



# When are Alternate Asbestos Project Work Practices Necessary?

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## INTRODUCTION

Most asbestos projects can be conducted using the conventional asbestos abatement procedures specified in Section 9.06 of Spokane Regional Clean Air Agency Regulation I. However there may be circumstances in which one or more of the requirements listed in Section 9.06 may not be feasible for a particular asbestos project (e.g. damaged structures). In these instances, Alternate Asbestos Project Work Practices (refer to section 9.08.A of Spokane Regional Clean Air Agency Regulation I) may be necessary to properly remove and dispose of asbestos containing materials (ACM).

To determine if Alternate Asbestos Project Work Practices 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 Project Work Practices, specified within an Alternate Work Plan (AWP), may be required to ensure ACM is removed and disposed of properly. The use of Alternate Asbestos Project Work Practices must be indicated on the required Notice of Intent form submitted to Spokane 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 Project Work Practices 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 which is prohibited per Section 9.06.B.4.

Exceptions per standard industry practices:

- 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 provided the machine is fitted with HEPA filtration and work is done within a negative pressure enclosure. All other requirements apply (e.g. wetting).
- 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 9.06.B.1)
- 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 9.06.B.3.a)
- 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 9.06.B.3.b)
- 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 9.06.B.4)
- 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 9.06.B.5.a)
- 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 9.06.B.5.b)
- 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 9.06.B.5.c)
- 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 9.06.B.5.d)
- yes  no Will the leak-tight container be carefully handled without dropping it, throwing it, sliding it, or otherwise damaging it? (Section 9.06.B.5.e)

- 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 9.06.B.5.f)
- yes  no Will the asbestos project be conducted in a manner which produces no visible emissions? (Section 9.06.B.6)