



Asbestos Updates - January 2017

Alternate Work Plans: Manual Methods vs Mechanical Methods

Several scenarios may result in the need to obtain an **Alternate Work Plan** for an asbestos abatement project, including the use of **mechanical methods for abatement**.

During an asbestos abatement project, using mechanical tools or equipment, such as backhoes, trackhoes, skid steer loaders, etc., will typically damage Asbestos Containing Material (ACM) or presumed ACM. Damaging ACM/presumed ACM is prohibited. Therefore, manual methods must be employed where feasible, even if using manual methods increases the asbestos project cost. If mechanical methods are being considered to abate ACM you'll want to review [Section 9.08](#)

If an asbestos project must be performed using a mechanized method, an Alternate Work Plan must be in place. The plan should be designed to be as effective as manual methods in the reduction of asbestos air emissions.

Exceptions: Mechanical Methods not requiring Alternate Work Plans:

- Use of a stationary, fixed-blade attached to a motorized vehicle (i.e. Terminator) is acceptable for vinyl floor tile removal. Also refer to [WISHA Interim Interpretive Memorandum #97-7-G](#). All other requirements apply (e.g. wetting).
- Use of a self-contained shot blasting equipment (i.e. Blastrac) is acceptable for abating floor tile mastic provided the machine is fitted with HEPA filtration and work is done within a negative pressure enclosure. All other requirements apply (e.g. wetting).
- Use of vacuum trucks or trailers are acceptable for removing vermiculite containing less than or equal to 1% asbestos. All other requirements apply, e.g. wetting/misting. (Vermiculite containing more than 1% asbestos, you would need to perform removal as defined in [Section 9.06 B Standard Asbestos Project Work Practices](#))

Compliance with Other Rules - Other government agencies have adopted rules that may apply to asbestos regulated under Spokane Clean Air's rules, including but not limited to:

- [U.S. Environmental Protection Agency](#)
- [U.S. Occupational Safety and Health Administration](#)
- [Washington State Department of Labor and Industries](#)

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- Call Spokane Clean Air (509) 477-4727 and ask to speak with an inspector.
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