

Actions and inactions can lead to compliance issues during renovation projects

Eager to move on that project that got delayed? Before you dig in, let's review how actions and inactions come into play on an asbestos project.

General Contractors as well as the DIY crowd may not be aware that SRCAA inspectors look at both **actions and inactions** that may have led, or could lead to, asbestos disturbance. *The photo above depicts disturbed Thermal System Insulation during an interior demolition of walls and ceilings.*



The definition of an *asbestos project* in SRCAA Regulation I, Article IX Section 9.05 B. *Conditions that will Likely Result in Disturbance.*

Asbestos Project is:

- Any activity involving the abatement, renovation, demolition, removal, salvage, clean-up or disposal of asbestos-containing material, or any other **action or inaction** that disturbs or is likely to disturb any asbestos-containing material.
- Includes the removal and disposal of asbestos-containing material or asbestos-containing waste material.
- Does not include the application of duct tape, rewettable glass cloth, canvas, cement, paint, or other non-asbestos materials to seal or fill exposed areas where asbestos fibers may be released.

Over the years as a SRCAA inspector, I have observed numerous actions and inactions that have resulted in compliance issues. An example that comes to mind involves interior demolition and Thermal System Insulation (TSI) - as depicted in the photo above. Whether or not the interior demolition activities *caused* the TSI to become damaged or the demolition activities *resulted in the discovery of* damaged TSI, you are required to immediately treat the damaged TSI as an asbestos project.

I have also seen ACM floor tiles scheduled for abatement heavily damaged by construction activities such as free-falling building materials or by running mechanical equipment over the ACM tiles. Once damaged, the tiles must be abated.

In summary,

- All asbestos-containing material (ACM) must be treated the same
- If ACM(s) are discovered disturbed, they should be clearly addressed in the asbestos survey and the owner/operator should take immediate actions such as abatement or encapsulation to address the disturbance while renovation activities continue in the work area.

Please contact me with your questions and we're always looking for suggestions for future *Asbestos Updates* topics:

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