GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

PBS 1000.1A
April 11, 2022

GSA ORDER

SUBJECT: Asbestos Management

1. Purpose. The purpose of this Order is to identify the minimum Public Buildings Service (PBS) requirements necessary to comply with Occupational Safety and Health Administration (OSHA), Environmental Protection Agency (EPA) and applicable State and local asbestos regulations for Federally owned facilities under the jurisdiction, custody and control of the U.S. General Services Administration (GSA), including facilities operating under a GSA delegation of authority. This Order also applies to facilities leased by GSA in accordance with the lease provisions regarding asbestos.

2. Authority.

a. 41 C.F.R. § 102-80 establishes real property policy asbestos requirements for PBS and other Federal agencies.

b. OSHA 29 C.F.R. § 1910.1001 establishes asbestos requirements for general industry.

c. OSHA 29 C.F.R. § 1926.1101 establishes asbestos requirements for the construction industry.

d. EPA 40 C.F.R. Part 61 Subpart M, the National Emission Standards for Hazardous Air Pollutants, establishes requirements for asbestos demolition and disposal.

e. EPA 40 C.F.R. Part 763, Asbestos Hazard Emergency Response Abatement Reauthorization Act establishes asbestos training requirements (Model Accreditation Plan) for inspectors and management planners performing work in Federal facilities.

f. EPA 40 C.F.R. Part 302.4, Comprehensive Environmental Response, Compensation, and Liability Act establishes reporting requirements for asbestos released into the environment.

3. Background. Asbestos is a naturally occurring mineral used in a large assortment of commercial and industrial products due to its good insulating and tensile strength properties. Microscopic fibers from broken or deteriorated asbestos products can lead to disease or cancer when inhaled. Federal (referenced OSHA and EPA standards), state and local regulations exist to limit human exposure and environmental contamination of asbestos-containing materials in Federal and commercial facilities through strict asbestos management, demolition, and disposal requirements.

4. Cancellation. PBS 1000.1, dated March 25, 2015, is hereby canceled by this Order.

5. Scope and Applicability. This Order is intended to meet the applicable OSHA and EPA asbestos standards for all Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority. The Order also applies to GSA leased facilities as leases awarded by GSA must include contractual requirements for asbestos certification and related information.

6. Definitions.

a. Asbestos. A group of naturally occurring, fibrous, silicate minerals used in a broad number of manufactured and applied commercial products. Chrysotile, amosite, and crocidolite are the most common asbestos types found in products.

b. Asbestos Awareness Training. A course of no more than 2 hours in length, designed to impart general health, safety and environmental information about asbestos to individuals who may work on asbestos or may come in contact with asbestos during performance of their job duties. A GSA asbestos awareness training course is available to PBS employees through the On-line University.

c. Asbestos Bulk Sample. A small, usually thumbnail-sized, portion of a suspect asbestos-containing building material that is collected for laboratory analysis to determine asbestos content.

d. Asbestos-Containing Material (ACM). Also called asbestos-containing building material, any material that contains 1% or more of asbestos content as determined through laboratory bulk testing.

e. Asbestos Inspection. The process of physically walking through a facility and gathering asbestos bulk samples for the purpose of preparing an asbestos inspection report and accompanying inventory. An inventory identifies the locations, quantities and condition of all asbestos in the facility. Asbestos inspection and inventory information is used to create an asbestos management plan and assist in performing pre-alteration assessments for construction projects and maintenance activities.

f. Periodic Surveillance. The process of physically walking through a facility with either the most current asbestos inspection inventory list or most recent periodic surveillance report and visibly noting any changes in asbestos condition or quantities. The periodic surveillance is performed annually, often by an asbestos-trained facility operations and maintenance (O&M) employee or similarly trained consultant. Unlike an asbestos inspection, the periodic surveillance typically does not include bulk asbestos sampling and analysis, nor is it intended to result in a comprehensive inventory of all regulated asbestos in the facility.

g. Pre-alteration Assessment. The process of determining whether planned renovation or construction projects may impact asbestos in building materials or equipment associated with the project. The purpose of a pre-alteration assessment is to identify asbestos that may be disturbed so that it can be accounted for in the project scope and thereby avoid an accidental release of asbestos that could put occupants at risk or result in environmental contamination. When a pre-alteration assessment is expected to include bulk sample collection, it must be performed by an EPA-accredited asbestos inspector or project designer.

h. Response Actions. An EPA term for the options used to prevent the release of friable ACM, in order to protect human health and the environment:

- Removal
- Repair
- Encapsulation
- Enclosure
- Dismantling
- Operations and Maintenance

i. Regulated Asbestos. Refers to any material containing more than 1% asbestos through bulk laboratory analysis, as defined by the EPA and OSHA. Also refers to materials containing any concentration of asbestos that has become airborne and poses an exposure risk, as defined by OSHA.

7. Policy.

a. Regulated asbestos in all Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority shall be managed in place unless the age and condition of the asbestos constitutes a risk to occupants that cannot be mitigated through ongoing management of the asbestos. Asbestos that cannot be managed in place shall be subject to a response action to mitigate the ongoing risk.

b. All Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, constructed before 1998 shall be initially inspected for regulated asbestos, and every 5 years thereafter, unless a previous inspection or reinspection indicates no asbestos or suspect asbestos is present.

c. Periodic surveillance shall be performed at least annually in all Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, that contain regulated asbestos.

d. An asbestos pre-alteration assessment shall be performed in all Federally owned facilities under the jurisdiction, custody and control of GSA and facilities operating under a GSA delegation of authority, prior to any construction work which will likely disturb asbestos or suspect asbestos through demolition, dismantling or renovation activities.

e. All asbestos inspections and construction project designs involving regulated asbestos in GSA-controlled Federally owned facilities and facilities operating under a GSA delegation of authority, shall be performed by an EPA-accredited asbestos inspector or an EPA-accredited project designer..

f. All occupants and contractors in Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority which contain asbestos, shall be notified annually of the presence of asbestos by the office responsible for management of the facility.

g. All PBS employees who work on asbestos or may come in contact with asbestos during their routine job duties, must complete an asbestos awareness training course one time. New employees should complete the course as soon as feasible.

h. All new leases awarded by GSA shall include contractual requirements for asbestos certification and associated documentation.

8. Recordkeeping. For all Federally owned facilities under the jurisdiction, custody and control of GSA that contain asbestos, the asbestos module of the PBS IRIS FMA IT application is the official repository for:

a. asbestos inspection and re-inspection results

b. asbestos periodic surveillance results

c. accounts of asbestos activities involving:

- occupant communications,
- pre-alteration assessments,

- response action projects,
- project and periodic monitoring log,
- O&M activities, and
- Updates to the management and O&M plan

The PBS Kahua IT application is the official asbestos repository of record for:

a. asbestos information furnished by the lessor or Offeror for all GSA leased facilities, and

b. detailed asbestos abatement project documents, including but not limited to design and construction submittals and drawings, for all Federally owned facilities under the jurisdiction, custody and control of GSA

For Federal facilities operating under a GSA delegation of authority, all asbestos records produced by the delegated agency shall be maintained by the agency and made available to GSA upon request.

9. Program Audit. The PBS Financial Operations Division, with support from the PBS Office of Facilities Management, conducts regular reviews of asbestos inspections and asbestos projects as required by a Federal accounting standard for asbestos. Annual inspection information is examined for accuracy in both asbestos quantities and cost estimates. Construction project information is examined for accurate asbestos cost accounting. The reviews support overall environmental liabilities, which make up a portion of the annual agency financial report.

10. Responsibilities.

a. PBS Office of Facilities Management (OFM). Central Office PBS OFM is responsible for:

(1) Issuance of this policy and all subsequent updates,

(2) Providing national guidance and training in support of this policy,

(3) Reviewing asbestos awareness training completion status for PBS employees designated to receive the required training,

(4) Maintaining the IRIS FMA asbestos module IT recordkeeping system,

(5) Supporting the PBS Financial Operations Division in the asbestos financial liability auditing process,

(6) Supporting regional environmental, health, safety and fire protection (EHSF) offices in asbestos program management activities.

b. PBS Office of Design and Construction. Central Office PBS Office of Design and Construction is responsible for:

(1) Ensuring that updates to the P100 Facility Standards for the Public Buildings Service incorporates the most current, applicable asbestos requirements.

c. PBS Office of Leasing. Central Office PBS Office of Leasing is responsible for:

(1) Ensuring that updates to the standard, national lease contracting language incorporates the most current, applicable asbestos requirements for leases.

d. PBS Regional Design and Construction Division. Regional Design and Construction Divisions are responsible for ensuring:

(1) A pre-alteration assessment is performed for every project managed by the Division that may disturb known or suspected asbestos materials,

(2) Every project with asbestos impact, as determined by the pre-alteration assessment, includes a scope for asbestos response and third-party oversight, developed by an EPA-accredited project designer,

(3) Training has been completed for employees identified to receive the one time asbestos awareness course,

(4) The summary information for every asbestos project response action is recorded in the IRIS FMA asbestos module IT system,

(5) Asbestos project documents are maintained in the Kahua IT system.

e. PBS Regional Leasing Specialists / Lease Contracting Officers (LS/LCO). Regional LS/LCOs are responsible for ensuring:

(1) For new, replacing, succeeding and superseding leases, the Offeror has completed the asbestos representation on GSA Form 1364

(2) If an Offeror indicates the presence of asbestos, the Offeror also provides a current asbestos-related management plan or O&M plan, along with a current asbestos re-inspection report, in accordance with the Request for Lease Proposal requirements,

(3) Any re-inspection report and management or O&M plan received from the Offeror is forwarded to the regional EHSF for review,

(4) Any asbestos documentation received from an Offeror is maintained in the Kahua.

f. PBS Regional EHSF Program Office. The PBS Regional EHSF program office is responsible for:

(1) Overseeing compliance with the asbestos management program and this policy throughout the region,

(2) With support from the PBS regional facility management, service center, and design and construction divisions, identifying regional employees required to complete the one time asbestos awareness training course,

(3) Ensuring asbestos inspections and periodic surveillance are conducted for all regional Federal facilities containing regulated asbestos,

(4) Providing technical asbestos program support to regional facility managers, project managers and lease administration managers, as needed,

(5) Ensuring regional asbestos program information is recorded and maintained within the IRIS FMA asbestos module IT system,

(6) Reviewing asbestos reports and documentation for accuracy and completeness and providing recommendations to responsible offices as needed.

g. PBS Regional Facility Management and Service Center (FM/SC) Divisions. For each Federally owned facilities under the jurisdiction, custody and control of GSA, the PBS Regional FM/SC Divisions are responsible for ensuring:

(1) A pre-alteration assessment is performed for every project managed by the Divisions that may disturb known or suspected asbestos materials,

(2) Training has been completed for employees identified to receive the one time asbestos awareness course,

(3) Every project with asbestos impact, as determined by the pre-alteration assessment, includes a scope for asbestos response and third-party oversight, developed by an EPA-accredited project designer,

(4) Annual asbestos periodic surveillance is completed for each facility that contains regulated asbestos,

(5) Only trained individuals perform asbestos O&M work,

(6) Summary asbestos information is recorded in the IRIS FMA asbestos module IT system for all: communication events, O&M work, construction

projects managed by the Divisions, routine air monitoring events, and management plan or O&M plan events,

(7) Periodic surveillance results are recorded in the IRIS FMA asbestos module IT system with support, as needed, from the regional EHSF Office,

(8) Any asbestos accident or release in a facility is promptly reported to the regional EHSF Office.

11. Revision. The following are changes from PBS 1000.1:

a. Changed all references of GSA-controlled facilities to facilities under the jurisdiction, custody, or control of GSA.

b. Inserted references to OSHA, state and local regulations where applicable.

c. Added a Program Audit section.

d. Added definitions and policy sections.

e. Removed the Table of Contents section.

12. Signature.

/S/_____
NINA M. ALBERT
Commissioner
Public Buildings Service

Appendix A: Desk Guide for Asbestos Management - see below

Public Buildings Service
Desk Guide
For
GSA Order PBS 1000.1A Asbestos Management

Office of Facilities Management
Facility Risk Management Division
April 11, 2022

Desk Guide for Asbestos Management

Contents

Introduction

PBS Order 1000.1A and this companion desk guide issue a national Public Buildings Service (PBS) asbestos management policy in compliance with Federal, State and local asbestos regulations as they apply to Federally owned and leased facilities under the jurisdiction, custody or control of the U.S. General Services Administration (GSA) and facilities operating under a GSA delegation of authority.

The Order and desk guide apply to all Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority. They also apply to facilities leased by GSA in accordance with the lease provisions regarding asbestos. PBS's priority is to safely manage asbestos in place. However, once asbestos can no longer be safely managed in place, one or more response actions, recognized by the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA), must be performed to avoid immediate and long-term risk to occupants, contractors, visitors, employees, and the environment. What follows are detailed PBS requirements, templates, and best practices in support of asbestos management.

References

41 C.F.R. § 102-80.15: Federal Management Regulations that require federal agencies to provide safe and healthy work environments and be responsible for the following assessment and management actions regarding asbestos:

- Inspect and assess buildings for the presence and condition of asbestos.
- Ensure space to be leased is free of asbestos except undamaged asbestos flooring in the space or boiler or pipe insulation outside the space that is subject to a management plan.
- Manage in place asbestos that is in good condition and unlikely to be disturbed.
- Abate damaged asbestos and asbestos likely to be disturbed.
- Perform a pre-alteration asbestos assessment for activities that may disturb asbestos.
- Do not use asbestos in new construction, renovation/modernization or repair of owned or leased space.
- Do not obtain space with asbestos through purchase, exchange or transfer unless approved by GSA.
- Communicate all written and oral asbestos information about leased space to tenants.

OSHA 29 C.F.R. § 1910.1001: OSHA asbestos regulations for general industry that require protective measures for people working with and around asbestos. Establishes requirements in the following:

- worker training,
- exposure assessment,
- medical monitoring,
- personal protective equipment,
- asbestos warning signs and labels,
- cleaning and housekeeping procedures,
- work practices during activities that will disturb asbestos, and
- disposal of asbestos waste.

OSHA 29 C.F.R. § 1926.1101: OSHA asbestos regulations for the construction industry that require protective measures for people working with and around asbestos in the construction trades. Establishes requirements in the following:

- worker training,
- exposure assessment,
- medical monitoring,
- personal protective equipment,
- asbestos warning signs and labels,
- cleaning and housekeeping procedures,
- work practices during activities that will disturb asbestos, and
- disposal of asbestos waste.

EPA 40 C.F.R. Part 61, Subpart M: Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations for asbestos. The Asbestos NESHAP establishes the following requirements for owners and operators of regulated asbestos containing material (RACM) when conducting demolition and renovation activities:

- Thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable Asbestos Containing Material (ACM).
- Provide notification to EPA or the delegated State or local authority prior to demolition or renovation and disposal of RACM.
- Implement adequate controls in the demolition and renovation processes involving RACM to prevent any discharge of visible asbestos emissions to the air outside the work area(s) or building.
- Ensure all asbestos waste from demolition or renovation activities is properly packaged, labeled and sent to a licensed asbestos waste management site, accompanied by an asbestos waste shipment record.

EPA 40 C.F.R. Part 763, EPA Asbestos Hazard Emergency Response Abatement (AHERA) regulations for asbestos-in-schools. AHERA establishes requirements for Local Education Agencies to inspect school buildings for ACM, prepare asbestos management plans, and

perform asbestos response actions to prevent or reduce asbestos hazards. AHERA establishes the following requirements for schools:

- Perform an original asbestos inspection for each school and a reinspection every three years.
- Develop, maintain, and update an asbestos management plan.
- Provide yearly notification to parent, teacher, and employee organizations on asbestos.
- Designate a contact person responsible for asbestos within the school district.
- Perform periodic surveillance for asbestos every 6 months.
- Ensure that trained and licensed professionals perform asbestos activities.
- Provide custodial staff with asbestos-awareness training.

While AHERA generally does not apply to public buildings, in accordance with industry practice and EPA guidance, GSA applies the following AHERA requirements to all Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority:

- Conduct asbestos facility reinspections every 5 years for facilities built prior to 1998.
- Have an asbestos management plan for every facility containing asbestos.
- Communicate annually to occupant agencies about the presence of any asbestos in their facility.
- Provide asbestos awareness training for any employee working with asbestos or likely to contact asbestos.
- Perform annual periodic surveillance facility inspections for facilities containing asbestos.

The Asbestos School Hazard Reauthorization Act of 1990 (ASHARA) reauthorized AHERA and specifically extended asbestos training requirements for asbestos inspections and projects to commercial and public buildings. ASHARA requires all asbestos inspections to be performed or reviewed by an EPA accredited inspector. ASHARA requires all asbestos projects to be designed or reviewed by an EPA accredited asbestos project designer.

EPA 40 C.F.R. Part 302.4: EPA Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) regulations that establish reporting requirements for asbestos released into the environment. CERCLA requires immediate notification to the EPA National Response Center of any release of 1 pound or more asbestos within any 24 hour period, into the environment.

49 C.F.R. § 173: Department of Transportation (DOT) regulations for the packaging and transport of asbestos waste. DOT establishes the following requirements:

- Asbestos must be packaged in bags inside closed freight containers or rigid leak-tight containers.
- Vehicles transporting asbestos waste must have a DOT class 9 sign. The asbestos class 9 is a white diamond placard with seven black vertical stripes on the top half extending from the top of the placard to one inch above the horizontal centerline, labeled with the number 2212.

Definitions[1]

Asbestos. A group of naturally occurring, fibrous, silicate minerals used in a broad number of manufactured and applied commercial products. Chrysotile, amosite, and crocidolite are the most common asbestos types found in products.

Asbestos awareness training. A class of no more than 2 hours in length, designed to impart general health, safety, and environmental information about asbestos to individuals who may work on asbestos or may come in contact with asbestos during performance of their job duties. A GSA asbestos awareness training course is available to PBS employees through the On-line University

Asbestos bulk sample. A small, usually thumbnail-sized, portion of a suspect asbestos-containing building material that is collected for laboratory analysis to determine asbestos content.

Asbestos containing material (ACM). Also called asbestos-containing building material (ACBM), any material that contains more than 1% asbestos content as determined through laboratory bulk testing.

Asbestos Contractor/Supervisor and Worker training. These are multi-day initial and annual refresher courses that follow the EPA asbestos model accreditation plan. These courses are designed for individuals who perform or supervise asbestos removal and other response actions.

Asbestos Inspection. The process of physically walking through a facility and gathering asbestos bulk samples for the purpose of preparing an asbestos inspection report and accompanying inventory. An inventory identifies the locations, quantities, and condition of all asbestos in the facility. Asbestos inspection and inventory information is used to create an asbestos management plan and assist in performing pre-alteration assessments for construction projects and maintenance activities.

Asbestos Inspector training. A 3-day initial and 4-hour annual refresher course that follows the EPA asbestos model accreditation plan. The course is designed to train individuals who perform asbestos facility inspections. Trained individuals must maintain their state or local authority licensing or certification by completing annual refresher courses. This course is often offered with a 2-day Management Planner course to create an initial 5-day Inspector/Management Planner overall course. The management planner is designed for those who prepare asbestos

[1] These definitions are taken directly from EPA regulations and guidance documents, or are common industry terms defined to make them clearer to the reader.

facility management plans. Any asbestos inspection or pre-alteration assessment performed for GSA must be conducted by or reviewed by a licensed asbestos inspector, per EPA regulations.

Asbestos Management Plan. A library of critical and asbestos information for a facility that includes, but is not necessarily limited to: a listing of asbestos and any marked up floor plan from an inspection/reinspection, the Operations and Maintenance (O&M) plan for the facility, a catalog of occupant communication events, a catalog of asbestos O&M activities, a catalog of asbestos abatement activities, a catalog with summary results of asbestos monitoring and oversight, copies of asbestos disposal waste manifests, copies of asbestos training certificates for facility management staff, and results of the most recent periodic surveillance reflected in the listing of asbestos materials. Management plans are intended to be updated after every completed asbestos event for the facility. Management plans may be kept in electronic or printed format and must be maintained with other facility records to be accessible by facility management staff and contractors.

Asbestos O&M Plan. A written document covering asbestos maintenance, repair and surveillance work procedures for a given facility. An O&M plan is typically a subset of the overall management plan. It must be specific to the facility and the asbestos materials and locations contained therein. An O&M plan should contain the specific procedures to be followed by facility service contract staff when performing work with or around asbestos and specific procedures for the contractor responsible for asbestos O&M activities in the facility. Appendix A contains an example outline of an O&M plan.

Asbestos O&M training. A minimum 14 hour class following the EPA model accreditation plan requirements. The course is designed to train facility O&M staff in safely performing maintenance, cleanup and repair activities on equipment or surfaces containing asbestos.

Asbestos Project Designer training. A 3-day initial and 8-hour annual refresher course that follows the EPA asbestos model accreditation plan. The course is designed to train individuals who perform asbestos project designs. Trained individuals must maintain their state or local authority licensing by completing annual refresher courses. All asbestos removal projects performed in Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, must be designed by or reviewed by a licensed asbestos project designer, per EPA regulations.

Category I Nonfriable ACM. EPA classification of asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than one percent asbestos as determined using the method specified in appendix A, subpart F, 40 C.F.R. Part 763, section 1, Polarized Light Microscopy.

Category II Nonfriable ACM. EPA classification of any material, excluding Category I nonfriable ACM, containing more than one percent asbestos as determined using the methods specified in appendix A, subpart F, 40 C.F.R. Part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Class I asbestos work. OSHA classification of asbestos removal involving thermal system or surfacing ACM.

Class II asbestos work. OSHA classification of asbestos removal of any ACM material other than thermal system or surfacing ACM.

Class III asbestos work. OSHA classification for repair or maintenance work on asbestos materials.

Class IV asbestos work. OSHA classification for the cleanup of asbestos materials and maintenance or custodial activities which may involve contact with, but no disturbance of asbestos.

Damaged ACM. Asbestos material that is in a damaged condition such that up to 25% localized or 10% distributed within a functional space or a facility.

Friable. Any asbestos-containing material that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously nonfriable material that once damaged, can now be crumbled, pulverized, or reduced to powder by hand pressure.

Functional space. A term commonly used to designate a room, group of rooms, or area(s) designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions in a facility.

Future potential damage. A term commonly used to estimate the probability (low, medium, high) and type of damage (air erosion, vibration, physical contact) that may occur to ACM materials in the future.

Homogeneous area. A common method of assigning an identifier for all identical ACM materials within a facility, based upon factors such as color, texture and age of application.

Major fiber release episode. An incident, accident or unintentional event that results in the disturbance of more than 3 square or linear feet of asbestos material.

Minor fiber release episode. An incident, accident or unintentional event that results in the disturbance of no more than 3 square or linear feet of asbestos material.

Miscellaneous material. Any other asbestos material in a facility that is not surfacing material or thermal system insulation.

Periodic Surveillance. The process of physically walking through a facility with either the most current asbestos inspection inventory list or most recent periodic surveillance report and visibly noting any changes in asbestos condition or quantities. The periodic surveillance is performed annually, often by an asbestos-trained facility O&M employee or similarly trained consultant. Unlike an asbestos inspection, the periodic surveillance typically does not include bulk asbestos

sampling and analysis, nor is it intended to result in a comprehensive inventory of all regulated asbestos in the facility.

Pre-alteration Assessment. The process of determining whether planned renovation or construction projects may impact asbestos in building materials or equipment associated with the project. The purpose of a pre-alteration assessment is to identify asbestos that may be disturbed so that it can be accounted for in the project scope and thereby avoid an accidental release of asbestos that could put occupants at risk. Pre-alteration assessments must be performed by or reviewed by a licensed asbestos inspector or project designer. A pre-alteration assessment can range from simply matching asbestos inventory information to the project scope in terms of location and materials, to an independent contract for a limited inspection of the project area and materials. Pre-alteration assessments should be performed as early as possible in the project planning or scoping phases, in order to account for any necessary asbestos work scope and cost in the project.

Presumed asbestos. Any product, application or building material that either has not been tested or cannot be tested to confirm ACM, but which may likely contain asbestos based on appearance or use (also called assumed asbestos). Presumed asbestos is to be treated as ACM unless laboratory testing shows no asbestos presence.

Response actions. An EPA term for the options used to prevent the release of friable ACM, in order to protect human health and the environment:

- Removal. The process of removing asbestos from the substrate, commonly referred to as abatement
- Repair. The process of repairing asbestos to an undamaged condition.
- Encapsulation. The process of applying a coating to a surface or material, intended to cover and bind any underlying damaged asbestos.
- Enclosure. The process of constructing a physical barrier around the damaged asbestos.
- Dismantling. The process of physically removing the damaged building component or structure
- O&M. The process of maintaining asbestos during facility O&M activities through cleanup, repair or small-scale, short-duration removal.

Regulated asbestos. Refers to any material containing more than 1% asbestos through bulk laboratory analysis, as defined by the EPA and OSHA. Also refers to materials containing any concentration of asbestos that has become airborne and poses an exposure risk, as defined by OSHA.

Significantly Damaged ACM. Asbestos material that has severe damage of more than 25% localized or 10% distributed surfaces throughout a functional space or a facility.

Small-scale, short duration (SSSD) activities. Removal of small quantities of asbestos when required in the performance of other maintenance activities. SSSD quantities are no more than the amount of asbestos that can be contained in a single glove bag.

Surfacing material. Any asbestos material that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

Thermal system insulation (TSI). Any asbestos material applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.

Third-party monitoring. An industrial hygiene or environmental consultant company independently hired and separate from the company performing asbestos removal or other response actions. The third-party consultant is commonly responsible for performing visual and air sampling quality assurance of the asbestos response action(s) to confirm compliance with regulations and the scope of work. Monitoring also commonly includes final visual inspection and clearance sampling to confirm the response action(s) have been successful and the space(s) are acceptable for re-occupancy.

Vermiculite. A natural platy material containing mica and other minerals. Often used for insulation, in potting soil and as a packing material. Until 1994, nearly 90% of vermiculite used in the United States was from an asbestos-contaminated source. Vermiculite found in Federal facilities, constructed before 1994, should be considered contaminated with asbestos until thoroughly tested. Testing commonly reveals trace (<1%) amounts of asbestos present.

Waste shipment record. The name of the manifest document defined by EPA, used to record the transport and disposal of asbestos waste.

Recordkeeping

PBS asbestos facility records are to be maintained indefinitely, unless otherwise directed by the Office of General Counsel. The PBS IRIS FMA asbestos module IT system (FMA Asbestos) is the repository of record for all Federally owned facilities under the jurisdiction, custody and control of GSA. The PBS Kahua IT system is the repository of record for asbestos information received from the lessor or Offeror, for all GSA leased facilities. For Federal facilities operating under a GSA delegation of authority, all asbestos records produced by the delegated agency shall be maintained by the agency, and made available to GSA upon request.

FMA Asbestos is intended to house detailed information for:

- inspections,
- re-inspections, and
- periodic surveillance.

FMA Asbestos is also intended to house accounts or logs of activities for:

- asbestos projects,
- communication,
- pre-alteration assessments,
- project monitoring,
- O&M activities,
- management plan, and
- O&M plan updates.

Additional asbestos records associated with other PBS operations will be maintained as follows:

1. Detailed asbestos abatement records associated with construction projects, including but not limited to design and construction submittals and drawings, are to be maintained in Kahua or its successor PBS IT system of record.
2. Asbestos certifications, facility inspection reports and asbestos management plan records for leased facilities are to be maintained in Kahua or its successor PBS IT system of record.
3. Detailed asbestos records of facility O&M plans, occupant communications, fiber release incidents, and periodic air monitoring are to be recorded in the management plans for the specific facility. The management plan is to be maintained with the operations records for the facility, but a copy must be maintained in FMA Asbestos.

FMA Asbestos. The system is an IT module within the PBS IRIS FMA application that consists of the following information sections or topics:

1. Asbestos Building Inspection. Detailed information collected during an asbestos inspection.
2. Asbestos Building Re-Inspections. Detailed information collected during an asbestos re-inspection.
3. Abatement Projects**.** A summary of construction projects that involve asbestos.
4. Pre-Alteration Assessments. A listing of all pre-alteration assessments performed.
5. Project Monitoring**.** An overview of third-party monitoring activity results associated with O&M and abatement work.
6. Communications. A record of all asbestos communications that have gone out to occupants.
7. Periodic Surveillance. Detailed information collected during asbestos periodic surveillance.
8. O&M Activities. A list of asbestos maintenance and repair activities conducted.
9. Asbestos Management Plans. A record of management plan milestones, including creation and updated dates.

Information for each topic can be input into the system either through a spreadsheet template or directly through the system user interface.

Accessing and navigating the FMA Asbestos module is performed as follows:

1. Obtain the *IRIS_Asbestos_Regular_User* role through SailPoint via the PBS Portal (portal.pbs.gsa.gov).
2. Enter the PBS Portal and select FMA.
3. Select the Asbestos link at the top.
4. Once in the Asbestos module:
    a. Use the left-hand panel to search for a particular facility,
    b. Click on the *Building Number* to navigate to the asbestos information for that facility,
    c. The *Assessments* tab allows easy navigation between information contained in the nine aforementioned sections,
    d. The *Information* tab is used to download and upload templates, which are used to capture various facility-specific information. Templates are in a spreadsheet format and contain tabs for each of the nine aforementioned sections.

Building Inspections and Re-inspections

Asbestos building inspections and re-inspections involve a process of physically walking through a facility and gathering asbestos bulk samples for the purpose of preparing an asbestos inspection report and accompanying inventory. An inventory identifies the locations, quantities and condition of all asbestos in the facility. Asbestos inspection and inventory information is used to create an asbestos management plan and assist in performing pre-alteration assessments for construction projects and maintenance activities.

All asbestos inspections and re-inspections for Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, must be performed by an EPA accredited Asbestos Inspector or Management Planner. An initial inspection is required for every Federally owned facility under GSA's jurisdiction, custody and control constructed prior to 1998. A re-inspection is required every 5 years.

The FMA Asbestos template is used to record inspection and re-inspection results for any given facility. An exported FMA Asbestos template will be pre-populated with the previous survey information, if already present in the Asbestos module. This allows for an easier re-inspection or periodic surveillance when the existing information can just be updated. The inspection and re-inspection process includes the following steps:

1. Review any prior inspection information.
2. Conduct a physical walk-through of the facility, attempting to visually inspect every area of the facility.
3. Record all suspect materials, quantities and conditions on the FMA Asbestos template or provide updates to the previous inspection, if that information is available and trustworthy.
4. Collect bulk samples of materials that have not been previously identified as asbestos or non-asbestos.
5. Record sample and material locations on facility floor plans, if available.
6. Submit all bulk samples to an accredited laboratory for asbestos analysis.
7. Update the material information in the template as asbestos or non-asbestos based on the results of the laboratory analyses.
    a. Materials with >1% asbestos per laboratory analysis should be noted as *Asbestos-Containing Material*.
    b. Materials with detectable asbestos present but less than or equal to1% asbestos content per laboratory analysis, should be noted as *Trace Asbestos.*
    c. Materials that are not sampled but which likely contain asbestos should be noted as Presumed ACM.

    d. Materials that show no asbestos per laboratory analysis should be noted as *Non-Asbestos Material.*
8. Incorporate an estimated abatement unit cost for each material that is either asbestos-containing, trace or presumed into the FMA Asbestos template. Unit cost estimates should be based on a consistent methodology such as the RS Means guide for construction. Note: the FMA Asbestos template contains drop down fields and calculated fields that must not be changed or edited.
9. The final asbestos inspection or re-inspection report should include:
    a. The completed and saved FMA Asbestos template.
    b. The chain-of-custody and laboratory analyses reports for all bulk samples.
    c. A summary including:
        i. Individual and company performing the work.
        ii. The date(s) performed.
        iii. A listing of all inspected areas.
        iv. Any areas not inspected or inaccessible.
        v. An overview of the types of asbestos materials identified.
        vi. A list of facility management or contract support individuals who assisted in the work.
    d. Any marked up or annotated floor plans.
    e. Any photos collected to document material appearance or condition.
    f. A listing of all asbestos and non-asbestos materials inspected. Note: it is recommended that all suspect and non-asbestos materials be accounted for in the inspection information.
    g. Copies of certifications for the individual(s) performing the work.

Periodic Surveillance

Asbestos periodic surveillance involves a physical walkthrough of a facility using the most current asbestos inspection information to note any visible changes in asbestos presence or condition. Periodic surveillance is required annually for Federally owned facilities under the jurisdiction, custody and control of GSA and Federally owned facilities operating under a GSA delegation of authority. Periodic surveillance must be performed by an individual who has successfully completed asbestos training in inspections, management planning, or O&M.

The FMA Asbestos template is used to record periodic surveillance results for any given facility. Periodic surveillance includes the following steps:

1. Download an FMA Asbestos template (periodic surveillance event type) for the facility. Note: the template will be pre-populated with any current, existing inspection or reinspection data for the facility.

2. Transpose any inspection/re-inspection information over to the periodic surveillance tab of the template.
3. Perform a walkthrough visual inspection of the facility, using any existing locations and materials in the inspection/re-inspection information as a guide.
4. Note visible changes in material quantities and conditions on the FMA Asbestos template.
5. Identify any new suspect asbestos that has not been identified previously and have bulk samples collected by an EPA-accredited asbestos inspector.
6. Upon completion of the walkthrough and subsequent laboratory analysis of any bulk samples, finalize the information gathered in the FMA Asbestos template.
7. Upload the saved template into the FMA Asbestos module.

Annual Air Monitoring

Federally owned facilities under the jurisdiction, custody and control of GSA and Federally owned facilities operating under a GSA delegation of authority that contain asbestos fireproofing shall be monitored annually for asbestos air quality. Air samples shall be collected using the EPA AHERA method for Transmission Electron Microscopic analysis. The total number and location of air samples shall be identified to be representative of the fireproofed areas of the facility and areas impacted by the fireproofing. The number and location of samples shall be selected to be roughly representative of the fireproofed and affected HVAC zones in the facility. Each sample shall be compared to the benchmark of 70 s/mm^2(structures per square millimeter) Any areas with samples >70 s/mm^2 shall be inspected for potential contamination, cleaned and resampled as necessary until subsequent air concentrations are reduced below the 70 s/mm^2 benchmark. Affected occupants shall be notified of any air samples that exceed the benchmark in accordance with the Risk Management Notification policy (PBS 2400.1).

Management Plans

Each Federally owned facility under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority that contain asbestos shall have a management plan specific to the facility. The management plan shall be maintained in a location and format accessible to those needing access to the facility asbestos information, including but not limited to:

- facility management staff,
- O&M contractors,

- custodial contractors,
- regional PBS project staff,
- regional environmental, health, safety and fire protection staff,
- occupant agencies performing contract work in the building,
- occupants requesting detailed asbestos information about the facility,
- other contractors performing work in the facility, and
- emergency response staff.

Management plans should be considered living documents and as such, be updated with each new asbestos event (inspections, periodic surveillance, O&M activities, communications, pre-alteration assessments, accidents and incidents, monitoring activities).

Operations and Maintenance

Each Federally owned facility under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, that contain asbestos shall have an O&M plan specific to the facility and the standard procedures used to address maintenance, repair, and cleanup of the asbestos. O&M plans are often chapters or sections within the asbestos management plan for the facility. The procedures should match the actual steps used by the O&M or other contractor(s) responsible for performing asbestos O&M activities. O&M plans should be considered living documents and as such, be updated as procedures are changed. The facility O&M contractor or the service contract Contracting Officer's Representative are responsible for maintaining the asbestos O&M plan.

Communication

For each Federally owned facility under the jurisdiction, custody and control of GSA and Federally owned facilities operating under a GSA delegation of authority that contains asbestos, the building or property management office shall communicate annually to all occupants the presence of asbestos. The office shall also communicate to each contractor working in the facility about asbestos presence at the beginning of their contract and annually thereafter. The annual communication is intended as a general notice of asbestos awareness and therefore does not need to include all information contained in the management plan. However, annual communication should include at a minimum:

- A declaration of the annual asbestos communication.
- A brief summary of the types of asbestos material(s) in the facility.

- Any general precautions all occupants should be aware of (such as avoid entering a certain area without first checking with the GSA facility management office).
- Affirmation of the asbestos O&M plan and notification of the company(s) responsible for the plan.
- Instructions to contact the GSA facility management office with any questions or for further asbestos facility information.

Asbestos communication shall also be performed by the facility management office or their designee to all affected occupants for any accident or fiber release episode involving asbestos, or any construction project involving asbestos, in accordance with the Risk Management Notification policy (PBS 2400.1). The facility management office must also institute a notification process for all contractors performing work in the facility. The process can include labeling, signage, permitting or any combination. The purpose of the process is to ensure all contractors, including occupant agency contractors are fully aware of the locations and materials containing asbestos so that they can take adequate precautions to avoid asbestos exposure to their staff and other occupants.

Each asbestos communication event shall be logged in the FMA Asbestos module. Communication information can be entered directly into the module through the user interface, or through an FMA Asbestos template that is downloaded, populated and uploaded into the module.

Response Actions and Projects

Asbestos that can no longer be managed in place through O&M activities, or which shall be disturbed during a planned construction project is subject to one or more of the following response actions, to be performed in compliance with EPA 40 C.F.R. Part 61:

- Removal (also called abatement). The physical stripping or removing asbestos material from equipment or a substrate.
- Repair. Restoring damaged asbestos to an undamaged state.
- Encapsulation. Application of a coating (such as paint or epoxy) to an asbestos surface to render the asbestos nonfriable or lockdown any loose asbestos fibers.
- Enclosure. Construction of a physical barrier around the asbestos material or equipment to protect against physical contact.
- Dismantling. The physical removal of an intact asbestos insulated building component or equipment (e.g., fire door, transite panels, etc.) that does not disturb the asbestos.
- O&M. The process of maintaining asbestos during facility O&M activities through cleanup, repair and/or small-scale, short-duration removal.

All construction projects in Federally owned facilities under the jurisdiction, custody and control of GSA and Federally owned facilities operating under a GSA delegation of authority, must be assessed for potential asbestos impact early in the planning or design process, through a pre-alteration assessment. Asbestos was never completely banned in the United States, and some imported products have recently been found to contain asbestos. Therefore, even newly constructed or renovated facilities could have asbestos materials. Vermiculite materials may also be contaminated with asbestos and should therefore be presumed asbestos for Federal facilities constructed before 1994, until testing proves otherwise.

The asbestos portion of any construction project in Federal facilities must be designed or reviewed by an EPA accredited asbestos project designer. The asbestos portion of all construction projects must be monitored by a third-party environmental or industrial hygiene consultant. Monitoring should consist of air sampling and visual inspection, during and after the asbestos work. The asbestos work shall be considered complete and acceptable only when it passes third-party visual inspection and clearance air sampling criteria that meet applicable State or local regulations.

Clearance air sampling shall preferentially consist of transmission electron microscopy (TEM) following the EPA AHERA sampling and analytical method, if not otherwise dictated by State and local regulations. Phase Contrast Microscopy (PCM) following the NIOSH 7400 collection and analytical method may be used for clearance instead of TEM as follows:

- Whenever TEM analytical support is not readily available, or
- Project or site conditions require an immediate or expedient turnaround of clearance results.

Asbestos projects shall pass clearance testing when all TEM air samples are less than or equal to 70 structures per millimeter squared (s/mm2) or all PCM air samples are less than or equal to 0.01 fibers per cubic centimeter (f/cc), blank corrected. Asbestos projects that fail visual inspection or clearance air sampling require the asbestos abatement contractor to reclean the space, followed by a subsequent round of inspection and sampling. This cleaning and clearance cycle shall be repeated until the area passes visual inspection and air clearance.

Pre-Alteration Assessments

A pre-alteration assessment is required for every construction project in Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, that have potential asbestos impact. The pre-alteration assessment is intended to verify whether asbestos materials may be impacted by project demolition or might otherwise be disturbed during the construction project. Any asbestos materials found during the

pre-alteration assessment shall be accounted for in the project planning and design, in order to avoid any exposure risk to occupants or contractors. Pre-alteration assessments should be performed as early as possible in the project planning or scoping phases since discovered asbestos will likely impact the project budget and schedule. Pre-alteration assessments typically involve the following steps:

1. Review the most current asbestos inspection, re-inspection or periodic surveillance listing for the facility.
2. Search the listing for locations, equipment, and materials likely to be included in the construction project.
3. Flag any materials or equipment in the listing that will likely be disturbed or demolished in the project.
4. Materials or equipment in the project that aren't identified in the listing will need to be bulk sampled and laboratory analyzed to confirm whether they contain asbestos.
5. The project design will need to include an asbestos portion for any asbestos materials found to be impacted by the project, either from the listing review or from bulk material sampling and analysis.

All pre-alteration assessment events shall be logged into the FMA Asbestos module. The information can be entered directly into the module through the user interface, or through an FMA Asbestos template that is downloaded, populated and uploaded into the module.

Cost Accounting

The cost associated with asbestos work for any construction project in Federally owned facilities under the jurisdiction, custody and control of GSA, including facilities operating under a GSA delegation of authority, must use the function code PGL26 in order to accurately account for asbestos-related agency costs, as required in GSA financial liability reporting.

Asbestos inspections and re-inspections for Federally owned facilities under the jurisdiction, custody and control of GSA, must include abatement cost estimates recorded in the FMA Asbestos templates. The unit cost estimates must be consistent and should be based on some defensible method such as the RS Means guides. Each template automatically calculates the overall abatement cost estimate for each asbestos material (quantity x unit cost) and the costs for all inspections and re-inspections are compiled and analyzed by the PBS Financial Operations Division as part of the required agency annual asbestos financial liability reporting process.

Asbestos financial liability reporting relies on agency-wide unit cost values for each major asbestos category multiplied by the size of the entire GSA Federal facilities portfolio. The

portfolio and unit costs are adjusted quarterly and annually to account for changes in the number of covered facilities and results from inspection or reinspection estimates. Facilities that appear to no longer have asbestos, for financial reporting purposes are requested to complete an Asbestos Confirmation Statement (ACS), attesting to the change. The current version of the ACS is displayed in Appendix B. Such facilities are excluded from future asbestos financial liability reporting.

GSA has determined that asbestos is a building shell cost, as reflected in the *Pricing Desk Guide,* 5th ed. at § 3.5.1. Therefore, all asbestos abatement or response actions performed as part of a customer agency project, including support work such as pre-alteration assessments and third-party monitoring should be funded by GSA. Whenever customer agency projects are fully funded via Reimbursable Work Authorization, GSA shall provide rent consideration to credit the agency for the associated asbestos work. *See Pricing Desk Guide,* 5th ed. at § 3.5.1 (note).

Project Monitoring

Project monitoring for asbestos is the use of an environmental or industrial hygiene consultant, unaffiliated with the asbestos removal contractor and independently hired by GSA to oversee the asbestos work on a construction project. Project monitoring shall be performed on all asbestos removal projects in Federally owned facilities under GSA's jurisdiction, custody and control and facilities operating under a GSA delegation of authority. Monitoring can vary based upon site-specific circumstances, but typically involves the following activities:

- A review of the asbestos contractor's technical submittals.
- Inspection of the initial asbestos removal work area setup.
- Air sampling before and during asbestos work (typically with phase contrast microscopic analysis). Sampling during asbestos work generally consists of air samples collected:
    - Outside the regulatory work area or enclosure,
    - Opposite of a critical barrier, and
    - Outside any entrances and exits to the work area (decon area and loadout). Air samples collected outside the asbestos enclosure or work area(s) should remain below 0.01 f/cc or the background levels measured prior to abatement. Levels above these thresholds will require some cleaning of affected area(s) by the abatement contractor.
- Periodic inspection of the asbestos work being performed.
- Final visual inspection of the work area after all asbestos work is completed.
- Final air clearance sampling after the work area has passed visual inspection.

  Air sampling before and during the asbestos work is compared either to the typical acceptable baseline of 0.01 f/cc concentration or to some ambient baseline fiber

concentration measured in a clean space outside the work area. Asbestos work practices are required to be adjusted if the air concentrations exceed these baseline values. The asbestos contractor will also be required to make corrections to any unsafe practices or defects in their work area setup, observed by the monitoring professional.

Final air clearance is needed to determine if the asbestos work area is acceptable to be opened for further construction or general occupancy. Clearance air sampling should always be performed aggressively, and may only proceed once the asbestos work area has passed visual inspection. Clearance air sampling shall preferentially consist of TEM following the EPA AHERA sampling and analytical method, if not otherwise dictated by State and local regulations. PCM following the NIOSH 7400 collection and analytical method may be used for clearance instead of TEM as follows:

- Whenever TEM analytical support is not readily available, or
- Project or site conditions require an immediate or expedient turnaround of clearance results.

Air clearance is considered acceptable whenever all TEM air samples are less than or equal to 70 structures per millimeter squared (s/mm2) or all PCM air samples are less than or equal to 0.01 fibers per cubic centimeter (f/cc), blank corrected. Visual inspection and final clearance air sampling shall be repeated whenever either fails and after the work area has been recleaned by the asbestos abatement contractor.

Training

Training is required for individuals performing certain asbestos-related tasks. The EPA AHERA Model Accreditation Plan (EPA 40 C.F.R. Part 763) established accredited training curricula for the following disciplines:

- Asbestos Inspector (initial 3-day training duration)
- Asbestos Management Planner (Inspector completion plus initial 2-day training duration)
- Asbestos Project Designer (initial 3-day training duration)
- Asbestos Worker (initial 4-day training duration)
- Asbestos Contractor/Supervisor (initial 5-day training duration)

Asbestos training accreditation is delegated by the EPA to each state. States have the ability to require additional training for any discipline and may establish requirements for an asbestos project monitor discipline. Individuals successfully completing initial EPA-accredited training must complete an annual refresher course to retain their state certification for the respective discipline.

Asbestos inspections, re-inspections, pre-alteration assessments, and asbestos project designs for all Federally owned facilities under the jurisdiction, custody and control of GSA, must be performed by individuals successfully completing EPA accreditation in the following disciplines:

- Asbestos inspections and reinspections = Asbestos Inspector training
- Asbestos pre-alteration assessments = Asbestos Inspector or Project Designer training
- Asbestos project designs = Asbestos Project Designer Training

GSA employees and delegated agency staff performing any of the above three activities must have completed the associated training as required by the EPA AHERA reauthorization act (ASHARA).

Asbestos Awareness Training. The EPA and OSHA require general asbestos awareness training for individuals who work around asbestos or may come in contact with asbestos. EPA requires awareness training to be two hours. PBS employees who perform duties as facility managers, project managers, or lease administration managers (LAMs) must completie the awareness class, one time. Awareness training for PBS employees can be completed through the GSA On-line University (OLU). Regional PBS service center, facility management, and design and construction divisions are responsible for identifying their facility managers, project managers, and LAMs who require asbestos awareness training. Regional PBS EHSF program offices are responsible for ensuring identified employees have completed the awareness training. The PBS Office of Facilities Management, Facility Risk Management Division is responsible for updating the OLU awareness course and for supporting regional EHSF program offices by reviewing the training completion status for identified employees.

Asbestos O&M Training. Individuals performing routine maintenance, repair or small-scale, short-duration cleanup of asbestos on building equipment or components must complete asbestos O&M training. EPA requires O&M asbestos training to be fourteen hours. O&M contractors performing the aforementioned asbestos work within Federally owned facilities under the jurisdiction, custody and control of GSA, and facilities operating under a GSA delegation of authority, must ensure their employees have completed the 14-hour training.

Leasing Requirements

GSA contract language for new leases has several clauses involving asbestos containing materials. Standard and template lease contract language is reviewed annually to ensure all requirements are current and applicable. The building owner or lessor is required to certify whether space being offered to GSA for a lease contains asbestos.
The following clause specifies the Government's preference and requirements regarding asbestos:

> 2.06 ASBESTOS (OCT 2021)
>
> A. Government requires space with no asbestos-containing materials (ACM), or with undamaged, nonfriable ACM. For purposes of this paragraph, "space" includes the 1) space offered for lease; 2) common building area; 3) ventilation systems and zones serving the space offered; and 4) the area above suspended ceilings and engineering space in the same ventilation zone as the space offered. Notwithstanding the preceding, if no offers are received for such space, the Government may consider space with thermal system insulation ACM (e.g., wrapped pipe or boiler lagging), which is not damaged or subject to damage by routine operations.
>
> B. ACM is defined as any material with a trace or more of asbestos quantity present.
>
> C. Space with ACM of any type or condition may be upgraded by the Offeror to meet conditions described in sub-paragraph A by abatement (removal, enclosure, encapsulation, or repair) of ACM not meeting those conditions. If any offer involving abatement of ACM is accepted by the Government, the successful Offeror will be required to successfully complete the abatement in accordance with OSHA, EPA, Department of Transportation (DOT), state, and local regulations and guidance prior to occupancy.
>
> D. Management Plan and re-Inspection Report Submittals. If space is offered which contains ACM, the Offeror shall submit a current asbestos-related management plan or operations and maintenance plan, along with a current asbestos re-inspection report (performed within the past 5 years) for acceptance by the Government prior to lease award. The management plan or operations and maintenance plan, and re-inspection report shall conform to generally accepted industry practice in accordance with EPA guidance.

Also, the following clause allows GSA to inspect or monitor for asbestos within leased space:

> 1.12 INSPECTION—RIGHT OF ENTRY (OCT 2021)
>
> A. At any time and from time to time after receipt of an offer (until the same has been duly withdrawn or rejected), the agents, employees and contractors of the Government may, upon reasonable prior notice to Offeror, enter upon the offered Space or the Premises, and all other

areas of the Building access to which is necessary to accomplish the purposes of entry, to determine the potential or actual compliance by the Offeror with the requirements of the RLP and its attachments, which purposes shall include, but not be limited to:

1. Inspecting, sampling, and analyzing of suspected asbestos-containing materials and air monitoring for asbestos fibers, and/or reviewing similar existing Offeror records.

This last clause requires the owner or lessor to submit to GSA a current asbestos O&M or management plan if there is asbestos in the leased facility.

3.06 ADDITIONAL SUBMITTALS (OCT 2021)

N. A current asbestos management plan or operations and management plan, along with a current reinspection report (performed within the past 5 years), if the offered Building contains asbestos-containing materials.

APPENDIX A - Example Asbestos O&M Plan Outline

Cover Sheet.

- Facility ID, Name and Address
- Date of O&M plan
- Points of contact (POC) for the plan
  - GSA facility manager POC
  - O&M contractor POC
  - Custodial contractor POC
  - Regional asbestos program manager POC
  - Company(s) responsible for asbestos O&M work and POC(s)

Employee Training and Assessment

- Copies of O&M and custodial staff asbestos certificates
- Copies of GSA facility manager POC asbestos certificate(s)
- Copies of asbestos training for company staff responsible for asbestos O&M work
- Results of exposure assessment monitoring of contractors who perform O&M activities

Asbestos Information

- Current listing of asbestos for the facility (copied from the management plan or most recent inspection/re-inspection or periodic surveillance)
- List of asbestos cleanup, repair, maintenance, or small-scale abatement performed (including date performed, location, asbestos material and task performed)
- List of any asbestos release episodes (including date, description of episode and actions performed in response)
- Copies of third-party monitoring performed in response to asbestos cleanup, repair, maintenance, abatement or fiber release episodes
- Copies of asbestos waste disposal manifests for any asbestos disposed during asbestos O&M activities.

O&M Procedures

- Detailed, standard procedures for performing asbestos O&M activities, and specific to the types of asbestos materials present in the facility:
  - TSI repair and glove bag removal
  - Floor tile repair
  - Asbestos fiber release response
  - Debris cleanup
  - Annual air monitoring (for facilities with asbestos fireproofing)
  - Above-ceiling access (for buildings with fireproofing and damaged TSI in ceiling plenums)

Laboratory Reports and Field Notes

- Laboratory reports from bulk or air sampling
- Written notes taken during O&M activities

APPENDIX B

ASBESTOS CONFIRMATION STATEMENT

To the best of my knowledge*, this asset, _____ (Region 01___)
Building Number

Asset/Facility Name _____

Street/Facility Address _____

has no asbestos present.

*This is based on the year this building was built, nearly all commercial products ceased to have asbestos by that time and the PBS P100 design guide restricted the use of asbestos in GSA buildings. This confirmation is for purposes of Financial asbestos liability reporting and is not a guarantee that asbestos may never be found. For that reason, asbestos pre-alteration assessments will continue to be performed in accordance with PBS policy prior to any construction in the project.

_____ _____
Printed Name Date

This certification is based on the following (check one):

☐ Project (renovation) that removed any remaining acm _____
Date

☐ Correspondence confirming no acm
(letter/email from bldg mgr/builder/PM etc.)

☐ Asbestos survey/periodic surveillance document does not find acm _____
Date

☐ Other *(Explain)*: _____

For More Information:

Main contact: _____ _____ _____
Name Email phone

Alternate contact: _____ _____ _____
Name Email phone

APPENDIX C – Example Annual Communication Notification

Date:

To: [*facility agency points of contact and service contract points of contact*]

Greetings,

As required by U.S. General Services Administration (GSA) policy and in accordance with Federal asbestos and safety regulations, GSA is providing this annual notification of the presence of asbestos in this facility.

Facility: [*building name and address*]

Asbestos materials:

[*list summary categories of asbestos and broad locations. Examples listed below*]
old floor tile throughout most of the building
pipe insulation in all mechanical rooms
fire doors throughout the building
fireproofing in the lobby

The asbestos is actively managed through a [*management plan and/or O&M plan*] to ensure the safety of all occupants and visitors.

Please share this information with your employees and contractors. Contact the GSA facility management office for detailed asbestos facility information, and coordinate with GSA's facility management office prior to performing any project or work that might disturb asbestos in the building.

Contact [*building manager point of contact(s)*] with any questions or for further information.