



UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION
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YUMA, ARIZONA 85369-9100

StaO 5103.1A
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05 JUN 1996

STATION ORDER 5103.1A

From: Commanding Officer
To: Distribution

Subj: STATION ASBESTOS OPERATION AND MAINTENANCE (O&M) PROGRAM

Ref: (a) OPNAVINST 5100.23B
(b) 40 Code of Federal Regulations 763
(c) 29 Code of Federal Regulations 1926.1101
(d) 40 Code of Federal Regulations 61, Subpart M
(e) StaO 6260.1A

Encl: (1) Asbestos Operation and Maintenance (O&M) Program

1. Purpose. This Order establishes the Asbestos Operation and Maintenance Program for Marine Corps Air Station (MCAS) Yuma. It outlines the criteria, procedures, and responsibilities for asbestos management aboard this Station as required by the references.

2. Cancellation. Station Order 5103.1.

3. Scope. This Order covers circumstances which require or may require management of known asbestos containing materials (ACM) in Station buildings, Station "wildcat" dumping, and/or future discoveries of other areas of ACM.

4. Information. The enclosure details the requirements for the safe and competent management of asbestos at MCAS. There is currently no regulatory requirement to remove ACM, only to manage any associated hazards, and to maintain ACM in good condition. An active and aggressive O&M program is the most effective method to monitor known ACM, minimize any accidental disturbances, and to deal with any future discoveries of ACM. Therefore, it is Government policy to maintain ACM in place.

5. Action. All organizations aboard MCAS Yuma, including civilian contractor personnel will be held accountable for compliance with this Order. Non-compliance can result in civil as well as criminal liabilities and fines up to \$25,000 per violation.

6. Summary of Revision. This revision contains substantial number of changes and should be reviewed in its entirety.


A. M. TORRANCE
By direction

DISTRIBUTION: B

ASBESTOS OPERATIONS AND MAINTENANCE (O&M) PROGRAM

1. Purpose. The goal of the Marine Corps Air Station (MCAS) Yuma Asbestos O&M Program is the safe and competent management of asbestos in buildings and the minimization of potential hazards associated with asbestos surface contamination. Budgetary restraints have eliminated the prospect of complete inventory and removal of all asbestos containing materials (ACM) in MCAS buildings. While ACM remains, an O&M program is the most effective method of monitoring ACM condition and minimizing any chance of an accidental disturbance that might release asbestos fibers into the breathing air space. The principal objective is to minimize exposure of all personnel to asbestos fibers. To accomplish this objective, an O&M program includes:

- a. Monitoring the condition of ACM.
- b. Maintaining known ACM in good condition.
- c. Preventing the possible release of asbestos fibers.
- d. Insuring proper cleanup of asbestos debris.

2. Elements. An O&M program provides a responsible alternative to asbestos removal by developing a pro-active, in-place asbestos management program whenever asbestos is discovered in buildings, and the management of potential hazards associated with asbestos surface contamination due to "wildcat" dumping. The elements of the program are:

- a. Notification and Labeling.
- b. Surveillance.
- c. Controls.
- d. Work Practices.
- e. Recordkeeping.
- f. Training.
- g. Worker Protection.
- h. Disposal.
- i. Contractor Operations.

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3. Notification and Labeling

a. Notification

(1) The Asbestos Program Manager (APM) will notify building POC's in writing regarding known ACM utilizing Station Bulletins, Plan of the Day, base newspaper, or electronic mail.

(2) Notification given to building occupants and workers shall contain the location and condition of ACM, stress the need to avoid activities that may disturb the ACM, (e.g., no removal, drilling, cutting, sanding or grinding of ACM, do not push furniture against ACM), and the process to report any evidence of disturbance or damage of ACM to the APM, at extension 5539.

(3) Building POC's shall disseminate APM notification information to building occupants, workers and tenants. If asbestos is located in inaccessible areas to all but a few building occupants (i.e., mechanical rooms), only those with access to areas where ACM is located need to be notified. Building occupants shall be informed of any potential hazard in their vicinity because informed persons are less likely to disturb the material and cause fibers to be released into the air.

(4) Building POC's are responsible for reporting to the APM any dust or debris that might come from ACM or suspected ACM, any change in the condition of the ACM, or any improper action relative to ACM by building personnel.

b. Labeling

(1) Labeling of known ACM areas will be the responsibility of the Facilities Management Department's (FMD) Asbestos Team.

(2) Labels shall contain a warning statement against breathing airborne asbestos fibers.

(3) Warning labels will be placed directly adjacent to thermal system insulation, (TSI), in service and maintenance areas such as boiler rooms. These labels will alert and remind MCAS maintenance workers and contractors not to inadvertently disturb the TSI. In most cases all boilers, pipes, and other equipment with ACM in service areas where damage may occur should have prominent warning signs placed adjacent to the ACM. In locations where there is ACM and the asbestos inventory is incomplete, labels will be placed on the door to the area and all TSI shall be treated as ACM.

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(4) Access to areas of asbestos surface contamination shall be restricted by fencing or posting of warning signs or both. Warning signs shall be in English and Spanish.

4. Surveillance. This is a regular inspection of known ACM to note, assess, and document any changes in the ACM's condition. Inspections of areas with known asbestos surface contamination will be conducted to assess the effectiveness of signing and fencing to restrict access.

a. MCAS has certified inspectors to perform semi-annual inspections of known ACM. These inspectors will determine if known ACM requires more frequent inspection, requires maintenance or repairs to maintain in good condition, restricting access has been compromised, or the material has extensive damage and requires immediate removal.

b. Any change in the condition of known ACM shall be reported to the APM.

5. Controls

a. Before any work begins that may disturb known ACM, call the APM, extension 5539, or the FMD Customer Service Desk at extension 2222 so that asbestos can be removed or encapsulated.

b. If suspected ACM is to be disturbed, stop all work and call the APM or the FMD Customer Service Desk to report the material as suspected ACM. The material in question will be analyzed for asbestos by certified inspectors. If the material is asbestos, the FMD Asbestos Team will abate the ACM before any further work is done. Treat all suspected material as ACM until notified by the APM that the material is not asbestos.

6. Work Practices. Work practices are basic procedures that avoid or minimize asbestos fiber releases during activities with potential to disturb ACM. They also include clean-up methods. Only certified asbestos workers with Level 3 training will be allowed to remove asbestos.

a. Fiber Release Episode. When a fiber release occurs, either intentional or unintentional, special procedures are needed to minimize the spread of fibers throughout the building. Any suspected release will be telephoned immediately to the APM at extension 5539, or the FMD Customer Service Desk at extension 2222.

b. Routine Tasks. Basic procedures include wet methods, use of mini-enclosures, glovebags, and avoidance of certain activities such

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as sawing, sanding, grinding, cutting or drilling ACM to minimize and/or contain asbestos fibers. Any work with the potential to disturb asbestos must be evaluated by the APM prior to the start of any work. This includes all self-help projects and contracted work for all organizations and activities aboard the Station on a permanent or temporary basis.

c. Special Requirements. Improper cleaning techniques, like dry sweeping, may resuspend asbestos fibers in the building's air. Only Level 3 trained personnel shall perform asbestos clean-up. Special cleaning techniques are appropriate for a building with exposed ACM surfacing or TSI. These techniques may include wet wiping floors or using a vacuum with a high efficiency particulate air (HEPA) filter.

d. Protective Clothing. All asbestos removal/repair work will be conducted in disposable protective suits. Respirators, eye protection, and gloves will also be worn during these operations.

7. Recordkeeping. All building asbestos management documents will be stored in permanent files. For employees engaged in asbestos related work, federal regulations require that employers retain personal air sampling records, medical records, and training records indefinitely. Asbestos related records will not be destroyed.

a. Building Information. All files relating to asbestos removal at MCAS shall be maintained by the APM. A file for each building will be established and a building master map maintained. Each building file will contain inspection/assessment documents, job request files, evaluation of work disturbing ACM and approval for work, ACM reinspection and surveillance files, air sampling results, and building occupant notification.

b. Employee Training and Medical Programs. These files include information such as: respirator protection program documents, personal air sampling records for workers performing work involving asbestos exposures, area/clearance sampling records, medical records for each employee subject to the medical surveillance program, and employee/supervisor training records.

c. Federal/State/Local Requirements. These files contain any documents required by federal/state/local agencies. Examples are notifications for asbestos removal operations, building demolition, and asbestos waste disposal.

8. Training. Training is one of the key elements of a successful O&M program. There are three levels of training provided for asbestos related activities.

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a. Asbestos Awareness Training. This training is also known as Level 1 training. It is required for all personnel who may have contact with asbestos in the normal completion of their duties. This includes such simple acts as mounting pictures, hanging shelves on surfaces which contain asbestos, and custodial duties. Provided on an annual basis, this two-hour training includes health hazards associated with asbestos, how to avoid disturbing ACM, and what to do in case ACM is disturbed.

b. Special O&M Training. Also known as Level 2 training, this 16-hour training is for maintenance workers and others who conduct activities that may disturb ACM. This training accredits personnel to do maintenance and repair work, not full scale abatement and shall be provided on an annual basis. The APM will determine what is maintenance and repair work vice full abatement.

c. Abatement Worker Training. This is also known as Level 3 training. This 32-hour training is required for all employees involved in asbestos removal operations. The FMD Asbestos Team members will be certified as Level 3 workers and shall be recertified on an annual basis.

d. Professional Training. New Environmental Protection Agency (EPA) regulations require individuals who inspect for asbestos or who design or conduct asbestos response actions to be accredited. MCAS has personnel who are Asbestos Hazard Emergency Response Act (AHERA) certified as Building Inspections, Management Planners, and Project Designers. Certified Inspectors will perform all asbestos inspections or will provide technical oversight to contractors who will perform inspections. Management Planners will determine appropriate response actions for ACM. Project Designers will be responsible for technical expertise in the project design and development of contract specifications for asbestos abatement projects.

9. Worker Protection. Key aspects of worker protection are medical surveillance, respirators, and protective clothing.

a. Medical Surveillance

(1) OPNAVINST 5100.23D, Section 1709, contains the Navy Asbestos Medical Surveillance Program. It states, "Those individuals who, because of the nature of their job, must work with or be in the vicinity of operations which generate airborne asbestos" and meet certain other requirements, "shall be included in the medical surveillance program." All aspects of the MCAS Asbestos Medical Surveillance Program will comply with reference (a). The Station

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will provide a medical surveillance program for military and/or civilians who are responsible for asbestos response actions.

(2) Medical Exams. Medical exams are required by law for all employees who are required to disturb asbestos in the course of their duties and are required to wear a negative pressure respirator. The exam is provided at no cost to the employee by the Branch Medical Clinic, Yuma. For these employees, a medical surveillance program is used to determine their baseline health status (health status prior to beginning work), to monitor their health for the duration of their employment or project, and to also provide documentation of the health status along with their work history upon completion of their employment or project. Asbestos medical exams must have at least four parts:

(a) A work history to assess past exposure to materials that might have caused lung damage. These could include coal dust, cotton fibers, silica, or asbestos.

(b) A general physical exam that concentrates on lungs, heart, and stomach. After checking lungs and heart, the doctor will decide if a respirator can be worn (a mask that protects from asbestos and/or oxygen depleting substances), and if there are any restrictions that would prohibit the employee from working with asbestos.

(c) A pulmonary function test is taken to measure lung capacity and will be used for comparison with later tests.

(d) A chest x-ray is taken to be used as a comparison to future x-rays.

(e) Additional requirements to the medical exam may include an EKG (electrocardiogram), sputum cytology, and hemocult. These tests will be performed only at the request of the doctor performing the exam.

(f) A medical exam is required before starting work and annually thereafter.

b. Respirators. The Station's Industrial Hygienist will administer the Respiratory Protection Program. All elements of the Station's Respiratory Protection Program are found in reference (e). The reference covers operating procedures, personnel responsibilities, medical examinations, fit testing, training, care and cleaning, and work site supervision.

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c. Protective Clothing. MCAS will provide necessary protective clothing, at no cost, to any employee involved in asbestos removal or repair work. This includes disposable protective suits, hardhats, respirators, eye protection and gloves.

10. Asbestos Disposal

a. Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing consigned for disposal shall be collected and disposed of in sealed, labeled, impermeable bags or other approved containers. Information to identify the generator of such waste must be included within the containers. Waste generator information would include, name and address of the facility where ACM was removed, date of removal, and name of those responsible for the removal (i.e., FMD Asbestos Team, XYZ Asbestos Abatement Co.).

b. Labeled asbestos containers are to be stored in an approved secured location at FMD until ready for transport to an EPA approved landfill. No ACM shall be stored in excess of 90 days.

c. It is the responsibility of the APM to notify the Defense Reutilization and Management Office (DRMO) when disposal of asbestos waste is required and to provide proper disposal documentation for inclusion on the next contract delivery order.

d. DRMO will be responsible for issuing a delivery order for the transport and disposal of the asbestos waste.

e. The APM will prepare proper shipping documents, complete the generator's portion of the Non-Hazardous Waste shipping papers, and monitor chain of custody records until waste is received at the landfill.

11. Contractor Operations. All contractors, including Non-Appropriated Funds Activity (NAFI) contractors who have the potential to disturb asbestos in the course of their work shall comply with all regulations regarding asbestos operations and this Station Order.

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