

Asbestos Handling and Disposal

Guidance

July 2018

Alaska Department of Environmental Conservation
Division of Environmental Health
Solid Waste Program



Asbestos refers to a group of naturally-occurring minerals used in a wide variety of building materials and friction products. Asbestos is not hazardous if it remains undisturbed. However, if the material is disturbed and the fibers become airborne and are inhaled or ingested, they can cause lung and other cancers. During the demolition or renovation of most structures, **you are required to identify and properly manage asbestos-containing material (ACM)** to protect workers and the public from possible exposure. ACM must be carefully removed, packaged, and disposed to avoid exposure.

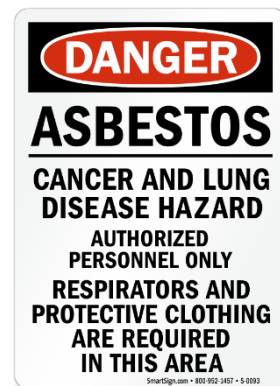
Prior to 1980 a variety of construction materials contained asbestos fibers. Although some uses were restricted in 1980, asbestos can still be found in wallboard, flooring materials, roofing materials, mastics, thermal protection, and cement products. To ensure that the hazards are properly identified, prior to demolition or renovation a certified inspector must perform a building or hazard survey to identify suspected ACM. Asbestos cannot be identified by sight but can be identified through simple laboratory tests. Samples of each suspect material must be tested to determine the presence of asbestos fibers. Material that contains more than 1% asbestos fibers is regulated as ACM.

Removal of ACM

Federally, the [Environmental Protection Agency](#) (EPA), and [Occupational Safety and Health Administration](#) (OSHA) regulate the removal and handling of ACM. At the State level, [Alaska Occupational Safety and Health](#) (AKOSH) performs regulatory compliance and enforcement duties and offers consultation and training services to help contractors ensure that they are in compliance with the regulations.

Due to the potential health risks, AKOSH requires special training, certification, and protection plans for asbestos removal workers. RACM removal requires very careful handling and special equipment. Non-RACM must be handled appropriately so it is not exposed to sanding, grinding, crushing, or other processes that could damage the material and result in release of fibers. Per AKOSH regulation 8 AAC 61.600 Certification Required: *A person performing, directly supervising, or monitoring asbestos abatement work must have a certificate issued under 8 AAC 61.720. The certificate must be in the person's possession when performing work.*

At least 10 days prior to beginning the demolition of any structure (except a residential structure with four or fewer units) and regardless of the presence of ACM, EPA requires that the operator submit a [Notification of Demolition and Renovation Form \(PDF\)](#) regarding the project. A notification must also be submitted for a renovation project that will disturb ACM above the EPA regulatory threshold. Even though a project may not require notification, health and management standards still apply. Many of the applicable regulations overlap, but each set of regulations has requirements that must be applied to an asbestos abatement project. The project must adhere to the most stringent of the regulations when a conflict occurs.



8 AAC 61.600. Certification Required

A person performing, directly supervising, or monitoring asbestos abatement work must have a certificate issued under 8 AAC 61.720. The certificate must be in the person's possession when performing work.

ACM Regulations

Regulations divide ACM into two categories based on whether the material is friable or non-friable.

Friable ACM

Material that can be crumbled, pulverized, or reduced to powder by hand pressure. This typically includes products such as thermal or acoustic insulation and ceiling texture. The handling and disposal of friable ACM is stringently regulated as the material poses the greater health risk to residents and workers. Friable ACM is more commonly referred to as *regulated ACM* (RACM).

Non-friable ACM

Non-friable ACM, also referred to as non-regulated ACM (non-RACM), falls into one of two classifications:

- **Category I** – include packing, gaskets, resilient floor coverings, and asphalt roofing products that are not friable or likely to become friable during handling.
- **Category II** – include any other ACM that are not friable.

Despite the use of “non-regulated” to describe these materials, both state and federal regulations govern the handling and disposal of non-RACM. These less-stringent regulations apply as long as these materials are handled carefully during demolition or renovation to prevent the release of asbestos fibers. If these materials are damaged to the point that they may create dust or release asbestos fibers, they are regulated as RACM, and must be removed, packaged, and disposed accordingly.

Asbestos Regulations

AGENCY	REGULATION	DESCRIPTION
EPA	40 CFR 61, Subpart M	National Emissions Standards for Asbestos
EPA	40 CFR 61.145	Asbestos Emission Standards for Demolition and Renovation
EPA	40 CFR 61.150	Standards for Waste Disposal from Demolition and Renovation
EPA	40 CFR 61.154	Standards for Active ACM Waste Disposal Sites
OSHA	29 CFR 1926.1101	Occupational Safety & Health Regulations for Asbestos in Construction & Demolition
AKOSH	8 AAC 61.600-720	Asbestos Abatement Regulations
ADEC	18 AAC 60.450	Asbestos Disposal Regulations

Disposal of ACM Waste

The ADEC regulates the disposal of ACM. ACM may only be disposed in a landfill permitted to accept it. This can include Class I and Class II municipal landfills, or monofills specific to construction and demolition debris or asbestos. However, each landfill determines its own acceptance policy. Most small rural landfills (Class III) are not permitted to accept any ACM. Contact the landfill directly to determine specific policies for ACM waste disposal, or contact your ADEC regional office to discuss disposal options in the project area.

All RACM, including any non-RACM that has been damaged by processes that could result in release of fibers, must be packaged in leak-tight containers or bags, with proper warning labels and generator information. A waste shipment record signed by both the transporter and the landfill operator must accompany each load. In addition, the transporter must adhere to the Department of Transportation (DOT) hazardous materials requirements.

The landfill operator is required to inspect each load to verify that the RACM is properly packaged and labeled and that waste shipment records match the quantities delivered. Any discrepancies in the waste shipment record must be reported to EPA. Access to the RACM disposal cell must be restricted with warning signs posted around the cell, and the landfill operator must supervise the disposal of each container to ensure that containment remains intact. One copy of the signed waste shipment record must be retained in the landfill record, and one returned to the waste generator. Detailed records of the quantities and disposal locations and depths of all RACM disposed in the landfill must also be kept in the landfill record.

Non-RACM that has not been damaged does not require special packaging or shipment records, although the landfill may have specific requirements. Once at the landfill, non-RACM requires special handling to ensure that it does not become friable. This requires gently placing

the material into the disposal cell so it does not break or create dust, and preventing landfill equipment from running over or compacting the non-RACM until it is covered by at least six inches of material that does not contain asbestos. Landfills often choose to dispose of non-RACM separately from other waste because access restrictions also apply. These restrictions include prohibiting salvaging in any cell that accepts non-RACM to protect the public from contacting asbestos fibers. Landfills are not required to track waste shipment records or disposal quantities for non-RACM unless they are commingled with RACM and are therefore disposed in the RACM cell.

Summary of ACM Handling Requirements

	GENERATORS MUST	LANDFILLS MUST
ACM	<ul style="list-style-type: none"> Perform surveys and testing Notify EPA & AKOSH, as required Ensure removal is performed by certified asbestos abatement professionals only Use proper removal and safety techniques Handle materials so they are not crushed, broken, abraded, or otherwise may release fibers Determine landfill acceptance policies Deliver to a landfill permitted for asbestos disposal 	<ul style="list-style-type: none"> Ensure that ACM from demolitions and renovations is properly identified when delivered. ADEC recommends requiring submittal of building surveys for a project to identify if ACM is present, and disposal records if ACM is disposed elsewhere. Place all ACM at the appropriate working face in a manner that does not create breakage or dust Cover ACM daily with at least six inches of soil or non-ACM Do not allow salvaging in any area with ACM
Also for RACM	<ul style="list-style-type: none"> Seal RACM in leak-proof containers Apply required warning label Label with generator information Fill out all required shipping records Maintain all required records 	<ul style="list-style-type: none"> Inspect each load to verify that RACM waste is properly contained and labeled Ensure that shipping records are complete and match the amounts delivered, and report any discrepancies to EPA Track quantities, depths, and location of all RACM waste Maintain access control and signage

Summary

Take responsibility for protecting yourself, workers, and the public from contacting asbestos fibers by following the regulatory requirements for identification, handling, and disposal of ACM. Contact EPA, AKOSH, or ADEC if you have any questions regarding the requirements and options for handling ACM for your project.

Asbestos Regulatory Contacts

AGENCY	ISSUE	PHONE
EPA	Asbestos Emissions, Reporting, Handling	(907) 271-3688
AKOSH	Worker Safety & Training	(800) 656-4972
AKOSH	Workplace Compliance & Enforcement	(800) 770-4940
ADEC	Disposal Options & Requirements	(907) 269-7622

ADEC Regional Office Contact

Anchorage

555 Cordova Street
Anchorage, AK 99501
(907) 269-7802
(907) 269-7510 Fax

Fairbanks

610 University Avenue
Fairbanks, AK 99709
(907) 451-2108
(907) 451-2188

Juneau

410 Willoughby Avenue, Suite 303
Juneau, AK 99801
(907) 465-5318
(907) 465-5362