

Removal of Asbestos Containing Material (ACM) Using Dry Method



A Message from the Spokane Regional Clean Air Agency

Spokane Regional Clean Air Agency Regulation I, Article IX requires the use of wet removal methods except as provided for in Section 9.08. For example, when standard asbestos project work practices in Section 9.06.B can not be utilized (financial consideration aside) to remove asbestos-containing material (ACM) prior to renovation or demolition, an alternative means of compliance may be used. Similarly, the federal asbestos NESHAP (40 CFR 61.145(c)(3)(i)) provides for dry removal on renovation projects under very limited circumstances where wetting would unavoidably damage equipment or present a safety hazard.

One scenario where dry removal might be necessary is when ACM is being removed from an electrical structure or component where standard wet methods cannot be utilized because equipment would likely be damaged or safety would be jeopardized. Again, performing dry removal of ACM is unlawful except in extraordinary conditions when standard methods can not be used and only when an alternative means of compliance work plan has been prepared pursuant to Section 9.08.

Can Shot Blasting Machines Be Used to Remove Flooring Mastic?

The United States Environmental Protection Agency (EPA) only allows the use of shot-blasters on wetted flooring. The mastic must be wetted before and during the shot blasting operation, keeping the shot-blasted material adequately wet before collection.

An abstract from EPA on the Applicability Determination on the Use of Shot Blasting Machines dated September 21, 1990 (Control Number C76) states, “Nonfriable material (including floor tile mastic) which is removed using abrasive forces such as grinding, sanding or other abrasive methods, is subject to the asbestos NESHAP regulation. The shot-blasting operation would cause nonfriable asbestos material (mastic) to be crumbled, pulverized, or reduced to powder, and therefore, asbestos NESHAP work practices must be followed. This means adequately wetting the nonfriable material (mastic) before and during the shot-blasting operation, keeping the shot-blasted material adequately wet before collection, and disposing of the waste according to the requirements of the asbestos NESHAP. In addition, because this process does cause asbestos-containing material to be crumbled, pulverized or reduced to powder, shot blasting must be performed under wet conditions.” The asbestos NESHAP does not allow for an alternative to wet methods except under very limited circumstances.

Similarly, Spokane Regional Clean Air Agency Regulation I, Article IX, Section 9.06.B requires continuously coating the non-absorbent ACM mastic with a liquid wetting agent prior to and during removal and keeping it wet until sealed in leak-tight containers. Only in very limited situations where standard asbestos project work practices in Section 9.06.B can not be utilized (financial considerations aside) will dry removal be an option. When such a situation exists, removal must be conducted in accordance with SRCAA Regulation I, Section 9.08.A - Alternative Means of Compliance.

October 2010