



The National Park Service EnviroFact Sheet

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Managing Asbestos-Containing Waste (SW-2)

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Asbestos was used in the past for its excellent insulating capacity. Asbestos-containing materials (ACM) may include gaskets, piping, insulation, asphalt and vinyl floor tile, sheet vinyl floor covering, ceiling tile, and asphalt roofing products containing more than 1% asbestos.

ACM is either friable or non-friable. *Friable* ACM is any ACM containing more than 1% asbestos that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. *Non-friable* ACM is any ACM containing more than 1% asbestos that, when dry, **cannot** be crumbled, pulverized, or reduced to powder by hand pressure.

ACM is a potential respiratory hazard when it is friable. Friable asbestos, if ingested, can cause breathing disorders and a type of cancer called asbestosis.

Waste ACM is any waste material contaminated with asbestos, including air filters used during remediation, bags or other packaging, disposable equipment, and clothing.

Certain materials are generally considered more likely to contain asbestos. OSHA regulations presume the following contain asbestos, unless proven otherwise: thermal system insulation and sprayed-on surfacing materials in buildings constructed before 1980, and asphalt and vinyl floor tile material installed before 1980.

APPLICABLE REGULATIONS

The EPA regulates asbestos-containing material (ACM) handling at 40 CFR 61, Section 145-Standard for Demolition and Renovation and Section 150-Standard for Waste Disposal. OSHA regulates exposure to asbestos in the workplace at 29 CFR 1910.1001 and 29 CFR 1926.58.

Parks that must renovate or demolish structures containing asbestos must meet very specific regulatory requirements regarding notification and emission control requirements—to name just a few. Before the park begins **any** renovation or demolition project, EPA and OSHA regulations must be reviewed closely. Whether and which regulations apply depend upon:

- The **size** of renovation project;
- The **type** of ACM present (pipe insulation, floor tiles); and
- The **quality** of asbestos present (friable/non-friable).

Most states have adopted regulations for abating, managing, and disposing of asbestos materials that are similar to the federal regulations. However, state regulations can be more stringent than federal and should be reviewed. Local regulations for asbestos management may also exist, particularly in larger metropolitan areas. NPS guidance titled "Health Hazards of Asbestos, Lead, and Radon Gas in NPS Housing" (July 21, 1997) provides specific policies and procedures to be followed in the management of asbestos at parks.

IDENTIFICATION

Although not a regulatory requirement, it is recommended that parks survey all structures built before the early 1980's to identify the presence of any ACM, regardless of any current intent to renovate or demolish the structure so that any asbestos hazards are known and can be considered during maintenance activities.

Once identified, the ACM should be inspected on a regular basis to ensure that it remains in good condition (i.e., does not become friable).

HANDLING AND STORAGE

Before any demolition or renovation activity can begin, the park must thoroughly inspect the structure for the presence of asbestos to determine the extent to which asbestos handling regulations apply. Park records may include manufacturer's information about the material in question (e.g., information about floor tile or pipe insulation installed during past building or renovation projects). If not, an Asbestos Hazard Emergency Response Act (AHERA) certified professional should perform testing.

It is best to leave undamaged ACM in place. If it must be removed, the park should use only trained and qualified contractors for renovations that may disturb asbestos. Once waste ACM has been removed it must be placed in containers labeled with the name of the waste generator and the location of the waste generation. Waste ACM containers should be stored in a secured area.

DISPOSAL

Waste ACM is considered a non-hazardous waste or "special" waste in most states. The state agency responsible for solid waste management should be contacted to determine specific waste ACM disposal requirements.



When disposing of waste ACM off-site, the park is required to follow reporting requirements listed under 40 CFR 61.150(d). For each shipment the park must:

- Maintain a waste shipment record,
- Provide a copy of the waste shipment record to the disposal site, and
- Make the proper notifications if they do not receive a signed copy of the waste shipment record from the disposal facility.



FOR MORE INFO...

EPA's Asbestos Home Page:
<http://www.epa.gov/asbestos/index.htm>

ASBESTOS WASTE MANAGEMENT COMPLIANCE CHECKLIST

Checklist Item	Notes
1. Confirm that the park has performed a survey to identify the presence of any asbestos-containing material (ACM) in any park structure.	
2. Confirm that records are kept identifying ACM at the park (e.g., manufacturing records or inspection records from a properly certified inspector—check with your state agency to determine specific certification requirements).	
3. If ACM has been identified, determine the quality and condition of the material (e.g., is it deteriorating or in need of replacement or repair?).	
4. Confirm that all appropriate park staff is made aware of the presence of ACM and are aware of the prohibition on removing it.	
5. If a renovation or demolition project is planned, determine if structures involved contain ACM.	
6. If renovation or demolition involves ACM, determine if it includes more than 80 linear meters (260 linear feet) of pipe or 15 square meters (160 square feet) of <i>other</i> materials (e.g., floor or ceiling tile).	
7. If the renovation or demolition involves ACM greater than the amounts in #6, confirm that the park has met the regulatory requirements listed at 40 CFR 61.145(b) and (c), namely: <ul style="list-style-type: none"> • Proper notification was made at least 10 working days before starting the renovation or demolition; and • Proper procedures for asbestos emissions control were taken. 	
8. During disposal of waste ACM, confirm that procedures required under 40 CFR 61.150(a)-(c) are followed, notably: <ul style="list-style-type: none"> • Measures are taken to assure that no visible emission of ACM occurred; • Waste ACM is properly disposed of as soon as practical; and • Vehicles loading/unloading waste ACM are properly marked. 	
9. For all waste ACM transported to an off-site disposal facility, confirm that the park has met the following recordkeeping requirements: <ul style="list-style-type: none"> • Maintained a waste shipment record (specified in the regulations); • Provided a copy of the waste shipment record to the disposal site, to be signed and returned to the park, at the time the ACM waste is delivered; and • Made the proper notifications if they did not receive a signed copy of the waste shipment record from the disposal facility. <p>(Review 40 CFR 61.150(d) for details on the information required in the waste shipment report.)</p>	