

DEPARTMENT OF THE ARMY
Omaha District, Corps of Engineers
215 North 17th Street
Omaha, Nebraska 68102-4978

CEMRO-ED-EH

Memorandum
No. 1110-3-2

15 December 1993

Engineering and Design
ASBESTOS PROCEDURES AND RESPONSIBILITIES

1. Purpose. This memorandum establishes procedures and responsibilities for asbestos surveys, design, design review, construction, and construction safety monitoring.
2. Applicability. This memorandum applies to all civil, military, and environmental projects where facility renovation, mechanical system repair with known or suspected asbestos, or demolition of existing facilities will occur, regardless of whether the user has indicated no asbestos is present or whether a survey by an independent architect-engineer (A-E) or contractor has been conducted.
3. General. Historically, requirements for asbestos removal have not been identified early enough in the design process to be included in preliminary cost estimates. Typically, it is determined very late in the project design that asbestos exists, that the asbestos survey was incomplete, or that the survey was inaccurate. The procedures and assignment of responsibilities in this memorandum will resolve these past problems.
4. Responsibilities. The technical manager (TM) and project manager (PM) assigned to the project (either military construction or hazardous, toxic, and radiological waste (HTRW)) are responsible for the asbestos activities detailed below. Other responsibilities for asbestos activities are shown in the enclosed table and detailed below.
5. Services.
 - a. Initial Evaluation. At the inception of a project involving renovation or demolition of facilities, the TM will send a request for services (RFS) asking the Engineering Division, Environmental Branch, Industrial Hygiene Section (CEMRO-ED-EH) to perform an initial evaluation to determine the likelihood that asbestos-containing materials (ACM) may be present and the extent to which such materials could impact the project. The initial evaluation may include review of existing documents (including adequacy of any previous asbestos surveys), inquiries of appropriate personnel, or a site walk-through. All site visits will be coordinated with TM/PM to minimize travel costs.
 - b. Asbestos Surveys/Sampling. The TM will send an RFS asking CEMRO-ED-EH to provide a cost estimate for activity based on project information. Once funding is received, the TM sends an RFS to CEMRO-ED-EH requesting asbestos survey/sampling and determination of execution lead based on time, scope, and resources. CEMRO-ED-EH makes the decision regarding execution lead in coordination with the TM and PM. If work is performed by:

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(1) CEMRO-ED-EH staff, they will provide a team leader who reports directly to the TM.

(2) Indefinite delivery architect-engineer (IDAE), CEMRO-ED-EH will provide a scope of services (SOS) and assist the TM in negotiations, technical review, and field oversight. The TM will have management responsibility of IDAE contract delivery order.

c. Asbestos Removal Design. If asbestos is found, the TM will send a request for services asking CEMRO-ED-EH to provide a cost estimate for design and abatement. The TM will forward a notification and funds request to the PM. The PM, in coordination with the TM and technical staff, will develop a project schedule and budget. The TM sends an RFS to CEMRO-ED-EH requesting design and determination of execution lead based on time, scope, and resources. CEMRO-ED-EH makes the decision regarding execution lead in coordination with the TM and PM. If design is performed by:

(1) CEMRO-ED-EH staff, they provide a project team leader and coordinate preparation of design documents with Engineering Division, Design Branch (CEMRO-ED-D).

(2) IDAE, CEMRO-ED-EH will provide a SOS, and CEMRO-ED-EH and CEMRO-ED-D will assist the TM in negotiations and technical review. The TM will have management responsibilities of IDAE contract delivery order.

d. Document Distribution. The TM is responsible for distributing all documents for projects containing renovation or demolition involving asbestos.

e. Design Review. CEMRO-ED-EH has the responsibility to review all asbestos designs not performed by CEMRO-ED-EH staff. CEMRO-ED-D will provide technical support on all asbestos designs, regardless of the designer, as requested by CEMRO-ED-EH. The Safety and Occupational Health Office (CEMRO-SO) will review all asbestos designs for safety and health aspects. For projects outside of Omaha District boundaries, the design will be referred to the appropriate construction district safety office for safety and health review.

f. Funds Management. The PM has overall responsibility for project schedules and funding. The TM has the responsibility for coordinating and providing funds for all aspects of asbestos surveys, survey verification, design, and design review for CEMRO-ED-EH.

g. Asbestos Found During Construction. When asbestos is found on a construction site previously thought to have no asbestos (despite an initial evaluation as discussed in paragraph 5.a.), the Engineering Division TM will be notified. The TM will request CEMRO-ED-EH to initiate corrective action per the procedures discussed in paragraphs 5.a. and 5.b.

h. Construction Monitoring. Construction Division (CEMRO-CD) has the responsibility to monitor all asbestos removal work on projects. CEMRO-SO has

the responsibility to monitor all asbestos removal work for safety, proper procedures, and compliance to regulations.

i. Contract Submittal Review.

(1) Category I Submittals. All category I submittals will be sent initially to CEMRO-ED-D for tracking and distribution to the proper review organization. The safety office (either CEMRO-SO or safety office from the appropriate construction district) is responsible for review of the Asbestos Removal and Disposal Plan (ARDP) and all other category I submittals and project closeout reports. If necessary, CEMRO-ED-EH or the A-E (as appropriate) will provide review and assistance for design-related questions.

(2) Category II Submittals. The Construction Division field offices are responsible for review of all category II submittals or to forward to CEMRO-ED-D if technical support is required. CEMRO-ED-D will distribute as appropriate.

j. Safety and Occupational Health Office. For work within Omaha District boundaries, CEMRO-SO will:

(1) Monitor selected design criteria, contract plans and specifications, and operating procedures to verify adequate accident prevention provisions are included.

(2) Monitor each contractor's written safety program and records of pre-construction conferences to verify the contractor's intention to comply with the accident prevention provisions.

(3) Survey construction and operational sites periodically to evaluate the degree of compliance with established policies and procedures.

(4) Assist in determining safety training needs by monitoring safety awareness and skills of the Omaha District personnel.

k. Training. Obtaining proper certified training related to asbestos for all Omaha District elements is the responsibility of the Human Resources Office, Human Resources Development Branch (CEMRO-HR-E). CEMRO-SO may assist in determining safety training needs for on-site Omaha District personnel. CEMRO-ED-EH will assist by determining asbestos-related design training needs.

FOR THE COMMANDER:



William S. Pavlick
LTC, EN
Deputy Commander

Distribution:

CEMRO-CD	CEMRO-EM	CEMRO-MD	CEMRO-PD
CEMRO-ED	CEMRO-HR	CEMRO-OP	CEMRO-SO

DISTRICT OPERATING PROCEDURE FOR ASBESTOS

ACTIVITY	EXECUTION RESPONSIBILITY	REVIEW/COMMENT	RECOMMEND APPROVAL
Scopes of Work for Survey/Design	CEMRO-ED-EH writes		
Survey and Sampling Plan	A-E	Local Construction Dist-SO (Information Only)	CEMRO-ED-EH
Survey and Sampling Report	A-E	Local Construction Dist-SO (Information Only)	CEMRO-ED-EH
CEMRO-ED-EH		Local Construction Dist-SO (Information Only)	CEMRD-ED-EH
Design Documents	A-E	CEMRO-ED-D/ Local Construction Dist-SO	CEMRO-ED-EH
CEMRO-ED-EH		CEMRO-ED-D/ Local Construction Dist-SO	CEMRD-ED-EH
Asbestos Removal and Disposal Plan (ARDP)	Construction Contractor	CEMRO-ED-D, Field Office, Local Construction District-SO	Local Construction District-SO
Category I			
Other Category I & II Submittals	Construction Contractor	CEMRO-ED-D, Local Field Office, Local Construction District-SO	A-E (Title II) Local Construction District-SO
Category II			
Construction Contractor		Local Construction Dist-SO and Field Office	Field Office
Project Close-Out/ Reports	Construction Contractor	A-E (Title II), Local Construction District-SO	A-E (Title II) Local Construction District-SO

Figure 1