Damaged Structures

From Asbestos Surveys to Clean-Up

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Asbestos surveys normally are performed prior to renovation or demolition. However, structures are sometimes damaged prior to obtaining an asbestos survey (e.g. damaged by fire), which makes the structure or a portion of the structure permanently uninhabitable or unusable. The damage may preclude conventional asbestos surveys from being performed on some portion of the structure, or in some cases, on the entire former structure.

When structures are damaged, promptly taking the steps outlined in this information sheet to assess the presence of asbestos is important in safeguarding public health. Until the site is cleaned-up, reasonable measures must be taken by the owner to prevent visible emission.

The guidelines that follow are intended to help owners of damaged structures, consultants, and contractors comply with Asbestos Control Standards in Spokane Regional Clean Air Agency (Spokane Clean Air) Regulation I, Article IX. This guidance is not a substitute for the regulation. Depending on the extent of damage, one or more of the following apply:

Identifying Asbestos-Containing Material(s)

1. Presume Materials are Asbestos-Containing Materials
   (Section 9.03.F.2) Also refer to Spokane Clean Air publication, *When are Alternate Asbestos Project Work Practices Necessary?*

2. Alternative Survey Methodology to Determine if Asbestos is Present
   (Section 9.03.F.3*)* Also refer to Spokane Clean Air publications, *Alternate Asbestos Surveys* and *When are Alternate Asbestos Project Work Practices Necessary?*

3. Conventional Asbestos Survey Methodology to Determine if Asbestos is Present
   (Section 9.03.A-E*)* Also refer to Spokane Clean Air publication, *Asbestos Survey Guidance*.

Details of each follow:

1. Presuming Asbestos is Present.

Pursuant to Section 9.03.F.2, any material that is presumed to be asbestos-containing material doesn't need to be sampled and tested. This may save money on asbestos-survey costs or alternate asbestos survey costs, but depending on the amount of material involved, disposal costs may be more. Therefore, presuming materials contain asbestos may be done in conjunction with conventional asbestos surveys and/or alternate asbestos surveys. Refer to 2.b and 3.b regarding asbestos removal requirements.

2. Alternative Asbestos Survey Methodology to Determine if Asbestos is Present.

An alternative survey methodology as provided for in Regulation I, Article IX, Section 9.03.F.3 must be used on occasions when conventional sampling methods of intact and identifiable homogeneous area can not be exclusively performed.

Alternative asbestos survey guidance is described in Spokane Clean Air's Publication, *Alternative Asbestos Surveys.*

a. If No Asbestos is Found using an Alternative Survey Methodology.

If no asbestos is found, a Notice of Intent (NOI) and applicable fees must be submitted to Spokane Clean Air a minimum of 10 days prior to demolition (3 days for qualifying owner-occupied, single-family residence projects). The standard notification period may be waived if the project qualifies as an emergency pursuant to Regulation I, Article IX, Section 9.04.A.6.h.

b. If Asbestos is Found using an Alternative Asbestos Survey Methodology.

If asbestos is found using alternative asbestos survey methodology, it generally cannot be abated using standard work practices, because it involves asbestos-containing material (ACM) no longer intact within the building (e.g., damaged building components, rubble, debris, ash, and soil).

To determine if Alternate Asbestos Project Work Practices will be required, refer to Spokane Clean Air's publication, *When are Alternate Asbestos Project Work Practices Necessary?*

If alternate asbestos project work practices are required, a NOI with applicable fees must be filed for using Alternate Asbestos Project Work Practices (Section 9.08.A) or the Exception for Hazardous Conditions (Section 9.08.C). Not all asbestos abatement companies listed on Spokane Clean Air's *Asbestos & Demolition Service Providers* information sheet prepare special Alternate Work Plans, which are required under the provisions for these project categories. Spokane Clean Air recommends you seek out a company with the necessary expertise to prepare your Alternate Work Plan pursuant to Section 9.08.A or 9.08.C to avoid potential pitfalls (e.g., project delays due to incomplete notification or work plan, etc.).

If asbestos containing material is present, it must be properly removed and disposed of pursuant applicable regulations. Until an asbestos contractor can begin work, Spokane Clean Air requires that adequate measures (e.g., wetting, covering, etc.) be taken to prevent visible emissions from the site and that the site be clearly demarcated with asbestos warning signs and controlled in a manner that allows only personnel authorized by the owner or owner's representative to access the site.

3. Conventional Asbestos Survey Methodology to Determine if Asbestos is Present.

For portions of structures that remain standing where individual building components and materials are intact and homogeneous areas are identifiable, it may be possible for an accredited AHERA Building Inspector to perform an asbestos survey using procedures outlined in the 40 CFR 763.86.

For example, a partially fire-damaged kitchen may have intact homogeneous areas of building materials representative of all kitchen materials that can be identified and sampled as needed, to conclude that the kitchen does or does not contain asbestos.

Conventional asbestos survey guidance is described in Spokane Clean Air's Publication, *Asbestos Survey Guidance.*

a. If No Asbestos is Found using Conventional Asbestos Survey Methods.

   If no asbestos is found, a Notice of Intent (NOI) and applicable fees must be submitted to Spokane Clean Air a minimum of 10 days prior to demolition (3 days for qualifying owner-occupied, single-family residence projects). The standard notification period may be waived if the project qualifies as an emergency pursuant to Spokane Clean Air Regulation I, Article IX, Section 9.04.A.6.h.

b. If Asbestos is Found using Conventional Asbestos Survey Methods.

   If asbestos is found using conventional survey methodology, the intact areas can generally be abated (i.e., asbestos removed) using standard work practices as described in Regulation I, Article IX, Section 9.06. If standard removal methods can't be used, alternate asbestos work practices are required pursuant to Section 9.08.A. A NOI and applicable fees must be submitted to Spokane Clean Air a minimum of 10 days prior to asbestos removal and/or demolition (3 days for qualifying owner-occupied, single-family residence projects). The standard notification period may be waived if the project qualifies as an emergency pursuant to Regulation I, Article IX, Section 9.04.A.6.h. The NOI and applicable fees are generally submitted by the asbestos abatement company hired to perform the work. Spokane Clean Air maintains an *Asbestos & Demolition Service Providers* information sheet that is available by calling our office or by going to www.spokanecleanair.org. Workers trained and certified in accordance with the Washington State Department of Labor Industries (L&I) must perform asbestos removal unless the project qualifies as an Owner-Occupied, Single-Family Residence (refer to Spokane Clean Air's information sheet titled, *Renovation, Demolition, and Asbestos*).

   Conventional sampling methods often cannot be exclusively performed on projects involving damaged buildings, particularly when the structures are burned-out, rubble/debris piles, and/or ash/soil is involved. Damaged buildings, or portions thereof, may no longer have homogeneous areas. It may be possible to use conventional survey procedures on a portion of a damaged structure where the walls, floors, roofing, etc. are still intact and homogeneous areas are still identifiable. However, rubble/debris piles (e.g. collapsed structures) and ash/soil cannot be surveyed using conventional procedures. As such, one or more of the above (refer to items 1 and 2) must typically be performed, sometimes in combination with conventional asbestos survey methodology described in item 3.