



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 asbestos survey procedures specified in Section 9.03.B and 40 CFR 763.86 and/or alternate asbestos survey procedures in Section 9.03.F.3

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 (e.g. when materials are not intact or homogeneous areas are not identifiable). Conventional sampling methods shall not be used for rubble or debris piles and ash or soil. If conventional sampling methods cannot exclusively be used and material is not presumed to be asbestos-containing material (ACM), alternate asbestos survey methodology must be utilized.

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, 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 considered to be asbestos containing waste material per Spokane Clean Air Regulation I, Article IX, Section 9.02.E.

If asbestos is found using alternate survey methodology, it generally cannot be abated using standard work practices in Section 9.06. Alternate Means of Compliance is required when ACM has been disturbed or is no longer intact (e.g., pile/area of debris, rubble, ash, soil) or when mechanical methods are used for removal.

Guidelines for the content of an alternate asbestos survey are provided on Page 2. The guidelines are not intended to be a substitute for applicable regulations.

Alternate Asbestos Survey Content Guidelines

In addition to the requirements in Section 9.03.B – Asbestos Survey Procedures and Section 9.03.C - Asbestos Survey Report, a description of the sampling method and how the results of sampling will be used is required pursuant to Section 9.03.F.3. An example follows:

1. Grid Dimensions

It is not uncommon to use a 10' x 10' square grid pattern. Depending on the project, the AHERA Building Inspector or AHERA Project Designer may determine the grid pattern should be smaller or larger.

2. Location of Samples

Samples are typically collected in a random fashion within each grid. However, if suspect ACMs are identified on the surface, they should also be collected for analysis.

3. Type of Samples

The AHERA building inspector should collect bulk samples of identifiable suspect ACMs and composite samples of debris, ash and/or soil.

4. Number of Samples

One sample of composite debris, ash and/or soil should be collected at the surface from each grid. Additional samples must be collected from each grid at incremental depths of about one foot. Depending on the project, an AHERA Building Inspector or AHERA Project Designer may determine the incremental sampling depths should be smaller or larger. If suspect ACMs are identified, they must also be collected for analysis.

5. Laboratory Analysis

All samples must be submitted to a NVLAP accredited laboratory for analysis. Generally, the laboratory is instructed to analyze samples using a “one-hot, all-hot” approach, which means sample analysis stops with the first bulk sample that tests positive for asbestos. It should be noted that PLM analysis for debris, ash and/or soil gives only the presence (positive) or non-presence of asbestos (negative).

6. Results and Removal

The alternate asbestos survey must include an explanation of how laboratory results will be used. Generally, if any sample tests positive for asbestos, all debris, ash and/or soil in all grids is treated as friable ACM.