
FORT CAMPBELL ENVIRONMENTAL HANDBOOK
Guidance and Instruction
DISPOSAL OF ASBESTOS CONTAINING BRAKE SHOES

1. **Purpose and Scope:**

The purpose of this guidance and establish responsibilities for proper handling, accounting, and disposal of asbestos containing brake shoes.

2. **References:** Occupational, Safety, and Health Administration (OSHA)

3. **Definitions:**

Asbestos Containing Material (ACM): ACM, in this case brake shoes, is that which contains more than one percent asbestos.

4. **General:**

- a. Many of the new and replaced automotive brake shoes on Post contain asbestos. Unless identified as asbestos free, assume brake pads are asbestos containing.
- b. Accomplish removal of asbestos containing building materials by EPA certified workers. However, equipment and equipment parts containing asbestos, like asbestos containing brake pads, may be handled by uncertified workers. Still, take care not to damage the new or replaced brake pads and thereby possibly release asbestos fibers. Preventive Medicine / Industrial Hygiene, 798-8693/7286, in conjunction with OSHA guidance has recommended procedures for reducing asbestos dust during brake service. Obtain this guidance from Industrial Hygiene. Follow one of these two prescribed methods for all such operations on Post.
- c. OSHA requires respirator use where the asbestos in the air, per air monitoring, exceeds the permissible exposure limit of .1 f/cc. If respirators are required, then physicals for workers, as prescribed by OSHA, would also be necessary. Additionally, accomplish air monitoring by a person or persons and lab holding proper credentials. A contractor is to provide their own medical monitoring and/or air sampling as required by OSHA. This service is provided for military and civilian Government employees. Further, it is highly recommended that sampling and analysis be accomplished by contractors to give them a baseline as to what air fiber concentrations may be during their preferred removal method. Government functions, through coordination with the Industrial Hygiene office, will be provided this service. If baseline air monitoring were not done and there were a problem with asbestos fiber concentrations, than the contractor or Government would be placing themselves in a knowingly unjustifiable situation. Air monitoring may be a one time requirement, unless their method of brake shoe removal and replacement changes or the baseline sampling demonstrates elevated levels of asbestos in the air.

5. **Responsibilities:**

The EQO is responsible for ensuring that Unit maintenance personnel, involved in brake shoe replacement, have this information.

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6. Instruction:

- a. Once brake pads are replaced using one of two methods, as given by the Industrial Hygiene office, double wrap brake pads in 6 mil. or thicker plastic and seal with duct tape for disposal.

- b. After sealing, brake pads may either be taken to the Defense Reutilization and Marketing Office (DRMO) or the Solid Waste Convenience Centers. DRMO is located in Bldg. 5212. Brake shoes may be brought to DRMO on Monday or Tuesday 0730-1500 hours without an appointment or Wednesday through Friday by appointment only. DRMO's phone number is 798-4740. The locations of the Solid Waste Convenience Centers are Stillwell and Airborne St (open Sunday through Saturday, except holidays, 0600-1700 hours) or 47th and Market Garden. (open Monday through Friday, except holidays, 0830-1700 hours).

- c. DRMO also requires that brake pads be accompanied by a completed DD Form 1348-1A.

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.