



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 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

No buildings are excluded until documentation can be produced that can verify that 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:

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



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

Friable: 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, Asbestos Control Program
North Dakota	North Dakota Department of Health, Asbestos Control Program
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, Asbestos



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):
[\[http://www.epa.gov/region8/toxics/asbestos/\]](http://www.epa.gov/region8/toxics/asbestos/).

Standardized Procedure:

- 6.0 All asbestos procedures will be developed by the Regional Asbestos Program Manager (RAPM) and maintain the SOP.
- 6.1 Initially, during renovations, at a minimum of every five years afterwards, and for any building built after 1980 which lacks proper documentation, the Project Manager will procure asbestos containing material (ACM) inspection services from a state-certified asbestos inspector.
 - 6.1.1 The Project Manager will also procure the service of a 3rd party air monitoring specialist if air monitoring services are needed.
- 6.2 The state-certified asbestos inspector 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 state-certified inspector will inform the Project Manager who will contact the (RAPM).
 - 6.2.1 Asbestos assessments will be accomplished by the state-certified inspector 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 state-certified inspector.
- 6.3 The Service Center Asbestos Program Manager (SCAMP) will do an annual in house asbestos “walk-through”. If any asbestos is found, the SCAMP will contact the Property Manager and provide a report (the annual ACM report). The Property Manager will then forward this report to the RAPM who will contact the Project Manager, and to the Industrial Hygienist (IH) for review.
 - 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 SCAMP 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. The Project Manager will procure the services of Contractors to perform any repair or abatement. Both the RAMP and Project Manager will review and approve the repair/abatement plans before work commences.
- 6.5 The Contractors 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 Project Manager will ensure a qualified 3rd party monitors the work done by the Contractors. This 3rd party monitor will report to the Project Manager who will review their findings.
- 6.6 The Project Manager will conduct the final clearance test after the Contractors have completed their work. The Project Manager 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 IH 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,



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	construction, repair, maintenance, and renovation of facilities containing ACM
40 CFR 763.93	EPA, Asbestos Hazard Emergency Response Act (AHERA) 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
	GSA Asbestos Management, Inspection and Assessment Technical Guide

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

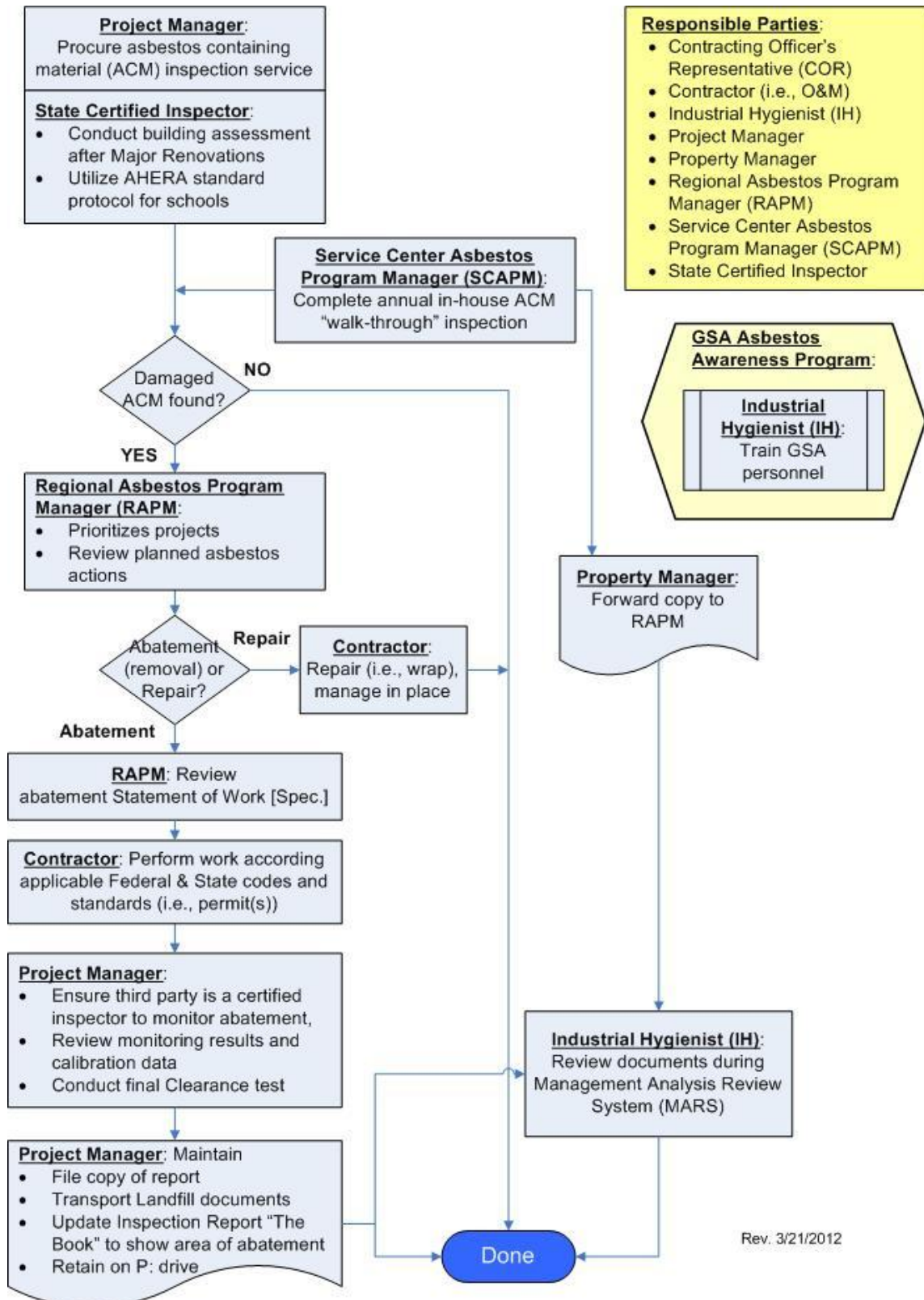
Attachment C: Fiber Release Episode / Response Action Report

Attachment D: Periodic Surveillance of Asbestos Containing Materials Form

Document Control Information:	Approved & Dated:
Asbestos Management “Month-Date-Year”.docx	RJM July 3, 2012

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11/28/2005	Working Draft	Tom Record
03/16/2006	Original Release	Tom Record
01/29/2010	Add ISO 14001 Document Control, add Flowchart (by Erik Petrovskis)	Robert Melvin
03/16/2010	Update Procedure, cross reference the Asbestos Management Procedure (Rocky Mountain Region)	Tom Record, Harold “Buddy” Alkire
06/19/2012	Emphasize Roles and Responsibilities in section 6, update flowchart, Periodic Surveillance of Asbestos Containing Materials Form added	Harold “Buddy” Alkire, Nick Gutschow, Robert Melvin

ATTACHMENT A: GSA Region 8 SEMS Asbestos Management Flowchart





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 area to be disturbed and indicate work area)

Demolition ___ **Renovation** ___ **Routine Maintenance** ___ **Emergency Response** ___

Estimated duration of project Start ___/___/___ Finish ___/___/___

Environmental Control Method

Glove Bag ___ Mini-Containment ___ Full Containment ___ Other ___ None ___

Quantity of ACM to be disturbed Linear Ft. ___ Sq Ft ___ Cubic Ft ___

Permit requested by _____ Phone (_____) _____

Date of request ___/___/___

***Date of EPA notification** ___/___/___ Approval received ___/___/___

****Date of state notification** ___/___/___ Approval received ___/___/___

Actual start date ___/___/___ **Actual finish date** ___/___/___

Air Monitoring Final clearance samples required TEM ___ PCM ___ Other ___

(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 training and all certification, medical, and respiratory documentation has been reviewed and is current

Permit approved by _____

Title _____

Phone (_____) _____ Ext. _____

*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.



ATTACHMENT C: Fiber Release Episode / Response Action Report

FIBER RELEASE EPISODE / RESPONSE ACTION REPORT

FIBER RELEASE EPISODE

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

Building Name : _____

Address: _____

City: _____ State: _____ ZIP: _____

Building Number: _____ Room Number: _____

Provide a brief description of the cause of the episode:

What area(s) were affected by the episode:

Was the area occupied at the time of the incident: Yes ___ No ___

List occupants occupying the space or entering the space at the time of or after the episode (use the back of the form if necessary):

RESPONSE ACTION / ROUTINE O&M ACTIVITY

Personnel (name and title) conducting the response action:

Work Permit Number: _____

Action taken: Isolated area ____, Posted Warning Signs ____, Began Response Action ____
 Routine O7M Action _____,

Release Response: Glove Bag ____, Tile Replacement – Ceiling ____ Floor ____
 Light Fixture/Bulb ____, HVAC Filter ____, Other _____

Posted air sample results: Date ___/___/___ Time _____AM/PM

Report sent to Region: Date ___/___/___

Comments:

Signature _____ Date ___/___/___

Title _____



HOW TO USE THE PERIODIC SURVEILLANCE OF ASBESTOS CONTAINING 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.

Encapsulated/Enclosed - 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.

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 Buddy Alkire at **(303) 236-2987** or Tom Record at **(303) 236-2549**.