ASBESTOS LOCATION O&M PROGRAM

HYBLA VALLEY FEDERAL BUILDING
6801 TELEGRAPH ROAD
ALEXANDRIA, VIRGINIA

OPERATION AND MAINTENANCE PROGRAM
FOR
LOCATION OF ASBESTOS-CONTAINING MATERIALS

Prepared For
Washington Headquarters Services
1301 South Gate Road
Arlington, Virginia 22202

June 25, 2014 Revision

CONTENTS

Page

INTRODUCTION 1
- Background Asbestos Information 1
- Asbestos Policy 2
- Summary of O&M Program 3

ASBESTOS IDENTIFICATION 4

KEY PERSONNEL 7

TRAINING 8

OPERATIONS AND MAINTENANCE GUIDELINES 9
- Specific O&M Procedures 9
- Notification of Outside Contractor 10

RECORD KEEPING 11
- Periodic Surveillance Reports 11

OTHER PROCEDURES 12
- Periodic Surveillance 12
- Emergency Situations 12

APPENDICES

APPENDIX A Floor Plans

APPENDIX B Photographic Documentation

UNITED STATES COURT OF MILITARY APPEALS

INTRODUCTION

1. Background Asbestos Information

a. Asbestos is a mineral, mined from the earth in much the same way as other minerals such as iron, lead and copper. There are two general types of asbestos rock: serpentine and amphibole. Chrysotile asbestos is derived from serpentine rock. Chrysotile, sometimes called white asbestos, has very thin fibers that are soft and flexible. Approximately 95 percent of the asbestos used in the United States are the chrysotile type, and its primary applications are in textile, high-strength cement products, and insulating materials.

Amphibole asbestos, which has thicker, harder fibers than chrysotile asbestos, includes several subcategories: amosite, crocidolite, anthophyllite, actinolite, and tremolite. Amosite asbestos, sometimes called brown asbestos, is used widely in insulating materials, plastics, textiles, and construction products. It has the longest fibers of all types of asbestos, and its resistance to acid and heat is particularly high. For that reason, amosite is often found in buildings as insulation on high-temperature heating equipment such as boilers and exhaust stacks. Crocidolite or “blue” asbestos is also very resistant to acid and to the effects of outdoor exposure. It is used in textiles and high-strength cementitious products. Anthophyllite, actinolite, and tremolite asbestos have brittle fibers and, therefore, limited applications.

b. Asbestos was not used extensively in building materials until the 1940's. During the post WWII building boom, from 1950-1970, use of asbestos as a building material increased substantially. The decline in use did not start until 1973-1978 when the Environmental Protection Agency (EPA) instituted bans on several asbestos-containing materials (ACM), including:

1) Most spray-applied Surfacing ACM.

2) Sprayed-on application of materials containing more than 1% asbestos to buildings, structures, pipes, and conduits unless the material is encapsulated with a bituminous or resinous binder during spraying and the materials are not friable after drying.

3) Wet-applied and pre-formed asbestos pipe insulation, and pre-formed asbestos block insulation on boilers and hot water tanks.

4) Corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and new uses of asbestos.

c. The EPA Purple Book (controlling Asbestos-Containing Materials in Buildings) has concluded, "The presence of asbestos in a building does not mean that the health of building occupants is endangered. If ACM remains in good condition and is unlikely to be disturbed, exposure will be negligible." Asbestos can become an airborne hazard if improperly handled. According to the experts, the health risks associated with asbestos arise only when and if fibers become airborne and are inhaled.

d. The purpose of this Asbestos Operations and Maintenance (O&M) Program is to reduce risks associated with ACM by identifying, addressing existing and potential hazards, and outlining a set of work procedures to follow when ACM is disturbed.

2. Washington Headquarters Services' Asbestos Policy

a. The long term goal for all buildings occupied or controlled by Washington Headquarters Services (WHS) is to remove all ACM. WHS is committed to maintaining a safe and healthy building environment for its employees, tenants, contract workers and the public. WHS has therefore established this O&M Program for the Hybla Valley Federal Building at 6801 Telegraph Road, Alexandria, Virginia. This O&M program will remain in effect as long as ACM remains at the facility. It is the policy of WHS that:

1) No employee, tenant, contractor, or contractor's employee shall intentionally disturb known or suspect ACM without the prior permission of the WHS building management;

2) All asbestos related work <u>will</u> be authorized by WHS or the designated Asbestos Program Manager;

3) All asbestos related work shall be performed by an accredited asbestos contractor, project designer (if necessary) and monitored by accredited asbestos personnel;

4) ACM will be periodically inspected to identify change in conditions/ assessments; and,

5) Contractors performing work in the building will be notified of the presence of ACM if their work activities could potentially disturb ACM.

b. ACM will not be disturbed or removed, without prior approval of the Asbestos Program Manager and the Pentagon Safety Environmental Management Branch (SEMB). Asbestos abatement will be conducted in accordance with EPA, Occupational Safety and Health Administration (OSHA) and local asbestos removal requirements and/or local regulations.

c. Building maintenance employees and contractors shall not perform maintenance, repair, construction, or renovation work that may disturb or damage ACM or presumed asbestos-

containing material (PACM). This work shall be contracted to a properly licensed asbestos abatement contractor.

3. Summary of Asbestos Location O&M Program: This program has been developed with input from WHS and is based upon normal work activities necessary to maintain the facilities in good condition without disturbing ACM. This O&M Program consists of a number of components, which include:

a. Identification of known ACMs;

b. Identification of a responsible party for O&M program coordination;

c. Outlining necessary training requirements for employees;

d. Establishment of a system of operation and maintenance guidelines and protocols for the property; and,

e. Establishment of record keeping requirements.

ASBESTOS IDENTIFICATION

1. Asbestos-containing materials are classified into three distinct categories including surfacing materials, thermal system insulation materials and miscellaneous materials. Surfacing materials may include, but are not limited to: sprayed-on fire proofing or troweled-on decorative plastering and textured ceiling material (popcorn). Thermal system insulation may include, but is not limited to: insulating jacketing for boilers, tanks, ductwork, piping, pump houses, etc. Miscellaneous materials include all other materials not classified as surfacing or thermal system insulation. Miscellaneous materials include, but are not limited to: vinyl flooring, ceiling panels, sealants, mastics, roofing, insulators, joint compound associated with sheetrock wall/ceiling systems, etc. A summary of previous survey information is included below.

2. Asbestos Containing and Presumed Asbestos Containing Material Summary:

a. ACM and PACM have been identified within the Hybla Valley Federal Building by comprehensive surveys conducted in 1986 (Assessment - Occupational Medical Center, Inc.) and 2010. During these surveys the following materials were identified:

1) Thermal Systems Insulation (Pipe Insulation/Pipe Joint Insulation Compounds) in the Mechanical rooms of the C and E corridors.

2) Duct insulation and duct pipe connection to the air handlers in the Mechanical rooms of the C and E corridors.

3) Valve Insulation above the suspended ceiling in the B-corridor basement outside of room B-2.

4) 8” X 8” Black and Gray Vinyl Floor Tile – 3% Chrysotile Asbestos – identified in A wing, Conference Room A and B of the 2nd floor. These materials were found to be in an intact condition. They are currently located under carpet tile and loom carpeting (Appendix B – Photo # 1).

5) Black Mastic with White VFT – 5% Chrysotile Asbestos – identified in C wing, Office 159. These materials were found to be in an intact condition. They are currently located under carpet tile and loom carpeting (Appendix B – Photo # 2).

6) 9” X 9” Black Vinyl Floor Tile located under the off-white 9” X 9” floor tile (two layers) – 3% Chrysotile Asbestos – identified in D wing, Office 241. These materials were found to be in an intact condition. They are currently located under carpet tile and loom carpeting (Appendix B – Photo # 3).

7) Black Mastic (associated with the 9” X 9” Black VFT located under the 9” X 9” off-white VFT) – 5 % Chrysotile Asbestos – identified in D wing, Office 241. These materials were found to be in an intact condition. They are currently located under carpet tile and loom carpeting (Appendix B – Photo # 3).

b. PACM that remain within the building are listed below:

1) Black Mastic (associated with the off-white 9” x 9” VFT) – 5% Chrysotile Asbestos - Identified in all Basement, 1st Floor and 2nd Floor hallways. These materials were identified to be in an intact condition (Appendix A).

2) Black Mastic (associated with the Off-White 9” x 9” VFT) – 5% Chrysotile Asbestos - Identified in all 1st floor offices of the C Wing. These materials were identified to be in an intact condition (Appendix A).

3) Window Glazing – PACM – Due to the age of the building, it is assumed to exist throughout the exterior of the building. These materials were identified to vary in condition from damaged to intact. The glazing is primarily not accessible unless Construction/Renovation activities are performed. Confirmation sampling should be conducted before disturbance of any suspect materials.

4) Fire Doors – PACM – Due to the age of the building, it is assumed to exist in stairwells, mechanical rooms, hallways, attic areas and exit doors throughout the building. These materials were identified to be in an intact condition with the interior contents (asbestos packing) enclosed and inaccessible. Confirmation sampling should be conducted before disturbance of any suspect materials.

5) Roof – PACM – Due to the age of the building, it is assumed to exist in the roofing system materials. Confirmation sampling should be conducted before disturbance of any suspect materials.

c. The locations and information pertaining to the asbestos-containing materials identified in this Location Operations and Maintenance Program are based upon discussions with the onsite Building Manager, and a review of all available asbestos related documentation up to June 2014. No confirmatory bulk sampling was performed of existing building materials to verify the information provided.

1) Asbestos abatement of floor tile was reported to have been performed in Rooms 119, 121, 126, 127, 130, 136 and 137 as part of an office renovation in June 2012. A

total of 74 Sq. Ft. of tile was reportedly removed. It is unknown whether the asbestos-containing floor tile mastic was also removed with the tile.

2) No other asbestos abatement has been reported by the Asbestos Program Manager.

UNITED STATES COURT OF MILITARY APPEALS

KEY PERSONNEL

All notices, reports and other information related to activities involving ACM and PACM at this facility should go through Mr. Gary Lawson, Asbestos Program Manager who can be reached at 703-692-8108.

TRAINING

1. Management. The on-site Property Manager, Asbestos Program Manager, and other management level personnel who may encounter asbestos related issues and come into contact with asbestos-containing material should attend a two-hour asbestos awareness program.

2. Building Operations and Design Personnel (e.g. maintenance, custodial, and design employees). Building Operations Personnel who may come into contact with asbestos containing material should attend a two-hour asbestos awareness program.

3. Non-Maintenance Occupants. Non-maintenance personnel working in the facility who will not come into contact with ACM while performing their assigned duties do not require any level of asbestos training.

4. Records of employee training should be maintained by the Asbestos Program Manager. This program shall include, at a minimum, the following topics:

a. Identification and location of ACM in the building;

b. Recognition of potentially hazardous conditions, including damage, delamination, and deterioration. Procedures for reporting hazardous situations to the Asbestos Program Manager.

OPERATIONS AND MAINTENANCE GUIDELINES

1. The following paragraphs describe general guidelines for asbestos-related activities. The general approach for any maintenance or housekeeping activity should take into account the following goals:

a. Maintenance or custodial activities will be conducted so as not to disturb or damage materials that are ACM or PACM.

b. If any disturbance of floor tile occurs it is required to be treated as asbestos containing material. Disturbance of floor tile will typically only be the result of work performed by maintenance personnel.

c. A qualified person must assess the condition of ACM and PACM in the building annually. Contractors, whose work activities will disturb ACM, shall be licensed asbestos contractors and shall provide appropriate employee licensing and training to WHS prior to commencing the work.

d. Removal of ACM or PACM containing building material will only be performed by contractors that are properly trained.

2. SPECIFIC O&M PROCEDURES

a. Floor Tiles & Mastic - When performing any type of removal or maintenance work on asbestos containing or assumed asbestos containing floor tiles or mastic personnel will not:

1) Cut, saw, sand, abrade or drill the material.

2) Damage intact material.

3) Use an ordinary vacuum or dry sweeper to clean up debris.

4) Use power sanders or chippers.

5) Use abrasive pads on power disc strippers.

6) Dry buff or dry strip unwaxed vinyl floor tiles.

7) Operate powered floor cleaning or polishing equipment at speeds greater than 300 RPM.

8) Over strip floors.

9) Dry strip floors.

b. Duct Wrap Insulation - When performing any type of maintenance work near asbestos containing or assumed asbestos containing duct wrap insulation personnel will not:

1) Cut, saw, sand, abrade or drill the material.

2) Damage intact material.

3) Use an ordinary vacuum or dry sweeper to clean up debris.

3. Notification of Outside Contractor - The building's Asbestos Program Manager shall be contacted prior to engaging any outside contractor or building maintenance personnel to perform any maintenance, repair, or renovation work inside the building that may disturb ANY asbestos-containing material for any reason. If that work will disturb ACM, no work will be done until WHS determines if abatement of the asbestos is necessary. Outside contractors should be provided with information about the locations of ACM and must agree not to disturb that material. A signed Notification of Outside Contractor form will be maintained in a permanent file at the building. All outside contractors must sign this form and be given a copy of it prior to commencing any work in the building.

RECORD KEEPING

1. Records that relate to any asbestos-related matter shall be maintained indefinitely in an asbestos file maintained by the Building Asbestos Program Manager. These records are to include, but not limited to:

a. Employee Awareness Training;

b. Notification to Outside Contractor;

c. Periodic Surveillance Reports; and,

d. Summary of Improvement surveys and abatement activities.

2. Periodic Surveillance Reports - Periodic Surveillance Inspection Report form(s) will be maintained in a permanent file. The Asbestos Program Manager will coordinate with building maintenance employees to confirm locations, conditions and monitor any subsequent changes in identified ACM or suspect building materials as part of daily routine operations. Building engineers will report any changes in condition of ACM via Periodic Surveillance Report form.

3. Floor Plans – Appendix A contains floor plans designating the areas of concern for ACM and PACM.

OTHER PROCEDURES

1. Periodic Surveillance - The condition of all ACM in the building should be re-evaluated and documented on a routine basis (typically completed by WHS building maintenance employees who have been trained with the 2-hours asbestos awareness training). The Asbestos Program Manager will coordinate the execution of periodic surveillance for changes in condition from visual observations reported by the building maintenance employees. Increased activity in and around the materials, evidence of deterioration, damage, or delamination, water damage and other factors, which might increase the potential for disturbance, should be noted. This re-evaluation should be documented, with pictures for example, for each material. Marked plans and any photographs should also be maintained in the asbestos file. The Asbestos Program Manager shall maintain records of re-evaluations. If a problem is encountered, the follow-up activity should be documented and kept in files. The Asbestos School Hazard Abatement Reauthorization Act (ASHARA) re-inspection requirements will be followed.

2. Emergency Situations - The first priority in an incident or emergency situation is the safety of the building employees and occupants. The following procedures shall be initiated immediately by designated building personnel:

a. Stop the cause of the contamination (renovation work, coring, etc.);

b. Evacuate the affected area, if necessary;

c. Isolate power to the HVAC system supplying the affected area;

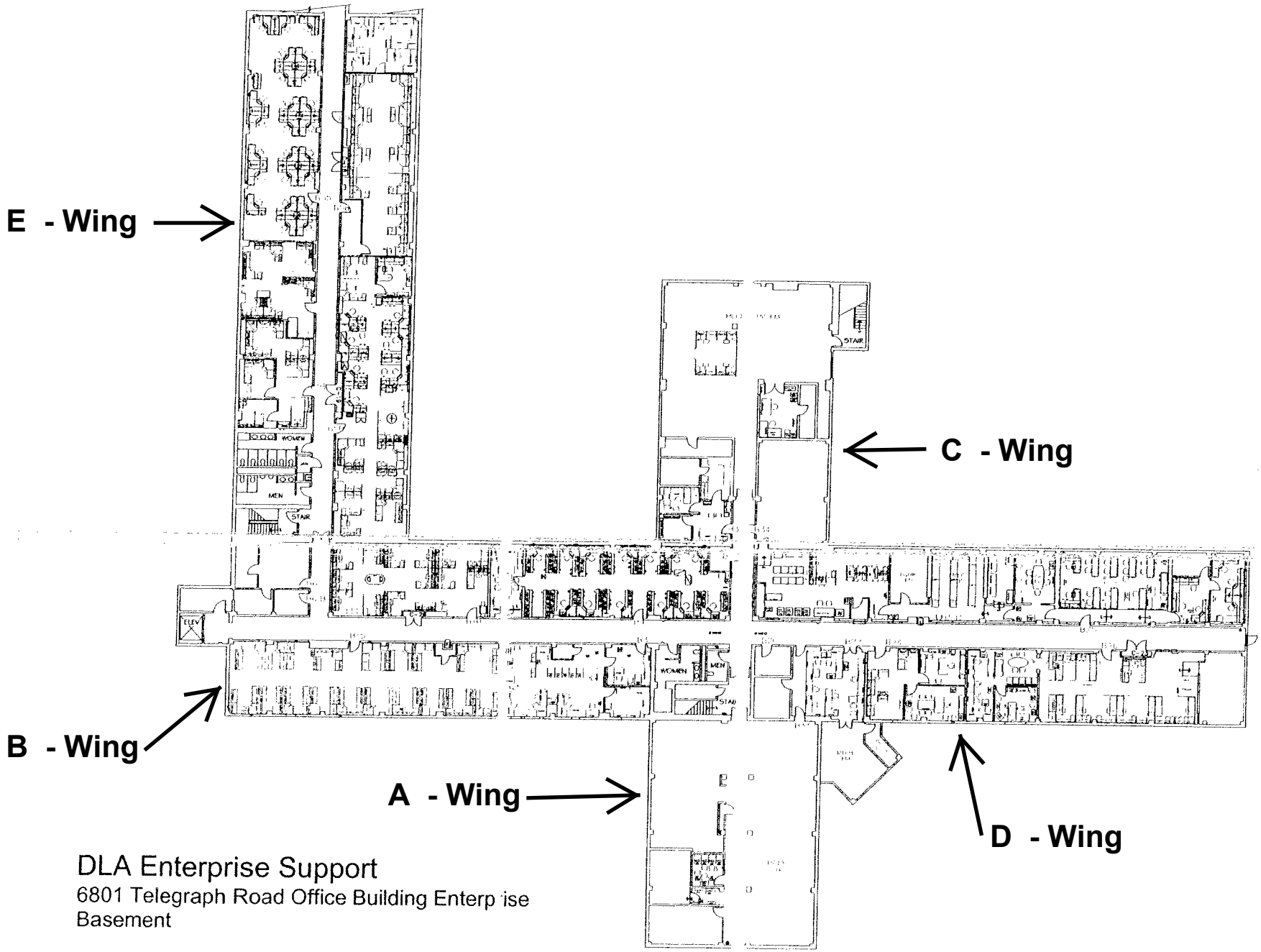
d. Isolate the affected area by closing all doors leading to the area;

e. Posting appropriate signage or locking mechanism to prevent inadvertent entry; and

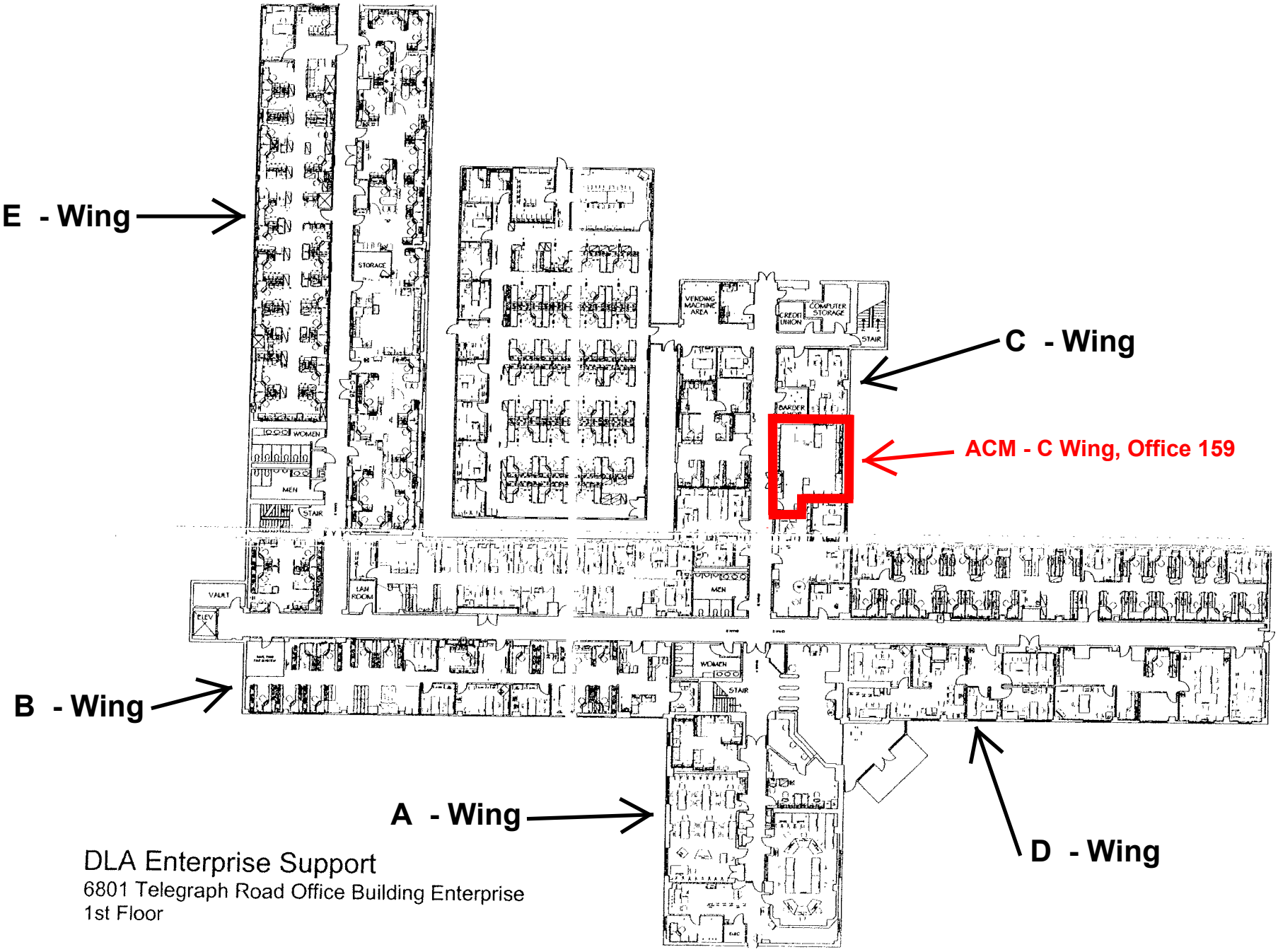
f. Immediately notify appropriate personnel including the Asbestos Program Manager and/or Washington Headquarters Services.

3. Asbestos is a hazardous substance under the provisions of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA). The Asbestos Program Manager should be contacted immediately if large-scale disturbance of ACMs or airborne releases of asbestos fibers are discovered.

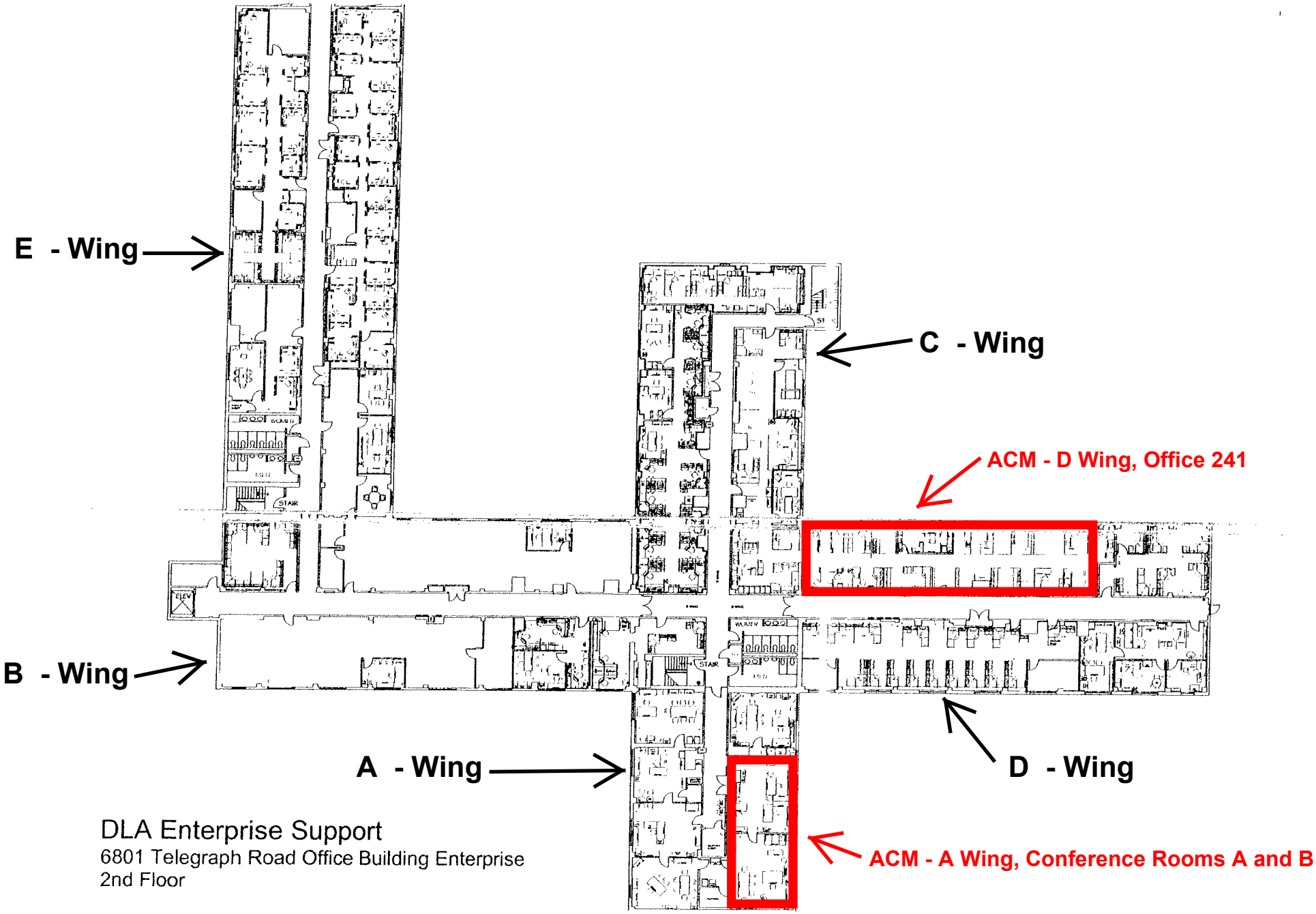
APPENDIX A
FLOOR PLANS



DLA Enterprise Support
6801 Telegraph Road Office Building Enterp ise
Basement

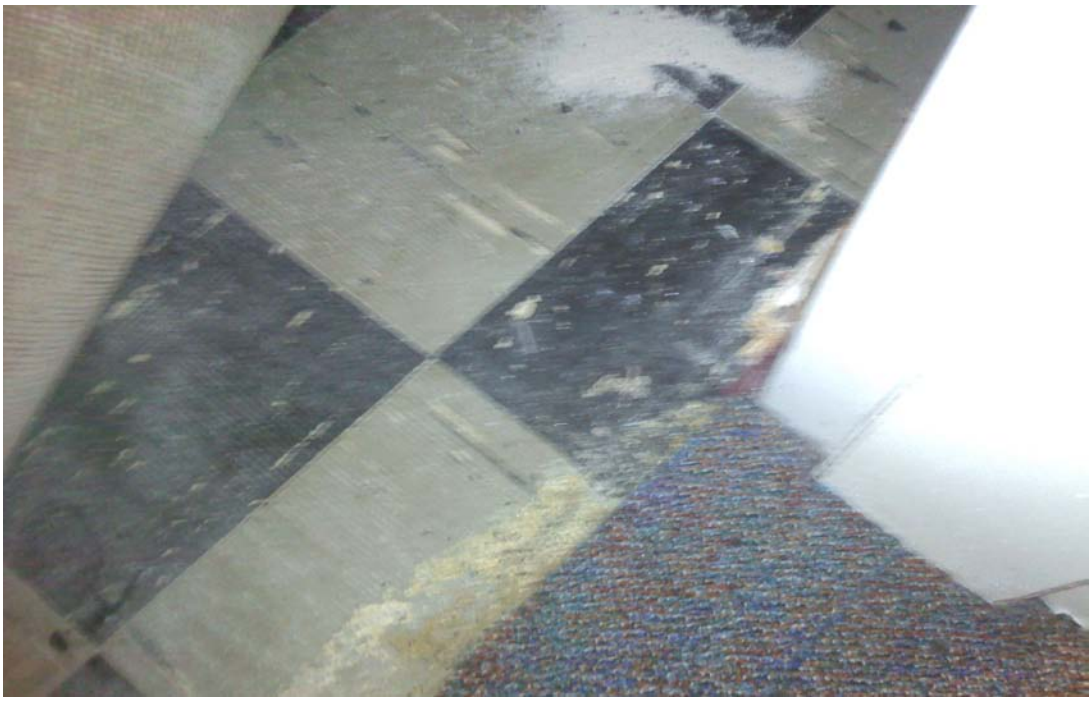


DLA Enterprise Support
6801 Telegraph Road Office Building Enterprise
1st Floor



DLA Enterprise Support
6801 Telegraph Road Office Building Enterprise
2nd Floor

APPENDIX B
PHOTOGRAPHIC DOCUMENTATION



Photograph 1: Black and Grey 8”x8” Vinyl Floor Tile (VFT) found in A wing, Conference Room A and B of the 2nd floor.

Photograph 2: Black Mastic under carpet panel (yellow mastic and 9” x 9” off-white tile), C wing, Office 159.

Photograph 3: 9” x 9” Black Vinyl Floor Tile located under 9” x 9” Off-White floor tile (two layers). Black Mastic lies underneath the 9” x 9” Black VFT.