U.S. Department of
Homeland Security

**United States
Coast Guard**

Asbestos Management
Tactics, Techniques, and Procedures (TTP)

**Force Readiness Command
(FORCECOM)**

**CGTTP 4-11.1
May 2014**

This page intentionally left blank.

U.S. Department of Homeland Security
United States Coast Guard

Commander
United States Coast Guard
Force Readiness Command

300 E. Main Street, Suite 1100
Norfolk, VA 23510
Staff Symbol: FC-P
Phone: (757) 628-4463

CGTTP 4-11.1
02 MAY 2014

COAST GUARD TACTICS, TECHNIQUES, AND PROCEDURES 4-11.1

Subj: ASBESTOS MANAGEMENT TTP

Ref: (a) Asbestos Exposure Control Manual, COMDTINST M6260.16 (series)

(b) OSHA, Occupational Safety and Health Standards, Toxic and Hazardous Substances, Asbestos, 29 CFR 1910.1001

(c) OSHA, Safety and Health Regulations for Construction, Toxic and Hazardous Substances, Asbestos, 29 CFR 1926.1101

(d) Protection of Environment, Environmental Protection Agency, Toxic Substances Control Act, Asbestos, 40 CFR 763

(e) Safety and Environmental Health Manual, COMDTINST M5100.47 (series)

(f) Thermal, Fire, and Acoustic Insulation, NSTM 635-10.2.3 (series)

1. PURPOSE. To provide unit-designated asbestos control coordinators with specific procedures for developing, implementing, and maintaining an asbestos management plan.

2. ACTION. The provisions of this CGTTP publication apply to all Coast Guard units with confirmed and suspected asbestos containing materials (ACM) and personnel assigned to these units. Internet release is authorized.

3. DIRECTIVES/TTP AFFECTED. None.

4. DISCUSSION. This TTP provides guidance to asbestos control coordinators, unit safety coordinators, certified asbestos workers, and instructors on complying with asbestos awareness and control requirements.

5. PROCEDURE. FORCECOM TTP Division posts an electronic version of this TTP publication to the CGTTP Library on CGPortal. In CGPortal, navigate to the CGTTP Library by selecting References, Tactics, Techniques, and Procedures (TTP), and then TTP Library. FORCECOM TTP Division does not provide paper distribution of this publication.

6. REQUEST FOR CHANGES. Submit recommendations for TTP improvements or corrections via email to FORCECOM-PI@uscg.mil or through the TTP Request form on CGPortal. In CGPortal, navigate to the TTP Request form by selecting References, Tactics, Techniques, and Procedures (TTP), and then TTP Request.

   Info COMCOGARD FORCECOM NORFOLK VA//FC-P// on message traffic containing lessons learned applicable to this TTP publication.

7. RECORDS MANAGEMENT CONSIDERATIONS. Integrated Process Team (IPT) members thoroughly reviewed this publication during the TTP coordinated approval process and determined there are no further records scheduling requirements per Federal Records Act, 44 U.S.C. 3101 et seq., NARA requirements, and Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This publication does not have any significant or substantial change to existing records management requirements.

8. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS. While developing this publication, Integrated Process Team (IPT) members examined environmental considerations under the National Environmental Policy Act (NEPA) and determined they are not applicable.

9. FORMS/REPORTS. None.

WOLTER.WILLIAM.J.1137530267

Digitally signed by WOLTER.WILLIAM.J.1137530267
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USCG, cn=WOLTER.WILLIAM.J.1137530267
Date: 2014.05.02 16:34:09 -04'00'

WILLIAM J. WOLTER
Captain, U. S. Coast Guard
Chief, FORCECOM TTP Division (FC-P)
By Direction of Commander,
Force Readiness Command

Table of Contents

1. PURPOSE OF THIS PUBLICATION 1

2. NOTES, CAUTIONS, WARNINGS 1

3. INTRODUCTION 2

4. ASBESTOS CONTROL COORDINATOR 3

5. ASBESTOS MANAGEMENT PLAN 4

6. INVENTORY 4

7. LABELING ACM 8

8. INSPECTIONS 9

9. HAZARD AWARENESS TRAINING 10

10. CONTRACTOR NOTIFICATION 10

11. EMERGENCY RESPONSE TEAM 11

APPENDIX A: GLOSSARY AND ACRONYMS A-1

APPENDIX B: ASBESTOS MANAGEMENT PLAN TEMPLATE B-1

APPENDIX C: ASBESTOS CONTAINING MATERIAL INVENTORY, INSPECTION, & CONDITION ASSESSMENT C-1

1. Purpose of this Publication

This publication provides tactics, techniques, and procedures (TTP) for basic information and guidance for implementing an effective asbestos management program. This guide does not account for every possible situation.

2. Notes, Cautions, Warnings

The following definitions apply to notes, cautions, and warnings found in TTP publications.

NOTE: **An emphasized statement, procedure, or technique.**

CAUTION: **A procedure, technique, or action that, if not followed, carries the risk of equipment damage.**

WARNING: ***A procedure, technique, or action that, if not followed, carries the risk of injury or loss of life.***

3. Introduction

Asbestos is a confirmed human carcinogen. There is no safe level of exposure to asbestos fibers. Exposure to airborne asbestos fibers leads to fiber build-up in the lungs, thus greatly increasing the risk of incurring three serious diseases: asbestosis, mesothelioma, and lung cancer. Asbestosis is a chronic lung disease that impairs breathing and increases the risk of serious illness or death from respiratory infections. Mesothelioma is a cancer of the tissue that surrounds the lungs. Lung cancer from asbestos is the most prevalent illness from asbestos exposure. Onset of these serious illnesses may occur after a latency period of 10 to 50 years following initial exposure to airborne asbestos fibers. The risk of developing one of these illnesses directly correlates to the duration and extent of an individual's exposure to asbestos fibers.

In March 2012, during a Health, Safety and Work-Life Service Center, Safety and Environmental Health Division (HSWL SC (se)) Safety, Mobile Assessment, and Response Team (SMART) visit, significant deterioration of vermiculite coatings was identified on the aids to navigation barge assigned to a Coast Guard inland construction tender. Subsequently, HSWL SC (se) began a class-wide asbestos condition assessment. The results of these assessments found nearly 5,000 square feet of damaged friable asbestos aboard the inland construction tender fleet. The SMART visits revealed that active asbestos management programs were not being maintained, as required by reference (a) Asbestos Exposure Control Manual, COMDTINST M6260.16 (series). In addition, the absence of formal training for designated asbestos control coordinators (ACC), frequency of personnel rotations, lack of asbestos containing material (ACM) inventories, historical coating documentation, and cutter hull history files all contributed to the problems identified and created the need to readdress how asbestos is managed throughout the Coast Guard.

This TTP publication provides guidance on developing, implementing, and maintaining an asbestos management plan (AMP) for the ACC. This TTP publication also provides basic guidance and direction to control asbestos in the workplace. Intended users are United States Coast Guard (USCG) personnel and employees with the potential for asbestos exposure.

4. Asbestos Control Coordinator

The commanding officer (CO)/officer-in-charge (OIC) designates a command ACC in writing once ACM is identified, presumed, or suspected at their unit. (Once COMDTINST 5100.47A is released, the ACC will be called "Asbestos Program Manager (APM)). The ACC:

- Maintains and updates a unit AMP per HSWL SC (se) guidance and the following references:
  - Reference (a), Asbestos Exposure Control Manual, COMDTINST M6260.16 (series).
  - Reference (b), OSHA, Occupational Safety and Health Standards, Toxic and Hazardous Substances, Asbestos, 29 CFR 1910.1001.
  - Reference (c),OSHA, Safety and Health Regulations for Construction, Toxic and Hazardous Substances, Asbestos, 29 CFR 1926.1101.
  - Reference (d), Protection of Environment, Environmental Protection Agency, Toxic Substances Control Act, Asbestos, 40 CFR 763.
  - Reference (e), Safety and Environmental Health Manual, COMDTINST M5100.47 (series).
- Maintains a current inventory of all ACM identified at the unit using the template in Appendix C: Asbestos Containing Material Inventory, Inspection, & Condition Assessment.
- Ensures labeling of representative sections of ACM.
- Conducts an annual inspection and condition assessment of ACM.
- Reports damage to identified ACM, and the presence of suspect, previously unsampled ACM to the command and to HSWL SC (se).
- Provides hazard awareness training to all personnel initially upon arrival at the unit and then annually thereafter, as well as the 2-day shipboard Asbestos Emergency Response course for personnel designated as emergency response team (ERT) members.
- Notifies outside personnel or contractors coming aboard of asbestos hazards before they perform work.
- Maintains communication with each abatement contractor conducting asbestos repair or removal work and the contracting officer representative (COR).
- Follows up with COR to obtain final documentation, including clearance-sampling results, following abatement.
- Updates the AMP following contract work.

4.a. Transferring ACC Responsibilities

The CO/OIC designates a new ACC prior to relieving the current ACC. The transfer of duties includes the following steps:

- Conduct inventory of ACM with relieved ACC prior to assuming duties as newly appointed ACC.
- Review AMP with relieved ACC.
- New ACC receives hazard awareness training.

5. Asbestos Management Plan

Identification of asbestos in the workplace is the first step in controlling asbestos exposure. Once ACM is identified, the ACC institutes an AMP to help manage ACM in a systematic and risk-prioritized manner.

Include the following elements in the AMP:

- Ensure AMP is unit specific.
- Identify ACC by name and rank.
- Maintain *ACM Inventory, Inspection, & Condition Assessment* records for at least 5 years.
- Include names of individuals designated for the emergency response team. Update upon rotation from ERT.
- Append the following items to the AMP:
  - ACM inventory.
  - Copies of all asbestos sampling lab analysis reports.
  - Scope of work, bulk samples results, and air clearance results after abatement projects.
  - Any other supporting material.

6. Inventory

The ACC maintains a complete inventory of ACM at the unit. Accurate inventory records are essential in order to minimize personnel exposure by ensuring that the ACC is aware of and able to communicate locations of all confirmed and suspect ACM. Consult the inventory list prior to authorizing personnel to engage in any activity that may disturb identified, presumed, or suspected ACM.

6.a. Inventory Records

Use the record in Appendix C: Asbestos Containing Material Inventory, Inspection, & Condition Assessment to inventory all materials previously sampled and analyzed for asbestos. The inventory includes the following:

- Reference number. A unique sequential number used to find supporting documentation attached to the AMP.
- ACM location. Identify the location of each material as specifically as possible to ensure that personnel can readily identify the material from the inventory. Use measurements to/from landmarks whenever possible.
- ACM identification. Identify whether material is ACM or non-ACM.
  - Review available ACM sampling/report data from unit files, Shore Infrastructure Logistics Center, Surface Forces Logistics Center, and HSWL SC (se) report files. Append sampling/report data to AMP and document on Asbestos Containing Material Inventory, Inspection, & Condition Assessment template.
- ACM types.
  - Thermal system insulation (TSI).

- Surfacing.

- Miscellaneous

- ACM quantity. Determine approximate amount (in square feet or linear feet) of ACM at each location. Determine ACM quantity for each homogenous area. A homogeneous area is an area of ACM surfacing material, TSI, or miscellaneous material that is uniform in color and texture. Homogeneous areas can be very small or extremely large depending upon the type and location of suspect ACM.

An example of an entry for pipe insulation would appear as follows:

ACC Name: SKC Thurston Howell		Asbestos Containing Material Inventory, Inspection, & Condition Assessment				Unit USCGC Guppy			
Inspection Date: 04 August 2014						Location/Homeport Base Gilligan			
Ref #	ACM Location (Building/Room/Compartment/Frame)	ACM? (Yes/No)	ACM Type (TSI, Surfacing, or Miscellaneous)	Physical Description (color, texture, etc.)	Quantity (SF or LF)	Location Labeled? (Yes/No)	ACM Condition (mark one) intact	ACM Condition (mark one) damaged	ACC Initials
1	Engine Room, frame 67-78	Y	TSI	white, cementitious	10 LF	Y	X		TH

6.b. Modification to the ACM Inventory, Inspection, & Condition Assessment List

- Add all materials sampled and analyzed for asbestos to inventory and append lab analysis report.
- Remove previously confirmed and suspect ACM items from inventory when an abatement project completely removes the material.
- Modify inventory physical description and quantity for damaged and repaired, encapsulated, or partially removed ACM or suspect ACM. Append contractor records of projects to inventory list.
- Label AMP attachments (i.e., lab reports or abatement completion documentation) to correlate with the applicable ACM reference number from the ACM Inventory, Inspection, & Condition Assessment record (see Appendix C: Asbestos Containing Material Inventory, Inspection, & Condition Assessment).

7. Labeling ACM

Clear labeling of ACM is essential to ensure that personnel are aware of the locations of these materials and the hazards posed by disturbing them.

The ACC ensures that materials, identified as ACM, are labeled as follows:

- Affix at least one label on ACM in each compartment or workspace the ACM might contaminate if damaged.
- Ensure that spacing between labels does not exceed 15 linear feet for larger areas of ACM.
- Use a stencil or metal tag with an affixed label for structures that are inappropriate to label (e.g., steam pipe, historical artifact, etc.).
- Use asbestos warning labels or signs to display required information as illustrated below.
- Use warning labels with lettering of sufficient size and contrast as to be readily visible and include the following information:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

- Contact HSWL SC (se) if a specific location does not lend itself to one of the listed labeling solutions (i.e., visible surfacing material in a sensitive area).

8. Inspections

An annual visual inspection of ACM provides significant information concerning the potential for fiber release. ACM becomes a health hazard to personnel once ACM becomes damaged or deteriorated, or once mechanical action (such as grinding or cutting) generates loose asbestos fibers.

8.a. Annual Visual Inspections

- Obtain current inventory of ACM found in AMP.
- Date inspection sheet.
- Conduct a walkthrough of all spaces and compartments with confirmed or suspect ACM listed on inventory.
- Using inspection section of ACM Inventory, Inspection, & Condition Assessment record, complete as follows:
  - Location Labeled?: Indicate "yes" if ACM labeling is per section 7; otherwise indicate "no."
  - ACM condition: Material physical description and current condition. Identify and classify each ACM and suspect ACM as "*intact*" or "*damaged*." Refer to Appendix A: Glossary and Acronyms for intact and damaged classifications.
  - ACC initials: Designated ACC places initials after each line item after inspecting.

8.b. Response to Damaged ACM

If you discover damaged friable ACM, do not continue inspection in that room/compartment. Take photos and contact HSWL SC (se).

9. Hazard Awareness Training

Provide asbestos hazard awareness training to personnel engaged in housekeeping, maintenance, or other activities with the potential to contact or disturb ACM. A person with a thorough understanding of hazards, controls, and safe work practices pertaining to asbestos provides this training before the individual contacts ACM, and annually thereafter. This might be the ACC, safety officer, unit safety coordinator, or HSWL SC (se) staff.

Document training with the individual's name, date of training, and signature of trainer. Maintain training documentation at the unit for a minimum of 5 years. Training must include:

- Health effects and hazards of asbestos.
- Association between smoking, asbestos exposure, and increased risk of lung cancer.
- Locations of ACM at the unit and activities that could increase exposure risks.
- Controls and safe work practices associated with particular work assignments.
- Purpose, proper use, and limitations of protective equipment.
- Notification and approval process for performing work with potential to disturb ACM.
- Description of emergency actions and procedures to take in the event of fire or other damage to ACM.
- Meaning of warning signs, labels, and placards.
- Workplace re-entry requirements after disturbing ACM or ACM abatement.

10. Contractor Notification

The ACC is responsible for notifying Coast Guard maintenance personnel and the COR for contractors hired to perform work on confirmed ACM that might be disturbed during the work. Accomplish the notification by sharing the current inventory, inspection, and condition assessment.

The contractor is responsible for conducting bulk asbestos sampling and analysis by an accredited laboratory to confirm the presence and/or absence of ACM in any material they might damage or disturb.

11. Emergency Response Team

Cutters with ACM coordinate with HSWL SC (se) to train and maintain an ERT. The ERT provides limited response and clean up of an ACM release when the option of returning to shore, where a qualified contractor could respond, is not available and denying access to that compartment prohibits safe operation of the cutter.

The ACC:

- Ensures that ERT members receive training and fitting for proper personal protective equipment.
- Shows ERT member location of ACM on the cutter.
- Conducts annual ACM release drills in conjunction with annual training.

ERT member designation/qualification:

- CO designates members in writing.
- Contact HSWL SC (se) CDO watch at 757-846-5348 if deploying an ERT due to an ACM release. For deployed cutters, contact HSWL SC Afloat Safety Branch: East Coast (757) 628-4409; West Coast (510) 637-1238.
- Document release of ACM, and the ERT response, with eMisrep entry.

Appendix A: Glossary and Acronyms

ACC	Asbestos control coordinator.
ACM	Asbestos containing material.
AMP	Asbestos management plan.
Asbestos	Naturally occurring, incombustible, chemical-resistant, silicate minerals that are resistant to heat and corrosion. Asbestos includes the mineral fibers chrysotile, amosite, crocidolite, tremolite, anthophyllite, actinolite, and any of these materials that have been chemically treated or altered.
Asbestos containing material	Any material containing more than 1 percent asbestos.
CO	Commanding officer.
COR	Contracting officer representative.
Damaged	Material with deterioration of more than 1 percent of ACM or ACM encapsulation in a particular homogeneous area.
Disturbed	Any activity that disrupts the matrix of, crumbles or pulverizes, or generates visible debris from ACM or suspect ACM. Release of ACM or suspect ACM fibers from the material in which they are embedded.
ERT	Emergency response team.
Friable ACM	Any material containing more than one percent (>1%) asbestos which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure (i.e., spray-on insulation, thermal system insulation [TSI], etc.). However, friability is dependent on several factors and can vary somewhat even within a single homogenous area. Contact HSWL SC (se) for clarification when necessary.

Homogeneous Area	An area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. Homogeneous areas range from very small to extremely large depending on the type and location of suspect ACM.
HSWL SC (se)	Health, Safety and Work-Life Service Center, Safety and Environmental Health Division.
Intact	Material with less than or equal to 1 percent damage or deterioration of ACM in a particular homogeneous area.
Miscellaneous Materials	Materials that are not surfacing or thermal insulation, but applied to structural components (i.e., transite panels, drywall, flooring, roofing, ceiling tiles, mastic, taping/joining compound, exterior siding, etc.).
Non-friable ACM (Category I & II)	Category I – ACM (>1%) such as packing, caulks, gaskets, resilient floor covering (vinyl-asbestos tile), and asphalt products. Category II – ACM that cannot be crumbled, pulverized, or reduced to powder by hand pressure, such as transite board/pipe or siding material.
OIC	Officer in charge.
SMART	Safety, Mobile Assessment, and Response team.
Surfacing ACM	Troweled-on, applied-on, or sprayed-on surface materials (e.g., stucco, plaster, acoustical ceiling, vermiculite coatings, structural fireproofing, etc.).
Thermal System Insulation	ACM applied as insulation, such as pipe lagging, pipe wrap, batt, and cements for pipes, boilers, and tanks to reduce heat transfer.
TSI	Thermal system insulation.
TTP	Tactics, techniques, and procedures.
USCG	United States Coast Guard.

Appendix B:
Asbestos Management Plan Template

Subj: Unit Asbestos Management Plan

Ref: (a) OSHA, Occupational Safety and Health Standards, Toxic and Hazardous Substances, Asbestos, 29 CFR 1910.1001

(b) OSHA, Safety and Health Regulations for Construction, Toxic and Hazardous Substances, Asbestos, 29 CFR 1926.1101

(c) Protection of Environment, Environmental Protection Agency, Toxic Substances Control Act, Asbestos, 40 CFR 763

(d) Asbestos Exposure Control Manual, COMDTINST M6260.16 (series)

(e) Safety and Environmental Health Manual, COMDTINST M5100.47 (series)

(f) Thermal, Fire, and Acoustic Insulation, NSTM 635-10.2.3 (series)

1. **PURPOSE.** This instruction provides specific guidance on minimizing exposure to asbestos containing materials (ACM) by actively and effectively preventing disturbance and managing in place.

2. **ACTION.** Department heads, division officers, branch chiefs, supervisors, and unit asbestos control coordinators (ACC) ensure compliance with provisions of this plan once ACM is identified, presumed, or suspected at their unit.

3. **DIRECTIVES AFFECTED.** None

4. **DISCUSSION.** Asbestos is a cancer-causing agent. Exposure to airborne asbestos fibers significantly increases the risk of lung cancer. The onset of serious illnesses typically occurs 20 to 40 years after initial exposure to airborne asbestos fibers. Asbestos is in a variety of materials on Coast Guard cutters, including thermal insulation (e.g., pipe lagging), sprayed-on vermiculite coatings, fireproofing, brake lining, and gasket material. Intact and undisturbed ACM do not pose a health risk. The mere presence of asbestos does not endanger the health of personnel. When ACM is in good condition and properly managed, the risk of asbestos-related disease is minimal. However, when damaged, cut, sanded, or otherwise disturbed, ACM releases asbestos fibers into the air and increases exposure risks. Federal, state, and local agencies have specific standards and requirements to mitigate asbestos hazards. The Coast Guard also requires units to develop and maintain asbestos management plans (AMP) after detecting ACM. AMPs include identification, inventory, placards, and annual inspections of ACM. In addition, units are required to prohibit removal of

ACM and any activity that may disturb ACM, and must provide asbestos hazard awareness training for all personnel.

5. **POLICY STATEMENTS.**

a. Coast Guard personnel assigned to this command and members of its civilian workforce shall not engage in the removal, rip-out, or repair of ACM during the normal execution of their assigned work duties. Additionally, Coast Guard personnel shall not perform work that may disturb materials potentially containing asbestos without first having the material sampled and analyzed by an accredited laboratory per references (a-d).

b. A state-certified/licensed abatement contractor must perform work that might disturb or affect materials containing, or presumed to contain, asbestos.

c. Contact Health, Safety and Work-Life Service Center, Safety and Environmental Health Division (HSWL SC (se)), Afloat Safety Branch, or the District Safety and Environmental Health Officer to request for assistance or guidance for any asbestos-related issues.

d. Point of contact for this management plan is {*include name and rank of unit's ACC and his or her phone number*).

Signature Block of Commanding Officer
or Officer-in-Charge

Roles and Responsibilities

A.1. CO/OIC

- Designate an ACC for the command once ACM is identified, presumed, or suspected at the unit.
- Implement this AMP.
- Prohibit disturbance of ACM by USCG employees, unless authorized by HSWL SC (se).
- Notify HSWL SC (se) to conduct identification testing of an identified or suspected potential asbestos exposure hazard.
- Notify HSWL SC (se) before contractors remove ACM.
- Provide a current ACM inventory to engineers to consider in contract preparation for maintenance projects that may disturb ACM.
- Retain a copy of the ACM hazardous waste records provided by Surface Forces Logistics Center.
- Ensure an asbestos hazard awareness briefing is provided to all personnel upon assignment and annually thereafter.

A.2. Asbestos Control Coordinator

- Maintain and update the unit AMP per HSWL SC (se) guidance and the following references:
  - Reference (a), Asbestos Exposure Control Manual, COMDTINST M6260.16 (series).
  - Reference (b), OSHA, Occupational Safety and Health Standards, Toxic and Hazardous Substances, Asbestos, 29 CFR 1910.1001.
  - Reference (c),OSHA, Safety and Health Regulations for Construction, Toxic and Hazardous Substances, Asbestos, 29 CFR 1926.1101.
  - Reference (d), Protection of Environment, Environmental Protection Agency, Toxic Substances Control Act, Asbestos, 40 CFR 763.
  - Reference (e), Safety and Environmental Health Manual, COMDTINST M5100.47 (series).
- Maintain an up-to-date inventory of all ACM identified at the unit using the template in Appendix C: Asbestos Containing Material Inventory, Inspection, & Condition Assessment. Include items that were tested, but were negative for ACM.
- Ensure proper labeling of representative sections of ACM.
- Conduct annual inspections and condition assessments of ACM.
- Report ACM disturbances or failures to the command and HSWL SC

	(se). • Provide hazard awareness training to all personnel initially upon assignment to the vessel and then annually thereafter.
A.3. Engineering Officer/ Engineering Petty Officer	• Ensure all members are aware of the proper notification process in the event that they find damage or deterioration to ACM. • Ensure proper labeling of identified and suspect ACM per this management plan. • Submit required Cutter Ship Maintenance Program (CSMP) and maintain all records for work to remove, stabilize, or encapsulate any damaged or deteriorated ACM. Set an emergency priority for repair when ACM might pose a health risk to personnel.
A.4. All USCG Personnel	• Clearly understand hazards and exposure risks posed by asbestos. • Abide by all warning labels indicating the presence of ACM. • Do not engage in any activity that may disturb ACM such as pipe lagging repair or removal, paint/coating stabilization or removal, or hot work near suspect materials without first getting authorization from the ACC and command. • Immediately report any damage or deterioration of ACM to the ACC.

Program Requirements

A.5. Inventory

An accurate inventory is essential to minimize risks of personnel exposure by ensuring that personnel know the locations of ACM. Consult the inventory before authorizing personnel to engage in any activity that may disturb coatings, insulation, pipe lagging, or similar materials. When properly maintained, the inventory eliminates unnecessary costs associated with repeated laboratory analysis of the same material. Finally, the inventory provides a database from which contractors hired to perform maintenance and repairs at the unit can obtain information.

Appendix C: Asbestos Containing Material Inventory, Inspection, & Condition Assessment contains a template for ACCs to inventory identified ACM and record its location, description, and current condition.

A.6. Labeling

Clearly label identified or presumed ACM to ensure personnel are aware of the locations of these materials and hazards posed by disturbing them. Also, label ACM in storage areas.

Space labels no more than 15 feet apart, with at least one label in each compartment that ACM could contaminate if damaged. For structures on which a label cannot be affixed (e.g., steam pipe), use a stencil or a metal tag with an affixed label. Asbestos warning labels are available from commercial vendors.

A.7. Inspection

Conduct and document a visual inspection of materials confirmed or presumed to contain ACM at least annually. A sample documentation template is in Appendix C: Asbestos Containing Material Inventory, Inspection, & Condition Assessment. This inspection may be conducted in conjunction with unit material inspections, annual unit safety self-assessments, or HSWL SC (se) SMART visits.

An annual visual ACM inspection provides significant information about the potential for fiber release from the ACM. ACM becomes health hazardous to employees once asbestos fibers are generated from the material by mechanical action (such as grinding or cutting) or from damage or deterioration.

A.8. Repair, Removal, and Disposal

USCG military and civilian personnel assigned to this unit are prohibited from removing, repairing, or disposing of ACM, unless specifically authorized by HSWL SC (se).

HSWL SC (se) may only authorize USCG personnel to perform minor ACM removal.

Submit requests to perform such work in writing to HSWL SC (se). Include a scope of work and amount of ACM affected by the activity.

Many repair and removal projects require air monitoring during the activity in coordination with a USCG industrial hygienist.

Examples of minor ACM removal include:

- Removal and replacement of brake shoes.
- Small-scale removal of non-friable ACM (i.e., single floor tile).

A.9. Emergency ACM Repair Exception

Cutter crews remove or rip out ACM only during underway emergency casualty work that has the approval of the commanding officer and follows safety requirements in reference (f), Thermal, Fire, and Acoustic Insulation, NSTM 635-10.2.3 (series). Ensure asbestos control procedures are prepared, followed, and available for review. Underway, asbestos removal is limited to small-scale and short-duration repair or maintenance activities performed by qualified and trained personnel.

A.10. Contractor Notification

The ACC notifies contractors and outside maintenance personnel hired to perform work on the cutter of confirmed and presumed ACM that might be disturbed during the contracted work. Accomplish this notification by sharing the current inventory, inspection, and condition assessment.

The command ensures the ACC conducts information briefings with all contractors to make sure that all persons with the potential to disturb ACM have been properly notified of the following:

- Location of confirmed and presumed ACM that might be disturbed.
- Current condition of the ACM.
- Notification protocol for reporting damage, dust, or debris from ACM; a change in the condition of the ACM; or unauthorized actions affecting these materials.

Appendix C:
Asbestos Containing Material Inventory, Inspection, & Condition Assessment

Inspection Date:		Asbestos Containing Material Inventory, Inspection, & Condition Assessment				Unit Location/Homeport			
Ref #	**ACM Location** (Building/Room/Compartment/Frame)	**ACM?** (Yes/No)	**ACM Type** (**TSI**, **Surf**acing, or **Misc**ellaneous)	**Physical Description** (color, texture, etc.)	**Quantity** (SF or LF)	**Location Labeled?** (Yes/No)	**ACM Condition** *(mark one)* intact	 damaged	**ACC Initials**

ACC Name:		Asbestos Containing Material Inventory, Inspection, & Condition Assessment				Unit			
Inspection Date:						Location/Homeport			
Ref #	**ACM Location** (Building/Room/Compartment/Frame)	**ACM?** (**Y**es/**N**o)	**ACM Type** (**TSI**, **Surf**acing, or **Misc**ellaneous)	**Physical Description** (color, texture, etc.)	**Quantity** (SF or LF)	**Location Labeled?** (**Y**es/**N**o)	**ACM Condition** *(mark one)*		**ACC Initials**
							intact	damaged	