

FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
ACCOMPLISHMENT OF ASBESTOS AND LEAD-BASED PAINT
“ABATEMENT RESPONSE ACTIONS”

1. **Purpose and Scope:**

An asbestos and/or lead-based paint (LBP) abatement action (generally removal of the material) is often required where damage to the material creates an elevated risk to the occupants of the facility. Removal may also be required to support other work such as maintenance, repair, construction, and/or demolition efforts. The intention of this guidance is to inform and aid those who are needing an abatement action.

2. **References:** None

3. **Definitions:**

a. **Asbestos:** Asbestos is a group of naturally occurring minerals that separate into fibers. Using asbestos in building products have enhanced it's properties. When conducting an asbestos survey, we are actually surveying for the presence of asbestos containing material (ACM). ACM means any material or product that contains more than one percent asbestos.

b. **Asbestos Abatement Response Action:** This is the response action to an ACM that has been damaged and presents a risk to occupants. This action, for the most part, has been removal of that material. Accomplishment of this action must be by EPA certified abatement workers. There are other actions that are possible; the O&M action is always the action until one of the response actions are required. Response action alternatives fall into five main categories:

Encapsulation - the use of an agent to seal the surface or penetrate the bulk of ACM.

Enclosure - a resilient structure, built (or Sprayed) around ACM designed to prevent disturbance and contain released fibers.

Operations and Maintenance - cleaning work practices and periodic surveillance to maintain ACM in good condition, and minimizing and controlling ACM disturbance.

Removal - stripping ACM from its substrate.

Repair - returning damaged ACM to an undamaged condition or to an intact state through limited replacement and patching.

c. **Lead-Based Paint:** This includes paint or another similar surface coating material containing lead or lead compounds (for survey purposes, LBP would include paint already applied or in situ as opposed to paint in liquid form). When testing existing paint on surfaces, LBP is any paint that tests equal to or greater than 1.0 milligram/cm² when using the X-Ray Fluorescence analyzer or 0.5% by weight (or 5,000 ppm) when using Atomic Absorption Spectroscopic analysis.

d. **Lead-Based Paint Abatement Response Action:** The response action to a LBP that in chipping badly or presents a risk to occupants, it appears, will also for the most part been removal of that material. Accomplishment of this action must be under the supervision of an EPA certified abatement supervisor using trained workers. There are other actions that are possible, again with "maintenance controls" always the action until one of the response actions are required. Response action alternatives fall into four categories:

Full Abatement - removal of the LBP. This would include:

-- Component Removal - Controlled removal of LBP and substrate.

-- Enclosure - Installation of a rigid, durable barrier that is mechanically attached to the building component with the edges and seams sealed.

-- On-Site Removal - Controlled removal of the LBP from the building component while it remains in place.

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-- Off-Site Removal - Controlled removal of the LBP from the building component off-site.

Interim Controls - Paint stabilization, clean-up of surfaces, dust removal, surface treatment

Intermediate Controls (Encapsulation) - not a permanent solution, a coating of the material.

Maintenance Controls - specialized resident / worker protection measures designed to manage maintenance lead hazards.

4. General:

a. It is Army policy to manage asbestos containing material (ACM) and LBP in place as long as practical. It is Fort Campbell's intention to remove ACM and LBP when it is a potential threat to personal health; and/or, as necessary to comply with applicable regulations and/or whenever it is opportune to do so.

b. It is also an Army goal to survey all Army buildings for asbestos and designated target facilities for LBP. Those buildings not already surveyed for asbestos are in progress. Target facilities, for LBP management, are basically those where small children may live or spend a lot of time; these are Army Family Housing Units, schools, and child care facilities build prior to 1978. On Fort Campbell, we have thus far surveyed all target facilities except schools. Granting requests are unlikely for a quick turnaround survey in support of building management only. Surveys for building management purposes are complete for most building on Post; with the exception of newly constructed facilities, the remainder of surveys were completed in October 1996. Before pursuing an abatement action, the survey will be consulted to first check to ensure that the material is asbestos or lead containing. Accomplishment of a survey, if needed, also may support an abatement action.

c. Normally, abatement response actions, unless an emergency, are scheduled in a sufficient time to support the maintenance, repair, construction, and/or demolition to follow. An emergency is one in which the occupants are experiencing an immediate, unreasonable risk of exposure to asbestos fibers or lead containing paint/dust. An emergency abatement action will normally be initiated within 48 hours as resources are available. Abatement actions most often require removal of nonessential materials from the work area, and always controlled personnel access.

5. Responsibilities:

The EQO is responsible for ensuring that building managers have appropriate information as to how to initiate and track and asbestos or LBP abatement request.

6. Instruction:

The following, outlined in chronological order, designate the tasks necessary to accomplish asbestos and/or LBP abatement response actions. Identification of the action person or office is shown using all capital letters. Also included and the end of this Instruction is a flowchart that I trust more simply describes this process.

Task 1: REQUESTER prepares and submits Work Request (DA Form 4283).

Task 2: PWBC / SERVICE DIVISION (SD) / SUPPORT BRANCH (SB) /

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STATUS CLERK loads Work Request into computer and monitors status (Requester calls Status Clerk for status at 798-9722).

- Task 3: PWBC / SD / SB / CUSTOMER SERVICE REPRESENTATIVE determines if an asbestos and/or LBP survey has already been done. If a survey is required, the CUSTOMER SERVICE REP. determines whether abatement is to be accomplished In-House or by contract.
- Task 4: If have adequate survey, the CUSTOMER SERVICE REP. is to see tasks 10 and 11 below and act appropriately (If not, forward survey request to Contract Branch).
- Task 5: PWBC / SD / CONTRACT BRANCH (CB) submits to Environmental Division for survey consideration (if have adequate survey, see task 10 below).
- Task 6: PWBC / Environmental Division (ED) / INSTALLATION ASBESTOS AND LBP PROGRAM MANAGER also determines need for survey and submits facilities to be surveyed as required and as funds are available.
- Task 7: The SURVEY CONTRACTOR accomplishes survey per contract requirements.
- Task 8: PWBC / ED / INSTALLATION ASB. & LBP PROGRAM MANAGER files copy of survey into Division official files while another is forwarded.
- Task 9: CB advises Status Clerk.
- Task 10: PWBC / SD / CB / REQUIR. CONTRACT REP. issues Delivery Order for contractor abatement.
- Task 11: PWBC / SD / SB / CUSTOMER SERVICE REP. issues Phase for In-House Team abatement.

7. Additional Guidance:

- a. For additional guidance and information, and answers to your questions, contact PWBC Environmental Division, 798-9637 / 9597.

- b. For future reference, place this document behind *Tab number 2* in your Fort Campbell Environmental Handbook.