



UNITED STATES MARINE CORPS
MARINE AIR GROUND TASK FORCE TRAINING COMMAND
MARINE CORPS AIR GROUND COMBAT CENTER
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CCO 5100.2G
MA C
FEB 26 2025

COMBAT CENTER ORDER 5100.2G

From: Commanding General
To: Distribution List

Subj: LEAD, ASBESTOS, AND MOLD CONTROL PROGRAM

Ref: (a) MCO 5100.29C
(b) OPNAV M-5100.23
(c) CCO 5090.1J
(d) 29 CFR 1910.1001
(e) 29 CFR 1926.1101
(f) 40 CFR 745
(g) 40 CFR 763
(h) 29 CFR 1910.1025
(i) 40 CFR 61 Subpart M
(j) MAGFTC/MCAGCC Lead, Asbestos and Mold Handling SOP
(k) MCO 5090.2 Volume 12

Encl: (1) Abatement Plan Checklist
(2) LAMMB Recommendations Routing Worksheet

1. Situation. Federal agencies are required to ensure all civilian and military personnel aboard federal installations follow federal, state, and local regulations as referenced in this Order. References (a) through (i) provide civilian and military personnel aboard the Marine Air Ground Task Force Training Command (MAGTFTC), Marine Corps Air Ground Combat Center (MCAGCC) with policy and procedural guidance governing the Lead, Asbestos and Mold Control Program. References (a) through (c) provide United States Marine Corps (USMC) policy and procedures for Lead, Asbestos and Mold management which include Environmental and Safety entities. Reference (d) through (i) are federal mandates for the management of Lead/Lead Containing Materials (LCM), Asbestos/Asbestos Containing Materials (ACM) and mold as hazardous pollutants and as occupational safety hazards. Reference (j) establishes Lead, Asbestos and Mold Handling Standard Operating Procedures for MAGTFTC, MCAGCC and will be routinely reviewed and updated by the Lead, Asbestos and Mold Management Board (LAMMB).

2. Cancellation. CCO 5100.2F.

3. Mission. To publish instructions for the conduct, recordkeeping, and reporting of the Lead, Asbestos and Mold Control Program.

4. Execution. Ensure all civilians, military personnel, and contractors aboard the Combat Center implement federal, state, and local regulations when lead, asbestos or mold are present or presumed present.

a. Commander's Intent and Concept of Operations

DISTRIBUTION STATEMENT A: Approved for public release; distribution is unlimited.

(1) Commander's Intent. To ensure that all Marines, civilians, and contractors operating aboard the Combat Center comply with this Order, the references, and the law.

(2) Concept of Operations

(a) Records will be maintained so that they can be located, reviewed, updated, and protected from damage. Records include, but are not limited to, Waste Shipment Records (WSR), training certificates, contracts, building inspection records, regulatory notifications, medical surveillance records, sampling records, and appointment letters. The Combat Center's LAMMB will meet quarterly to review all records.

(b) All Maintenance and custodial personnel and managers that work in a building that may contain lead or asbestos are required to be trained at an awareness level at the start of employment and annually thereafter. All personnel who have the potential to work with or disturb lead or asbestos must be trained and certified by an Environmental Protection Agency (EPA) or state accredited training program per references (a) through (c). Training for asbestos work will follow the Occupational Safety and Health Administration (OSHA) level I, II, or III training and will be completed annually. Lead training will follow OSHA guidelines and will consist of either: Lead Renovation, Repair, and Painting Training or Lead Worker. Training will be completed annually.

(c) Regardless of age, all facilities will have a survey conducted prior to any renovation or demolition. If a facility does not have a lead and asbestos survey, it will be presumed to have Lead Containing Material/Asbestos Containing Material (LCM/ACM) until proven otherwise. Reference (j) contains procedures to obtain survey information.

(d) Construction contracts and activities expected to disturb LCM and/or ACM must follow this Order, state, and federal regulations. A competent person certified with an EPA or state accredited Lead and Asbestos certification must supervise abatement work in regulated areas.

(e) Ensure National Environmental Policy Act (NEPA) documentation is included in all projects that are expected to disturb LCM/ACM. NEPA requirements can be found in references (j) and (k).

(f) Ensure Public Works Division (PWD) approval is obtained through the USMC Maximo Work Request system for all building renovations and modifications including any construction, demolition, renovation, or building modifications via self-help projects.

b. Subordinate Element Missions

(1) Director, Mission Assurance, Safety Office

(a) Appoint in writing an Installation Lead, Asbestos and Mold Safety Program Oversight Coordinator. The appointee will be certified by an EPA or state accredited training program per reference (a) for Lead Inspector/Risk Assessor, Asbestos Contractor/ Supervisor, Asbestos Building Inspector and Management Planner, and Mold Assessor. The appointee will be the point of contact for federal and local safety agencies. The appointee will chair the LAMMB. In the event of any unauthorized facility modification that disturbs presumed LCM/ACM, the Safety Program Oversight Coordinator will

maintain a timeline of events and gather recommendations from the LAMMB. Upon conclusion of an unauthorized event, the LAMMB will complete a causal map to determine the root cause of the significant event to be used for lessons learned.

(b) Ensure base-wide regulatory compliance by conducting frequent and regular inspections of facilities and work centers. Respond to lead, asbestos, or mold inspection requests to ensure safety of workers and building occupants.

(c) Provide oversight to the chair and co-chairs of the Combat Center's LAMMB ensuring validation of applicable regulatory requirements for all scheduled, unauthorized, or emergency lead, asbestos, and mold projects. Facilitate all routine updates and review of the Order with input from all LAMMB members. The LAMMB will ensure compliance with applicable regulations, completion, and documentation of the appropriate level of training for contractors and base personnel, regulatory notification, payment of appropriate fees, completion of sampling reports, and will review and approve sampling and abatement plans related to lead, asbestos or mold projects.

(2) Assistant Chief of Staff (AC/S), G-4 Installation Support (INST SUPP). Ensure that MAGTFTC, MCAGCC follows this Order and federal regulations for recordkeeping, documentation, and training.

(a) Environmental Affairs (EA)

1. Appoint in writing a Lead, Asbestos and Mold Program Manager for environmental oversight. The appointee will be certified by an EPA or state accredited training program for Lead Inspector/Risk Assessor, Asbestos Building Inspector and Management Planner, and Mold Assessor. The appointee will be the point of contact for federal, state, and local environmental agencies. The appointee will co-chair and support the LAMMB and assist with reviewing and approving lead, asbestos and mold sampling, and abatement plans. The appointee will ensure all annual training is completed for EA personnel in accordance with this Order.

2. Support the LAMMB with appropriate guidance for all scheduled renovation, demolition projects, and unauthorized facility modification aboard the installation.

3. In accordance with reference (c), coordinate turn-in and disposal of all LCM/ACM base-wide, provide related technical assistance, and maintain WSRs. EA is the only authorized agency aboard the Combat Center to review and sign all WSRs for LCM/ACM. All WSRs must be signed by the disposal site operator and returned to EA within 30 days of delivery of waste to a disposal site.

4. Provide Comprehensive Environmental Training and Education Program support for applicable environmental training needs associated with lead, asbestos, and mold. All personnel that may be in contact with LCM/ACM will be trained at the two-hour awareness level. Training will be completed on an annual basis.

(b) PWD

1. Appoint in writing a Lead, Asbestos and Mold Program Manager for PWD. The appointee will be certified by an EPA or state

accredited training program for Lead Inspector/Risk Assessor, Asbestos Building Inspector and Management Planner, and Mold Assessor. The appointee will provide Lead, Asbestos and Mold Program support for facility issues and PWD personnel. The appointee will co-chair the Combat Center's LAMMB. The appointee will be responsible for reviewing and approving lead, asbestos and mold sampling and abatement plans for the installation's non-construction activities.

2. Identify facilities that contain LCM/ACM and mold.

3. Manage LCM/ACM in place and maintain LCM/ACM in good condition. Ensure all contract specifications for renovation or demolition projects comply with this Order and all federal, state, and local regulations.

4. Post warning signs at the entrance of areas containing friable or thermal systems insulation ACM where personnel can be expected to enter. Signs must conform to federal regulation. Post warning signs at the entrance of areas containing lead in which personnel can be expected to enter. Signs must conform to federal regulation.

5. Ensure the LAMMB is included in all planning and program construction, demolitions, and renovations to include specifications for sampling, abatement, and disposal of LCM/ACM in accordance with this Order, federal, state, and local regulations. Ensure NEPA documentation is included in all contracts for construction that are expected to disturb LCM/ACM.

6. For facility renovations, notify each affected person as soon as possible, but no later than five working days after the receipt of the results of any lead, asbestos, or mold sampling. Within 10 days of the end of work completion, personnel will be informed of the presence, location, and quantity of LCM/ACM and mold remaining in their workplace.

7. All personnel that work on infrastructure/maintenance related work requests, inspectors and government monitors that work in a building that may contain lead or asbestos are required by the references to be trained at the awareness level at the start of employment and annually thereafter. Training for asbestos will follow OSHA level I, II, or III training and will be completed annually. Lead training will follow OSHA guidelines and will consist of either; Lead Renovation, Repair, and Painting or Lead Worker training, and will be completed annually.

8. Contract Representatives/ Supervisors and personnel writing abatement contracts will be certified by an EPA or state accredited training program for Asbestos Project Designer.

9. All abatement contract documents will be reviewed for accuracy by the LAMMB prior to commencement of the project. The government personnel overseeing the abatement contracts will complete the Abatement Plan Checklist, enclosure (1), and route it to the LAMMB Chair with the package. The abatement package will be submitted allowing at least 14 working days for LAMMB review.

10. In the event of any unauthorized facility modification that disturbs presumed LCM/ACM, PWD will provide facility related support as directed. Facility related support will include taping off and securing areas of buildings, securing any ventilation or facility controls, and

testing/abating any LCM/ACM disturbed through contracted support. All entry into areas known to contain disturbed LCM/ACM will be completed through contracted services. Asbestos and lead are presumed present unless recent surveys, less than a year old, show that the building material to be disturbed is not detected or below California thresholds for asbestos and/or lead. Special considerations can be made at the LAMMB's discretion in the event the results are over the timeframe from project delays. Extensions may be requested though the LAMMB chair and written confirmation will be received before renovations commence.

11. Ensure contractors notify the Mojave Desert Air Quality District (MDAQMD) 10 working days prior to commencement of all renovation and demolition projects and pay all necessary fees. If exempt from the notification requirement, a MDAQMD Asbestos Checklist documenting the exemption must be submitted to MDAQMD instead. Any asbestos or lead abatement project, regardless of scope, that requires negative pressure, or vacuum machinery will submit a permit to operate through MDAQMD at <https://www.mdaqmd.ca.gov/permitting/asbestos-information>. A copy of the approved permit(s) will be maintained on site.

12. Ensure contractors coordinate all disposal of LCM/ACM through EA.

(c) Facilities Engineering Acquisition Division (FEAD)

1. The FEAD Director will appoint in writing a Lead, Asbestos and Mold Program Manager for contract oversight. The appointee will ensure appropriate FEAD personnel receive two-hour Lead and Asbestos Awareness training at the start of employment and annually thereafter. The appointee will support the Combat Center's LAMMB. The appointee will be responsible for reviewing and providing input for lead, asbestos and mold sampling and abatement plans for the installation's construction activities.

2. Contract Representatives/ Supervisors and personnel overseeing abatement contracts will be certified by an EPA or state accredited training program for Asbestos Project Designer.

3. All abatement contract documents will be reviewed for accuracy by the LAMMB prior to commencement of the project. The government personnel overseeing the abatement contracts will complete the Abatement Plan Checklist, enclosure (1), and route it to the LAMMB Chair with the package. The abatement package will be submitted allowing at least 14 working days for LAMMB review.

4. Ensure contractors notify the MDAQMD 10 working days prior to commencement of all renovation and demolition projects and pay all necessary fees. If exempt from the notification requirement, a MDAQMD Asbestos Checklist documenting the exemption must be submitted to MDAQMD instead. Any asbestos or lead abatement project, regardless of scope, that requires negative pressure, or vacuum machinery will submit a permit to operate through MDAQMD at <https://www.mdaqmd.ca.gov/permitting/asbestos-information>. A copy of the approved permit(s) will be maintained on site.

5. Ensure contractors coordinate all disposal of LCM/ACM through EA.

(3) AC/S, Marine Corps Community Services (MCCS)

(a) Prior to all construction or renovations to MCCS facilities, MCCS and/or indirect service, contractors will coordinate with the LAMMB and inspect the building for LCM/ACM as per the references. Asbestos and lead are presumed present unless recent surveys, less than a year old, show that the building material to be disturbed is not detected or below California thresholds for asbestos and/or lead. Special considerations can be made at the LAMMB's discretion in the event the results are over the timeframe from project delays. Extensions may be requested though the LAMMB chair and written confirmation will be received before renovations commence.

(b) Appoint in writing a Lead, Asbestos and Mold Program Administrator for MCCS. The appointee will provide program support for MCCS facilities issues.

(c) Post warning signs at the entrance of areas containing friable or thermal systems insulation ACM where personnel can be expected to enter. Signs must conform to federal regulation. Post warning signs at the entrance of areas containing lead in which personnel can be expected to enter. Signs must conform to federal regulation.

(d) For facility renovations, notify each affected person as soon as possible, but no later than five working days after the receipt of the results of any lead, asbestos, or mold sampling. Within 10 days of the end of work completion, personnel will be informed of the presence, location, and quantity of LCM/ACM and Mold remaining in their workplace. Respond to disturbed areas and provide appropriate level of support as directed by the Safety Office, EA and PWD.

(e) Ensure the LAMMB is aware of all construction that is expected to or could potentially disturb LCM/ACM or mold at MCCS facilities in compliance with federal, state, and local regulations.

(f) All abatement contract documents will be reviewed for accuracy by the LAMMB prior to commencement of the project. The government personnel overseeing the abatement contracts will complete the Abatement Plan Checklist, enclosure (1), and send it to the LAMMB Chair with the package. The abatement package will be submitted with at least 14 working days for review.

(g) Ensure contractors notify the MDAQMD 10 working days prior to commencement of all renovation and demolition projects and pay all necessary fees. If exempt from the notification requirement, a MDAQMD Asbestos Checklist documenting the exemption must be submitted to MDAQMD instead. Any asbestos or lead abatement project, regardless of scope, that requires negative pressure, or vacuum machinery will submit a permit to operate through MDAQMD at <https://www.mdaqmd.ca.gov/permitting/asbestos-information>. A copy of the approved permit(s) will be maintained on site.

(h) All Maintenance and custodial personnel and managers that work in a building that may contain lead or asbestos are required by the references to be trained at a two-hour awareness level for each hazard at the start of employment and annually thereafter. All personnel who have the potential to work with or disturb lead or asbestos must be trained and certified. Training for asbestos will follow OSHA level I, II, or III training and will be completed annually. Lead training will follow OSHA

guidelines and will consist of either; Lead Renovation, Repair, and Painting or Lead Worker training, and will be completed annually.

(4) Staff Judge Advocate. In coordination with the Western Area Counsel Office, review and advise during the Combat Center lead, asbestos, and mold decision-making to ensure compliance with applicable laws and regulations. Advise the Commanding General and/or staff of appropriate action(s); provide legal advice for regulatory and legal actions involving lead, asbestos, and mold brought against the Combat Center and personnel acting within the scope of their employment.

(5) Tenant Commands. Each Commanding Officer (CO) will establish and implement awareness training, command inspection programs, and other internal controls to ensure compliance with applicable regulations set forth in this Order. Training will be completed on an annual basis.

c. Coordinating Instructions

(1) Enclosure (2) will be used to record and route the recommendations of the LAMMB.

(2) The LAMMB makes recommendations based on the expertise and knowledge of the members. Final decisions on actions taken will be made by the respective Commanders (O-5 or above) or by the AC/S, G-4 INST SUPP.

(3) Per enclosure (2), LAMMB recommendations, and dissenting views, will be forwarded and reviewed by the Directors of PWD, EA, Safety Office, the Naval Medicine Readiness and Training Command Twentynine Palms Public Health Officer if there is a health issue or potential for exposure, and in the case of a facility under the cognizance of MCCS, the AC/S of MCCS who will concur or non-concur with the recommendations.

(4) Enclosure (2) will then be forwarded to the Commander (O-5 and above) who has cognizance over the respective building/site or to the AC/S, G-4 INST SUPP in cases where the building/site is under the cognizance of MAGTFTC, MCAGCC.

(5) The Commander or the AC/S, G-4 INST SUPP will then make the decision on actions to be taken in response to a lead, asbestos, or mold incident.

5. Administration and Logistics

a. Reference (j) may be obtained at <https://www.29palms.marines.mil/Staff-Offices/Special-Staff/Mission-Assurance/Safety-Office/>.

b. Directives issued by this Headquarters are published and distributed electronically. Electronic versions of Combat Center directives can be found at <https://www.29palms.marines.mil/Staff-Offices/G-1-Manpower-Directorate/Adjutant/#combat-center-orders>.

6. Command and Signal

a. Command. This Order is applicable to all commands, organizations, units, and activities located aboard the Combat Center except as exempted above.

b. Signal. This Order is effective the date signed.



R. D. STORER
Chief of Staff

Distribution: A

Abatement Plan Checklist	
Yes/No (Page #)	Checklist Item
ABATEMENT PLAN REQUIREMENTS	
	1. Is there a detailed abatement plan?
	2. Is the plan prepared, signed, and sealed by the Private Qualified Person, including certification number and certification date?
	3. Does the plan include a drawing showing the location, size, and details of the regulated areas, including the following: <ul style="list-style-type: none"> <input type="checkbox"/> Location of the clean and dirty areas <input type="checkbox"/> Buffer zones <input type="checkbox"/> Showers <input type="checkbox"/> Storage areas <input type="checkbox"/> Changing rooms <input type="checkbox"/> Local exhaust equipment
	4. Does the plan include step-by-step details for the sequencing of abatement related work?
	5. Does the plan include a work area and breathing zone air monitoring plan?
	6. Does the plan include the precise personal protective equipment to be used?
	7. Does the plan specify the type of wetting agent to be used?
	8. Does the plan include both Fire and Medical Emergency response plans?
	9. Does the plan include a detailed description of the environmental pollution control method?
	10. Does the plan include a disposal plan?
ADDITIONAL ATTACHMENTS REQUIRED	
	11. Is the Decision Memorandum attached?
	12. Are copies of Mojave Desert Air Quality Management District (MDAQMD) permits for all asbestos/ lead abatement equipment (e.g., HEPA filters or negative air machines) attached?
	13. a. Is a copy of the Notification of Renovation/Demolition form, approved by MDAQMD, attached? 13. b. If notification is not required, is a copy of the Asbestos Checklist form, approved by MDAQMD, attached?
	14. Is the Laboratory Analysis of the hazardous material to be abated attached? (Sampling results)
	15. Are the supervisor and worker certifications to perform the work attached?
	16. Are the medical surveillance and fit test records attached?
	17. Is the Hazardous Waste Plan attached to include: <ul style="list-style-type: none"> <input type="checkbox"/> Waste stream profile (40 CFR requirement) <input type="checkbox"/> TSDF that waste stream will be shipped to <input type="checkbox"/> Name of hazardous waste transporter <input type="checkbox"/> Acknowledgment that notification to the Hazardous Waste Management Branch will happen on the date of waste stream shipment

LAMMB Recommendations Routing Worksheet

LAMMB MEMBERS PRESENT:

PWD: _____

EA: _____

Safety Office: _____

NH Public Health: _____

SUMMARY OF INCIDENT:

LAMMB RECOMMENDATIONS:

LAMMB DISSENTING OPINIONS:

DIRECTOR ROUTING:

Director, PWD: Concur_____ Non-Concur_____

Comments:

Director, EA: Concur_____ Non-Concur_____

Comments:

Director, MA: Concur_____ Non-Concur_____

Comments:

AC/S, MCCS *(if a MCCS facility)*: Concur_____ Non-Concur_____

Comments:

NH Public Health Officer: Concur_____ Non-Concur_____

Comments:

CO or AC/S, G-4 INST SUPP: Concur_____ Non-Concur_____

Comments:

Signature: _____