



DEPARTMENT OF THE NAVY

BUREAU OF MEDICINE AND SURGERY
WASHINGTON, D C 20372-5120

IN REPLY REFER TO

6262/1
Ser 242/90515041.A
8 Dec 89

From: Chief, Bureau of Medicine and Surgery

Subj: BUMED INDUSTRIAL HYGIENE INVOLVEMENT IN ASBESTOS ENGINEERING CONTROL

Ref: (a) NAVMEDCOM NEREG ltr 6260 Ser 03C/90156 of 10 May 89

Encl: (1) Guidance for BUMED Industrial Hygiene Involvement in Asbestos Engineering Control
(2) Pre-work Asbestos Abatement Project Checklist

1. Policy guidance requested in reference (a) regarding Bureau of Medicine and Surgery (BUMED) industrial hygienists (IHS) role in engineering control of asbestos-containing material in Navy buildings is provided as enclosures (1) and (2).

2. The point of contact on this subject is Lieutenant Commander George Kramer, MSC, USN, Head, Occupational Health Branch, who may be reached at AUTOVON 294-1624 or Commercial (202) 653-1624.

W A Buckendorf

W. A. BUCKENDORF
Assistant Chief for Fleet
Readiness and Support

Distribution:

SNDL

FA47 (NAVHOSP_s reporting to CINCLANTFLT)
FA49 (NAVMEDCLINIC_s reporting to CINCLANTFLT)
FB58 (NAVHOSP_s reporting to CINCPACFLT)
FB60 (NAVMEDCLINIC_s reporting to CINCPACFLT)
FC16 (NAVHOSP_s reporting to CINCUSNAVEUR)
FC17 (NAVMEDCLINIC_s reporting to CINCUSNAVEUR)
FT108 (NAVHOSP_s reporting to CNET)
FT110 (NAVMEDCLINIC_s reporting to CNET)
FW1 (NATNAVMEDCEN)
FW3 (NAVHOSP_s reporting to COMNAVDIST)

Copy to:

CINCLANTFLT
CINCPACFLT
CINCUSNAVEUR
CNET
COMNAVDIST
NAVENVIRHLTHCEN (NEHC-33)

GUIDANCE FOR BUMED INDUSTRIAL HYGIENE INVOLVEMENT IN
ASBESTOS ENGINEERING CONTROL

1. Policy guidance, based on Naval Medical Command Northeast Region questions, follows:

a. Should BUMED IHs do quality assurance type sampling and inspection for asbestos abatement (baseline, boundary integrity, clearance)?

(1) "Baseline" Samples. BUMED IHs are not required to conduct "baseline" air sampling for airborne asbestos in Navy buildings just because there is asbestos present in the building. However, if, in their professional judgment such sampling is necessary to ensure the health of Navy employees and guests is protected, then "baseline" sampling shall be performed by the BUMED IH.

(2) "Boundary Integrity" Samples

(a) Contractor-performed Asbestos Abatement Projects. BUMED IHs shall conduct such sampling when substantiated complaints are received which indicate "boundary integrity" may have been compromised.

(b) Navy-Performed Asbestos Abatement Projects. BUMED IHs shall conduct sampling to verify that all Navy personnel who are in the vicinity of an asbestos abatement project but are not working inside a "regulated area" and/or "containment" are not exposed to more than 0.01 fibers per cubic centimeter (f/cc) as determined by Phase Contrast Microscopy. Projects which meet the Occupational Safety and Health Administration (OSHA) definition of small scale, short duration do not require "boundary integrity" sampling unless the cognizant BUMED IH determines otherwise. More importantly, prior to allowing work to begin, BUMED IHs, aided by enclosure (2), should assess whether the area has been properly prepared and necessary equipment staged.

(3) "Clearance" Samples

(a) Contractor-performed Asbestos Abatement Projects. BUMED IHs shall conduct clearance sampling when substantiated complaints are received which indicate the final clean-up may be inadequate. This is not considered quality assurance sampling, per se, but is necessary support provided to the Navy contracting officer to expeditiously address complaints requiring expertise of an unbiased third party. Such questions if not quickly resolved may result in unnecessary exposure of personnel and claims.

(b) Navy-performed Asbestos Abatement Projects. BUMED IHs shall collect "clearance" samples at the end of each asbestos abatement project, except those projects which meet the OSHA

definition of a small scale, short duration job. The need for 'clearance' sampling for small scale, short duration jobs shall be determined by the cognizant BUMED IH. If in doubt, provide the service and argue the point later.

b. If we are to do sampling and inspection (viz., quality assurance), is it for efforts using Navy personnel only, or are we to do contractor performed surveys?

(1) Contractor-performed Asbestos Abatement Projects. BUMED IHs shall not perform sampling and analysis which the contract requires the contractor to perform. Sampling and analysis to resolve differences of opinion between the contractor and the Navy (e.g., as in paragraph 1a(3)(a) above) shall be performed. BUMED IHs shall review proposed asbestos abatement contract abatement plans or specifications to ensure compliance with NAVOSH requirements and provide technical assistance to Resident Officers in Charge of Construction upon request.

(2) Navy-performed Asbestos Abatement Projects. BUMED IHs shall provide the full range of IH support for all Navy-performed asbestos abatement projects.

c. Should BUMED IHs do asbestos building assessment/inventory surveys? No. This can be done by persons in a number of different professional and technical fields and, due to the scarcity of IH resources, should not be done by BUMED IHs. If Navy personnel are not available, this function should be contracted.

d. Should BUMED industrial hygiene laboratories perform asbestos analysis on samples not collected by BUMED-sponsored personnel? (Note: We interpret BUMED-sponsored personnel to mean workplace monitors under technical supervision of a BUMED IH.)

(1) Contractors. Samples submitted by contractors shall not be analyzed by BUMED industrial hygiene laboratories.

(2) Navy Personnel Neither Employed By Nor Sponsored by BUMED. BUMED IHs shall be guided by the precept that they are in a service organization providing support to line commands; therefore sample analysis should be accommodated to the extent feasible. Priority shall be given to analysis of samples from jobs currently in progress.