



Alternate Asbestos Surveys

For AHERA Building Inspectors in Spokane County

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Spokane Regional Clean Air Agency (Spokane Clean Air) Regulation I, Article IX, Section 9.03, addresses the requirement for an *Asbestos Survey* as defined in Section 9.02.G. If all suspect asbestos-containing materials are not presumed to be asbestos-containing material, an asbestos survey must be performed. An asbestos survey consists of a written report resulting from a thorough inspection performed by an AHERA building inspector using the conventional sampling methods in EPA regulations (40 CFR 763.86) or an alternate asbestos survey method.

A written alternate asbestos survey method as described in Section 9.03.F.3 shall be prepared and used prior to renovation or demolition on occasions when conventional sampling methods can not be exclusively performed (all other asbestos survey requirements in Section 9.03 of Spokane Clean Air's Regulation apply). For example, conventional sampling methods may not be possible on damaged buildings or portions thereof, rubble or debris piles, and ash or soil, because they are not structures with intact materials and identifiable homogeneous areas. Alternate asbestos survey methodology may be used alone or, when possible, in combination with conventional survey methodology.

An alternate asbestos survey methodology typically includes establishing a grid pattern (e.g. 10' x 10') and collecting samples of all identifiable pieces of suspect asbestos-containing building materials within each grid. In many cases, asbestos-containing material (ACM) is hidden within debris piles. In addition to collecting identifiable suspect ACM, random composite samples of non-identifiable materials (e.g. burned building materials), soil, and ash typically must also be collected from each grid at incremental 1' depths. An illustration of how the principles of such sampling techniques are applied can be found on pages 167 and 168 of the EPA publication, *Preparation of Soil Sampling Protocols: Sampling Techniques & Strategies*, EPA/600/R-92/128, July 1992. The publication is posted on Spokane Clean Air's website at www.spokanecleanair.org.

If sample results show asbestos fibers are present within a grid area, the debris, ash, and/or soil located within that entire grid is typically considered to be asbestos containing waste material per Spokane Clean Air Regulation I, Article IX, Section 9.02.E.

If asbestos is found using alternative survey methodology, it generally cannot be abated using standard work practices. See Spokane Clean Air's publication, *When are Alternate Asbestos Project Work Practices Necessary?*

Below are guidelines for the content of an alternate asbestos survey. The guidelines are not intended to be a substitute for applicable regulations.

Alternate Asbestos Survey Content Guidelines

For an alternative asbestos survey method to be adequate pursuant to Spokane Clean Air Regulation I, Section 9.03.F.3, it must typically include, at a minimum, the following:

- (1) Owner name, address, and telephone number;
- (2) Name and certification number of AHERA Building Inspector to survey the site;
- (3) Physical address of site to be surveyed;
- (3) Description of area to be surveyed;
- (3) Site schematic with structure and/or debris layout and approximate dimensions;
- (4) Proposed sampling method, which includes:
 - a. Grid dimensions (e.g., 10' x 10' squares).
 - b. Location of samples (e.g., randomly selected within each 10' x 10' grid).
 - c. Type of samples (e.g., composite bulk samples of identifiable suspect asbestos-containing materials (ACMs) and composite bulk ash and/or soil samples).
 - d. Number of samples (e.g., At the surface and at incremental 1' depths: 1 sample of suspect ACMs from each grid and 1 sample of composite ash and/or soil from each grid).
 - e. Laboratory analysis (e.g., all samples submitted to NAVLAP accredited laboratory and all samples analyzed using PLM analysis with "one-hot, all-hot" approach on some sample series) and note that PLM analysis for ash and/or soil gives only the presence or non-presence of asbestos, not a percentage of asbestos result).
 - f. An explanation of how laboratory results will be used (e.g., If using a "one-hot, all-hot" approach for samples taken from a debris pile, analysis will stop with the first hot sample of ACM and all debris will be treated as friable ACM (or) if a determination is to be made that the debris pile is to be treated as nonfriable, all samples collected will be analyzed. For ash and/or soil samples shown to contain asbestos, either TEM will be employed to get a percentage result or the entire debris pile will be treated as friable ACM).
- (5) Proposed sampling date.