



Standard Operating Procedure

MAGTFTC, MCAGCC Twentynine Palms

Asbestos Handling

Date: 8 October 2020

1.0 Purpose and Scope

This procedure provides instructions relating to asbestos handling at the Marine Air Ground Task Force Training Command (MAGTFTC), Marine Corps Air Ground Combat Center (MCAGCC) Twentynine Palms. It covers renovation and demolition activities which disturb or have the potential to disturb asbestos at the facility. Base personnel and contractors are required to comply with these requirements.

2.0 Overview

This procedure outlines compliance at MAGTFTC, MCAGCC Twentynine Palms in regards to handling of asbestos containing materials or suspected asbestos containing materials during renovation and demolition activities. It provides guidance to comply with applicable requirements associated with the Occupational Safety and Health Association (OSHA) and the Mojave Desert Air Quality Management District (MDAQMD) Asbestos Program.

3.0 Applicability

This procedure applies to all renovation, construction, and demolition activities at MAGTFTC, MCAGCC Twentynine Palms that have the potential to disturb asbestos.

4.0 Responsibilities

Center Safety shall:

- Functions as the Installation Asbestos Program Managers and Coordinate with appointed Asbestos Program Managers;
- Lead the Asbestos Management Team (AMT) - coordinate, organize, implement, review abatement plans, and track the Base-wide effort to maintain compliance with asbestos related requirement;
- Provide applicable OSHA Guidance as it pertains to Asbestos related projects and actions; and
- Comply with Combat Center Order 5100.2_.

Environmental Affairs shall:

- Coordinate with appointed Asbestos Program Manager;

- Assist with Asbestos Management Team lead - coordinate, organize, implement, review abatement plans and track the Base-wide effort to maintain compliance with asbestos related requirement;
- Provide applicable regulatory guidance to include the Mojave Desert Air Quality Management District (MDAQMD) for Renovation and Demolition projects and the Resource Conservation and Recovery Act (RCRA) for proper disposal of hazardous waste associated with ACM; and
- Comply with Combat Center Order 5100.2_.

Contractors shall:

- Furnish records, including certification documents and analytical report to the AMT upon request.
- Complete and submit abatement plan for review by AMT prior to start of project.
- Comply with all regulatory requirements pertaining to asbestos, renovation, construction and demolition activities, including submission of all required notifications to MDAQMD and OSHA.
- Comply with Combat Center Order 5100.2_.

Public Works Division shall:

- Communicate regularly with the AMT to address asbestos related compliance concerns and to obtain information and assistance on complying with regulatory requirements, including notification submittal prior to the start of work.
- Assist with Asbestos Management Team lead - coordinate, organize, implement, review abatement plans and track the Base-wide effort to maintain compliance with asbestos related requirement;
- Coordinate for sampling and analysis of PACM for routine and unauthorized renovation projects. Respond to work areas with ACM and provide support and directed by Center Safety, Public Work Division, and or the Environmental Affairs Office.
- Comply with Combat Center Order 5100.2_.

Navy Medicine Readiness and Training Command Twentynine Palms (NMRTCTP)

- Communicate regularly with the AMT to address asbestos related compliance concerns and to obtain information and assistance on complying with regulatory requirements, including notification submittal prior to the start of work.
- Assist with Asbestos Management Team lead - coordinate, organize, implement, review abatement plans and track the Base-wide effort to maintain compliance with asbestos related requirement;
- Coordinate for sampling and analysis of PACM for routine and unauthorized renovation projects. Respond to work areas with ACM and provide support and directed by Center Safety, NMRTCTP, and or Environmental Affairs Office; this could include temporary sealing rooms and isolating Air Conditioning units.

- Comply with Combat Center Order 5100.2_.

Facility Engineer and Acquisition Division (FEAD) shall:

- Communicate regularly with the AMT to address contractor compliance concerns and update the AMT regarding renovation, construction, or demolition activities scheduled at MAGTFTC, MCAGCC Twentynine Palms.

5.0 Requirements

MDAQMD requires the completion of a building survey prior to any demolition or renovation activities for the presence of any asbestos materials. The required facility survey must include the inspection, identification, and quantification of all friable Class I and Class II non-friable asbestos containing material and any physical sampling of materials. The survey must be conducted by a Certified Asbestos Consultant to determine asbestos content. Samples must be taken for all insulation removal, unless the material is assumed to be Asbestos Containing Material (ACM). Asbestos must be removed prior to activities that may disturb it. All asbestos must be removed prior to demolition.

MDAQMD and Occupational Safety and Health Administration (OSHA) require notifications. Notifications and fees to MDAQMD must be postmarked 10 working days prior to start of work. FEAD is to ensure that contractors notify the MDAQMD as required.

Planned Notification Requirements are for non-scheduled asbestos removals of less than 160 square feet due to equipment breakdown or maintenance. A notification for these small projects that may occur in a calendar year must be made annually. Removals of greater than 160 square feet require separate notification.

Contractors must follow all requirements for asbestos abatement, monitoring, and waste disposal as required by federal, state, and local laws.

ACM must be removed prior to demolition or renovation with only approved removal procedures. There are five procedures that may be used:

1. Removal within containment
 - a. Cover non-working surfaces.
 - b. The isolated area must be free of gaps and tears and be airtight.
 - c. Air movement must be restricted
 - d. Containment area must have viewing ports.
 - e. Work area must be filtered with a high-efficiency particulate air (HEPA) system.
 - f. HEPA filters must be free of tears or damage.
 - g. Wetting of ACM must occur during removal.
2. Glovebag or mini enclosures
3. Wetting, drop cloths, tenting, and manual removal
4. AQMD-approved dry ACM removal (with proof of approval)
5. AQMD-approved alternative techniques (with proof of approval)

Contractors are responsible for ensuring that all employees have the required training and personal protective equipment (PPE), including respirators and Tyvek. Asbestos must be handled in full containment or Glovebag procedures 29 CFR Section 1926.5877(g), Appendix G and Cal/OSHA requirements. Work area must be barricaded to protect surrounding employees. All surfaces in the work area shall be cleaned with a vacuum system utilizing HEPA filtration, wet mopping and wipe down with water, prior to dismantling plastic barriers or sealed openings.

Each HEPA filter or other control device used to ventilate an area must obtain a Permit to Operate from MDAQMD and pay the fee for an air pollution control device as required by MDAQMD Rule 301 (E)(7)(h).

Labeling, Storage and Transportation Requirements

ACM must be handled carefully without damaging or disturbing it. Waste must be lowered to the ground via a leak tight chute if less than 50 feet. The waste must be wetted or encapsulated. Waste must be collected and placed in leak-tight transparent bags, and must be properly labeled and marked.

Waste manifests must be completed properly and return copies received from the Treatment, Storage and Disposal Facility (TSDF) within 45 days or and manifest correction letter or exception report must be submitted. Only approved landfills can be used.

Copies of surveys, notifications, training certifications, monitoring and calibration records, and waste manifests must be kept on site and available for review.

Unauthorized Renovation

In the case where unauthorized renovations have occurred that may have impacted ACM, the following steps should be taken:

1. All work in the area that may disturb ACM should be immediately suspended.
2. Notify Center Safety.
3. The area where the work occurred should be isolated.
4. Avoid disturbance of any debris. Do not attempt to clean up dust or debris.

The Asbestos Management Team will make a determination as to whether a release of ACM has occurred and the proper actions to be conducted. Follow-up actions may include: ACM debris clean up by properly trained workers using appropriate methods and equipment; environmental testing that may include bulk or wipe sampling and area air monitoring; and notification to MDAQMD if required.

If asbestos removal work has been conducted already and there is a possibility that an employee has been exposed to asbestos above the Permissible Exposure Limit or Action Level, this exposure must be reported to OSHA. Decontaminate anyone who is contaminated with dust and debris using a HEPA filtered vacuum. Dispose of clothing or PPE properly.

Cal/OSHA and MDAQMD would require notification if the cleanup or removal of a significant amount of ACM debris must be done. If ACM has been transported to a landfill, the landfill should be notified, including dates, amounts and a description of the material that was transported.

6.0 MAGTFTC, MCAGCC Twentynine Palms Points of Contact

Installation Asbestos Program Manager	Center Safety Office 760-830-8466
Environmental Affairs Asbestos Program Manager	EA 760-830-8480 760-830-7774
Public Works Asbestos Program Manager	PWD/FEAD 760-830-3198
MCCS Asbestos Program Manager	MCCS 760-830-4210
Occupational Health Technician	Twentynine Palms NMRTCTP 760-830-2697
Public Works Trouble Desk	760-830-6271
Hazardous Waste Manager	EA 760-830-5403

7.0 References and Resources

US Department of Labor. 29 CFR Section 1910, 1926.1101.

MDAQMD. Rule 302 Other Fees: <http://mdaqmd.ca.gov/rules/rule-book/regulation-iii-fees>

MDAQMD. Rule 301 Permit Fees: <http://mdaqmd.ca.gov/rules/rule-book/regulation-iii-fees>

MDAQMD. Forms: <http://mdaqmd.ca.gov/permitting/forms>

The Cal/OSHA notification site and forms, <https://www.dir.ca.gov/dosh/asbestos.html>.

ASBESTOS

KNOW THE FACTS BEFORE YOU ACT



Asbestos is a naturally occurring mineral fiber that was historically used in various building materials before its dangerous health effects were discovered.



What is the HAZARD?

- ✓ Asbestos fibers can be released into the air during activities that disturb asbestos-containing materials.
- ✓ Once airborne, asbestos fibers can be inhaled.
- ✓ Asbestos is a known human carcinogen and can cause chronic lung disease and/or cancer. Adverse health effects can take many years to develop following exposure.

Where is the HAZARD?

Some building materials are presumed to contain asbestos. Examples of these materials include:

- Thermal system insulation
- Roofing and siding shingles
- Vinyl floor tiles
- Plaster, cement, putties and caulk
- Industrial pipe wrapping
- Heat-resistant textiles

Call before you act!

Public Works • 760-830-6271
Center Safety • 760-830-8467
Environmental • 760-830-8480

