
CITY AND COUNTY OF DENVER
GREENPRINT DENVER
ENVIRONMENTAL MANAGEMENT SYSTEM

Internal Asbestos Requirements

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1. Overview

This Internal Asbestos Requirements Registry details the legal requirements that the City and County of Denver (CCOD) are subject to on the Federal, State and local levels. It also includes the best management practices and accepted industry standards in the respective field. The registry is intended to outline how CCOD will meet mandatory requirements as it focuses on a policy and City Program designed to represent a consensus on the continuing actions that CCOD needs to take in order to control and mitigate the health effects and environmental hazards of asbestos containing building material (ACM).

2. Purpose and Objectives

The City and County of Denver has set forth a policy for managing ACMs in City-owned and operated buildings. It establishes an organizational structure including at its center an Asbestos Management Taskforce under which the City's Asbestos Management Program is guided and which provides a forum to make informed decisions regarding asbestos management issues.

The focus of the Program is to develop and implement asbestos inspections, operations and maintenance (O&M) plans, and provides an abatement policy for City facilities where ACMs are known or are presumed to be present. Under federal and state regulations, all suspect materials are presumed to contain asbestos until laboratory analysis proves otherwise.

The Program's objectives include:

- Protecting the public health as well as the health of City employees who may encounter airborne asbestos fibers in city facilities, properties, or leased space;
- Compliance with applicable City Mayoral Executive Orders, and federal and state environmental laws, standards, and guidelines;
- Identify and mitigate potential City liability with respect to asbestos-containing building materials;
- Incorporation of appropriate elements of nationally recognized consensus standards; and
- Effective and efficient use of internal and external resources and expertise available to the City.

3. Policy

It is the policy of the City to provide a safe and healthy workplace free from significant risks of the harmful effects associated with exposure to airborne asbestos fibers. This applies to all employees and contractors, building occupants, and visitors in city-occupied or city-controlled facilities. The policy explains in detail the following points necessary to the program;

- Program Scope – related to City activities, employees, & City-owned and operated property.
- City Asbestos Management Taskforce – responsible for consensus of Program and implementation of the policy.

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- Division of Environmental Quality's (DEQ) Role – defines actions as consulting agency and limits as a financial resource.
 - Property Leasing, Acquisition Agencies, and City Leases – evaluation duties to avoid unforeseen issues related to asbestos.
 - City Departments and Agencies – overall cooperative efforts for effective management.

4. **Program Components**

The Program consists of several elements that will be utilized for the in-place management and control of ACM during routine cleaning, maintenance, renovation, and other operational activities. They are;

- Program Administration
- Building Inspection and Assessment
- Operation & Maintenance Plans
- Asbestos Safety Training
- Notification
- Surveillance and Re-inspection
- Control System
- Work Practices
- Asbestos Air Monitoring
- Medical Surveillance
- Communication, Outreach, and Program Visibility
- Disposal of Asbestos containing Material and Debris
- Procurement Practices

5. Applicable Regulations & Other Requirements

NAME	REGULATOR	CITATION	APPLICABLE PROGRAM	CCoD RESPONSIBLE PERSON
Asbestos Hazard Emergency Response Act	USEPA	Toxic Substance Control Act II – 40 CFR 763 Subpart E	Asbestos Management Program	Asbestos Program Manager
Asbestos Worker Protection Rule	USEPA	40 CFR 763 Subpart G	Asbestos Management Program	Asbestos Program Manager
National Emission Standards for Hazardous Air Pollutants	USEPA	40 CFR Part 61 Subpart M	Asbestos Management Program	Asbestos Program Manager
Asbestos Regulation for the Construction Industry	OSHA	29 CFR 1926.1101	Asbestos Management Program	Asbestos Program Manager
Respiratory Protection Standard	OSHA	20 CFR 1910.134	Asbestos Management Program	Asbestos Program Manager
Colorado Department of Public Health and Environment, Regulation No.8, Part B – Emission Standards for Asbestos	CDPHE	Colorado Air Pollution Prevention and Control Act (the Act), Section 25-7-105 (1), C.R.S. & The Act, Part 5	Asbestos Management Program	Asbestos Program Manager
Colorado Department of Public Health and Environment Solid Waste Regulations	CDPHE	-(6 CCR 1007-2) Currently under revision. -Mayor’s Executive Order No. 115 Requiring City disposal to Denver Arapahoe Disposal Site	Asbestos Management Program	Asbestos Program Manager
Managing Asbestos in Place – A Building Owner’s Guide to Operations and Maintenance Programs for Asbestos Containing Materials	USEPA	Nationally recognized standard and guidance document – Issued July 1990	Asbestos Management Program	Asbestos Program Manager

6. Applicable Permits, Plans and Procedures

NAME	REGULATORY DRIVER	PHYSICAL LOCATION	EFFECTIVE DATE	RENEWAL DATE	CCOD RESPONSIBLE PERSON
Asbestos Facility Surveys	Asbestos Policy	Program Manager	Site specific	Project specific	Asbestos Program Manager
Facility 3 Year Re-inspection Report	Asbestos Program – Operation & Maintenance	Program Manager	Site specific	Site specific	Asbestos Program Manager
Personal Asbestos Credentials	CDPHE/USEPA	Program Manager	Credential specific	Credential specific	Department Representative
Asbestos Taskforce Meetings	Asbestos Policy	N/A	In Review 2008	N/A	Asbestos Program Manager

7. Reporting Requirements

NAME	DRIVER/ GUIDANCE	FREQUENCY	RECIPIENTS (& ADDRESSES)	REQUIRED SIGNATURE	PHYSICAL LOCATION	DIA RESPONSIBLE PARTY	INSTRUCTIONS
Site Demolitions	Regulation #8	As needed	Site specific	Y	Site File	N	Survey to Permitted Process