



COMPLIANCE ASSISTANCE PROGRAM

When Are Alternate Asbestos Removal Methods Necessary?

INTRODUCTION

Most asbestos projects can be conducted using the conventional asbestos abatement procedures specified in Section 3.07 of Yakima Regional Clean Air Agency Regulation I. However there may be circumstances in which one or more of the requirements listed in Section 3.07 may not be feasible for a particular asbestos project (e.g. damaged structures). In these instances, Alternate Asbestos Removal Methods (refer to section 3.07.J of Yakima Regional Clean Air Agency Regulation I) may be necessary to properly remove and dispose of asbestos containing materials (ACM).

To determine if Alternate Asbestos Removal Methods are necessary to remove and dispose of ACM properly, refer to the following checklist.

CHECKLIST

If you answer "No" to any of the following questions, then Alternate Asbestos Removal Methods, specified within an Alternate Work Plan (AWP), may be required to ensure ACM is removed and disposed of properly. The AWP must be submitted with the required Notice of Demolition or Renovation form to Yakima Clean Air.

yes no Is all ACM, including presumed ACM, intact within or on the structure and readily identifiable?

ACM that has been disturbed may require Alternate Asbestos Project Work Practices. Possible exceptions include:

- A small debris pile on an impervious surface such as concrete may be abated in some cases using conventional abatement methods if all debris is treated as ACM.
- A small distinct debris pile consisting of largely intact and easily identifiable materials (e.g., roofing, siding, vinyl tile), but excluding materials such as ash, acoustical ceiling texture ("popcorn"), and fine or pulverized materials on a lawn or on a compact dirt surface might, in some cases, be abated using conventional abatement methods.
- Some individual pieces of easily identifiable cement board siding that have fallen to the ground can generally be collected using conventional methods.

A debris pile not described above (e.g. known or presumed ACM debris mixed to some degree on a dirt surface; fine or small pieces of ACM such as ash, "popcorn", or other materials that are not easily discernable on grass or dirt surfaces; and when the boundaries of a debris pile/field are not distinct or clearly identifiable) requires an AWP specifying the Alternate Asbestos Removal Methods necessary to address the asbestos contaminated area.

yes no Will manual methods be used exclusively to remove and dispose of ACM and asbestos-containing waste material (ACWM)?

The use of mechanical means such as a back hoe, track hoe, skid steer loader or other mechanized tools or equipment typically damages the ACM/presumed ACM is not approved per Section 3.07.I. However, exceptions per standard industry practices include:

- Use of a stationary fixed blade attached to a motorized vehicle (i.e. Terminator) is acceptable for vinyl floor tile removal. Also refer to WISHA Interim Interpretive Memorandum #97-7-G.
- Use of a self-contained shot blasting equipment (i.e. Blastrac) is acceptable for abating floor tile mastic



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provided the machine is fitted with HEPA filtration and work is done within a negative pressure enclosure.

- Use of vacuum trucks or trailers are acceptable for vermiculite removal provided the exhaust is HEPA filtered.

- yes no Will the work be performed in a controlled area? (Section 3.07.1.4.a)
- yes no Will all absorbent ACM, such as surfacing material and thermal system insulation, be immediately saturated with a liquid wetting agent prior to removal and kept wet until sealed in leak-tight containers? (Section 3.07.1.2.d)
- yes no Will all nonabsorbent ACM, such as cement asbestos board or vinyl asbestos tile, be continuously coated with a liquid wetting agent on any exposed surface prior to and during removal, and kept wet until sealed in leak-tight containers? (Section 3.07.1.2.f)
- yes no Will the ACM being removed be carefully lowered to the ground or the floor without dropping it, throwing it, sliding it, or otherwise damaging it? (Section 3.07.1.2.j)
- yes no Will all absorbent and nonabsorbent asbestos-containing waste material be kept saturated or continuously coated with a liquid wetting agent until sealed in leak-tight containers? (Section 3.07.1.2.g)
- yes no Will all ACWM resulting from the asbestos project be sealed in leak-tight containers as soon as possible, but no later than the end of each work shift? (Section 3.07.1.2.g)
- yes no Will the clean exterior of each leak-tight container be labeled with asbestos warning signs as specified by the Washington Department of Labor and Industries or the Occupational Safety and Health Administration? (Section 3.07.1.2.h)
- yes no Will each leak-tight container be permanently marked with the date the material was collected for disposal, the name of the waste generator, and the address at which the waste was generated? (The marking must be readable without opening the container.) (Section 3.07.1.2.i)
- yes no Will the asbestos-containing waste material be stored in a controlled area until transported to, and disposed of at, a waste disposal site approved to accept asbestos-containing waste material? (Section 3.07.1.2.k)

If you answered "no" to any question above, contact Keith Hurley at 834-2-50, ext 112 or at keith@yrcaa.org to determine if an alternate work plan is required.