welcome. But Ken, just before we go, there's just a couple of things just to that last question when you summarize it really well and just saying if you're doing Type 3, 253H won't be accepted. The other thing that I guess I just wanted to add there is since 253W is a prerequisite to 253H, there should be no issue with a worker producing a 253W card at any time. And the 253W card ensures the workers also registered with the ministry specifically to perform that work as required by law on Reg. 278/05.

So if a worker's going to be doing Type 2 glove bag work involving more than one square metre, then they need to be carrying that card. 253W and 253S cards are not optional, as you summarized very well, they are mandatory. And so if a worker has a 253H card, that's a bonus because obviously then they know about some other hazards. But as mentioned, these two programs were really created for two

different purposes. And the 253H, as you nicely put, is not accepted in place of 253W. And I just wanted to take a moment to summarize some of those kind of key points to ensure that hopefully it's a little bit clearer now.

Ken Rayner:

No, it's great, Michele. And if I'm a worker and I'm working with asbestos, what I've gleaned from this podcast, one of the things is just always have your 253W with you because you might be doing Type 1 or Type 2, and from what I've learned from you, it could, based on how much material is being removed, go into that category of type three. Well, now you need to demonstrate to an inspector that you have the proper training, and you need to have that card with you. So some great tips and some great guidance for our audience. Thanks again, Michele.

Michele Beckstead-Jackson:

Oh, you're very welcome. And thank you very much for asking me and giving me the opportunity to actually talk about this, and hopefully that helps workers stay safe.

Ken Rayner:

It's helped me, I know that much. I'm very clear on what we need to do from an asbestos training perspective. So thank you so much.

Thank you to the listeners for listening to our podcast on asbestos training requirements. Be sure to subscribe and "like" us on your podcast channel and visit us at ihsa.ca for a wealth of health and safety resources and information.

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