



MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE
PSC BOX 20005
CAMP LEJEUNE NC 28542-0005

MCIEAST-MCB CAMLEJO 5090.62A G-F/EMD

MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE CAMP LEJEUNE ORDER 5090.62A

From: Commanding General To: Distribution List

Subj: ASBESTOS MANAGEMENT PROGRAM ABOARD MARINE CORPS BASE CAMP

LEJEUNE AND MARINE CORPS AIR STATION NEW RIVER

Ref: (a) 40 C.F.R. § 61.141 and 763 et seq.

(b) 29 C.F.R. § 1910.1001 (c) 29 C.F.R. § 1926.1101

(d) 10A N.C.A.C. 41C.0601-0611

(e) MCO 5090.2

(f) NAVMC DIR 5100.8, Chapter 15

Encl: (1) Lejeune Asbestos Program Plan (LAPP)

(2) 6.24 Asbestos Emergency Response Environmental Standing Operating Procedures (ESOP)

(3) 6.25 Asbestos-Containing Floor Tile Maintenance ESOP

1. Situation

- a. Asbestos is a term used to define a group of naturally occurring minerals composed of hydrated silicates which are crystalline in structure and occur as parallel bundles of minute fibers. Because of its physical and chemical properties, asbestos has been widely used as a component of building materials. Asbestos fibers can have a negative health effect on people. Asbestos related diseases are caused by inhalation or ingestion of asbestos fibers. Asbestos Containing Materials (ACM) do not pose a health risk to building/facility occupants while the materials remain intact and/or undisturbed. Through the proper management of ACM, the release of asbestos fibers into the air is prevented or minimized. ACM can present a potential health risk to building/facility occupants when the materials are damaged or disturbed, resulting in elevated airborne asbestos fiber concentrations.
- b. The United States Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the state of North Carolina Department of Health and Human Services (NCDHHS) promulgate regulations regarding asbestos management applicable to Marine Corps Base Camp Lejeune (MCB CAMLEJ) and Marine Corps Air Station New River (MCAS NR) (collectively referred to as the "Installation"). References (a) through (d) contain regulatory guidance at the Federal and state levels. These regulations permit civil and criminal enforcement actions by the relevant jurisdiction. References (e) through (f) contain various Department of Defense,

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Department of the Navy, and Marine Corps policies relating to ACM management. These regulations are intended to protect human health and the natural environment. The implementation of procedures addressed in this Order will facilitate compliance with the applicable regulations.

- c. It is Marine Corps and Installation policy to protect personnel from exposure to asbestos and to eliminate the use of ACM where suitable alternate materials are available. Asbestos, and materials containing asbestos, shall not be used in the maintenance, repair, or construction of Installation buildings, nor shall such materials be used in any facility or operational application where suitable alternate materials are available. In facilities where ACM already exists but does not present a health hazard, removal operations will not normally be performed for the sole purpose of eliminating the ACM. In such cases, building occupant safety will be ensured through incorporation into the LAPP.
- d. Enclosure (1) is the most recent revision of the LAPP. The LAPP serves as a summary of policies and procedures aimed to mitigate the risks associated with the presence of ACM at Installation buildings/facilities and will be implemented in accordance with the references. The primary objective of the LAPP is to successfully manage all ACM at buildings/facilities in place, until such time it becomes necessary for removal. This plan details the Federal, state, and other applicable regulations which influence asbestos management at the Installation. The appointed Asbestos Program Manager (APM) shall be actively involved with all aspects of asbestos management and is responsible for ensuring the effective implementation of the LAPP. Enclosures (2) and (3) provide supplemental ESOPs to aid in the implementation of asbestos activities.
- 2. Cancellation. MCIEAST-MCB CAMLEJO 5090.62.

3. Mission

- a. This Order provides both Installation and contractor personnel with guidelines on the management of ACM in order to ensure the safety of all personnel aboard the Installation and adherence to all Federal, state, and local regulations.
- b. <u>Summary of Revision</u>. This Order updates previous Marine Corps Installations East (MCIEAST)-MCB CAMLEJ Order 5090.62 which established and utilized procedures and tasks required for the proper management of ACM and abatement practices to ensure no negative impacts to human health or the environment. This Order should be reviewed in its entirety.

4. Execution

a. Commander's Intent and Concept of Operations

- (1) <u>Commander's Intent</u>. It is the intent of Commanding General (CG) MCIEAST-MCB CAMLEJ that all applicable Federal, state, and local regulations related to asbestos management be adhered to aboard the Installation. This Order shall ensure the Installation meets or exceeds all applicable asbestos regulations.
- (2) <u>Concept of Operations</u>. This Order and the references shall be used to maintain an effective asbestos management program.
- b. <u>Tasks</u>. Responsibilities for subordinate and non-subordinate elements are outlined in Section 2 of enclosure (1).
- 5. Administration and Logistics. Not applicable.

6. Command and Signal

- a. $\underline{\text{Command}}$. This Order is applicable to all MCB CAMLEJ, MCAS NR, and all tenant commands.
 - b. <u>Signal</u>. This Order is effective the date signed.

S. A. BALDW:

Acting

DISTRIBUTION: A/C (plus MCAS NR, H&S Bn, and WTBn)

LEJEUNE ASBESTOS PROGRAM PLAN (LAPP)

MARINE CORPS BASE CAMP LEJEUNE AND MARINE CORPS AIR STATION NEW RIVER

MCIEAST-MCB CAMLEJO 5090.62A

APR 1 9 2019

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MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP)

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

This LAPP was developed for MCB CAMLEJ and MCAS NR (collectively referred to as the "Installation") as the basis for the Asbestos Management Program. This LAPP document serves as a summary of policies aimed to control the risks posed by the presence of ACM at Installation buildings/facilities.

Significant rules and regulations govern ACM. Specialized procedures and techniques are required and decisions made with respect to the management, maintenance, abatement, and disposition of ACM should only be made by qualified personnel.

The goal of the program is to successfully manage all ACM at any building/facility aboard the Installation in place until such time as it becomes necessary for removal. The APM is the central point of contact (POC) for Installation asbestos management issues, with the responsibility to be involved in asbestos management activities on the Installation.

APM: (910) 451-5837

This plan requires the APM to be able to access documentation relating to asbestos management and recordkeeping at the Installation. Additional specific asbestos management responsibilities for the Installation and personnel are assigned in this document. Environmental Management Division (EMD) funds re-inspections to evaluate the condition, accessibility, friability, and potential hazard posed by ACM where previous initial asbestos inspections have been conducted. New record data updates - including drawings - are maintained in the Installation Asbestos Database.

Prior to the initiation of any renovation or demolition activities, the National Emission Standards for Hazardous Air Pollutants require buildings/facilities to be inspected to determine the presence, location, and quantity of Presumed Asbestos-Containing Material (PACM). The EMD-funded inspection data does not conduct destructive sampling during routine inspections. As such, Installation buildings or the affected part of the building shall be inspected to determine the presence, location, and quantity of ACM prior to work being conducted.

A comprehensive asbestos operations and maintenance (O&M) program has previously been established; components of the O&M program include notification, surveillance, training, worker protection, work control, work practices, and record keeping.

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EXECUTIVE SUMMARY

Data collected during any work conducted at the installation should be used to implement and modify the direction of the O&M Program for the installation on a periodic basis. This document should be reviewed by an Asbestos Management Planner annually to include adjustments deemed necessary for the health and safety of all personnel, regardless of position or standing.

This LAPP serves as a brief guide of procedures and policies aimed to control the risks posed by the presence of ACM at Installation buildings/facilities and shall be used as a supplement to existing Federal and state asbestos rules and regulations.

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 1
REGULATORY REVIEW

1.0 REGULATORY REVIEW

The basic goal of an O&M program is to protect personnel from exposure to asbestos fibers. An effective O&M program protects personnel by ensuring that all ACM is identified prior to conducting activities that have the potential to disturb suspect materials and by ensuring that proper work practices are employed when such activities will disturb identified ACM. An O&M program also protects personnel by ensuring that all personnel are appropriately and adequately trained.

- 1.1 The ongoing identification and assessment of ACM at Installation buildings/facilities serves as the basis for implementing the O&M program specific to individual buildings/facilities. ACM inspection and sampling activities will dictate how the O&M program is required to be implemented at a particular building. Pursuant to 40 C.F.R. §302.4 and 40 C.F.R. §61.01, the United States EPA has listed asbestos as a hazardous substance and a hazardous air pollutant, respectively. The designation of asbestos as a pollutant is not dependent on its form or use. Therefore, all forms of asbestos are hazardous substances.
- 1.2 The primary regulations governing asbestos management include:
- 1.2.1 40 C.F.R. Part 61, Subpart M NESHAP National Emissions Standards for Asbestos
- 1.2.2 40 C.F.R. §763, Subpart E Asbestos-Containing Materials in Schools
- 1.2.3 15 U.S.C. §2641-2656 Toxic Substances Control Act, Title II Asbestos
- 1.2.4 29 C.F.R. §1910.1001 General Industry Standards for Asbestos
- 1.2.5 29 C.F.R. §1926.1101 Construction Industry Standards for Asbestos
- 1.2.6 N.C. Gen. Stat. §130A-444 through 130A-452 Asbestos Hazard Management.
- 1.2.7 10A N.C.A.C. 41C.0600-0611 Asbestos Hazard Management Program.
- 1.3 Federal facilities located in the State of North Carolina are considered by the state to be primarily regulated by the aforementioned Federal Regulations.

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 1
REGULATORY REVIEW

1.4 Training of MCB CAMLEJ personnel in the appropriate management of ACM and/or PACM is an integral component in the asbestos management program (see Figure 1.4). Awareness training is required annually for personnel who perform housekeeping work or activities that may impact ACM, or in areas where ACM/PACM is present. Contractors or other non-governmental personnel who conduct work aboard MCB CAMLEJ are also required (by OSHA regulations) to conduct and document training programs for their personnel if the individuals involved remove, disturb, or contact ACM or PACM.

Figure 1.4 Required training for asbestos operations

TRAINING REQUIREMENT	WHO MUST BE TRAINED	WHEN TRAINING MUST OCCUR
Five-Day Asbestos	- Personnel,	Prior to beginning work;
Abatement	supervisors, and	annual refresher
Contractor/Supervisor	contractors that	training
Course	engage in	
	maintenance	
	activities that	
	disturb friable	
	asbestos	
	- APM	
Three-Day Asbestos	- Personnel who	Prior to beginning work;
Inspector Course	inspect for ACM	annual refresher
	- APM	training
Three-Day Abatement	Personnel who design	Prior to beginning work;
Project Designer	projects that may	annual refresher
Course	disturb friable ACM	training
Two-Day Asbestos	- Personnel who	Prior to beginning work;
Management Planner	develop asbestos	annual refresher
Course	management plans and	training; inspector
	asbestos O&M plans	certification is a pre-
	- APM	requisite
Two-Day O&M Training	- Personnel who	Prior to beginning work;
	repair or maintain	annual refresher
	thermal system	training
	insulation and	
	surfacing ACM	
Two-Hour Asbestos	Maintenance and	Prior to beginning work;
Awareness Training	Custodial Personnel	annual refresher
	who work in areas	training
	where ACM may be	
	present	

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 2
INSTALLATION RESPONSIBILITIES

2.0 INSTALLATION RESPONSIBILITIES:

Asbestos management at the Installation involves varied organizations and personnel. This section of the LAPP addresses organizations and personnel with the main responsibilities for program management. Installation organizations and personnel who have responsibility for specific buildings/facilities (i.e., for those buildings and facilities where ACM has been identified) will need to incorporate an O&M program, to the greatest extent possible, into the existing system for managing building/facility operations. As regulatory requirements and/or activities change, revision to responsibilities may be made as necessary and appropriate. Responsibilities are detailed below. Note that it is not essential that persons are part of the Installation organization, only that responsibilities are addressed by an informed individual or organization.

2.1 Assistant Chief of Staff, G-F Department:

- 2.1.1 Serve as the principal staff assistant to the CG MCIEAST-MCB CAMLEJ on all environmental matters.
- 2.1.2 Act as an action sponsor for construction, demolition, and renovation projects.
- 2.2 Director, EMD, G-F:
- 2.2.1 Be responsible for appointing the APM.
- 2.2.2 Be responsible for the review of construction, demolition, and renovation projects occurring at the Installation buildings and facilities, and for their potential environmental impacts prior to the onset of project activities.
- 2.2.3 Ensure the effective implementation of the LAPP.
- 2.2.4 Ensure publication of directives and provide technical assistance to organizations aboard the Installation regarding asbestos management and serve as the principal POC with Headquarters, U.S. Marine Corps, and other Federal, state, and local agencies on matters pertaining to asbestos.
- 2.3 APM. The Installation APM, acts as the central point of contact for Installation asbestos management issues. This will involve coordinating with other Installation organizations with asbestos operations through meetings, training, and reviewing/establishing scopes of work (SOW) as required to accomplish the duties listed below:

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 2
INSTALLATION RESPONSIBILITIES

- 2.3.1 Maintain current state accreditation as a Building Inspector and Management Planner.
- 2.3.2 Upon notification, has cognizance of asbestos-related activities aboard the Installation, to include:
- 2.3.2.1 Participate in National Environmental Policy Act and scoping reviews by providing input on asbestos presence/absence, asbestos drawings, and database information and permit requirements where applicable.
- 2.3.2.2 Upon request, attend Design Acquisition, Design Review, Pre-Construction, Asbestos Designer and/or Beneficial Occupancy Date meetings to answer asbestos-related questions.
- 2.3.2.3 Upon request, review Asbestos Abatement Plans and NCDHHS permits to ensure worker protection measures, work control systems, and required documentation and disposal requirements are outlined properly. Provide comments/concurrence to the engineering technician or construction manager.
- 2.3.2.4 In the event potentially unidentified asbestos is discovered during an on-going project, perform site visits to provide advice and guidance on abatement requirements when requested by the construction manager or engineering technician.
- 2.3.2.5 Periodically review completed project files to ensure accurate and comprehensive records of asbestos-related activities are kept on file at the Installation. This may be accomplished by reviewing files in File Maker, obtaining access to archived files at Public Works/Resident Officer-in-Charge of Construction (ROICC) offices or receiving copies of documents directly from Public Works/ROICC.
- **2.3.2.6** Upon receipt of any asbestos abatement data, make notes in the Camp Lejeune Asbestos database to ensure the most accurate data is available until an official re-inspection of the building occurs.
- 2.3.3 Ensure the LAPP is maintained and up-to-date; develop SOWs when contractor support is required to update the LAPP; oversee the implementation of the SOW once awarded.
- 2.3.4 Develop SOW for environmental-funded asbestos surveys to ensure that ACM are properly identified at Installation buildings/facilities where such identification is required.

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 2
INSTALLATION RESPONSIBILITIES

- 2.3.4.1 Upon completion, ensure results of asbestos surveys are properly posted in the buildings/facilities after the contractor's inspection has been completed. Packets are required to be maintained on the building's official bulletin board and either the main electrical panel or the mechanical room door.
- 2.3.4.2 Maintain an up-to-date inventory of buildings that contain ACM for quick reference and for use by inspectors to check for asbestos survey information during Environmental Compliance Evaluations.
- 2.3.4.3 Maintain an electronic database to track asbestos-related activities at the Installation. Ensure results of surveys are entered into the Camp Lejeune Asbestos database in a timely manner to ensure the most accurate results are available.
- 2.3.4.4 Ensure that recommended response actions identified during building re-inspections are forwarded to the appropriate parties for action regarding the condition of identified ACM.
- 2.3.5 Conduct annual reviews of the Department of Defense Education Activity (DoDEA) Camp Lejeune Community Schools' asbestos management program to include ensuring inspections and management plans are upto-date, notifications have been issued, and all required training has been performed and documented within the management plans located in the office of each school with identified ACM.
- 2.3.6 Ensure that annual awareness training is conducted for all personnel who perform housekeeping/maintenance work or an activity that may disturb ACM, in areas where ACM and/or PACM is present. Maintain documentation to verify training was provided.
- 2.3.7 Conduct annual asbestos program update and database report interpretation training to Public Works and ROICC personnel.
- 2.3.8 Provide guidance on how asbestos-containing waste materials are packaged, transported, and disposed of properly.
- 2.3.9 Forward copies of waste shipment records to the state in accordance with the state's reporting requirements.
- 2.3.10 Monitor Installation compliance with Federal, state, and local asbestos regulations.

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INSTALLATION RESPONSIBILITIES

SECTION 2

2.4 Director, Public Works Division (PWD), G-F:

- 2.4.1 Consult the APM regarding contracted renovation and demolition projects at Installation buildings/facilities for the potential to disturb ACM.
- 2.4.2 Prepare contract specifications and related documents for renovation and demolition projects at Installation buildings/facilities which involve, or may involve, the disturbance of ACM.
- 2.4.3 Maintain all documentation for completed projects which involve asbestos abatement activities on file at PWD. Such documents shall include, but are not limited to: project contract documents, specifications and drawings, and contractor submittals (e.g., permits, asbestos training/accreditation for contractor personnel, asbestos abatement project notifications and plans, inspection, sampling and air monitoring results, final clearance documentation, and waste shipment records).
- 2.4.4 Consult the APM for the identification of ACM at Installation buildings/facilities.
- 2.4.5 Review EMD-funded building re-inspection reports for response recommendations and take appropriate action. When a determination is made that the response action(s) need to be altered, a trained Management Planner must determine the modified course of action.
- 2.4.6 When applicable, ensure that PWD personnel are properly trained and accredited by the state in the appropriate category for the asbestos work activities being performed by such personnel.
- 2.4.7 Maintain the ability to contract an emergency response team to isolate, repair, and clean up associated debris from a minor fiber release on steam lines and other areas deemed necessary by the Director, PWD.

2.5 Director, ROICC Office:

- 2.5.1 Provide contractor and project oversight to ensure contractor conformance with project specification and applicable regulations with regard to potential asbestos-disturbing activities.
- 2.5.2 Review contracted renovation and demolition projects for Installation buildings/facilities for their potential to disturb ACM.

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INSTALLATION RESPONSIBILITIES

SECTION 2

- 2.5.3 Consult the APM for previously identified ACM at Installation buildings/facilities.
- 2.5.4 Maintain all documentation for completed projects which involve asbestos abatement activities on file at PWD. Such documents shall include, but are not limited to: project contract documents, specifications and drawings, and contractor submittals (e.g., permits, asbestos training/accreditation for contractor personnel, asbestos abatement project notifications and plans, inspection, sampling and air monitoring results, final clearance documentation, and waste shipment records).
- 2.5.5 Ensure proper disposal of asbestos-containing waste materials generated through contracted work activities at Installation buildings/facilities.
- 2.5.6 Report findings to the PWD when concerns regarding asbestos management are identified.
- 2.6 Facilities Support Contracts Branch, PWD, G-F:
- 2.6.1 Provide contractor and project oversight during the Indefinite Delivery Indefinite Quantity (IDIQ) process to ensure contractor conformance with project specifications and applicable regulations concerning potential asbestos-disturbing activities.
- 2.6.2 Maintain all documentation for completed projects, which involve asbestos abatement activities, on file at PWD. Such documents shall include, but are not limited to: project contract documents, specifications and drawings, and contractor submittals (e.g., permits, asbestos training/accreditation for contractor personnel, asbestos abatement project notifications and plans, inspection, sampling and air monitoring results, final clearance documentation, and waste shipment records).
- 2.6.3 Ensure proper disposal of asbestos-containing materials generated through IDIQ contracts at Installation buildings/facilities.
- 2.6.4 Report findings to the Installation APM when concerns regarding asbestos management are identified.
- 2.6.5 Upon request, provide to the APM any asbestos related documents and maintain copies of all asbestos paperwork generated from awarded contracts aboard the Installation.

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INSTALLATION RESPONSIBILITIES

SECTION 2

- 2.6.6 In the event the Facilities Maintenance Contractor conducts Short Scale, Short Duration removals of pipe insulation to make repairs on hot/cold water piping or condensate/steam line or when making asbestos-containing floor tile repairs, ensures that all appropriate permits and certifications are in place. If these operations are subcontracted by the Facilities Maintenance Contractor, the subcontractor shall be required to follow all above items while conducting asbestos activities.
- 2.7 Municipal Solid Waste Landfill (MSWL), PWD, G-F:
- 2.7.1 Accept asbestos-containing waste materials generated on the Installation for disposal in the MSWL.
- 2.7.2 Maintain records of the locations, depths, areas, and quantities (in cubic yards or cubic meters) of asbestos-containing waste materials deposited in the MSWL.
- 2.7.3 Provide copies of waste shipment records to the Installation APM on a quarterly basis. Solid Waste Services will provide copies of other asbestos management documentation to the Installation APM upon request.
- 2.8 Safety Departments, MCIEAST-MCB CAMLEJ and MCAS NR:
- 2.8.1 Assist with providing annual asbestos awareness training to personnel who require such training.
- 2.8.2 Provide the APM with assistance when minor/major fiber releases occur to ensure that the incident can be mitigated in a timely manner, an unsafe/unhealthy investigation is completed, and exposure assessments are completed.
- 2.9 Superintendent, Camp Lejeune Community Schools, DoDEA. The Asbestos Hazard Emergency Response Act and the Asbestos School Hazard Abatement Reauthorization Act require elementary and secondary schools to be inspected to determine the presence of ACM and that separate Asbestos Management Plans be developed and maintained as long as ACM is present. Accordingly, pursuant to those statutes and local agreements between the schools and the installation, the Camp Lejeune Community Schools shall:
- **2.9.1** Designate a person (designated person) to ensure that responsibilities of DoDEA for achieving compliance with asbestos requirements are properly implemented. Ensure designated person receives proper training.

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 2
INSTALLATION RESPONSIBILITIES

- 2.9.2 Ensure that all school buildings leased, owned, or otherwise used as a school building are inspected to identify all friable and non-friable ACM.
- 2.9.3 Ensure that asbestos management plans are developed for DoDEA buildings/facilities that contain friable and/or non-friable ACM are kept up-to-date and are kept in the office of each school building or other readily accessible location.
- 2.9.4 Ensure the proper implementation of asbestos management plans for DoDEA buildings/facilities that contain friable and/or non-friable ACM.
- 2.9.5 Ensure that periodic surveillance of all identified ACM is conducted every six months and documented in the DoDEA asbestos management plans. Periodic surveillance does not need to be conducted by a licensed consultant; it can be conducted by the designated person, trained custodial or maintenance staff.
- 2.9.6 Ensure that, at least once every three years after a management plan is in effect, a licensed asbestos inspector or management planner conducts a re-inspection of all friable and non-friable ACM. Once completed, the updated plan(s) must be sent to the North Carolina Health and Human Services Division of Public Health, Health Hazards Control Unit.
- 2.9.7 Ensure that principals, assistant principals, maintenance and custodial personnel who may work at DoDEA buildings/facilities that contain ACM, or who conduct work activities where ACM is located, are appropriately trained; and that short-term workers (e.g., telephone repair workers, exterminators) who may come in contact with ACM at DoDEA's buildings/facilities are provided with information regarding the location(s) of ACM.
- 2.9.8 Ensure that notifications are made to DoDEA personnel and parent-teacher associations (in the absence of parent-teacher associations, to the parents of the pupils), where/when necessary and appropriate.
- 2.9.9 Maintain complete documentation for all DoDEA asbestos management activities.
- **2.9.10** Provide copies of DoDEA asbestos management documentation to the Installation APM upon request. Participates in APM annual reviews of DoDEA asbestos management program.

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INSTALLATION RESPONSIBILITIES

2.10 Family Housing Office, G-F:

- 2.10.1 Contact APM for any documentation on ACM identified at Family Housing Division buildings/facilities.
- 2.10.2 Ensure Family Housing housekeeping staff receive annual Asbestos Awareness training.
- 2.10.3 Ensure Public-Private Venture lease requirements for asbestos management are managed per lease requirements. Provide copies of all asbestos management documentation to the Installation APM upon completion of project.
- 2.11 Industrial Hygiene Department, Public Health Directorate, Naval Medical Center Camp Lejeune:
- 2.11.1 Serve as the primary POC regarding assessment of asbestos air sampling conducted by contracted companies and employee exposures in the event of asbestos releases in the workplace.
- 2.11.2 Provide recommendations on need for employee asbestos medical surveillance examinations.

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 3
WORK CONTROL SYSTEM

3.0 WORK CONTROL SYSTEM:

Work control systems are steps designed to ensure that ACM and/or PACM is not inadvertently disturbed during Installation work activities. All work activities which have the potential to disturb ACM and/or PACM shall be submitted for review by the APM prior to the initiation of such activities. This section of the LAPP provides details on the work control system established for the Installation.

***NOTE: In summary, 40 C.F.R. §61.145(a) requires that, prior to the commencement of a renovation or demolition, the affected facility or part of the facility where the renovation or demolition operation will occur shall be thoroughly inspected for the presence of asbestos, including Category I and Category II non-friable ACM (friable asbestos with no significant damage). If this information is not provided in the database, additional inspections are required.

- 3.1 Installation personnel and contractors requesting and/or performing work activities that have the potential to disturb ACM and/or PACM, including small scale self-help projects, shall notify the APM and provide the following information:
- 3.1.1 Date, time, and specific location(s) of the requested work activities.
- 3.1.2 Type of work activities to be performed.
- 3.1.3 Identity of personnel or contractor(s) performing the work activities.
- 3.1.4 Type of control methods to be utilized.
- 3.1.5 Determination of and submittal for North Carolina/EPA notification.
- **3.1.6** Contractor safety officer or project competent person/supervisor signature/approval.
- 3.1.7 Available information concerning ACM and/or PACM in the vicinity of the requested work activities.
- 3.2 After notification the APM (or other designated responsible individual) shall take the following steps to ensure the safety of Installation personnel, contractor personnel, and building/facility occupants during the initiation and completion of the requested work activities.

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WORK CONTROL SYSTEM

- 3.2.1 By referring to Camp Lejeune Asbestos database, the APM will determine whether ACM and/or PACM is present. Additional inspections of the work location by a certified asbestos inspector may be required to ascertain more information that may not be captured in the Camp Lejeune Asbestos database.
- 3.2.2 If ACM and/or PACM is present and such materials are likely to be disturbed during the work activities, the APM (or other designated individual) will notify the project designer, construction manager, or engineering technician and provide a copy of the database report to be included in the project documents.
- 3.3 If more than 35 cubic feet (one cubic meter), 160 square feet (15 square meters), or 260 linear feet (80 linear meters) of friable ACM (or non-friable ACM that may become friable during handling) is to be removed, a permit issued by the State of North Carolina must be obtained. Applications for ACM removal permits are recommended to be submitted to and received by the state at least 10 working days prior to the scheduled removal date.
- 3.4 Copies of the following documents are also required to be maintained at the project site during removal activities and shall be immediately available for review by authorized personnel:
- 3.4.1 A copy of the State of North Carolina Asbestos Removal Notification permit.
- 3.4.2 All applicable project specifications and contract documents.
- 3.4.3 Asbestos disposal information, including any authorization for disposal from a disposal facility.
- 3.4.4 Personal identification and applicable accreditation information for all personnel performing removal activities.
- 3.5 Should engineering controls or work practices be necessary to minimize or eliminate the release of asbestos fibers during the work practices, an Asbestos Abatement Plan containing a written description of such controls and practices must be provided to the construction manager and the APM for review. A copy of this written description shall be maintained in the permanent record file.

3.6 Building Notifications:

3.6.1 Following EMD-funded asbestos re-inspections of buildings, an Asbestos Notification Summary is posted on the building's Official Bulletin Board and contains the findings of the initial inspection or

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WORK CONTROL SYSTEM

subsequent asbestos re-inspection(s). Notification packets, with more detailed information, are located adjacent to the Main Electrical panels in mechanical rooms of the affected buildings. Additionally, warning signs and labels are posted on access doors to areas where maintenance/custodial work may occur and affixed to raw materials, piping, and debris communicating the presence of ACM.

- **3.6.2** Notifications containing the presence, location, and quantity of ACM and/or PACM in work areas in buildings/facilities must be made to the following persons:
- **3.6.2.1** Prospective employers applying or bidding for work whose employees reasonably can be expected to work in or adjacent to areas containing ACM and/or PACM.
- 3.6.2.2 Installation personnel who will work in or adjacent to areas containing such material.
- 3.6.2.3 On multi-employer worksites, all employers of employees who will be performing work within or adjacent to areas containing ACM and/or PACM.
- 3.6.2.4 Tenants who will occupy areas containing ACM and/or PACM.
- 3.6.2.5 Individuals who will perform housekeeping activities in areas which contain ACM and/or PACM.
- 3.6.3 Within 10 days of the completion of work, the APM and the employers of employees who will be working in the area must be informed of the current location and quantity of ACM and/or PACM remaining in the area and final air monitoring results, if air monitoring was conducted.
- **3.6.4** 29 C.F.R §1926.1101 also requires that upon discovery of ACM and/or PACM in a work area, information concerning the presence, location, and quantity of newly discovered ACM and/or PACM shall be provided to the APM and to other employers of employees working at the work site within 24-hours of the discovery.
- 3.7 All asbestos-containing waste materials generated at the Installation must be deposited at the Camp Lejeune Sanitary Landfill, a State of North Carolina approved asbestos landfill. Asbestos-containing waste disposal procedures must be in strict accordance with the conditions of the State of North Carolina permit for the Base Sanitary Landfill. Waste shipment records must be maintained for all asbestos-containing waste materials transported to disposal sites.

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3.8 It is the responsibility of construction managers and/or engineering technicians to visit sites where the work activities are being performed as often as possible to ensure the proper performance of such activities, including periodic visits during lengthy work activities. All observations shall be documented and any deviation from the prescribed practices or specifications should be noted and immediately corrected. This information shall also be retained in a permanent record file.

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RECORD KEEPING

4.0 RECORDKEEPING

Consistent and complete recordkeeping is required throughout the Installation asbestos management program. Federal and state regulations mandate strict recordkeeping practices, including: ***NOTE: Recordkeeping requirements associated with asbestos management are very detailed. The outline presented is not a complete listing of mandatory recordkeeping requirements.

- 4.0.1 Asbestos removal permits must be maintained at the work site.
- **4.0.2** Accreditation documentation must be maintained by the accredited individual.
- 4.0.3 Asbestos inspection reports must be maintained by the building/facility owner.
- 4.0.4 Suspension of wet methods due to sub-freezing conditions temperature logs must be maintained in abatement project logs.
- **4.0.5** Waste placement documentation must be maintained by the landfill.
- **4.2** It is important that the APM have access to the permanent records associated with asbestos management at the Installation. Copies of or the location of records associated with asbestos management should be provided to the APM as soon as practical. This allows the APM to serve as the central POC for awareness of Installation asbestos management activities.
- **4.3** Primary recordkeeping requirements of asbestos management and responsible party include:

4.3.1 APM (EMD):

- **4.3.1.1** Documentation from EMD-funded inspections/re-inspections identifying the presence, location, and quantity of ACM and/or PACM identified at Installation buildings/facilities.
- **4.3.1.2** ACM and/or PACM inspection and assessment reports for any additional inspections required for renovation/demolition projects.
- **4.3.1.3** Laboratory analytical results for all samples supporting the positive/negative ACM determination.

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- **4.3.1.4** Copies of all submittal, notifications, written reports, etc. provided to the State of NCDHHS-Health Hazards Control Unit regarding asbestos management at the Installation (including quarterly asbestos waste shipment records submittal documentation).
- **4.3.1.5** Fiber release episode reports (when provided). Appendix A contains a sample form. Form is accessible at https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/EMD-Approved-Forms/

4.3.2 ROICC:

- **4.3.2.1** ACM removal documentation (i.e., work specifications, abatement designs, ACM removal permits, final inspection reports, clearance air sampling data, and laboratory analytical results for all clearance air samples collected).
- **4.3.2.2** Written descriptions of engineering controls and work practices implemented during asbestos work activities.
- **4.3.2.3** Written descriptions of site visits to observe and evaluate work practices implemented during asbestos work activities.
- **4.3.2.4** Qualifications of contractors performing asbestos work activities at the Installation, including accreditation documentation for personnel performing asbestos work activities at the Installation.

4.3.3 Contractors:

- **4.3.3.1** Documentation of exposure monitoring and assessments conducted at the Installation.
- **4.3.3.2** Laboratory analytical results for all asbestos air samples collected.
- 4.3.3.3 Written respiratory protection program.
- **4.3.3.4** Training and accreditation documentation for personnel performing asbestos work activities at the Installation.
- **4.3.3.5** Additionally, the following must be maintained at the project site:
- **4.3.3.5.1** A copy of the North Carolina Asbestos Removal Notification permit.

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- **4.3.3.5.2** All applicable project specifications and contract documents.
- **4.3.3.5.3** Asbestos disposal information, including any authorization for disposal from a disposal facility.

4.3.4 Base Landfill:

- **4.3.4.1** Records of the locations, depths, areas, and quantity of asbestos-containing waste materials deposited at the Base Sanitary landfill.
- 4.3.4.2 Waste shipment records.

MCB CAMP LEJEUNE LEJEUNE ASBESTOS PROGRAM PLAN (LAPP) SECTION 5
PROCEDURE

5.0 PROCEDURE:

- **5.1** This section provides an overview of procedural elements to be met for the review of abatement documentation. The implementation of such elements will vary. Therefore, this section should be modified as needed once an established and effective work operation is developed.
- **5.2** Key groups involved in asbestos management at the Installation include EMD, ROICC, and Facilities/Public Works. The following checklist has been prepared to assist in ensuring all steps have been taken with regards to planning for asbestos in projects.

ITEM	RESPONSIBLE PARTY
Pre-Abatement	
Planning of renovation/demolition Asbestos permit completed, filed, and	DESIGN, PWD OICC, EMD, PWD
distributed	OICC, BAD, IND
Inspection or verification of ACM at the building	EMD, A&E
Reports provided, contractor informed	EMD, OICC
Abatement contract issued	DESIGN, PWD
Abatement	
NC Permits and licenses available Training documents/certifications reviewed	OICC
APM notified of Abatement project initiation	OICC/PWD
Area clearance for occupancy inspection conducted and satisfactory	OICC
Post-Abatement	
Clearance documentation on file	OICC/EMD
APM informed of completion	OICC/EMD
Waste manifests on file	OICC/EMD
Database updated	EMD

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LEJEUNE ASBESTOS PROGRAM PLAN (LAPP)

APPENDIX A

	Asbesto	s Emergency Re	sponse incident Reporting Form				
	or IH pers	onnel only and od of 30 years a	I shall be completed within 24 hours of an incident and may be applicable for inclusion into an employ				
Building:			Date:				
Location			Time:				
Inspector			000000				
Description of Event: Include de photograraphs (as applicable).	talls of eve	ent from identif	ication of spills to successful clean-up completion.	Collect			
					+		
Was ACM Involved?	CYES	CNO	Were personnel exposed to asbestos?	(YES	CNO		
Quantity of material disturbed?			ACM type (TSI, SFM, MSC)		•		
Were bulk supplies collected?	(YES	CNO	Did samples confirm ACM?	○ YES	CNO		
Were air samples collected	○YES	(NO	Did samples confirm airborne fibers?	(YES	CNO		
Were personnel exposed?	○ YES	CNO	Number of persons exposed.				
Potential for recurrence?	CYES	CNO	Prioritized for abatement?	C YES	CNO		
Personnel exposed during incider	it (use add	itional forms as	necessary):				

MCIEAST-MCB CAMLEJ/G-F-EMD-5090.62/1

REV (08/18)

PREVIOUSE EDITIONS OBSOLETE

ADOBE LS DESIGNER

<u>Title</u>: 6.24- ASBESTOS EMERGENCY RESPONSE ENVIRONMENTAL STANDING

OPERATING PROCEDURES (ESOP)

Related: MCIEAST-MCB CAMLEJO: 5090.62A

- 1. Purpose: This ESOP provides information regarding the hazards associated with asbestos and issues to be addressed during asbestos emergency response involving potential exposure to airborne concentrations of asbestos. Special procedures are required to minimize the spread of fibers throughout the building after an asbestos fiber release occurs (e.g., the partial collapse of an asbestos containing material (ACM) ceiling or wall, or the accidental disturbance of ACM). Under National Emission Standards for Asbestos Hazard Emergency Response Act regulations, a "major fiber release" (large asbestos episode) is defined as one involving more than three square feet or three linear feet of ACM.
- 2. Applicability: This ESOP is applicable to all personnel, including contractor personnel, who work in or occupy any building aboard MCB CAMLEJ and MCAS NR where asbestos may be present.
- 3. Responsibility: Any employees or building occupants who are in proximity to asbestos releases must take the identified necessary precautions and be aware of the safe work practices associated with avoiding and minimizing asbestos exposure.

4. Procedure

- a. For those buildings that have been identified as containing asbestos, occupants should be aware of its location by reviewing the Asbestos Notification located on the building's official bulletin boards. If needed, maintenance workers and housekeeping staff can review more detailed information in the Asbestos Information Packet, located in the building's mechanical room that contains the main electrical panel.
- b. In the event of a disturbance of known ACM or fibrous material that could potentially be ACM, the building occupant or maintenance employee must immediately evacuate personnel and identify and isolate the regulated area. If possible, heating, ventilation, and air conditioning should be stopped.
- c. Occupant or maintenance employees will immediately notify Public Works with an emergency work ticket identifying the potential for release of ACM. Following notification of Public Works, during normal working hours, the APM, or outside of normal working hours, Base Safety, shall be notified as soon as possible. The following information will be required:

- Building number and exact location;
- (2) Description of material(s) disturbed;
- (3) Approximate quantity of material disturbed; and,
- (4) Number of persons in the general proximity to the spill/release.
- 5. Personnel should not attempt to clean-up or repair damaged ACM. Access to the area should be restricted by best means possible until the APM/Base Safety arrives to post signs to prevent entry by unauthorized persons.
- 6. If available, the APM will provide a detailed report of the locations of ACM within the building. Using this information, or other building data, Public Works will contract and mobilize an asbestos abatement company/crew. Teams specially trained in emergency response will perform the clean-up using specific methods and specialized equipment to correct the situation.

7. The Asbestos Abatement Contractor shall:

- a. Repair/replace damaged ACM with asbestos-free materials.
- b. Clean all fixtures or other components in the immediate area using wet methods and high-efficiency particulate arresting vacuums.
- c. Place asbestos debris and other cleaning material in labeled, double-sealed bags or impermeable, leak tight containers for disposal.
 - d. Transport debris material to the MCB CAMLEJ Landfill.
 - e. Provide Public Works with clearance sampling results.
- 8. Public Works, along with the APM and Industrial Hygiene will review the clearance sampling results and determine if the area is safe for reoccupancy. Industrial Hygiene will inform personnel impacted of sample results and scope of exposure.
- 9. APM will document asbestos release episode utilizing EMD Asbestos Emergency Response Incident Reporting Form at https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/EMD-Approved-Forms/. Industrial Hygiene will determine if documentation in occupants/workers medical records is required.

10. Training Requirements

- a. For those buildings that have been identified containing asbestos, occupants should be aware of its location by reviewing the Asbestos Notification located on the building's official bulletin boards. If needed, maintenance workers and housekeeping staff can review more detailed information in the Asbestos Information Packet located in the building's mechanical room that contains the main electrical panel.
- b. Contractors are responsible for complying with all applicable training requirements relating to asbestos exposure and asbestos cleanup and for providing the training necessary to their workers in order for them to complete their tasks safely.
- c. Maintenance workers and housekeeping staff who work in areas where asbestos may be present are required to complete at a minimum, annual asbestos awareness training (2-hour course). The training provides general awareness level information regarding asbestos hazards and control measures.

Title: 6.25 - ASBESTOS-CONTAINING FLOOR TILE MAINTENANCE ESOP

Related: MCIEAST-MCB CAMLEJO: 5090.62A

- 1. <u>Purpose</u>: This ESOP establishes the procedures for the maintenance of resilient asbestos containing floor tile and other floor coverings that contain asbestos. The United States EPA and the OSHA both require specific work practices to prevent the release of asbestos fibers to the building occupants to the environment.
- 2. Applicability: This ESOP is applicable to all personnel, including contractor personnel, who work in or occupy any building aboard MCB CAMLEJ and MCAS NR.
- 3. Responsibility: All personnel who perform maintenance to any resilient floor covering containing asbestos must take the identified necessary precautions and be aware of the safe work practices associated with avoiding and minimizing asbestos exposure.

4. Procedure

- a. Wet Strip Floor Wax from Resilient Asbestos Flooring. This work practice covers the procedures for stripping floor wax or finish from resilient asbestos flooring. Do not strip damaged flooring. Any loose or damaged flooring should be repaired or replaced before stripping is started. Wet stripping, if performed properly, should not cause damage to resilient flooring. If any flooring damage occurs during stripping, work must be stopped immediately and Public Works must be notified to repair the floor. A work ticket will be generated and the flooring will be repaired or replaced. Do not dry strip, scrape, sand, or grind resilient asbestos flooring to remove any blemishes or imperfections.
- (1) Place tools, equipment, and materials needed in work area. Place walk-off mats where required to prevent tracking of stripping solution to other areas. Position "Caution Wet Floor" signs.
- (2) After proper mixing of stripping chemical, adequately wet the floor by mop applying liberal amounts of the solution. Allow chemical to soak for the amount of time recommended by the manufacturer. If the area becomes dry, reapply solution to keep floor adequately wet.
- (3) After wax or finish has softened, strip flooring using the least abrasive pad and low speed setting (300 revolutions per minute (RPM) maximum. Keep floor adequately wet during machine operation. Do not over strip. Stop stripping when old wax or finish is removed. Work small areas at a time.

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- (4) Remove dirty stripping solution with a wet vacuum or "strip" mop.
- (5) With "rinse" mop, apply liberal amount of clean water to area stripped and remove water with wet vacuum or mop. Repeat rinse procedures.
- (6) If some spots of wax or finish remain, re-strip those areas.
- (7) If new flooring will be installed over the stripped floor, do not apply wax or finish. When applying new wax or finish, do so according to the manufacturer's recommendations.
- b. Dry or Spray Buffing Resilient Asbestos Flooring. This work practice covers the procedures for spray buffing the polish to restore gloss on resilient asbestos flooring. Do not buff damaged flooring. Any loose or damaged flooring should be repaired or replaced before buffing is started. This practice assumes that the floor has adequate coats of polish, and that the flooring itself will not be damaged or contacted by the buffing equipment. If any flooring damage occurs during buffing, work must be stopped immediately and Public Works must be notified to repair the floor.
- (1) Place tools, equipment, and materials needed in work area. Position "Caution-Wet Floor" signs.
- (2) Pick up any large loose debris and place into disposal bags. If the material is asbestos containing, call Supervisor or Officer-in-Charge for guidance and reporting to EMD. Using scraper and water, remove all foreign matter from the finished surface (e.g., gum, tar, etc).
- (3) Spot or damp mop to remove stains and spills. Mix chemical cleaner or restorer with water and apply according to the manufacturers recommendations. If dry buffing will be performed, apply restorer chemical as required.
 - (4) Allow floor to dry thoroughly.

(5) Spray or dry buff as appropriate

- (a) To spray-buff, spray small area with spray-buff solution and buff using manufacturer's recommended pad or brush at recommended RPM. Repeat procedure until area is spray-buffed.
- (b) To dry-buff, buff or dry burnish with manufacturer's recommended pad or brush at recommended RPM.

C. DO NOT SAND, GRIND, CHIP, OR USE ANY OTHER MECHANICAL TOOLS TO REMOVE FLOOR COVERING. IF FLOOR COVERING IS DAMAGED, CALL YOUR S-4 OR FACILITIES CHIEF TO SUBMIT A WORK TICKET REQUEST TO THE PUBLIC WORKS DIVISION.