



October 28, 2015

Asphalt Shingles, Loose Vermiculite, Alternate Work Plans: Compliance with Other Rules - Asbestos Update #10

Questions and comments are coming in about the differences between Spokane Clean Air regulations and Washington State Department of Labor and Industries (LNI) regulations, especially in three areas:

- handling of asphalt shingles
- handling of loose vermiculite
- credentials required for preparation of an Alternate Work Plan

Asphalt Shingles ([Section 9.02.H, 9.02.Z](#))

Spokane Clean Air excluded asphalt shingles from the definition of Suspect Asbestos-Containing Material in the regulation change that took effect on 9/2/2014. When removing asphalt shingles, consult with [LNI](#) if you have questions regarding in what class of work your project falls, and what training and controls LNI requires.

Loose Vermiculite ([Section 9.02.D, Section 9.06.C](#))

Spokane Clean Air defined all loose vermiculite as asbestos-containing material, and specified removal, handling, and disposal procedures for vermiculite containing 1% or less asbestos, in the regulation change that took effect on 9/2/2014. When removing loose vermiculite, consult with [LNI](#) if you have questions regarding in what class of work your project falls, and what training and controls LNI requires.

Alternate Means of Compliance ([Section 9.08](#))

For projects that require an Alternate Means of Compliance, Spokane Clean Air allows the required Alternate Work Plan to be prepared by a certified Asbestos Project Designer. Spokane Clean Air dropped the requirement for a Certified Industrial Hygienist or Licensed Professional Engineer in the regulation change that took effect on 9/2/2014. [LNI](#) may require additional or different credentials. Further, Spokane Clean Air may require an Alternate Work Plan for projects where LNI does not. For these non-standard projects, please do not hesitate to review your project with any inspector at Spokane Clean Air by calling (509) 477-4727.

Compliance with Other Rules ([Section 9.10](#))

Other government agencies have adopted rules that may apply to asbestos regulated under Spokane Clean Air's rules, including but not limited to, the [U.S. Environmental Protection Agency](#), the [U.S. Occupational Safety and Health Administration](#), and [LNI](#). Nothing in the Agency's rules shall be construed as excusing any person from complying with any other applicable local, state, or federal requirement.

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- Access complete local [asbestos regulations](#) online.
- Contact Spokane Clean Air (509) 477-4727 and ask to speak with an inspector.
- Email your request to compliance@spokane-cleanair.org.