

Asbestos: Asbestos Hazard Emergency Response Act

National Emission Standards for Hazardous Air Pollutants

David Charlesworth, CIH

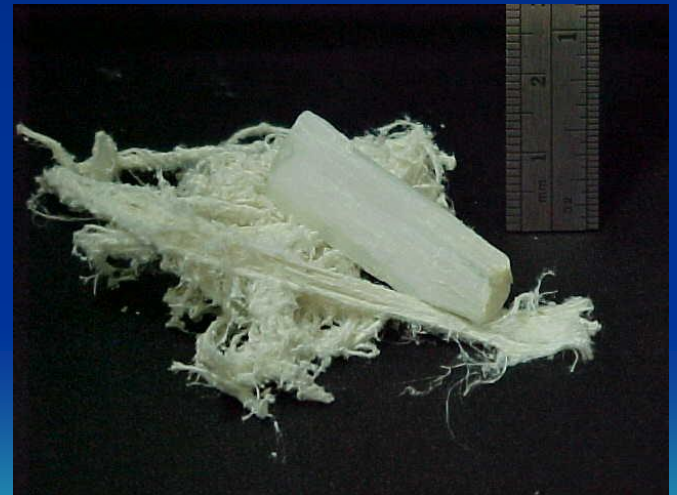
President

Acme Environmental, Inc.



Asbestos

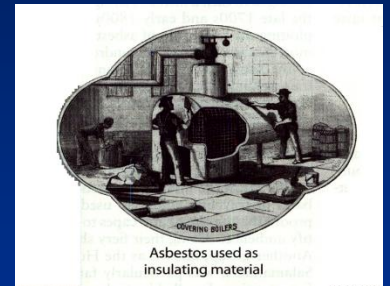
- "Asbestos" is the name of a class of magnesium-silicate minerals that occur in fibrous form. Minerals that are included in this group are;
- chrysotile,
- crocidolite,
- amosite,
- anthophyllite asbestos,
- tremolite asbestos, and
- actinolite asbestos.



ACM

- Asbestos Containing Material
 - Greater than one percent by
 - Polarized Light Microscopy

- Asbestos Containing Building Material
 - Surfacing
 - Thermal System Insulation
 - Miscellaneous



- Main Topic:
 - Perform the Inspection
 - Create an up-to-date Management Plan
 - Annual Notification to parents, guardians and teachers
-
- Asbestos Work Notification



Regulations

- EPA
 - ACM in Schools Rule (AHERA) 40 CFR 763
 - Renovation/Demo Rule (CAA) 40 CFR 61
- OSHA
 - Asbestos in Construction 29 CFR 1926.1101
 - Respiratory Protection 29 CFR 1910.134
- Department of Transportation
 - Packaging & Labeling 49 CFR 170's



Environmental Protection Agency

- TSCA: Toxic Substances Control Act
- EPA addresses TSCA with 40 CFR 763
 - Asbestos in Schools rule
 - Inspect and Control Friable Materials
 - Six month surveillance
 - Three year re-inspections
 - Control Option Selection



- Congress updates TSCA in 1985
- Asbestos Hazard Emergency Response Act (AHERA for School)



- Identify ACM
- Develop Written Management Plan
- Take Appropriate Actions to Control ACM
- Use Accredited Individuals to Conduct these activities
- EPA to Enforce Penalty for Non-Compliance

- October 1987 EPA promulgates 40 CFR 763 Amendments
- Asbestos Containing Materials in Schools Rule
- \$5,000 and \$25,000 Penalties
- April 1987 Model Accreditation Plan
- Training Requirements



Training

- Accredited
- Contractors
- Asbestos workers
- Inspectors
- Management Planner
- Designers
- Project Monitors
- Required Non-Accred
- Asbestos Awareness
- Maintenance Workers
- Designated Person
- Certain Roofers

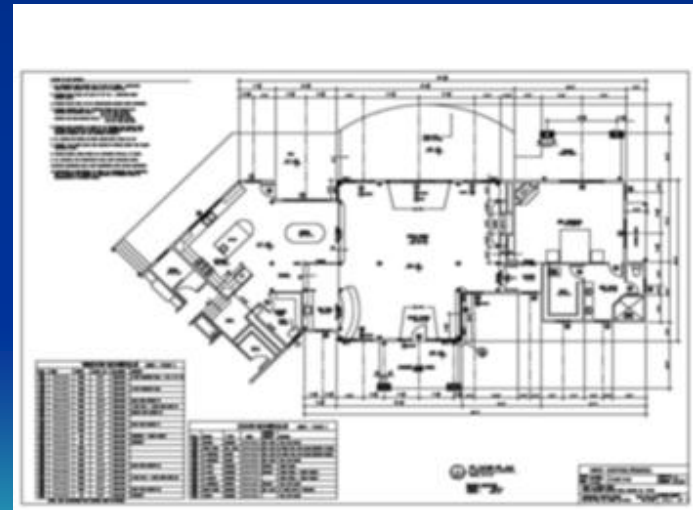


Inspection Issues

- Excluded items
 - Stored,
 - Exterior,
 - Roofing materials,
 - Landscaping
 - Electrical



- Included Buildings
 - Dormitories,
 - Administrative,
 - Leased (Exc. Bowling Alley)
 - Mechanical Buildings,
 - Exterior mechanical systems



ASHARA

- Congress ASHARA: Asbestos in Schools Hazard Abatement and Reauthorization Act
- Prescribes Model Accreditation Plan to Public and Commercial Buildings



Control Options

- Removal
- Encapsulation
- Enclosure
- Operations and Maintenance
- Repair and Cleaning



3000 Building Products

- Acoustic Plaster
- Adhesives
- Boiler Insulation
- Caulking
- Ceiling Tiles
- Duct Insulation
- Fireproofing
- Mastic
- Paper Products
- Pipe Gaskets
- Pipe Insulation
- Pipe Valve Insulation
- Roofing Felts
- Siding
- Transite (Cement)
- Vinyl Asb Floor Tiles

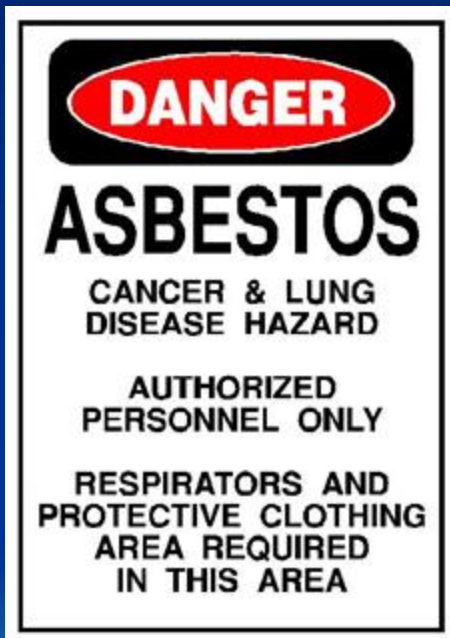


Training for In-House Personnel

- Teachers, Staff and Custodial
 - 2 Hour Awareness Training. Documented
- Minor Fiber Release Episodes (3 sf or 3 lf)
 - 16 Hours Maintenance Personnel
- Asbestos Removal Crews (In House)
 - 40 hour Supervisor/ 32 hour Worker
- LEA Designated Person:
 - Inspection, Management Plans, Abatement – Removal Principles.



- Posting and Labeling



Procedures

- Develop Procedures for the following:
- Inspections,
- Re-inspections,
- Cleaning,
- PPE,
- Communication Plan,
- Medical Surveillance,
- Notifications,
- Control Options,
- and future building acquisitions.



NESHAP

- National Emissions Standards for Hazardous Air Pollutants
- Demolition and Renovation Activities



Clean Air Act

- NESHAP Categories
- Friable
- Category 1 Non- Friable
 - Packings, Gaskets, Flooring and Roofing
- Category 2 Non- Friable
 - Everything Else declared Non-Friable
 - Sheetrock Wallboard Systems, Transite



National Emission Standards for Hazardous Air Pollutants

- Clean Air Act
- Demolition and Renovation

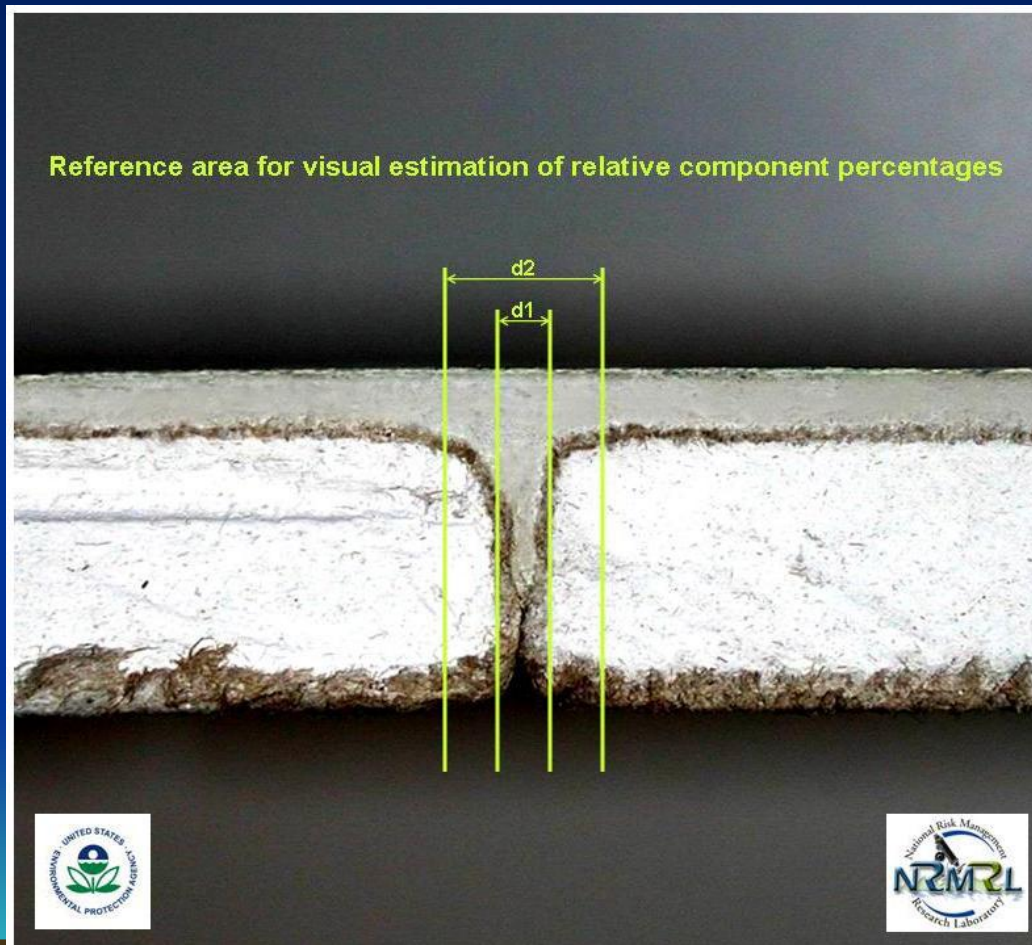


RACM

- Regulated Asbestos Containing Material
 - Friable
 - Cat.1 Non-Friable that becomes friable
 - Cat.1 Non-Friable subject to Sanding, Grinding, Cutting or Abrading
 - Non-Friable which becomes pulverized by force
 - New Topic: Pulverized at the landfill
responsibility of the Generator under State of NM



Wallboard System



- Important topic - All materials must be sampled
- Friable, Category I Non-friable And Category II Non-friable – No more assuming the material is positive or ACM.
- Transporters are not allowed to transport without verification



Notification Requirements

- Renovation Projects involving ACM
 - Projects Larger than 260 Linear feet or 160 square feet
 - Ten (10) Working Days in advance
- All Demolitions Projects
 - regardless of asbestos content
 - Ten (10) Day Notification



Notification Requirements

- Northern Pueblos
- Southern Pueblos
 - EPA Region 6 Dallas, TX
 - Elvia Evering 214 665 7575
- Navajo Nation
 - EPA Region 9 San Francisco, CA
 - Bob Trotter 415 972 3989



Notification Requirements

- New Mexico Environment Department
- Air Quality Bureau
- Scott Vail or Alan Morris (505) 476-4357
- www.nmenv.state.nm.us/aqb/asbestos/index.html
- Electronic Submission of Notification



Notification Requirements

- City of Albuquerque- Bernalillo County
- City of Albuquerque Air Quality
- Chris Luna (505) 768-1972
- www.cabq.gov/airquality/asbestos.html
- Fee = \$21.00 x (LF/260 + SF/160)




- BIA – Mr. Kendall Olsen
- 301 W Hill Ave
- Gallup, NM 87301
- (505) 863-8411




Example Notification

Version 10/30/2008



New Mexico Environment Department
Air Quality Bureau
 1301 Siler Road Building B
 Santa Fe, NM 87507
 Phone (505) 476-4300 Fax (505) 476-4375



NEW MEXICO ENVIRONMENT DEPARTMENT ASBESTOS NESHAP NOTIFICATION (40 CFR Subpart M §61.145 (b))			
I. OWNER INFORMATION (§ 61.145(b)(4)(ii))			
Owner:			
Address:			
City:	State:	Zip:	
Contact:	e-mail:	Tel:	
II. CONTRACTOR INFORMATION (§ 61.145(b)(4)(iii))			
Removal Contractor:			
Address:			
City:	State:	Zip:	
Contact:	e-mail:	Tel:	
NESHAP Contractor Certification Expiration Date:	NM GB-98 and GS-29 Contractors License No.'s and Expiration No: _____ Date: _____		
III. FACILITY INFORMATION (§ 61.145(b)(4)(i - ix))			
Facility Name and Description:		County:	
Address (street, city, state, zip):			
Building Information: Use:	Square Feet:	Age:	No. Floors
Is asbestos present? Yes <input type="checkbox"/> No <input type="checkbox"/>	Method of asbestos determination:		
Describe asbestos application (thermal insulation, Transite, Category 1, Category 2, etc.)			
Estimate asbestos to be removed: Pipe removal (linear feet): Surface to be cleaned (square feet): Asbestos debris to be removed (cubic yards):	Estimate non friable asbestos to remain and specify units: Category 1: Category 2:		
Type of Notification: Original: <input type="checkbox"/> Revised: <input type="checkbox"/> Tracking no.: _____	Type of Operation: Demolition: <input type="checkbox"/> Renovation: <input type="checkbox"/>		
If revised, specify reason for revision:	Work Schedule: Normal (M-F, days only): <input type="checkbox"/>		
Asbestos Removal Schedule: Start: _____ Finish: _____	Demolition Schedule: Start: _____ Finish: _____		

New Mexico Air Quality Bureau Asbestos Demolition and Remediation Notification **Page 2**

IV. WORK PLAN (§ 61.145(b)(4)(x - xi))			
Description of planned work and methods to be used and description of affected facility components (i.e. acoustical ceiling scrape, whole pipe removal, TSI removal, roofing removal, etc.)			
Description of work practices and engineering controls to be used to prevent emissions of asbestos at the work site (i.e. containment, glove bagging, wetting, filtration devices, etc.):			
V. WASTE TRANSPORTER (§ 61.145(b)(4)(xvii))			
Name:	Telephone:		
Address:	City:	State:	Zip:
VI. WASTE DISPOSAL SITE (§ 61.145(b)(4)(xii))			
Name:	Telephone:		
Address:	City:	State:	Zip:
VII. DEMOLITION ORDERED BY A GOVERNMENT AGENCY (§ 61.145(b)(4)(xiv))			
Explain: (Describe Agency, Agency Contact, Circumstances, Date of Order and Start Date)			
VIII. EMERGENCY RENOVATION (§ 61.145(b)(4)(xv))			
Explain: (Describe nature of the emergency; date and hour of unexpected event;			
IX. UNEXPECTED DISCOVERY OF FRIABLE ASBESTOS (§ 61.145(b)(4)(xvi))			
Describe procedures that will be taken in the event that unexpected asbestos is found or previously nonfriable asbestos material becomes friable (equipment on hand, available, subcontractor, etc.)			
X. CERTIFICATIONS (§ 61.145(b)(4)(xiii))			
I certify that asbestos remediation will be carried out by a contractor with valid New Mexico GB-98 and GS-29 licenses.			
I certify that an individual trained in the provisions of the Asbestos NESHAP (40 CFR 61, subpart M) will be on site during the demolition, renovation and evidence that the required training has been accomplished by this person will be available for inspection during normal business hours.			
I certify that the information contained in this notification is correct.			
Signature of Owner/Operator			Date:

E-MAIL COMPLETED FORM (as a word document) TO:

asbestos.aqb@state.nm.us

Project Design



Waste Disposal



New Mexico

- Storage
 - Previous 45 Days
 - Current 90 Days
- Proposed Action
 - Transfers
 - 210 Cubic Yards
- Responsibility
 - Hauler
 - Verification
 - Compliance



Questions

David Charlesworth, CIH

Acme Environmental, Inc.

(505) 872-2263

