



<i>Environmental Guideline</i> <b>Internal Asbestos / Lead Based Paint</b>	
<i>Document Identification Number:</i>	CCD-301.03.16
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<i>Contact Person:</i>	Steve Gonzales (DEQ)
<i>Controlled Copy Location:</i>	Not applicable.

<b>Activity Description</b>
<p>This activity manages asbestos-related issues for the City and County of Denver municipal operations. It works collaboratively with all agencies that may encounter asbestos-containing materials (ACMs) or could have asbestos compliance issues relative to asbestos regulations in the course of their daily operations.</p> <p>Examples of typical City activities triggering compliance issues are:</p> <ul style="list-style-type: none"><li>○ HVAC repairs disturbing friable ACMs</li><li>○ Plumbing repairs disturbing ACMs</li><li>○ Electrical repairs disturbing ACMs</li><li>○ General building renovation</li><li>○ Building demolitions</li><li>○ Recreation center building maintenance that may impact or disturb ACM</li><li>○ Fire station building maintenance that may impact or disturb ACM</li><li>○ Flooring replacement activities that may impact or disturb ACM</li><li>○ Irrigation pipe repair or water pipe repair by Public Works, Parks and Recreation, etc.</li><li>○ Fleet maintenance involving automotive ACM parts</li><li>○ Routine building maintenance and custodial activities contacting ACMs</li><li>○ Denver Fire Department training activities</li><li>○ Emergency repairs</li><li>○ Identification of unknown materials, which could be considered suspect asbestos-containing material</li></ul> <p>Goals of the program:</p> <ul style="list-style-type: none"><li>● To protect the public health as well as the health of City employees who may encounter airborne asbestos fibers in city facilities, properties, or leased space;</li><li>● To ensure compliance with applicable City Mayoral Executive Orders, and federal and state environmental laws, standards, and guidelines pertaining to asbestos;</li><li>● To identify and mitigate potential City liability with respect to asbestos-containing materials;</li><li>● To incorporate operations and maintenance (O&amp;M) plans using appropriate elements of nationally recognized consensus standards; and</li><li>● To ensure effective and efficient use of internal and external resources and expertise.</li></ul>

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**Potential Environmental Risks**

The following environmental concerns are associated with this activity:

- Improper disposal of contaminated media
- Contamination of clean soils
- Contamination of air
- Contamination of surface water
- Generation of hazardous wastes

Potential consequences from performing the activity incorrectly:

- Property damage, personal injury, damage to the environment.
- Possible regulatory non-compliance,
- Delays to other agencies' project schedule
- Financial liability related to contamination or improper waste disposal of asbestos-containing materials

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**Critical Operating Requirements**

<b>A. General Requirements</b>	
<b>Prohibited Activities</b>	
<ul style="list-style-type: none"> <li>Any city generated activity, maintenance or otherwise, that violates the USEPA Asbestos Worker Protection Rule, State Regulation No. 8, and the stringent Maximum Allowable Asbestos Limit (MAAL) air monitoring for public spaces.</li> <li>Improper disposal of asbestos-containing media</li> </ul>	
<b>General Considerations</b>	
<ul style="list-style-type: none"> <li>Asbestos Program Manager must be aware of asbestos-related compliance issues and regulations related to city activities.</li> <li>City agencies must inform Asbestos Program Manager of impending projects that may impact asbestos-containing materials.</li> <li>Conduct and/or review asbestos inspections for all existing City facilities or those proposed for acquisition by City. The Department of Environmental Health may require that property acquisition funds be used to fund asbestos inspections; Prepare and implement facility-specific O&amp;M plans for those facilities where ACM is to be managed in place;</li> <li>Conduct annual 2-hour asbestos awareness training for city personnel specified by appropriate agency management;</li> <li>Provide management and oversight of asbestos abatement projects;</li> <li>Assist and coordinate with city agencies on asbestos management issues;</li> <li>Conduct abatements associated with efforts to reduce or eliminate potential asbestos fiber exposures to employees and the public when DEQ determines potential exposure is possible due to deterioration and/or potential disturbance of asbestos-containing material. It shall be the responsibility of DEQ to assess the risk, prioritize responses, and take or recommend appropriate action in such cases; and</li> <li>Conduct any &amp; all spill response actions.</li> <li>This Environmental Guideline is meant as guidance only and does not supersede any regulations.</li> </ul>	
<b>Training Requirements</b>	
<ul style="list-style-type: none"> <li>Individual inspector training – All field inspectors must have at a minimum the Building Inspector/Management Planner certification via the Colorado Department of Environmental Health. This is an annual certification.</li> <li>Janitorial and maintenance staff must have annual asbestos awareness training</li> </ul>	
<b>Storage &amp; Material Handling Requirements</b>	
N/A	

<b>B. Planning Requirements</b>	Responsible: Asbestos Program Manager
B1. Identify City-owned projects that may impact asbestos-containing materials.	
B2. Secure access into buildings prior to investigation.	
B3. Understand project schedules and work with City agencies to minimize delays on project.	
B4. Have appropriate personal protective equipment (PPE) available.	

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<u>C. Critical Tasks</u>	Responsible: Asbestos Program Manager
C1. Any and all abatement activities performed in junction with the City shall be at the direction of the Asbestos Program Manager.	
C2. The City's on-call abatement contractor shall perform all asbestos related activities.	
C3. Consultant oversight and air monitoring of abatement activities shall be at the direction of the Program Manager.	
C4. Recorded keeping and documentation shall be the responsibility of the Program Manager.	
C5. Conduct and/or review asbestos inspections for all existing City facilities or those proposed for acquisition by City.	
C6. Use PPE as necessary.	

<u>D. Emergency Response</u>	Responsible: Asbestos Program Manager
D1. If an asbestos spill occurs, refer to Environmental Guideline Spill Response. <ul style="list-style-type: none"><li>• <b>Call the DEH Asbestos program Manager's 24-hour emergency number at 303-880-0981 (alt. # 720-290-9383).</b></li><li>• <b>Call the City's on-call abatement contractor 24-hour emergency number at 1-800-930-0011.</b></li><li>• <b>In conjunction, call one of the City's asbestos consultants for onsite response: Gobbell Hays Partners at 303-919-7139, HWS at 303-887-4597, or Walsh at 303-944-4140.</b></li></ul>	
D2. Have affected area/building shut down all HAVC until abatement actions have concluded.	
D3. Evacuate all personnel within the effected area and restrict access.	

<u>E. Inspection &amp; Maintenance Requirements</u>	Responsible: Asbestos Program Manager
E1. Initial building survey to identify ACM, its condition, and potential of risk.	
E2. Scheduled re-inspections to assess condition and potential risk of ACM.	
E3. Asbestos awareness training for authorized personnel who routinely interact with ACM.	

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<b>Expected Records / Outputs</b>	
<u>Record / Output</u>	<u>Instructions</u>
Reports from asbestos consultants and closeout documentation from asbestos contractors.	<ul style="list-style-type: none"> <li>• Notify City Clients as needed with appropriate memos and/or records.</li> <li>• Final all documentation is designated file area.</li> </ul>
Waste disposal records (profiles, LDR forms, manifests, sample results, etc.).	<ul style="list-style-type: none"> <li>• Manifests forms can be obtained from the Asbestos Program Manager.</li> <li>• Operator must maintain waste management records at the facility for a minimum of 3 years</li> </ul>
Evidence of training	While formal certifications are not always necessary, some form of "proof of training" (such as sign-in sheets and handouts) is expected and should be maintained on file by the Asbestos Program Manager.

<b>References</b>
<p><u>Phone Numbers</u></p> <ul style="list-style-type: none"> <li>• DEH DEQ..... (720) 865-5400</li> <li>• Bill Benerman (DEQ Environmental Scientist Supervisor) ..... (720) 865-5436</li> <li>• Steve Gonzales (DEH DEQ Asbestos Program Manager) ..... (720) 865-5447</li> <li>• <b>Asbestos Program Manager (24-hour emergency #)..... (303) 880-0981</b></li> <li>• Program Manager (alternate contact #) ..... (720) 290-9383</li> <li>• <b>On-call abatement contractor (24-hour emergency #) ..... 1-800-930-0011</b></li> </ul> <p>Asbestos consultants for onsite response:</p> <ul style="list-style-type: none"> <li>• <b>Gobbell Hays Partners ..... (303) 919-7139</b></li> <li>• <b>HWS ..... (303) 887-4597</b></li> <li>• <b>Walsh (303) 944-4140 ..... (303) 944-4140</b></li> </ul> <p><u>Guidance Materials (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>• "Managing Asbestos in Place – A Building Owner’s Guide to Operations and Maintenance Programs for Asbestos Containing Materials”, USEPA "Green Book"</li> </ul> <p><u>Training Materials (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>• 2 – Hour Awareness Training PowerPoint Presentation</li> </ul> <p><u>Related Environmental Guidelines (list not limited to the following)</u></p> <ul style="list-style-type: none"> <li>• None identified.</li> </ul>

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## **References**

### Applicable Regulations (list not limited to the following)

#### **Federal:**

- Toxic Substances Control Act of 1986, Subchapter II - Asbestos Hazard Emergency Response Act, and subsequent revisions, including the Asbestos School Hazard Abatement Reauthorization Act of 1990 (15 USC 2646)
- USEPA Asbestos Worker Protection Rule; Final Rule (40 CFR 763 Subpart G)
- USEPA National Emission Standards for Hazardous Air Pollutants (NESHAPs); Asbestos NESHAP Revision and Final Rule (40 CFR Part 61 Subpart M)

#### **State:**

- Colorado Department of Public Health and Environment, Regulation No. 8, Part B – Emission Standards for Asbestos
- Colorado Department of Public Health and Environment Solid Waste Regulations (6 CCR 1007-2)
- *Section 5 of the solid waste regulations includes regulations on packaging of asbestos for disposal and disposal criteria for landfills.*

#### Other Documents

- Compliance Bulletins
- CCoD Executive Order 65 - City Agencies Must Comply with OSHA Standards
- CCoD Executive Order 115 – All Asbestos Wastes Generated by Removal Actions Performed by the City are Required to be Disposed of at the Denver Arapahoe Disposal Site