

Office of the Inspector General

November 22, 1999

John R. Dyer
Principal Deputy Commissioner
for Social Security

Inspector General

Selected Procedures Used in the Social Security Administration's Asbestos Management Program for Its Main Complex (A-13-98-91026)

Attached is a copy of our subject final report. Our objective was to review the adequacy of selected procedures used to administer the Social Security Administration's Asbestos Management Program.

You may wish to comment on any further action taken or contemplated on our recommendations. If you choose to offer comments, please provide them within 60 days of the date of this memorandum. If you wish to discuss the final report, please call me or have your staff contact Daniel R. Devlin, Acting Assistant Inspector General for Audit, at (410) 965-9700.

James G. Huse, Jr.

Attachment

**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**SELECTED PROCEDURES USED IN
THE SOCIAL SECURITY
ADMINISTRATION'S ASBESTOS
MANAGEMENT PROGRAM FOR
ITS MAIN COMPLEX**

November 1999

A-13-98-91026

AUDIT REPORT



EXECUTIVE SUMMARY

OBJECTIVE

Our objective was to review the adequacy of selected procedures used to administer the Social Security Administration's (SSA) National Asbestos Management Program (Program).

BACKGROUND

Federal agencies are required to operate safety and health programs that comply with all health and safety standards under section 19 of the Occupational Safety and Health Act of 1970, as amended (29 U.S.C. § 668). Executive Order 12196, Occupational Safety and Health Programs for Federal Employees, requires each agency to ensure prompt abatement of unsafe or unhealthy working conditions. When an agency cannot promptly abate such conditions, it shall develop an abatement plan setting forth a timetable for the abatement and a summary of interim steps to protect employees.

Agencies are also required to have qualified personnel perform periodic inspections of workplaces using equipment designed to detect environmental hazards, such as asbestos.

In response to the Executive Order, SSA established its Program. The Office of Facilities Management (OFM) oversees this Program for managing asbestos containing building materials (ACBM). The Program calls for continuing inspection and evaluation of facilities and equipment. OFM's Office of Environmental Policy and Automation Resources (OEPAR) developed standard operating procedures for asbestos containing materials for each building in SSA's main complex.

Environmental Protection Agency guidelines¹ recommend that a "work control/permit" system be used in the control of new construction or renovation work to avoid disturbing ACBM. SSA's system requires the person requesting work to submit a work order to the SSA Office of Main Complex Management (OMCM). Work orders are submitted to the OMCM Safety and Occupational Health Specialist responsible for reviewing and approving the work orders.

RESULTS OF REVIEW

We determined that SSA had implemented the procedures we selected for review under the Program. These procedures were developed to ensure that OFM personnel have:

¹ *Managing Asbestos in Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, page 15, Work Control/Permit System.

- received appropriate annual asbestos training;
- been properly fit tested and certified to use a respirator;
- been medically certified to perform asbestos-related duties;
- implemented a work order review and approval process; and
- implemented an Environmental Hotline to address employee concerns.

However, we did note two areas of concern. We found that:

- work sites were not monitored to ensure compliance with standard operating procedures for asbestos containment and
- work order approvals were appropriate, but lacked quality assurance review.

CONCLUSION AND RECOMMENDATIONS

We believe SSA has implemented adequate policies and procedures to administer its Program. However, we believe adoption of additional controls would further enhance the Program and ensure adherence to SSA's standard operating procedures for working in the proximity of ACBM. Therefore, we recommended that:

- OMCM Safety and Occupational Health Specialists monitor work sites in the proximity of asbestos to ensure strict adherence to standard operating procedures.
- OEPAR review OMCM approved work renovation requests to ensure that decisions concerning such work orders are appropriate.

SSA COMMENTS

SSA concurred with our findings and reported that action is underway to implement report recommendations. Appendix B contains the complete text of SSA's comments.

TABLE OF CONTENTS

	Page
EXECUTIVE SUMMARY	i
INTRODUCTION	1
RESULTS OF REVIEW	4
WORK SITES WERE NOT MONITORED TO ENSURE COMPLIANCE WITH STANDARD OPERATING PROCEDURES	4
WORK ORDER APPROVALS WERE APPROPRIATE BUT LACKED QUALITY ASSURANCE REVIEW	5
CONCLUSION AND RECOMMENDATIONS	7
APPENDICES	
APPENDIX A – Random Sample – Review of Work Orders	
APPENDIX B – SSA's Comments	
APPENDIX C – Major Contributors to This Report	
APPENDIX D – SSA Organizational Chart	

INTRODUCTION

OBJECTIVE

Our objective was to review the adequacy of selected procedures used to administer the Social Security Administration's (SSA) National Asbestos Management Program (Program).

BACKGROUND

Federal agencies are required to operate safety and health Programs that comply with all health and safety standards under section 19 of the Occupational Safety and Health Act of 1970, as amended (29 U.S.C. § 668). Executive Order 12196, Occupational Safety and Health Programs for Federal Employees, requires each agency to ensure prompt abatement of unsafe or unhealthy working conditions. When an agency cannot promptly abate such conditions, it shall develop an abatement plan setting forth a timetable for the abatement and a summary of interim steps to protect employees.

Agencies are also required to have qualified personnel perform periodic inspections of workplaces using equipment designed to detect environmental hazards, such as asbestos. In addition, agencies are required to operate an occupational safety and health management information system and submit an annual report to the Secretary of Labor that includes an evaluation of all phases of its Occupational Health and Safety Program.

One known environmental hazard is the presence of asbestos in work areas. According to the United States Environmental Protection Agency (EPA), "Asbestos is known to cause cancer and other diseases if asbestos fibers are inhaled into the lung and remain there."² Those diseases include asbestosis³ and mesothelioma.⁴ EPA also cautions that, while asbestos levels in buildings in general are much lower than asbestos levels in industrial workplaces where more serious health effects have been observed, it is still important to minimize employee exposure to asbestos fibers.

In response to the Executive Order and Occupational Safety and Health Administration (OSHA) requirements,⁵ SSA established its Program. The Office of Facilities Management (OFM) oversees this Program for managing asbestos containing building materials (ACBM). The Program calls for continuing inspection and evaluation of facilities and equipment. It also requires a work protection program that provides for

² *An Advisory to the Public on Asbestos in Buildings: The Facts About Asbestos in Buildings*, 1991, page

³ Asbestosis is a lung disease caused by inhaling asbestos particles.

⁴ Mesothelioma is a cancer of the lining of the lung or abdominal cavities.

⁵ *Managing Asbestos in Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, page 15, Work Control/Permit System.

engineering controls; personnel exposure monitoring; medical surveillance; respiratory protection; and personal protection, such as protective clothing.

OFM's Office of Environmental Policy and Automation Resources (OEPAR) developed standard operating procedures to prevent any disturbance of ACBM in each building in SSA's main complex. The Office of Main Complex Management (OMCM) is responsible for overseeing asbestos abatement and managing asbestos in SSA's main complex, which includes the Altmeyer, Operations, Annex, West High/Low Rise, East High/Low Rise, and Supply Buildings located in Woodlawn, Maryland. Outside contractors, as well as SSA employees, are required to adhere to all of OEPAR's standard operating procedures without exception. OMCM is responsible for ensuring adherence to OEPAR's standard operating procedures for SSA's main office complex.

Because the EPA guidelines⁶ recommend that owners have an initial building inspection by a trained, experienced, and qualified inspector, OFM had all buildings in SSA's main complex independently surveyed at the onset of its asbestos Program. The independent surveyor recorded the location, type, and condition of asbestos in each of the main complex buildings. OMCM has SSA's main complex buildings resurveyed every 3 years.

The EPA guidelines⁷ also recommend that a "work control/permit" system be used in the control of new construction or renovation work to avoid disturbing ACBM. SSA's system requires the person requesting work to submit a work order to OMCM. Work orders are submitted to the OMCM Safety and Occupational Health Specialist responsible for reviewing and approving the work orders. The Safety and Occupational Health Specialist determines the appropriateness of the work order by reviewing the information on the work order and comparing it with asbestos survey results, performs visual inspection of the proposed work area, and/or collects bulk samples for laboratory analysis when necessary. The Safety and Occupational Health Specialist makes one of three determinations: (1) there is no ACBM in the area and the work order is approved; (2) the work to be performed is located in the proximity of ACBM and standard operating procedures must be followed at the work site; or (3) the work site is in an area that contains asbestos and the asbestos must be abated by an outside contractor before the work order is approved.

SCOPE AND METHODOLOGY

Our objective was to review the adequacy of selected procedures of SSA's Program. Because we do not possess the technical expertise in asbestos inspection or removal, we did not: (1) evaluate work performed in the proximity of work areas containing ACBM; (2) inspect sites where ACBM had been abated; or (3) inspect the location and condition of existing ACBM in SSA's main complex. We performed work at SSA's main complex in Woodlawn, Maryland, from May through August 1998. We conducted this

⁶ *Managing Asbestos in Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, page 7, *Building Inspection and Assessment*.

⁷ *Managing Asbestos in Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, page 15, *Work Control/Permit System*.

audit in accordance with generally accepted government auditing standards and included:

- reviewing a randomly selected sample of work orders approved by the Safety and Occupational Health Specialist from October 1, 1997, to May 31, 1998, to determine whether work orders were compared to independent building surveys and whether the appropriate guidelines were applied during the work order review and approval process;
- reviewing SSA's Environmental Hotline log of entries made between July 1997 and July 1998 to identify the type and number of asbestos complaints received and the action taken by OEPAR to respond or refer complaints to the appropriate staff;
- reviewing documentation to determine whether OFM personnel have completed the required annual asbestos training, were properly fit tested and certified to use a respirator, and medically approved to perform asbestos-related duties by SSA's qualified contractor who is licensed by the State of Maryland as an Occupational Health Physician;
- reviewing Executive Order 12196, OSHA policy, applicable EPA and General Services Administration (GSA) guidelines, SSA Administrative Instructions Manual System Chapter 13, OEPAR's standard operating procedures and other applicable Federal and State guidelines;
- interviewing SSA personnel responsible for establishing and administering the policies and procedures to oversee the Program; and
- interviewing personnel at the General Accounting Office (GAO) and GSA, reviewing their standard operating procedures for asbestos management, and benchmarking SSA's policies and procedures against the GAO and GSA procedures.

RESULTS OF REVIEW

We determined that SSA had implemented the procedures we selected for review under the Program. These procedures were developed to ensure that OFM personnel have:

- received appropriate annual asbestos training;
- been properly fit tested and certified to use a respirator;
- been medically certified to perform asbestos-related duties;
- implemented a work order review and approval process; and
- implemented an Environmental Hotline to address employee concerns.

However, we did note two areas of concern. We found that:

- work sites were not monitored to ensure compliance with standard operating procedures for asbestos containment and
- work order approvals were appropriate, but lacked quality assurance review.

WORK SITES WERE NOT MONITORED TO ENSURE COMPLIANCE WITH STANDARD OPERATING PROCEDURES

We are concerned that ACBM violations may occur and may not be detected by OMCM because work sites are not being monitored to ensure compliance with OEPAR's standard operating procedures. OMCM recognized the need to establish and implement an oversight Program for work performed in accordance with asbestos standard operating procedures. OMCM staff informed us that they were revising standard operating procedures and developing plans that would require the Safety and Occupational Health Specialists to begin random work site visits. The plans include integrating these additional responsibilities into OMCM's existing duties and responsibilities.

We are concerned because of two incidents that were brought to our attention during our review. In each incident, OMCM's standard operating procedures had been violated. In one incident, an SSA employee removed ceiling tiles without using the proper respiratory protection or containment procedures to reduce risk of exposure to himself and other employees. We were informed that all OFM employees met to address this violation of OEPAR's standard operating procedures. As a result of the meeting, OFM determined that employees did not appropriately apply the standard

operating procedures to their work. OFM addressed the issue by appointing a work group to review and revise the standard operating procedures used by employees. In addition, the Associate Commissioner for Facilities Management issued a memorandum to employees who process work order requests and to those who review work orders and perform operations/maintenance stating, "Everyone is REQUIRED to adhere to the standard operating procedures attached to the work orders. . . ." The memorandum also advised employees who require guidance on the use of the standard operating procedures prior to performing their duties to ". . . consult the Safety and Occupational Health Specialist identified on the Asbestos Review Sheet. If the Safety and Occupational Health Specialist is not available, you [the employee] should consult the immediate supervisor for direction."

A second incident involved an outside contractor who, while installing cable in the Annex building, disregarded OEPAR's standard operating procedures and drilled a hole in a ceiling tile within the 10-foot perimeter of the building's exterior wall. SSA's standard operating procedures prohibit ceiling work within 10 feet of the building's perimeter because the beams around the building's perimeter are covered with spray-applied asbestos. As a result of an OFM investigation, OFM now requires the Office of Acquisition and Grants to include in all contracts a provision that any contractor's employee identified as violating SSA standard operating procedures will be removed from SSA property and not allowed to return.

While we found no evidence that the violations resulted in employee exposure to asbestos, these incidents indicate the need for additional monitoring of work sites in the proximity of ACBM. Our benchmarking of SSA's asbestos management procedures with GSA and GAO supports the need to monitor work sites. We found that GAO and GSA consider the monitoring of work areas in and around ACBM so essential they have contracted with outside vendors to constantly monitor areas in their buildings where ACBM is located. The contractors not only ensure workers are adhering to environmental contract requirements, but also that a work permit is secured from their ACBM management office for all work in progress. We believe that adoption of a procedure for OMCM to monitor work being conducted in the proximity of ACBM, such as currently in place at GSA and GAO, will enhance SSA's Program.

WORK ORDER APPROVALS WERE APPROPRIATE BUT LACKED QUALITY ASSURANCE REVIEW

According to SSA's manual, *The Program to Control Asbestos-Containing Materials (ACM) for the Social Security Administration*, the Headquarters' work permit system is ". . . the primary tool employed by the Asbestos Section⁸ to ensure that routine maintenance and renovation activities do not disturb ACM. . . ." Safety and Occupational Health Specialists are responsible for reviewing work orders to determine whether the work site is near ACBM. To facilitate this determination, the Safety and Occupational Health Specialist compares proposed work sites with asbestos surveys of

⁸ Although the Asbestos Section no longer exists, its duties are now the responsibility of OFM.

the main complex, visually inspects the work sites, and/or collects bulk samples for laboratory analysis when necessary. Depending on the results of these procedures, the Safety and Occupational Health Specialist makes one of the following three decisions concerning the approval of the work order.

- If the work site does not contain or is not near ACBM, the work order is approved.
- If the work site is in an area containing ACBM requiring abatement, the work order is not approved until the necessary abatement work is completed.
- If the work site is near an ACBM area not requiring abatement, the work order is approved. Appropriate standard operating procedures are attached to the work order instructing SSA maintenance personnel or contractor employees on safety precautions that are necessary because of the presence of ACBM.

To test these procedures, we took a random sample of 30 of the 413 work orders (see Appendix A) approved by the Safety and Occupational Health Specialists between October 1, 1997, and May 31, 1998, to determine the effectiveness of the Safety and Occupational Health Specialists' processing of the work orders. We compared those work orders with the buildings' asbestos surveys to determine the correctness of the Safety and Occupational Health Specialists' approvals. We found that the Safety and Occupational Health Specialists made the appropriate approval decision in each of the sample cases. Moreover, in cases where there was ACBM in the work area, OEPAR's standard operating procedures were attached to the work orders instructing SSA maintenance personnel or contractor employees on safety precautions to be taken at the work site. There were no sample cases where ACBM abatement was required.

During our audit work, we found no evidence that OEPAR conducted a post-approval evaluation of work orders reviewed and approved by OMCM to ensure they were correctly processed. The Director of the Division of Environmental Services informed us that the component's mission requires quality assurance review of the work orders, but due to priorities, the reviews were not performed. We believe a formal procedure for periodically reviewing the work orders would provide an appropriate additional control to ensure that potential risks are identified and that appropriate standard operating procedures are included with the renovation requests.

CONCLUSION AND RECOMMENDATIONS

We believe SSA has implemented adequate policies and procedures to administer its Program. However, we believe adoption of additional controls would further enhance the Program and ensure adherence to SSA's standard operating procedures for working in the proximity of ACBM. Therefore, we recommend that:

- OMCM Safety and Occupational Health Specialists monitor work sites in the proximity of asbestos to ensure strict adherence to standard operating procedures.
- OEPAR review OMCM approved work renovation requests to ensure that decisions concerning such work orders are appropriate.

SSA COMMENTS

SSA concurred with our findings and reported that action is underway to implement the recommendations. Appendix B contains the complete text of SSA's comments.

APPENDICES

RANDOM SAMPLE REVIEW OF WORK ORDERS

**Social Security Administration
Office of the Inspector General, Office of Audit**

Unrestricted Attribute Appraisal	
Universe Size	413
Sample Size	30
Desired Characteristic(s)	
Quality Identified in Sample	0
Projected Quantity in Universe	0
Percent	0.000%

We are 90 percent confident that the maximum possible error rate is 7.25 percent.

APPENDIX B

SSA COMMENTS

COMMENTS ON OFFICE OF THE INSPECTOR GENERAL (OIG) DRAFT REPORT,
"SELECTED PROCEDURES USED IN THE SOCIAL SECURITY
ADMINISTRATION'S ASBESTOS MANAGEMENT PROGRAM"
(A-13-98-91026)

We appreciate OIG's review of this critical area. We are pleased that OIG found SSA has implemented adequate policies and procedures to administer its Asbestos Management Program. We agree that adopting additional controls would further enhance this Program. Action is underway to implement the report recommendations.

Recommendation

The Office of Main Complex Management's (OMCM) Safety and Occupational Health Specialists (SOHS) monitor work sites in the proximity of asbestos to ensure strict adherence to standard operating procedures.

Comment

We agree that the OMCM specialists should monitor work sites in the proximity of known asbestos containing building materials (ACBM) to ensure adherence to standard operating procedures. In February 1999 OMCM added the standard operating procedures Oversight Program to its ongoing oversight responsibilities. The Program was implemented to ensure strict adherence to standard operating procedures where work has the potential to disturb ACMB but can be performed in accordance with standard operating procedures.

Compliance is monitored in accordance with Occupational Safety and Health Administration regulations at 29 CFR 1926.1101. One hundred percent oversight is performed in areas that have a greater potential for asbestos disturbance, i.e., those areas within the 10-foot perimeter in the Altmeyer, Annex and Operations Buildings, and above the ceiling in the Supply Building.

In areas with lower degrees of risk, sufficient oversight is conducted to provide a statistically valid assurance that standard operating procedures are adhered to. Examples where lower risk is involved include removal of asbestos-containing floor tile, removal/replacement of ceiling tile in areas other than the 10-foot perimeter, and phone installation.

The work files documenting oversight are reviewed on a quarterly basis, and oversight reports are distributed to appropriate officials.

Recommendation

The Office of Environmental Policy and Automation Resources (OEPAR) review OMCM approved work renovation requests to ensure that decisions concerning such work orders are appropriate.

Comment

We agree. OEPAR will review work renovation requests as recommended.

Technical Comment

Page 2, second paragraph

The first sentence should be revised. Instead of "...for containing asbestos for each building..." it should state "to prevent any disturbance of ACBM in each building..."

APPENDIX C

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For additional copies of this report, please contact the Office of the Inspector General's Public Affairs Specialist at (410) 966-5998. Refer to Common Identification Number A-13-98-91026.

APPENDIX D

SSA ORGANIZATIONAL CHART
