Region 8 Sustainability & Environmental Management System

1.0 Purpose & Scope

The intent of the Rocky Mountain Region's (Region 8) Asbestos Management Policy and the Asbestos Management Procedure is to minimize asbestos exposure to all building occupants and is building specific to address the types, quantity, and location of Asbestos Containing Material (ACM). GSA minimizes asbestos exposures by all building occupants through managing asbestos in place.

2.0 Activities & Departments Affected

The Regional GSA Asbestos Management Procedure is developed by GSA Central Office in accordance with Asbestos Hazard Emergency Response Act (AHERA) and implemented by the GSA Regional Asbestos Procedures Manager (RAPM) located in Facilities Management and Service Programs; Occupational Health and Safety Team.

3.0 Exclusions

In accordance with GSA Asbestos Policy or documentation can be produced that verify the building does not have ACM.

4.0 Forms Used & Permits Required: (include reporting requirements)

Forms used will include a mixture of forms and documents required by OSHA, EPA, state standards/regulations, and in-house GSA forms. These forms will primarily involve regulatory documentation and program implementation (inspections, abatement, repair, etc.).

Federal and State Forms and Permits:

	SUBMITTED TO:	SUBMITTAL
PERMIT / FORM / REPORT	FEDERAL OR STATE AGENCY	FREQUENCE
[Colorado] Asbestos Abatement	Colorado Dept. of Public Health and	Prior to
Notification and Permit Application	Environment, Asbestos Compliance	abatement
Form	Assistance Group	
[Montana] Application for a Montana	Montana Department of	Prior to
Asbestos Project Permit and NESHAP	Environmental Quality, Asbestos	abatement
Demolition / Renovation Notification.	Control Program	
Type of Application / Permit		
[Montana] Asbestos waste transport-		After to
ation and/or disposal project permit		abatement
[North Dakota] Asbestos Notification	North Dakota Department of Health,	Prior to
of Demolition and Renovation (SFN	Division of Air Quality, Asbestos	abatement
17987)	Control Program	
[North Dakota] Asbestos Waste		After to
Manifest Form		abatement
[South Dakota] Asbestos Demolition/	Department of Environment and	Prior to
Renovation Notification Form (SD	Natural Resources, Asbestos	abatement
EForm 0413 V5)	Coordinator	
[Utah] 10 Working-Day Asbestos	Utah Department of Environmental	Prior to
Notification	Quality, Division of Air Quality	abatement



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	SUBMITTED TO:	SUBMITTAL
PERMIT / FORM / REPORT	FEDERAL OR STATE AGENCY	FREQUENCE
[Utah] Less than NESHAP asbestos		After to
removal/abatement notification form		abatement
[Wyoming] Notification of Demolition	Wyoming Department of	Prior to
and Renovation	Environmental Quality, Air Quality	abatement
[Wyoming] Waste Shipment Record	Division	After

In-house GSA Region 8 and Contractor Forms: Contact the RAPM for assistance with the asbestos management program.

- Asbestos Work Permit
- Fiber Release Episode / Response Action Report
- Periodic Surveillance of Asbestos Containing Materials Form
- Annual ACM Assessment (Annual inspection conducted by in-house personnel)

5.0 Acronyms, Abbreviations, and Definitions

Acronyms	Meaning
AHERA	Asbestos Hazard Emergency Response Act
ACM	Asbestos Containing Material; containing 1% or more of
	asbestos
CFR	Code of Federal Regulations
EPA	Environmental Protection Agency
NESHAP	National Emissions Standards for Hazardous Air Pollutants
O&M	Operations and Maintenance
OSHA	Occupational Safety and Health Administration
RAPM	Regional Asbestos Procedures Manager

Definitions:

<u>Friable</u>: The material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure

6.0 Procedure

State Specific Procedures & Requirements [refer to individual State Legal Reviews for details on Statues, Laws, and Rules]: Region 8 states administer their own asbestos programs. Applicable State and Local Regulations must be followed.

STATE	AGENCY		
Colorado	Colorado Department of Public Health and Environment, Air Pollution Control		
	Division, Asbestos Compliance Assistance Group		
Montana	Montana Department of Environmental Quality, <u>Asbestos Control Program</u>		
North Dakota	North Dakota Department of Health, <u>Asbestos Control Program</u>		
South Dakota	South Dakota Department of Environment and Natural Resources, Air Quality		
	Division, Waste Management Program - Asbestos		
Utah	Utah Department of Environmental Quality, Division of Air Quality, <u>Asbestos</u>		



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STATE	AGENCY
Wyoming	Wyoming Department of Environmental Quality, Air Quality Division,
	Asbestos Program

Each State in Region 8 has its own accreditation of trainers and certification of persons in each asbestos occupation (i.e., worker, contractor/supervisor, inspector, management planner, project designer, and project monitor): [http://www.epa.gov/asbestos].

Standardized Procedure:

- 6.0 Read the GSA Asbestos Policy (March 25, 2015).
- 6.1 Initially, during renovations, at a minimum of every five years afterwards, and for any building built after 1998 (GSA Asbestos Policy, 2015) which lacks proper documentation, the <u>Project Manager</u> will procure asbestos containing material (ACM) inspection services from a <u>state-certified asbestos inspector</u>.
 - 6.1.1 The <u>Project Manager</u> will also procure the service of a 3rd party air monitoring specialist if air monitoring services are needed.
- 6.2 The <u>state-certified asbestos inspector</u> will perform an assessment to determine if ACM is present, and if it is assess its condition, location, and amount. If damage is found, the <u>state-certified inspector</u> will inform the <u>Project Manager</u> who will contact the Regional Asbestos Program Manager (RAPM).
 - 6.2.1 Asbestos assessments will be accomplished by the <u>state-certified inspector</u> following the currently recognized standard protocol developed for schools under AHERA as promulgated in Title 40 CFR, Part 763 and as amended in the Federal Register.
 - 6.2.2 Sample locations shall be chosen in a non-random fashion, with emphasis on obtaining samples of each type of accessible, suspect material and minimizing damage to the material being sampled. All sampling shall be performed by the <u>state-certified inspector</u>.
- 6.3 The properly asbestos certified <u>Building or Property Manager</u> inspects, manages and plans an annual in house asbestos "walk-through". The walk-through will document changes, including all abatement or project requirements to the 5-year asbestos inspection report to <u>RAMP</u>.
 - 6.3.1 Following the procedures detailed in the Rocky Mountain Region Form Annual ACM Assessment (see section 7.0 Records), GSA management/maintenance personnel such as the Building Manager must be trained to complete the annual ACM inspection procedure.
- 6.4 Any buildings with ACM will be prioritized by the RAMP for repair or abatement.

GSA

ASBESTOS MANAGEMENT FOR BUILDINGS

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A <u>Project or Building Manager</u> will procure the services of <u>Contractors</u> to perform any repair or abatement. Both the <u>RAMP</u> and <u>Project or Building Manager</u> will review and approve the repair/abatement plans before work commences.

- 6.5 The <u>Contractors</u> will conduct repairs and abatement according to all applicable codes, standards and regulations; local, state and federal.
 - 6.5.1 In the case of abatement, the <u>Project Manager</u> will ensure a qualified <u>3rd party</u> monitors the work done by the <u>Contractors</u>. This <u>3rd party monitor</u> will report to the Project Manager who will review their findings.
- 6.6 The <u>Project Manager</u> will have the final clearance test conducted after the <u>Contractors</u> have completed their work. The <u>Project Manager</u> will also create and file a report, update the inspection report to show the area of abatement, complete Transport Landfill documents, and retain this all on the P drive. The <u>Industrial Hygienist (IH)</u> will review these documents.
- **7.0** Records Management [source: Asbestos Management Procedure, Rocky Mountain Region]
 - Inspection/Assessment Reports
 - ACM Building Assessment (Baseline building assessment)
 - Annual ACM Assessment (conducted by in-house personnel)
 - Asbestos Work Permits
 - Surveillance/Re-inspection
 - Written SOP
 - Fiber Release Incident Reports

- Abatement [Project] Records
 - (e.g., air monitoring and sampling results, disposal)
 - Building/Project Documentation
- Equipment Maintenance
- Training Records
- Medical Surveillance
- Notifications

8.0 References

Asbestos-Abatement.com/; The Official Online Resource For Information on Asbestos, Asbestos Abatement, Asbestos Removal, & More!

Asbestos Management Procedure, Rocky Mountain Region

Citation	Title or Topic
29 CFR 1910.1001	OSHA standards for workers
29 CFR 1910.1200	Hazard Communication Standard – Required development of a
	written program for implementing hazard communication
29 CFR 1926.2101	OSHA, Occupational Exposure Standards – for workers
	involved in inspection, demolition, removal, encapsulation,
	construction, repair, maintenance, and renovation of facilities
	containing ACM
40 CFR 763.93	EPA, Asbestos Hazard Emergency Response Act (AHERA)



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	Regulations
40 CFR 763 Subpart E	AHERA, Standard for Schools – requirements include
	designation of a person to maintain compliance
40 CFR 61 Subpart M	EPA, regulations covering the handling and disposal of
	asbestos containing waste material

Each state has its own specific regulations, visit the agencies listed under 6.0 Procedure; State Specific Procedures & Requirements, for additional information.

9.0 Appendices

Attachment A: GSA Region 8 SEMS Asbestos Management Flowchart

Attachment B: Asbestos Work Permit

Attachment C: Fiber Release Episode / Response Action Report

Attachment D: Periodic Surveillance of Asbestos Containing Materials Form

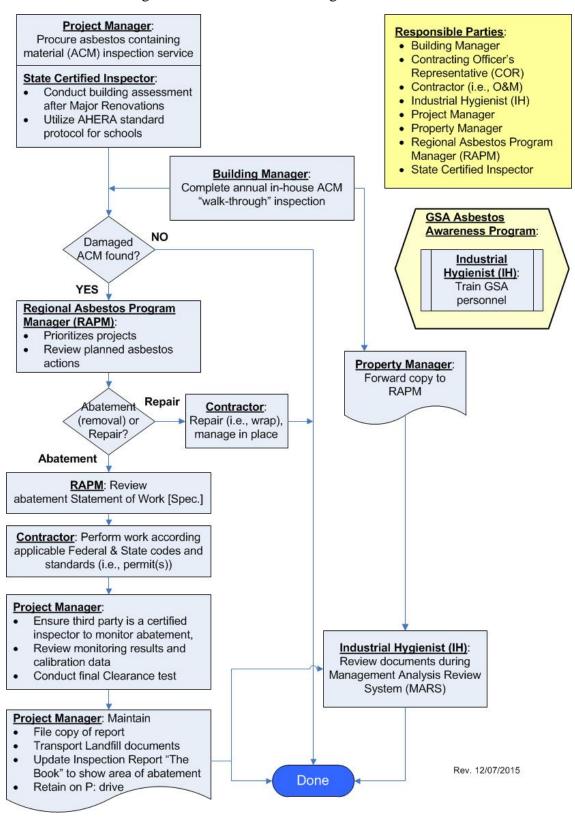
Document Control Information:	Approved & Dated:			
Asbestos Management "Month-Date-Year".docx	RJM Dec. 7, 2015			

Document Revision and Update:					
Revision Date	Nature of Revision	Revision made by:			
11/28/2005	Working Draft	Tom Record			
03/16/2006	Original Release	Tom Record			
01/29/2010	Add ISO 14001 Document Control, add	Robert Melvin			
	Flowchart (by Erik Petrovskis)				
03/16/2010	Update Procedure, cross reference the Asbestos	Tom Record, Harold "Buddy"			
	Management Procedure (Rocky Mountain Region)	Alkire			
06/19/2012	Emphasize Roles and Responsibilities in section	Harold "Buddy" Alkire, Nick			
	6, update flowchart, Periodic Surveillance of	Gutschow, Robert Melvin			
	Asbestos Containing Materials Form added				
12/07/2015	Incorporate the March 25, 2015 GSA Asbestos	Christopher Alden			
	Policy requirements.				



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ATTACHMENT A: GSA Region 8 SEMS Asbestos Management Flowchart





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ATTACHMENT B: Asbestos Work Permit

ASBESTOS WORK PERMIT

Building Name	Permit #
Building Number	
Street Address	
City, State, Zip	
Description of anticipated work (attach drawing of a	area to be disturbed and indicate work area)
Demolition Renovation Routine Maintena	ance Emergency Response
Estimated duration of project Start//	Finish/
Environmental Control Method	
Glove Bag Mini-Containment Full Containm	nent Other None
Quantity of ACM to be disturbed Linear Ft S	Sq Ft Cubic Ft
Permit requested by	Phone ()
Date of request/	
*Date of EPA notification// Approva **Date of state notification// Approv	al received/
Actual start date/ Actual finish date	e/
Air Monitoring Final clearance samples required The (Attach copy of final clearance sample results) Name of Air Monitoring Specialist	
ACM removed to (disposal facility)	
(attach copy of disposal manifest)	
All asbestos workers have received the appropriate tra documentation has been reviewed and is current	ining and all certification, medical, and respiratory
Permit approved by	
Title	
Phone () I	Evt

*NESHAP requires notification if ACM quantities to be disturbed will exceed 260 linear feet, 160 square feet, 35 cubic feet, or at the time annual accumulation of disturbed ACM will exceed these quantities.

** Some states require notification of 10 or more days prior to the start of the project. See your state asbestos standards to determine if this requirement is applicable to your project.



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ATTACHMENT C: Fiber Release Episode / Response Action Report

FIBER RELEASE EPISODE

FIBER RELEASE EPISODE / RESPONSE ACTION REPORT

Reported by: _____ Date: ___/___ Time _____AM/PM

Building Name:			
Address:			
City:Building Number:	State:	ZIP:	
Building Number:	Room Numb	oer:	
Provide a brief description of the cause of	f the episode:		
What area(s) were affected by the episode	2:		
Was the area occupied at the time of the i List occupants occupying the space or ent the form if necessary):			back of
RESPONSE ACTION / ROUTINE 0&M Personnel (name and title) conducting the			
Work Permit Number:, Posted Routine O7M Action,	Warning Signs	_, Began Response Action	
Release Response: Glove Bag, Tile Light Fixture/Bulb, HVAC Filter			
Posted air sample results: Date/ Report sent to Region: Date//_		AM/PM	
Comments:			
Signature		Date/	

Title

ATTACHMENT D: Periodic Surveillance of Asbestos Containing Materials Form Also known as the "Asbestos Appendix I Form"

General Services Administration		Rocky Mountain Region PERIODIC SURVEILLANCE OF ASBESTOS CONTAINING MATERIALS					Regional Safety/IH Office			
UILDING	NAME :		PERIODI				TAINING MATE		_DATE: _	
ROOM#	LOCATION IN ROOM	TYPE	AMOUNT ENCAPSULATED MOVEMENT POTENTIAL FOR				SIGNS LABELS	ACTION ITEMS COMMENTS		
otes:						<u> </u>		.	1	



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HOW TO USE THE PERIODIC SURVEILLANCE OF ASBESTOS CONTAINNG MATERIALS FORM

This form is used to record the semi-annual inspections of the asbestos containing materials (ACM) in the building. The form will also be used as a planning tool by the Regional Safety/IH Office to plan abatement or repair projects throughout the region.

Building Name/Date - Identifies the location and date of the surveillance.

Room # - Identify the room and/or location of the ACM.

Location In Room - Where in the space is the ACM, i.e. pipe chase, above ceiling, window sill, etc.

Type - How is the ACM used, floor tile, mastic, thermal (pipe wrap), spray-on, etc.

Amount Sq Ft/Lin Ft - How much ACM is in the space, for example spray-on will be in square feet, pipe runs will be linear feet. If you are in doubt consult the asbestos book for this building. Remember to subtract any ACM that has been removed since receiving the asbestos book.

EncapsulatedfEnclosed - Is the ACM you are describing encapsulated or enclosed. Encapsulation means spraying of ACM with a sealant. The sealant should bind together the asbestos fibers and other material components and offer some resistance to damage. Enclosure involves constructing airtight walls, ceilings, or other barriers around the ACM. A pipe chase is often considered an enclosure.

Movement Exposure - How susceptible is the ACM to movement, i.e. vibration, air movement (as in an air plenum or airstream), contact by employees, machinery, noise vibration, etc. State the type of exposure in this space.

Condition - What is the condition of the ACM, Good (no water damage, physical damage, or deterioration), Minor Damage or Deterioration, or Poor (significant damage with visible debris).

Accessibility - How accessible is the ACM? Can it be seen and reached easily or is it above a ceiling, in a crawl space or attic that would make viewing and reaching the ACM difficult.

Potential For Damage - How easily can the ACM be damaged by employees, air movement, water, etc. Rate this exposure as High, Medium, and Low. For high and medium provide a brief explanation at Notes section at the bottom of the page.

Signs and Labels - Are the proper signs and/or labels provided as required.

Action Items or Comments - Provide any additional information you feel would be helpful. When the surveillance form(s) are complete maintain a copy for your files and to use during the next surveillance. Send a copy of all pages to the Regional Safety/IH office.

If you have any questions contact Christopher Alden at (303) 236-2803.