UNITED STATES ARMY GARRISON (USAG)
FORT GORDON, GEORGIA 30905

ASBESTOS and LEAD BASED PAINT MANAGEMENT PLAN

January 2021, (REVISED)

DIRECTORATE OF PUBLIC WORKS (DPW)
ENVIRONMENTAL BRANCH

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Approval Certification

The Asbestos and Lead-Based Paint Management Plan has been prepared in accordance with good engineering practices, and accordance with state and federal regulations and guidelines, and best available, Asbestos and Lead-Based Paint Industry guidelines.

Approved by:

Signature: _____

Date: 2/10/2021

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CHAPTER 1

THE INSTALLATION ASBESTOS MANAGEMENT PROGRAM

1-1. PURPOSE

The purpose of the Asbestos Management Plan (AMP) is to minimize exposure of all building occupants to asbestos fibers. The AMP will cover the general designation of duties, identification of hazards, testing procedures, abatement methods, training requirements, and protection of individuals at Fort Gordon.

a. This document implements an asbestos management plan as required by Army Regulation (AR) 200-1 and Public Works Technical Bulletin (PWTB) 420-70-8.

b. The overall Army policy governing all facilities and activities is as follows:

(1) Fort Gordon will comply with all applicable Federal, state, and local laws and regulations.

(2) Exclude asbestos containing building materials from all procurements actions.

(3) Minimize asbestos releases to the utmost extent possible.

(4) Establish and execute AMP.

(5) Establish Asbestos Management Teams (AMTs).

(6) Program and budget resources to identify, manage, and control exposure to asbestos.

(7) Conduct installation surveys to identify the existence, extent, and condition of all Asbestos Containing Material (ACM).

(8) Perform an exposure assessment for all areas where ACM is located.

(9) Take immediate action when possible asbestos related health hazards have been identified.

(10) Notify facility occupants of any asbestos related health hazards identified in their work environment.

(11) Assess the relative health risks for alternative control actions.

(12) Comply with guidance of the Asbestos Hazard Emergency Response Act (AHERA) and related US Environmental Protection Agency (USEPA) Regulations when dealing with elementary and secondary schools.

(13) Procure the consultation of the local Staff Judge Advocate to interpret the obligations and applications of the relevant laws

(14) Ensure that all abatement measures are initiated in a manner that minimized risk to personnel who live and work at Fort Gordon.

1-2. OBJECTIVES

The purpose of this document is to provide information necessary to effectively manage all asbestos, i.e., ACM, Presumed Asbestos Containing Material (PACM), Asbestos Containing Building Materials (ACBM), etc., and to establish procedures that will minimize the release of asbestos containing fibers into the ambient air.

1-3. BACKGROUND

Asbestos Containing Materials (ACM) were used widely as construction and insulating materials in buildings from the 1940s through the early 90's. In many older buildings asbestos is still present in the form of pipe, duct, and boiler insulation and in other materials such as floor tiles. ACM's are regulated by the Environmental Protection Agency (EPA) and the Occupational Safety & Health Administration (OSHA). In terms of environmental protection, while asbestos is a serious health and safety concern, currently available data and risks assessments indicate that properly managed, undamaged ACM in buildings do not present a significant health risk to building occupants; therefore, the focus is to provide comprehensive and effective management rather than total removal. Effective management of ACM may include the following approaches, depending on the nature of the material, its condition, and potential for exposure. ACM that is in a safe condition and does not present a danger to building occupants may be left in place and periodically inspected to ensure it remains in a safe condition. For ACM that presents a potential exposure concern, one or more of the following actions may be appropriate: removal and secure disposal by certified subcontract personnel, enclosure or encapsulation, restricted access and isolation.

CHAPTER 2

ASBESTOS MANAGEMENT PLAN

2-1. SCOPE

This AMP defines procedures and protocols used in the identification, control and removal of asbestos containing materials from real property at Fort Gordon. The environmental program managers and staff at Fort Gordon are responsible for the development and implementation of the AMP as a tool for identifying and reducing possible exposure to airborne asbestos fibers.

2-2. POLICY

The Directorate of Public Works (DPW) will identify ACM within its area of responsibility. Further, DPW will control or abate all ACM that poses an immediate health hazard. Non-friable ACM that does not create an immediate health hazard will only be abated in conjunction with other abatement, renovation or demolition projects. During renovation projects (i.e. individual rooms or entire buildings), all potential ACM that is disturbed will be removed. For demolition projects, all ACM will be removed by licensed/certified abatement personnel, only.

2-3. APPLICABILITY

This plan is applicable to all personnel and commands, directorates, activities, tenants, and contractors, located at or conducting operations on Fort Gordon.

2.4. DEFINITIONS **(40 CFR 61.141, 40 CFR 763.83, 40 CFR 763.121 and 40 CFR 763.163)**

The following terms are topic specific to asbestos and are presented to clarify text used throughout this document.

Asbestos means the asbestiform varieties of: Chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonite-grunerite); anthophyllite; tremolite; and actinolite.

Asbestos-containing material (ACM) when referring to school buildings means any material or product which contains more than 1 percent asbestos.

Asbestos-containing product means, any product to which asbestos is deliberately added in any concentration or which contains more than 1 percent asbestos by weight or area.

Demolition means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

Facility means any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, or building containing condominiums or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units); any ship; and any active or inactive waste disposal site. For purposes of this definition, any building, structure, or installation that contains a loft used as a dwelling is not considered a residential structure, installation, or building. Any structure, installation or building that was previously subject to this subpart is not excluded, regardless of its current use or function.

Friable asbestos material means any material containing more than 1 percent asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM.

Asbestos Fiber -- A structure greater than or equal to 0.5 µm in length with an aspect ratio (length to width) of 5:1 or greater and having substantially parallel sides.

High-efficiency particulate air (HEPA) refers to a filtering system capable of trapping and retaining at least 99.97 percent of all mono-dispersed particles 0.3 µm in diameter or larger.

Regulated area means, an area established by the employer to demarcate areas where airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the permissible exposure limits (PEL).

Regulated asbestos-containing material (RACM) means (a) Friable asbestos material, (b) Category I non-friable ACM that has become friable, (c) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

Remove means to take out RACM or facility components that contain or are covered with RACM from any facility.

Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Removal means the taking out or the stripping of substantially all ACBM from a damaged area, a functional space, or a homogeneous area in a school building.

Repair means returning damaged ACBM to an undamaged condition or to an intact state so as to prevent fiber release.

2-5. REFERENCES

References used in this document are listed in the Appendix.

2-6. ASBESTOS MANAGEMENT TEAM (AMT)

The AMT shall be comprised of personnel who, in the normal course of their duties, are aware of pending construction, demolition, renovation, and/or self-help projects. Members of the AMT shall also include personnel with expertise in labor issues, media generation/distribution, and any legal liability or regulatory compliance issues. The AMT shall schedule meetings quarterly or less frequently if warranted. Coordination between AMT members will be instrumental in decreasing and/or eliminating the unknowing or unintentional disturbance of ACM. The primary AMT members with phone contact numbers are listed in Appendix C.

2-7. RESPONSIBILITIES:

a. Asbestos Management Coordinator (AMC), Building 14600, (706)791-5634. The AMC is the focal point for the Administration of the Fort Gordon AMP.

(1) Overall responsibility and management of the AMP and Chairperson for the AMT.

(2) Reviews all construction-related work orders to determine whether there is a potential for asbestos impact.

(3) Reviews all matters related to asbestos identification, control, removal actions.

(4) Coordinates sampling results and ensures that proper warnings and access controls are issued to users and building occupants.

(5) Reviews and approves asbestos abatement plans.

(6) Completes Record of Environmental consideration (REC) attachment forms for all work that may involve potential disturbance of ACM.

(7) Acts as clearinghouse for all asbestos related actions.

(8) Serves as technical consultant for all asbestos related matters. Is responsible for establishing, maintaining, and providing policy guidance for the installation asbestos program.

(9) Maintain training certifications/qualifications as Asbestos Building Inspector and Management Planner.

(11) Ensure contractor abatement work is completed IAW the SOW specifications and work practices are in compliance with Army, Federal, State, and Local asbestos regulations.

b. Environmental Branch. Building 14600, (706)791-9927. Responsible for arranging and executing the installation asbestos survey, ensure database is updated, manifesting of ACM waste, and submission of notifications to Federal, state, and local agencies, as appropriate, in a timely manner.

(1) The environmental branch is responsible for reviewing and updating the AMP as needed.

(2) The environmental branch and AMC will coordinate to identify the presence and condition of ACM and ensure the appropriate statement of work (SOW) asbestos abatement specifications are incorporated into all contract documents.

c. Industrial Hygiene. Building 300/ (706)-787-1214. An Industrial Hygienist (IH) assist with the review of pre/post-abatement sample data and provides clearance to re-occupy work environments after abatement work is completed, after review of sample data. Provide technical assistance to the AMC and Contracting Officer's Representative (COR) on abatement projects. Reviews contract specifications and statement of work for issues relating to health and safety in support of design/review process.

d. Occupational Health. Eisenhower Army Medical Center. Building 300, 7th Floor/ 706-787-5124.

(1) Performs necessary medical exams as required in the asbestos medical surveillance program.

(2) Provides Pulmonary Function Testing to Government employees participating in a respiratory protection program.

(3) Maintains medical records for Government employees.

(4) PMC will provide other subject matter experts as needed.

e**. Installation Safety Office. Building 33720/ (706)791-7233.** Implements the respiratory protection program in conjunction with Department of Preventive Medicine-Industrial Hygiene (DPM-IH) in accordance with USASC&FG Regulation 40-8 (Respiratory Protection Program, review all work orders having a potential asbestos impact, abatement specifications, and contractor's work plans as related to occupational health and safety related issues.

f. **Staff Judge Advocate (SJA). Building 35203/ (706)791-3148.** The SJA is to be consulted on any liability or regulatory compliance issues relating to the asbestos abatement project. A determination by the SJA is required on the appropriateness of using Army or civilian personnel on abatement projects, and on the question whether the installation is required to follow state, local, or host-nation regulations.

g. **Public Affairs Office (PAO) Building 33720/ (706)791-4306.** The representative from this office is responsible for informing installation personnel, the public, and media with regard to asbestos related matters that are newsworthy or cause public concern.

h. **Engineering Branch, DPW. Building 14500/ (706)791-3465.**

(1) Ensures adequate identification of ACM prior to the start of any construction project. Checks existing survey and testing records available from the Asbestos Coordinator.

(2) Provides AMC with results and documentation of all asbestos removal done through Engineering Branch contracts in order that asbestos data may be updated.

(3) Forwards copies of asbestos abatement plans to the AMC for review and approval.

(4) Ensures proper documentation, (e.g. state and federal notification forms), is prepared and sent to proper authorities with copies to the AMC prior to the start of any asbestos work.

(5) Informs the AMC of any asbestos fiber release incident so that proper response action may be taken.

i. **Operations and Maintenance Branch, DPW**. **Building 14600/ (706)791-6180.**

(1) Generates work requests for self-help and troop projects.

(2) Ensures that self-help projects are reviewed for possible disturbance of asbestos materials. After receiving a defined scope of work from Estimating, the work request is forwarded to the AMC, or designated asbestos qualified person, for review. The work request is then returned to the Estimator to determine the potential cost of the project, to include any asbestos removal necessary. All ACM subject to disturbance in such projects must be abated by asbestos trained and qualified personnel prior to turning the work over to the building occupants as a self-help project.

(3) Ensures adequate funding is programmed for ACM abatement projects.

(4) Ensures proper documentation, (e. g. State and Federal notification forms), is prepared and sent to proper authorities with copies to the Asbestos Management Coordinator prior to the start of any self-help and/or troop projects.

(5) Informs the AMC of any asbestos fiber release incident so proper action may be taken to clean it up.

j. **Public Works Division, DPW. Building 14500/ (706)791-3225.**

(1) Submits service orders to the Base Ops Contractor for existing surveys and sampling records prior to any work that may disturb any ACM. Requests additional testing if material is suspect.

(2) Direct asbestos abatement and control work using service order or contract.

(3) Prepares and ensures proper documentation, (e.g. State and Federal notification forms), is sent to proper authorities with copies to the AMC prior to the start of any work.

(4) Informs the AMC of any asbestos fiber release incident so that proper action may be taken to clean it up.

k. **Base Operations (BASOPS) Contractor Building 14608/ (706)791-4749.**

(1) Surveys and inspects condition of asbestos in all facilities when requested. Per requests submit of surveys and inspects reports of damaged ACM, to DPW.

(2) Maintain a computer database of ACM for all ongoing projects. Provide copies of database to the AMC for input into main data base when project is completed.

(3) Ensures information is updated and available so users, engineers, shop personnel, custodial and others can identify potential asbestos containing materials/areas.

(4) Maintains a trained staff IAW EPA regulations, to include but not limited to, abatement workers and supervisors (for the BASOPS Contractor asbestos response team, available for emergency asbestos clean-up and abatement actions), Building Inspector(s), Maintenance Person(s).

(5) Maintains asbestos testing contract to provide laboratory analysis of suspected ACM to include air and bulk samples. Maintain all laboratory samples analysis data to include: bulk samples, air monitoring, and project reports to include current status of ACM at facilities located on Fort Gordon.

(6) Assists in or coordinates collection and submission of bulk samples of suspect materials for analysis. Will update the Fort Gordon Asbestos database when the status of ACM changes and annually when requested.

(7) Coordinates area and personal air monitoring for BASOPS abatement workers during asbestos abatement projects. Will ensure utilization of an Independent third party air monitoring services.

(8) Post caution/warning signs and secure asbestos contaminated areas as requested by the Asbestos Management Coordinator or the Asbestos Management Plan.

l. **Building/Facility Managers: (all facilities constructed prior to 1990).**

Managers shall coordinate all work order including Self-Help project with the Fort Gordon DPW Environmental AMC for any facility that involves the potential disturbance of sheetrock, floors, and/or ceiling texture building materials. The AMC will determine if the facility contains ACM by requesting test analysis or by reviewing the applicable facility registry.

All facility managers shall have attended a Fort Gordon one hour Asbestos Awareness Briefing during their tenure at Fort Gordon.

m. Housing Division, Building 33720/ (706)791-9658. Inform the AMC of any asbestos fiber release incident so that proper action may be taken to clean it up.

(1) The Military Family Housing (MFH) partner is responsible for establishing, maintains, and providing policies, procedures and guidance for MFH ACM management program to the AMC.

CHAPTER 3

PROCEDURES

3-1. ESTABLISHING BUILDING RECORDS FOR ASBESTOS IDENTIFICATION, TESTING AND INSPECTIONS:

a. AR 420-1, paragraph 5-4, states that facility surveys and surveillance monitoring will be conducted and documented to identify the existence and extent of ACM hazards in accordance with (IAW) the installation asbestos hazard management plan. Exposure assessment, risk assessment and O&M plans shall be included in the survey for each location containing asbestos. Fort Gordon has not been funded for an installation-wide asbestos survey. When the survey is completed, all records and plans shall be maintained by the AMC.

b. The BASOPS Contractor currently maintains the data base and hard copy files of all asbestos related projects as defined in the contract. This includes reports, sampling reports, sketches or drawings showing location of samples taken, removal projects, or renovations which have taken place on the installation. The data base shall be migrated electronically into a new data base application that will be maintained by the AMC. The hard copy files will be moved to a location controlled by the government, location to be determined. The BASOPS contactor shall update the Fort Gordon asbestos database when the status of ACM changes or annually when requested.

c. A fiber release episode is defined by EPA as any uncontrolled or unintentional disturbance of asbestos containing building materials resulting in visible emission. Every asbestos fiber release episode that occurs and any changes in the condition of asbestos containing building material shall be recorded. If the release episode or change in condition is discovered in the course of work being accomplished on a building, the supervisor in charge in charge of work is responsible for recording the release or change in condition and reporting it to the Directorate of DPW. If the release is otherwise discovered, the person in charge of the building is responsible for recording the release or change in condition and reporting it to DPW. The person in charge of work or building, as appropriate, shall file a report listing the event(s), persons affected, response, evaluation of results, protective measures, clean-up efforts, and any other pertinent information. Such information shall be included in the asbestos building files.

d. Surveillance of buildings shall be performed by the facility manager or maintenance staff to ensure that ACM, that has been identified, is in good condition and not damaged.

e. The results of the post wide survey and any additional sampling data collected by BASOPS Contractor, or the IH shall be entered into the database. As organizations relocate to other buildings, available asbestos survey information for the new locations should be requested through the AMC.

f. The BASOPS Contractor will maintain a contract, overseen by the AMC, for the analysis of suspect ACM and associated air and bulk samples. Request for sampling will be accomplished by service order.

3-2. PROCEDURE FOR HANDLING HAZARDOUS ASBESTOS AREAS:

a. Potential hazardous asbestos areas are identified from asbestos surveys, tests, or reports of fiber release incidents of known or suspected ACM.

b. When deemed necessary, the AMC will regulate access to hazardous areas to ensure the safety of workers and building occupants. Information regarding such areas will be immediately forwarded to the IH and Installation Safety Office for review of actions, monitoring recommendations, and comments addressing the health hazards.

c. The AMC will finalize recommendations into DPW actions to eliminate the asbestos hazard. If the action requires containment or closure of subject area, the user will be notified of such actions.

d. Prior to the generation of a service order for action by BASOPS Asbestos Response Team, the AMC will be notified.

e. The AMC and/or DPM-IH will notify the user of completed actions and when it is safe to return to the area.

f. For ACM previously identified the following information regarding ACM abatement is needed before the area is declared ACM free: the building number, the room number, the amount of ACM, the type of ACM abated, laboratory analysis and Landfill Disposal Record..

g. Asbestos Records Retention: Regulation requires all records pertaining to ACM will be retained indefinitely.

3-3. INITIAL NOTIFICATIONS AND WARNINGS:

a. BUILDING OCCUPANTS: Building occupants shall report any damage or suspected damage to ACM to the building custodian or to the AMC. Building custodians shall report any damage or suspected damage to ACM to the AMC. Building occupants shall not disturb any ACM.

b. OUTSIDE CONTRACTORS, ETC.: Maintenance workers and outside contractors such as telephone workers, utility workers, computer installers and exterminators shall notify the AMC of work to be performed and the location prior to beginning any work. Outside contractors shall not perform work in areas where ACM is physically contacted unless appropriate safeguards are taken, such as proper training, and use of personal protective equipment. Since these personnel may unknowingly disturb ACM in the course of their work, notification of potentially hazardous ACM will be included in the SOW.

c. ASBESTOS ABATEMENT BY BASE OPERATIONS (BASOPS) CONTRACTOR:

(1) When work has been elected by the Work Control Section, DPW, to be performed by the BASOPS Contractor, they will submit a work order indicating the specific type, location, and amount of ACM to be removed. Quantities shall not exceed 160 square feet, 260 linear feet, or 35 cubic feet of friable ACM.

(2) The BASOPS Contractor Asbestos Response Team will perform asbestos removal. An Operations & Maintenance (O&M) Plan with specific procedures will be used for asbestos removal and will be developed by an EPA accredited asbestos Project Designer. The O&M Plan shall be approved by a Certified Industrial Hygienist, and submitted to the Asbestos Management Coordinator and DPM-IH for review and approval. The asbestos O&M Plan shall be submitted as required in the contract.

(3) The BASOPS Contractor is responsible for proper notification to state and federal agencies of all removal actions by the BASOPS Asbestos Response Team. A copy of the notifications will be provided to the Asbestos Management Coordinator prior to the start of work.

(4) The BASOPS Contractor will provide the Asbestos Management Coordinator a final report of the ACM removed from the abatement area and update asbestos survey records.

(5) Final third party air monitoring and clearance sampling will be arranged personnel, for all abatement projects. All results shall be forwarded to DPW for final review.

d. FEDERAL, STATE, AND INSTALLATION NOTIFICATIONS:

(1) Federal.

(a) EPA. A 10 working day notification in advance is required for all demolition projects.

(b) EPA. A 10 working day notification is required when a renovation project results in the removal of 160 square feet, 260 linear feet, 35 cubic feet or more of friable and/or non-friable Regulated Asbestos Containing Material (RACM). The notification is required under National Emissions Standards for Hazardous Pollutants (NESHAPs).

(c) OSHA. Other contractors shall be notified at the job site of the nature of the asbestos abatement activities, location of the ACM, and controlled access by O&M personnel. This shall be in compliance with the Hazard Communication 29 CFR 1910.1200 and 1926.1101.

(2) State of Georgia.

(a) A 10 working day notification in advance is required for all demolition projects.

(b) A 10 working day notification is required when a renovation project results in the removal of 10 square feet/10 linear feet or more of ACM.

(3) Installation. Building custodians shall be notified in writing if asbestos work will be performed in occupied buildings. Notification shall be posted on the bulletin board of that building area. Asbestos warning signs shall be posted in the area where asbestos work is performed.

(4) Above listed notifications are the responsibilities of the asbestos abatement contractor.

e. WARNING SIGNS:

(1) Warning signs shall be posted to all asbestos abatement areas. Signs shall be 20 inch by 14 inch manufactured danger sign at each entrance to the work area displaying the following legend with letter sizes and styles of visibility required by 29 CFR 1926.1101. LEGEND (HAZARD COMMUNICATION STANDARD):

DANGER
ASBESTOS
CANCER AND LUNG DISEASE HAZARD
AUTHORIZED PERSONNEL ONLY
RESPIRATORS AND PROTECTIVE CLOTHING REQUIRED IN THIS AREA

(2) Warnings are not intended to be publicly advertised but are designed as a last line of defense against inadvertent contact with ACM by unprotected individuals. These will be conspicuously posted in mechanical closets containing damaged ACM, at the entrance and around the perimeter of abatement projects or contaminated areas that have been isolated.

3-4. TRAINING REQUIREMENTS: All personnel involved in asbestos work will be properly trained in accordance with applicable federal and state regulations. Cost of required training shall be budgeted for by the unit/activity/company that employs the affected workers.

a. ASBESTOS INSPECTOR/MANAGEMENT PLANNER: DPW will be responsible for maintaining an accredited asbestos inspector/management planner within the organization. The individual must have successfully completed a 40 hour asbestos Inspection, Assessment and Management course approved by the EPA. Annual refresher courses must be completed in order to maintain accreditation.

b. ASBESTOS SUPERVISOR: All asbestos abatement projects require an accredited/licensed Asbestos Supervisor to oversee the project. The individual must have successfully completed a 40 hour asbestos contractor/supervisor training course approved by the EPA. Annual refresher courses must be completed to maintain accreditation.

c. ASBESTOS WORKER: Individuals performing Class I & II asbestos abatement projects are required to have successfully completed a 32 hour asbestos worker training course approved by the EPA. Annual refresher courses must be completed to maintain accreditation.

d. OPERATION AND MAINTENANCE (O&M) WORKERS:

(1) Maintenance employees shall be capable of recognizing ACM and trained in special techniques required in working around ACM. They should be responsible for notifying the manager of building maintenance if ACM is disturbed or damaged in any way. Trained staff shall perform routine inspections of ACM for progressive damage or deterioration. Complaints from the building occupants shall be reported directly to the building custodian, who will then inform the Asbestos Management Coordinator of such complaints.

(2) The maintenance and custodial staff conducting any Class Ill asbestos work, activities that result in the disturbance of ACM, must successfully complete 16 hours of O&M training from an EPA approved school. Annual refresher courses must be completed to maintain accreditation.

(3) O & M Workers disturbing ACM or cleaning up ACM debris, are required to receive a 16-hour asbestos worker training course approved by the EPA. Annual refresher courses must be completed to maintain accreditation.

e. AWARENESS TRAINING: Maintenance personnel, construction inspectors, engineers, or any individual that may be subject to work around ACM will be required to complete the 2 hour asbestos awareness training. The BASOPS Contractor will provide training to its employees as per conditions of the contract. The Installation Safety Office may provide annual asbestos awareness training to facility managers or maintenance staff from other directorates that will be conducting periodic surveillance of ACM. Supervisors at all levels are responsible for coordination and/or alternate training.

3-5. ASBESTOS CONTROL ACTIONS:

All real property work done on Fort Gordon must be directed by a DA Form 4283, Facility Engineering Work Request. When Work Orders/Requests are submitted through DPW, the Work Control Section will determine which projects will be conducted as self-help, in-house, or contracted out. After receiving a defined scope of work from the Estimator, the work request will be reviewed by the AMC to determine the potential for disturbance of ACM during the repair or renovation project. All ACM subject to disturbance in such projects must be abated by asbestos trained and qualified personnel prior to performing the work.

a. SPECIAL WORK PRACTICES FOR MAINTENANCE ACTIVITIES: Even normal maintenance activities may disturb ACM and raise the level of airborne asbestos fibers. Maintenance workers should avoid conducting any work that would disturb ACM. It is the responsibility of the supervisor and the workers to check existing asbestos records prior to conducting any maintenance or repair activities. If ACM is identified, workers shall follow guidelines specified in the Operation and Maintenance Program portion of this SOP.

b. BUILDING DEMOLITION: Prior to any demolition, facilities must have had an asbestos survey completed. Each organization that engages in demolition or renovation activity shall comply with the procedures specified in 40 CFR Part 61, Asbestos NESHAP Revision, Final Rule.

CHAPTER 4

OPERATION AND MAINTENANCE (O&M) PROGRAM

4-1. INTRODUCTION: This O&M program is considered a class III action under OSHA regulations and is a controlled method of working with ACM to prevent the emission of asbestos fibers into the air. Any O&M removal will be limited to operations where removal is secondary to another job, such as pipe fitting replacement and repair or electrical wiring, where contact with the ACM is either a possibility or a certainty. Any accidental damage to ACM by weather, physical means, leaking pipes, and etc., will be repaired in the same fashion. Any ACM removal project requires the use of a licensed abatement contractor or BASOP asbestos response team following an approved asbestos abatement plan.

4-2. DISTURBANCES: Activities involving removal of ACM are considered to be disturbances. Any ACM removal project will demand the use of a licensed abatement contractor or BASOP abatement team. All ACM removal projects will require the submission of an asbestos abatement plan developed specifically for that project. Abatement plans should be routed through the project engineer, AMC, Installation Safety, and IH for review and approval prior to the commencement of work.

a. Response Actions: Once asbestos is identified a response action will be selected IAW applicable Army, Federal, State, and local regulatory response actions. If the ACM is damaged or creating a hazard, an immediate abatement response action is necessary. The installation AMC will prepare the SOW and Contracting will work with the contractor to support O&M requirements that will only include removal, encapsulation, enclosure, and repair in conformance with Class II, III, IV, O&M, and Small Scale Short Duration (SSSD) work activities.

b. Hazards requiring immediate response actions: asbestos disturbances requiring immediate response are those which, if not controlled immediately could expose (above the PEL, 0.1 F/cc). Personnel working either in the immediate vicinity of the hazard or other areas of the building. To present such a hazard the ACM must have deteriorated, delaminated, or been disturbed to the point that significant amount of dust and debris are visible.

c. Control Procedures: Personnel responding to the hazard will first take action to halt the further dispersion of asbestos fibers. Activities that disturb asbestos debris must be ceased and the area where the hazard exists must be sealed off from the rest of the building. Written documentation will be submitted for all emergency response actions IAW applicable regulations.

4-3. EMERGENCIES: In the event of an unexpected asbestos spill/release, the following procedures shall be implemented:

a. The occupants shall leave the area immediately, taking nothing with them.

b. The area shall be closed off to admit no one except the asbestos response team.

c. Signs shall be posted warning of the danger.

d. Verbal warnings shall be given to all other occupants in the building.

e. The AMC and IH (787-1214/1213) shall be notified of the accident.

f. The occupants of that area shall be moved to another area where they can be decontaminated and away from others to prevent further contamination.

g. If necessary, IH or a contracted laboratory team shall suit-up to enter the room and place the area air sample pumps in the contaminated area.

h. The area shall remain closed until the results of the bulk analysis and/or the air sample is analyzed to determine the extent of contamination.

i. The building occupants shall be notified within 24 hours of the incident, if the results of the tests are positive.

j. If the results of the tests from the area are positive, the area shall remain closed until it is cleaned and the final air sample results are taken. All items in the area must remain in place until the area has been decontaminated.

k. Failure to comply with any of these rules and safety operations may result in disciplinary action being taken.

4-4. ORGANIZATION AND PLANNING: There will be an O&M team set up to handle emergencies dealing with asbestos. The O&M team consists of the BASOP asbestos response team members and any individuals in other shops that have been trained as asbestos workers, supervisors. The team will be equipped with all equipment and supplies necessary to perform work safely and to prevent the spread of the asbestos.

4-5. GENERAL OPERATION AND MAINTENANCE (O&M) PROCEDURES: Refer to the "Guidance Manual — Asbestos Operations & Maintenance Work Practices", December 1996, prepared by the National Institute of Building Sciences. The Asbestos Management Coordinator maintains a copy of this book for use, as needed.

CHAPTER 5

PERSONAL PROTECTIVE EQUIPMENT

5-1. PROTECTIVE CLOTHING: Employees will be required to wear whole body, protective clothing, head cover, gloves and foot covering during the entire course of the asbestos abatement. In the event that the decontamination shower is set up in a remote location, individuals engaged in asbestos abatement activities will be required to wear two whole body protective suits. Disposable plastic or rubber gloves are required to protect the employee's hands. Cloth gloves may be worn inside the plastic or rubber gloves for comfort but will not be used alone. Duct tape will be used to secure sleeves at the wrists and to secure foot coverings at the ankles. If eye protection is not integral with respirator, protective goggles are required.

5-2. RESPIRATORY PROTECTION:

a. During activities involving ACM removal, employees may be exposed to high concentrations of asbestos fibers for short periods of time. Therefore, activities engaged in ACM removal must provide respiratory protection for their employees conducting work on ACM. If the workspace is regulated or engineering controls are being implemented, respiratory protection shall be provided and used by all persons entering the site. Respiratory protection is required any time ACM is disturbed, unless a negative exposure assessment is performed and approved by the Asbestos Management Coordinator. In addition to providing respiratory protective equipment, activities engaged in ACM removal will have a written respiratory protection program IAW OSHA regulations (29 CFR), and AR 11-34.

b. All DoD personnel assigned to Fort Gordon, GA and its tenant organizations shall comply with requirements contained in USASC&FG Regulation 40-8 Respiratory Protection Program. A half mask air-purifying respirator equipped with HEPA filters, at a minimum, will be worn when there is a potential for ACM to be disturbed. NOTE: HEPA filters shall be disposed of as contaminated asbestos waste.

c. Any employee who is exposed to at least 0.1 fiber/cc as determined by air monitoring procedures for 30 or more calendar days per year, or who is required to wear a negative air pressure respirator, must be involved in a medical surveillance program. The medical surveillance program consists of the initial and the annual physical examinations. The initial exam is used to provide a baseline reference of the workers physical condition. The annual examinations are used to track the possible development of any asbestos related diseases as well as detect any other medical conditions that may arise which would increase risk of asbestos related disease while being exposed.

CHAPTER 6

ASBESTOS ABATEMENT AND REMOVAL

6-1. ACM may be removed by either BASOPS Contractor personnel or by separate contract. Whichever entity is used, federal and state regulations must be followed.

a. BASOPS Contractor removal projects:

(1) The BASOPS Contractor Asbestos Response Team will perform the removal.

(2) Specific procedures used for asbestos removal will be developed by the accredited asbestos supervisor or designer in charge of the asbestos response team, and approved by a Certified Industrial Hygienist. A copy of the procedures to be used for the abatement project will be provided to the AMC for review and approval.

(3) The BASOPS Contractor is responsible for proper notification to state and federal agencies of all removal actions by the asbestos response team. A copy of notifications will be provided to the AMC.

(4) The BASOPS Contractor will provide the AMC a report of ACM removed from the abatement area in order to update asbestos survey records.

b. Contract removal projects:

(1) Contract removal may be conducted by individual asbestos abatement contracts, as delivery orders in a requirements contract, or as part of a related construction contract.

(2) Contractors will be responsible for proper notification to state and federal agencies. Copies of this notification will be provided to the AMC. The project engineer should also ensure that a copy is placed in the project folder.

(3) Prior to the start of work, the contractor will submit an asbestos abatement plan to the DPW for approval and copy furnish the AMC. The plan will also be forwarded to Installation Safety Office and IH for review.

(4) Upon completion of the removal project, a report will be provided to the DPW, with a copy to the AMC, detailing the ACM that was removed from the area.

CHAPTER 7

WASTE HANDLING AND DISPOSAL

7-1. PACKAGING AND LABELING WASTE:

a. Asbestos waste and asbestos contaminated materials, including plastic from enclosures, rags, mop heads, contaminated coveralls, respirator filters, etc., will be sealed in impermeable bags or two layers of polyethylene sheeting and affixed with hazard labels for disposal at a state approved landfill. All asbestos contaminated waste will be placed in double, 6-mil. Polyethylene bags or sealable drums.

Labels will be affixed IAW the DOT and the OSHA Asbestos Standard. Caution labels will be of sufficient size to be clearly legible, displaying the following:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD
AVOID BREATHING AIRBORNE ASBESTOS
RQ (ASBESTOS)
Class 9
NA 2212 PGIII

b. IAW DOT regulations and 40 CFR 61.150, ACM disposed of off-post will be labeled with the DOT class 9 symbol, the name of the generator and the location at which the waste was generated.

7-2. HANDLING, TRANSPORTATION, AND DISPOSAL:

a. The abatement contractor or BASOPS Contractor abatement team will mark vehicles used to transport asbestos waste during the loading and unloading of the waste so that a person can easily read:

DANGER
ASBESTOS DUST HAZARD
CANCER AND LUNG DISEASE HAZARD

b. The hauling and disposal of asbestos waste will comply with 40 CFR 61, Subpart M, 40 CFR 763 Subpart E, Appendix D, DOT regulations, and Georgia Solid Waste Management Regulations. Workers will wear appropriate respirators and personal protective equipment when handling asbestos material at the disposal site.

c. Signs will remain until final cleanup is completed and the air monitoring indicates the area safe for re-occupancy. The AMC will be notified before unrestricted entry in the area is permitted.

d. Do not transport asbestos waste in the passenger compartment of any vehicle. Line the transporting area of the vehicle with polyethylene sheeting. Once asbestos waste has been unloaded remove polyethylene sheeting and dispose of as contaminated asbestos waste.

e. Ensure all asbestos waste is properly documented from point of origin to the final landfill. Documentation of proper disposal of asbestos waste at the landfill shall be kept in the project file.

APPENDIX A

This appendix contains a list of references used in this document, Ref: (http://chppm-www.apgea.army.mil/ihfs/asbestoslist.aspx).

a. **DEPARTMENT OF THE ARMY:**

(1) Army Regulation (AR) 200-1, Environmental Protection and Enhancement

(2) AR 420-1, Facilities Engineering Buildings and Structures

(3) AR 11-34, The Army Respiratory Protection Program

b. **U.S. ARMY CENTER FOR PUBLIC WORKS:** Public Works Technical Bulletin (PWTB) 420-70-8, Installation Asbestos Management Program

c. **OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)**:

(1) 29 CFR 1926.1101, Construction Standard for Asbestos

(2) 29 CFR 1910.1001, General Industry Standard for Asbestos

(3) 29 CFR 191 0.134, Respiratory Protection Standard

(4) 29 CFR 1910. 1200, Hazard Communication Standard

d. **ENVIRONMENTAL PROTECTION AGENCY (EPA)**:

(1) 40 CFR 763.120, EPA Regulatory Requirements, Definitions

(2) 40 CFR 61 Subpart M, EPA National Emission Standard for Hazardous Air Pollutants (NESHAP)

(3) 40 CFR 763 Subpart E, EPA Asbestos Hazard Emergency Response Act (AHERA)

(4) 40 CFR 763 Subpart I, EPA Asbestos Ban and Phase out Rule

e. **STATE OF GEORGIA**: The following regulations will be followed in addition to those listed in this above. Where there is a discrepancy in requirements, the most stringent will apply.

(1) Georgia Asbestos Safety Act O.C.G.A. Section 12-12, et seq.

(2) Asbestos Removal and Encapsulation, Chapter 391-3-14.

(3) Rules of Georgia Licensing Board, 52-2 et seq.

(4) Solid Waste Management, Chapter 391-3-4.

APPENDIX B

STATE AND FEDERAL REQUIREMENTS

a. State of Georgia Requirements:

(1) The State of Georgia requires notification at least 10 days prior to the commencement of an asbestos project.

(2) The state notification form shall be used for all notifications.

(3) All friable asbestos projects must be reported to the State of Georgia. Non-friable asbestos projects shall be reported on a courtesy notification.

(4) Notification of less than 10 days may be allowed in case of emergencies. Notification for emergency removal projects must be submitted within 24 hours of initiation of the project. Emergency projects include but are not limited to:

(a) Leaking or ruptured pipes,

(b) Accidentally damaged or fallen asbestos that could expose non-asbestos workers or the public,

(c) Unplanned mechanical outages or repairs essential to work process that require asbestos removal and could only be removed safely during the mechanical outage.

A written description of why this project is considered an emergency must be submitted on the notification. ** Lack of planning or inspection for asbestos before commencement of a general renovation project does not constitute an emergency project**

(5) Amended notifications may be submitted for modifications.

(a) Amended notices for start up dates must be received by at least one day prior to the removal date of the original notification. Submission of a re-notification shall be required after the original start date has passed.

(b) Amended notices for extension of project completion dates must be submitted by the end of the completion date on the original notification. Submission of a re-notification for extension of completion dates shall be required after the original completion date has passed.

(c) An amended notice must be submitted for any project which is completed prior to completion date indicated on the notification. This amended notice shall be submitted within 24 hours upon completion of the project.

(d) An amended notice may be submitted when additional asbestos containing materials are discovered during the course of an on-going removal project.

(6) Any project cancellation must be reported to the state.

b. Federal Requirements (EPA-NESHAP):

(1) In addition to reporting to the State of Georgia, projects of 160 square feet or 260 linear feet or greater must be reported to the U.S. Environmental Protection Agency.

(2) The Georgia notification form may be used for EPA notification.

c. Demolition Projects: Demolition of any facility as defined by 40 CFR 61.141 must be reported to the State of Georgia and to the U.S. Environmental Protection Agency.

d. Addresses:

US Environmental Protection Agency (EPA) Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104
Phone: (404) 562-9900
Fax: (404) 562-8174
Toll free: (800) 241-1754
Asbestos Desk (404) 363-7026

Georgia Environmental Protection Division (EPD)
East Central District (Augusta)
3525 Walton Way Ext.
Augusta, GA 30909
Phone: (706) 667-4343
Fax: (706) 667-4376

APPENDIX C

ASBESTOS MANAGEMENT TEAM MEMBERS

	Building /Phone Number
Command*	29808/ (706) 791-2181
Asbestos Management Coordinator*	14600/ (706)791-5634
Environmental Branch, DPW*	14600/ (706) 791-6374/9927
Industrial Hygiene*	300/ (706)787-1214
Occupational Health	300/ (706) 787-5124
Installation Safety Office*	33720/ (706) 791-7233
Legal (JAG)	35203/ (706) 791-3148
Public Affairs Office	33720/ (706) 791-4306
Engineering Branch, DPW*	14500/ (706) 791-3465
Operations and Maintenance Branch, DPW*	14600/ (706) 791-6180
Public Works Division, DPW*	14500/ (706) 791-3225
BASOPS*	14608/ (706) 791-4749
Facility Management*	14600/ (706) 791-6183
Housing Division	33720/ (706) 791-9658

* Denotes primary members who in the normal course of their work, are involved on a daily basis with design and execution of specific projects; and are aware of pending construction projects. The remaining persons listed are ad hoc members, who, depending on the complexity or the need, participate as full functioning members.

SECTION II

THE INSTALLATION LEAD BASED PAINT (LBP) MANAGEMENT PROGRAM

Table of Contents

CHAPTER 1

LEAD-BASED PAINT (LBP) MANAGEMENT PROGRAM

1-1. PURPOSE

a. The purpose of this plan is to identify and control exposures to lead hazards from lead-contaminated paint, dust, and soil.

b. The overall Army policy governing all facilities and activities is as follows:

(1) Comply with all applicable Federal, state, and local laws and regulations.

(2) Exclude lead based paint from all procurements and uses where lead-based paint - free substitute materials maybe feasible.

(3) Minimize lead-based paint dust releases to the utmost extent possible.

(4) Establish and execute lead lead-based management plans (LBP Plans).

(5) Establish lead-based paint management teams (LBPMTs).

(6) Program and budget resources to identify, manage, and control exposure to lead-based paint.

(7) Conduct installation surveys to identify the existence, extent, and condition lead-based paint containing materials.

(8) Perform an exposure assessment and risk assessment for all areas where lead-based paint containing materials are located. These assessments shall be included in the installation survey.

(9) Take immediate action where a possible lead-based paint related health hazard has been identified.

(10) Notify facility occupants of any lead-based paint related health hazard identified in their work environment.

(11) Assess the relative health risks for alternative control actions.

(12) Use all feasible and safe methods to control lead-based paint, ensure availability of Local Staff Judge Advocate to interpret the obligations and applications of the relevant laws.

1-2. OBJECTIVES

To provide the information necessary to manage lead-based paint. Identify those procedures that will reduce the amount of lead-based paint in buildings and the release of lead participles into the ambient air.

CHAPTER 2

LEAD-BASED PAINT MANAGEMENT PLAN

2-1. SCOPE

This Lead Based-Paint Management Plan (LBPMP) defines procedures and protocols used in the identification, control and removal of LBP containing materials from real property at Fort Gordon. The purpose of this LBPMP is to reduce worker exposure to and prevent the release of airborne lead participles in accordance with (IAW) applicable Federal, state, local laws, and regulations.

2-2. POLICY

The Directorate of Public Works (DPW) will identify LBP within its area of responsibility. Further, DPW will control or abate all LBP that poses an immediate health hazard. LBP that is inaccessible and/or Below Reporting Limit (BRL) that does not create an immediate health hazard will only be abated in conjunction with other abatement, renovation or demolition projects. During renovation projects (i.e. individual rooms or entire buildings), all LBP that is disturbed will be removed and confirmed by a wipe test. For demolition projects, all LBP containing materials will be analyzed before removal.

2-3. APPLICABILITY

This lead management plan applies to all Fort Gordon activities and contractor personnel. All projects involving lead-based paint and lead hazards conducted on Fort Gordon are subject to this plan, as well as all appropriate federal and state regulations. This plan covers the general aspects of lead and lead-hazard management on Fort Gordon.

2-4. DEFINITIONS

Abatement/Remedies: Paint removal and repainting, building component removal and replacement, enclosures, encapsulates, interim control and treatment in the case of soil.

Accessible Surface: surface that protrudes from the surrounding area to the extent that a child can chew the surface and is within three feet of the floor or ground (e.g., window sills, railings, and the edges of stairs treads.

Building Component Type: these items in the interior or exterior of building onto which paint, stain, varnish, or shellac has been applied and that have a common substrate

Demolition: The wrecking or taking out of any load-supporting structural member and any related razing, removing, or stripping of asbestos products.

Deteriorated Paint: any interior or exterior paint that is peeling, chipping, chalking, or cracking, or is located on an interior or exterior surface or fixture that is damaged or deteriorated.

Friction Surface: an interior or exterior surface that is subject to abrasion or friction (e.g., certain window, floor, and stair surfaces).

High-efficiency particulate air (HEPA) filter: A filter capable of trapping and retaining at least 99.97 percent of 0.3-micron diameter mono-dispersed particles of 0.3 micrometer in diameter or larger.

Impact Surface: an interior or exterior surface that is subject to damage from repeated impacts (e.g., certain parts of door frames).

Lead-Based Paint (LBP): paint, varnish, shellac, or other coating on surfaces that contain 1.0 mg/cm2 or more of lead or 0.5% or more lead by weight.

Lead-Based Paint Abatement: Any activity involving the removal, enclosure, or encapsulation of any painted surface.

Lead-Based Paint Hazards: any condition that causes exposure to lead contaminated dust, lead contaminated oil, or lead contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as identified by EPA Administrator under TSCA section 403.

Lead-Based Paint Inspection: a surface-by-surface investigation to determine the presence of lead-based paint. A report is then issued that identifies if there is lead-based paint present and where it is.

Lead: Elemental lead (Pb), is a heavy, soft, easily worked, bluish metal. Lead deposits are often found in the form of galena, a lead-sulfide mineral associated with zinc sulfides and silver. Lead is added to paint for three reasons: as a pigment, to add durability and corrosion resistance and as a drying agent.

Permissible exposure limit (PEL): per cubic centimeter of air as an 8-hour time-weighted average (TWA).

Protective clothing: The employer shall provide and require the use of protective clothing, such as coveralls or similar whole-body clothing, head coverings, gloves, and foot coverings for any employee exposed to airborne concentrations of lead that exceed the permissible exposure limit.

Regulated Areas: The employer shall establish a regulated area in work areas where airborne concentrations of lead exceed or can reasonably be expected to exceed the permissible exposure limit.

Renovation: The modifying of any existing structure, or portion thereof, where exposure to airborne participles may result.

Repair: Means overhauling, rebuilding, reconstructing, or reconditioning of structures or substrates where LBP is present.

Room Equivalent: an identifiable part of a building, such as a room, building exterior, foyer, hallway, staircase, or an exterior area (exterior areas contain items such as play areas, painted swing sets, painted sandboxes, fences, etc.).

Substrate: the material underneath the paint. Substrates maybe (HUD recommended 6): brick, concrete, drywall, metal, plaster or wood.

Test Location: a specific area on a testing combination where either an XRF reading or a paint chip-chip is taken.

Testing Combination: unique combination of room equivalent, building component type and substrate

2-5. REFERENCES

AR 420-1, AR 200-1, 40 CFR Part 745, 29 CFR 1910.1025, PWTB 420-70-2 & -8
References listed in Appendix A.

2-6. FORT GORDON LEAD HAZARD MANAGEMENT TEAM

The team is established in accordance with Public Works Technical Bulletin (PWTB) 420-70-2, Installation Lead Hazard Management (Para 2-1.c.). The purpose of the team is to provide technical input for lead issues on the installation. The team should consist, but not limited to personnel representing the following groups: Environmental Branch-DPW, Installation Safety Office, Occupational Health, Public Affairs Office, Engineering Branch-DPW, and Operations and Maintenance Branch.

The team shall perform the following duties:

a. Evaluate the installation Lead Management Plan

b. Coordinate activities between organizations for the control and elimination of lead containing materials and products

c. Review, evaluate, and provide guidance for selective projects involving lead paint and lead hazards

d. Develop public awareness and worker education programs to communicate the risks associated with exposure to lead hazards, ways to prevent or control exposures, and corrective actions to prevent, manage, and abate hazards.

2-7. RESPONSIBILITIES: Funding for lead abatement activities and similar projects are generally the responsibility of the proponent of the action. All materials and costs incurred during the project including personal protective equipment and waste disposal are also the responsibility of the proponent.

a. Installation Commander/Garrison Commander- Ensures compliance with all applicable Federal, state, and local environmental laws, regulations, and requirements.

b. Director DPW- Installation/Garrison Commander's staff proponent for Lead-Based Paint. Program and budget for necessary funds and personnel in order to execute environmental programs and to comply with applicable Federal, state and local environmental laws, regulations, and requirements.

c. Engineering Br/Public Works Div., DPW- Shall include lead-safe work practices in renovation, construction, and maintenance work to protect installation employees and contractors from lead exposure. Assists the Lead-Based Paint Program Manager in determining if LBP will be affected during the project's life.

d. Directorate of Housing- Ensures that all newly assigned residents are informed in writing of the presence lead-based paint and/or lead-based paint hazards in Government owned family housing units. Corrects deteriorated or damaged lead-based paint surfaces in Government owned on-post housing in a timely manner.

e. Operations and Maintenance Branch, DPW- Ensures construction projects conducted by contract personnel involving lead-based paint are performed in accordance with applicable rules and regulations, and industry practices.

f. Environmental Branch, DPW- Maintain the installation Lead Management Plan. Assigns and provides over-sight of the Lead-Based Paint Program Manager and ensures that the program manager is trained in compliance with U.S. Environmental Protection Agency (EPA), State, and local requirements

g. Occupational Health – Perform medical exams as necessary and implements and maintains the blood lead screening program. Follow established policies and procedures to screen and identify children at risk for lead poisoning at Fort Gordon.

h. Installation Safety Office- Assists installation activities in determining safety related issues as they relate to lead hazard management.

i. Lead-Based Paint Program Manager - Lead-Based Paint Program Manager shall:

(1) Maintains the overall responsibility and management of the Lead Management program.

(2) Reviews all construction-related work orders to determine whether there is a potential for lead impact.

(3) Coordinates sampling results and ensures that proper warnings and access controls are issued to users and building occupants.

(4) Requests, reviews and approves lead abatement plans.

(5) Completes Record of Environmental Consideration (REC) attachment forms for all work that may involve potential disturbance of lead.

(6) Maintain the government provided (owned) lead database.

(7) Maintain qualifications as Lead Inspector, Lead Risk Assessor, and EPA Certified Renovator.

CHAPTER 3

PROCEDURES

3-1. ESTABLISHING BUILDING RECORDS FOR LBP IDENTIFICATION, TESTING, AND INSPECTIONS

a. All records pertaining to the management of lead and lead hazards on Fort Gordon will be maintained by the Lead-Based Paint Program Manager, in a government provided (owned) database. Individual training records will be maintained by the appropriate supervisors. Individual supervisors will be responsible for maintaining and renewing all appropriate certifications and licenses

b. The intent of a lead-based paint inspection is to determine if lead is present and to identify the condition of the surfaces. Federal and state of Georgia regulations require that any person conducting lead inspections be an accredited and/or licensed lead inspector or risk assessor. All inspections conducted at Fort Gordon must meet the protocols outlined in, “HUD Guidelines for the Evaluation and Control of Lead Hazards in Housing,” and applicable federal and state regulations.

c. Preliminary or screening surveys may be conducted by appropriate Fort Gordon personnel to determine if lead-based paint is present. This information may be used to determine if licensed contract personnel will be required to perform further investigations or abatement activities. A preliminary or screening survey may consist of the use of instant read chemical field test, sometimes referred as Insta-Chek tests and historical data.

d. Once the initial inspection is completed a schedule should be developed to re-inspect the areas where lead-based paint was identified. This schedule will be included in the facility specific management plan. Re-inspections are necessary to evaluate the condition of the surfaces. Building occupants should notify Lead-Based Paint Program Manager when areas with lead-based paint require repair.

3-2. MINIMIZING AND MANAGING LEAD-BASED PAINT HAZARD

a. Lead-based paint hazard is defined by Section 1004(15), “Residential Lead-based Paint Hazard Reduction Act of 1992” and is summarizes as meaning any condition that causes exposure to lead from lead- contaminated dust, lead-contaminated soil, lead-contaminated paint that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency.

b. A risk assessment is an onsite investigation of a building for lead-based paint hazards. It includes, but is not limited to, a visual inspection; limited environmental samplings of dust, soil, and deteriorated paint; and a report of the results that identifies acceptable abatement and interim control strategies for controlling any lead-based paint hazards identified. The risk assessment can be performed only by a licensed and/or accredited risk assessor.

c. Risk assessment may be used as a tool to determine a course of action for renovation projects and individual building management plans. The risk assessment may be conducted to monitor identified hazards. The frequency should be based on dwelling specific criteria (e.g., types of hazards found, control actions taken, prior reevaluation results).

3-3. PROTECTION OF OCCUPANTS

a. Facility occupants will be protected as prescribed in the "HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," Abatement methods shall be designed to prevent or minimize any exposure to airborne lead dust during and after renovation activities. Family housing residents will also be protected in accordance with federal and state notification regulations. The project specific lead-abatement plan shall outline protective methods for each activity.

b. NO occupants or tenants shall remove or relocate any building components without permission from the DPW.

c. NO occupants or tenants shall remove any paint or re-apply lead based paint in any building without permission from the DPW

3-4. TRAINING AND EDUCATION

a. Required Training-

1) Fort Gordon personnel and contractors conducting lead-based paint activities on Fort Gordon, including sampling, writing management plans, and abatement activities shall be accredited or certified by the Environmental Protection Agency and licensed by the State of Georgia Department of Natural Resources.

2) Personnel conducting self-help projects shall receive training in accordance with appropriate Occupational Safety and Health Administration (OSHA) standards and Fort Gordon policy.

b. Installation Awareness and Education- Fort Gordon shall develop and implement an installation awareness and education program for building occupants that addresses hazards associated with lead in their respective areas. The program will also include information on proper management and identification of lead hazards, introduction to the building operation and maintenance program, and procedures for requesting repair of lead-based painted surfaces. The program shall be geared towards individuals who work in areas that have lead present, but are not expected to conduct repairs.

3.5. GENERAL HAZARD MANAGEMENT

a. In areas that are not likely to house children, LBP below 5000 ppm will be managed by means other than total removal.

b. LBP in any accessible areas that is above 5000 ppm will be totally removed and or eradicated by the most aggressive and safest means.

c. Lead-based paint hazards must be managed in accordance with “HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,” In-place management is preferred when feasible rather than abatement. In-place management means, when the lead source is not removed, but is left in place and the hazard is removed or significantly reduced by some means that prevents further deterioration of the lead-based paint. Examples would include applying a special coating to building components painted with lead-based paint, or mechanically attaching and sealing building materials over areas painted with lead-based paint. Projects which involve whole neighborhood revitalization or funds in the excess of $25,000 per unit in family housing are required by HUD to perform abatement.

d. If in-place management is selected as a management option, a building specific in place management plan is required. This plan outlines how lead-based paint hazards will be monitored and when necessary repaired, and which organizations are responsible for these actions. The plans will be maintained by the Lead-Based Paint Program Manger. In-place management may include controlling lead dust by specialized cleaning and routine cleaning activities, and repairing peeling or cracking paint. Abrasion or impact areas should be abated by removal, enclosed, or encapsulated per HUD guidelines.

CHAPTER 4

OPERATION AND MAINTENANCE PROGRAM

4-1. OPERATION AND MAINTENANCE PLANS

a. Operation and maintenance activities shall be conducted in accordance with applicable Federal, state, laws, and regulations, HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, and other appropriate industry standards. Maintenance activities may be conducted by Fort Gordon personnel or by contract employees. Persons conducting these activities must meet all applicable training accreditation and/or certification requirements. All maintenance activities involving Lead, shall be reviewed by the Lead-Based Paint Program Manger.

b. Written standard operation and maintenance procedures involving lead-based painted surfaces are maintained by the Lead-Based Paint Program Manger. These procedures shall outline the proper method for conducting routine maintenance activities within the building, training requirements, identification of lead hazards, and necessary documentation.

c. All projects involving lead in buildings meeting the definition of child-occupied or target housing must be conducted in accordance with all Federal, state, laws, regulations. This includes training requirements, and state licensing and certification. All work shall be conducted in accordance with HUD guidelines and other appropriate guidance.

4-2. MAINTENANCE ACTIVITIES

a. All demolition sites will be tested for LBP prior to demo. Sites containing LBP above the permissible exposure limits will be abated by ONLY certified abatement personnel. Sites with less than 100 ppm total lead or 5% TCLP will be managed in accordance with OSHA Guidelines. All maintenance activities will ensure that construction dust is kept to the very minimum.

b. All demo and/or renovation projects on Fort Gordon must be routed through the Work Control Section, DPW and cleared for compliance on a Record of Environmental Compliance (REC). The LBP assessment is verified and annotated on the REC.

c. LBP sample collection will only be done by trained and certified personnel. All analysis will be done by a licensed and certified laboratory.

d. HVAC systems ducts must be blocked in all construction areas to prevent the circulation of harmful dust into non-construction areas.

e. All construction/demo sites will be sealed against dust nuisances and positive pressure flows traveling outside the work area.

f. Maintenance activities may include building component replacement, wall or ceiling repair, plumbing, and ventilation repairs. Appropriate steps must be taken to minimize the release of lead dust. These activities are generally designed to repair or restore. In respect to lead-based paint, maintenance activities are defined as activities that can temporarily reduce lead-based paint hazards but are not designed to permanently eliminate them. Each project must be evaluated to determine when maintenance activities involving lead containing materials that require specialized training and licensed personnel.

g. Personnel assigned to conduct routine maintenance activities within their buildings will be trained in accordance with current Occupational Safety and Health Administration (OSHA) standards and Fort Gordon policy. Persons required to wear respiratory protection will obtain the proper certification and medical examinations prior to beginning any work.

4-3. SELF-HELP PROJECTS

a. Self-Help project does NOT include lead removal and disposal.

b. All self-help projects shall be evaluated individually by the Lead-Based Paint Program Manger to determine if they can be executed appropriately.

c. All personnel conducting self-help activities will be trained in accordance with current Occupational Safety and Health Administration (OSHA) standards and Fort Gordon policy.

d. Persons performing work in non-LBP areas that involves chipping, scraping and grinding are required to wear respiratory protection and will obtain the proper certification and medical examinations prior to beginning any work.

e. All Self-help (U-Do-It) purchase requests for paints will be accomplished on DA Form 4283, requesting ‘For Permission Only’ (FPO) and signed by the Director of DPW or designee.

f. Self-help projects in child-occupied and target housing are not permitted. These facilities are subject to full regulation under federal and state laws.

g. The purchase of paint containing more the .06% lead is restricted for any Fort Gordon project.

CHAPTER 5

WASTE MANAGEMENT

5-1. Waste Disposal

a. Disposing of wastes contaminated with lead or lead-based paint must be accomplished in accordance with Federal and state laws and regulations and Fort Gordon policy. A waste determination must be conducted to establish if the waste qualifies as hazardous under the Resource Conservation and Recovery Act requirements. All abatement and maintenance projects shall have a scope of work that outlines the collection, storage, and disposal destination of generated wastes.

b. If the total lead analysis is equal to or greater than 100 ppm, any debris created should be collected in bags (Ziploc for small quantities) and placed in a drum (recommend the smallest size possible). The generator will choose to:

(1) Have a Toxicity Characteristic Leaching Procedure (TCLP) done to determine if the debris is a hazardous waste, or

(2) Assume that the debris is a hazardous waste and dispose of in accordance with hazardous waste regulations.

c. Total lead level results less than 100 ppm do not require TCLP analysis and do not require bagging of debris. The debris must however, still be properly disposed of as solid waste.

d. Small, emergency type projects performed in non-child care facilities on possible LBP surfaces does not require certified abatement, notification or disposal, however must comply with all EPA and OSHA regulations for workers.

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APPENDIX A

Regulatory References

Code of Federal Regulations (CFR)

29 CFR 1910	Occupational Safety and Health Standards
29 CFR 1926	Occupational Safety and Health Standards for construction
40 CFR 260-265, and 270	Environmental Protection Agency Standards for management of hazardous waste
40 CFR 745	Lead-based paint Poisoning Prevention in Certain Residential Structures
49 CFR 172	Department of Transportation Regulations

HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing,

Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-24, “Lead-Based Paint Abatement, Certification and Accreditation

Army Regulation 200-1 Environmental Protection and Enhancement, December 2007
Army Regulation 420-70 Buildings and Structures, October 1997

APPENDIX B

Lead Hazard Management Team Members

Command	29808/ (706) 791-2181
Lead-Based Paint Program Manager	14600/ (706)791-5634
Environmental Branch, DPW	14600/ (706) 791-6374/9927
Occupational Health	300/ (706) 787-5124
Installation Safety Office	33720/ (706) 791-7233
Legal (JAG)	35203/ (706) 791-3148
Public Affairs Office	33720/ (706) 791-4306
Engineering Branch, DPW	14500/ (706) 791-3465
Operations and Maintenance Branch, DPW	14600/ (706) 791-6180
Public Works Division, DPW	14500/ (706) 791-3225
BASOPS	14608/ (706) 791-4749
Facility Management	14600/ (706) 791-6183
Housing Division	33720/ (706) 791-9658