EXAMPLE ALTERNATIVE ASBESTOS SURVEY PLAN

Site Address: _____

Site/Building(s) Description: _____

_____

Building Inspector Name (AHERA certification attached): _____

APPLICABLITY

This alternative asbestos survey plan has been prepared for Good Faith Asbestos Inspections (Asbestos Surveys) of structures damaged or destroyed in Spokane County by the 2026 Spokane Complex Fire.

The conventional asbestos survey procedures found in Article IX, Section 9.03.B of Spokane Regional Clean Air Agency Regulation I, shall be used alone, or in combination with this Alternative Asbestos Survey Plan, when possible and safe to do so.

This Alternative Asbestos Survey Plan may not be used for any other asbestos survey activity.

All deviations from this Alternative Asbestos Survey Plan shall be prepared as a separate document.

CONTAMINATED AREAS

When fire damage occurs the remaining building materials, debris, rubble and ash must be assumed to contain asbestos mineral fibers. The following areas will be surveyed and sampled in an attempt to reduce the amount of debris that must be handled and disposed of as asbestos containing waste material:

- The building materials and/or fire debris located within the original footprint of the structure(s).
- Any area that contains fire debris from the structure, including areas outside the original footprint of the structure. The landscaping, vegetation, and soil located in the debris field shall be considered to be contaminated with asbestos mineral fibers until sampling of the building materials and/or fire debris shows otherwise.
- Areas used by the homeowner to move building materials and/or fire debris out of the structure footprint while searching for salvageable items. This includes the locations of transport vessels (dumpsters, trailers, or truck beds).

INSPECTION AND SAMPLING PROTOCOL

The Alternate Asbestos Survey will include a visual inspection, conventional bulk sampling of intact building materials when possible, and random sampling according to a grid pattern for non-homogeneous fire debris, rubble, and ash.

Sample grids will be established in an attempt to identify and segregate areas that are not contaminated, thereby reducing the amount of building materials and/or fire debris that must be handled and disposed of as asbestos containing waste material.

All sampling/inspections shall be conducted by individuals who are currently certified as AHERA Building Inspectors.

GRID PATTERN LAYOUT

The grid pattern shall be reproducible from a known start point. The starting point shall be an easily identifiable point (paint marking on a solid surface, large pin, nail or wooden stake) driven into the ground and identified with a tape marker or flag.

The grid squares shall be no larger than twenty (20) feet by twenty (20) feet and in no case shall exceed one-half of the structure width.

See Figure 1 for an example of a grid pattern diagram.

VISUAL INSPECTION AND SAMPLING OF SUSPECT ASBESTOS-CONTAINING BUILDING MATERIALS

A visual inspection will be conducted prior to grid sampling. Per Article IX, Section 9.03.B of Spokane Regional Clean Air Agency Regulation I, samples of visible suspect asbestos-containing building material(s) will be collected for microscopic analysis.

GRID SAMPLING

Fire debris, rubble, and ash samples will be collected utilizing a modification to the asbestos survey procedures found in Article IX, Section 9.03.B of Spokane Regional Clean Air Agency Regulation I, and a modified AHERA sampling protocol (40 CFR, Subpart E, Section 763.86). The procedure and protocol will be modified as follows:

1. Composite samples will be collected from each grid square according to this modified sampling protocol. Each grid square will be divided into nine (9) approximately equal areas and a composite sample will be collected according to the following schedule:

    - Grid square size of less than 100 square feet (10ft x 10ft): will require one (1) sample collected from each of three (3) randomly selected divisions within the grid square.

    - Grid square size of less than 400 square feet (20ft x 20ft) but greater than 100 square feet (10 ft x 10 ft) will require one (1) sample collected from each of five (5) random selected divisions within the grid square.

    - Grid square size shall not exceed 400 square feet (20ft x 20ft).

2. Samples will be collected from an area approximately 6 inches in diameter (the diameter of standard posthole digger) from the surface and approximately every six (6) inches in depth until bottom of the debris field is reached.

3. The sample material will be sieved with a ¼ inch sieve to remove wood fragments and large debris, material passing through the sieve shall be placed into a clean, waste basket-size, disposable plastic bag until all selected test locations in that grid have been sampled and combined/composited.

4. The composite sample from each grid shall be homogenized into a single homogeneous mixture.

5. Place approximately 2 ounces of the homogeneous mixture into a clean sample container, numbered with a unique sample number and submitted for microscopic analysis following proper chain of custody procedures and requirements.

SAMPLE ANALYSIS

All samples shall be submitted to a National Voluntary Laboratory Accreditation Program (NVLAP) certified laboratory for microscopic analysis.

Samples collected from suspect asbestos-containing building materials during the visual inspection shall be analyzed using standard Polarized Light Microscopy (Method for the Determination of Asbestos in Building Materials, EPA/600/R-93/116, July 1993 or a more effective method).

The composite samples collected from debris, rubble, and ash shall be analyzed by a Polarized Light Microscopy (Method for the Determination of Asbestos in Building Materials, EPA/600/R-93/116, July 1993 or a more effective method) for a positive or negative result.

SAMPLE RESULTS

Building materials, identified as asbestos-containing will result in that grid being declared contaminated and that grid area will require proper remediation using an Alternative Work Plan.

Fire debris, rubble, and/or ash found to be positive for asbestos will result in that grid being declared contaminated and that grid area will require proper remediation using an Alternative Work Plan.

Grid areas found to be negative for asbestos (no asbestos-containing building materials, and no asbestos positive results for the fire debris, rubble, and/or ash) will not require remediation using an Alternative Work Plan. The building materials, fire debris, rubble, and/or ash within the grid will not be considered asbestos-containing waste material.

ASBESTOS SURVEY REPORT

Upon receipt of the Certificate of Analysis/Laboratory Report an Asbestos Survey Report will be prepared according to Article IX, Section 9.03.C of Spokane Regional Clean Air Agency Regulation I.

In addition to the required contents specified within Article IX, Section 9.03.C of Spokane Regional Clean Air Agency Regulation I, the inspection report shall include a diagram of the grid pattern indicating the size of each grid (see Figure 1) and the location of the starting point of the grid design.

The owner will be provided with a complete copy of the Asbestos Survey Report.

REMEDIATION ACTIVITIES

If asbestos is found, remediation activities shall be identified in an Alternative Work Plan prepared by an AHERA Project Designer according to Article IX, Section 9.08 of Spokane Regional Clean Air Agency Regulation I.
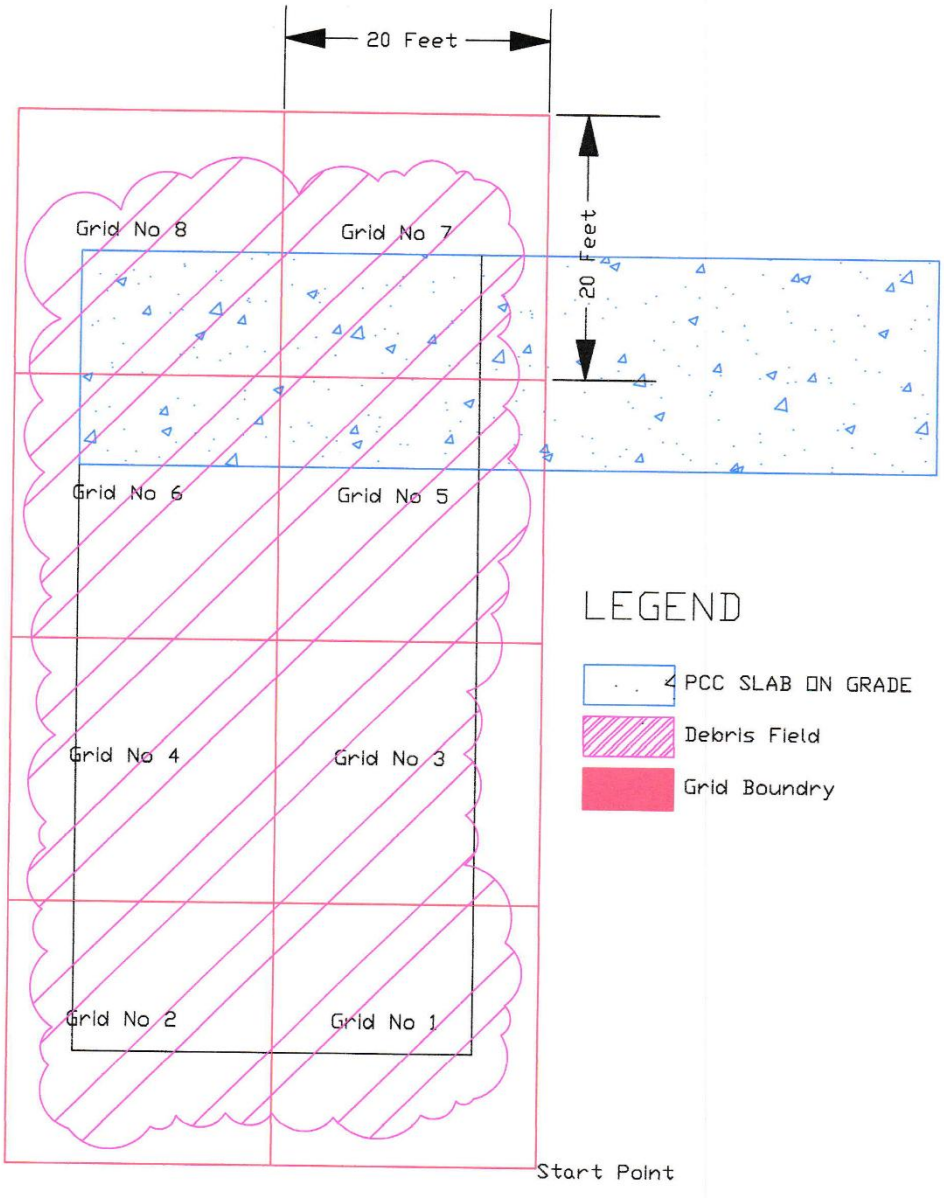
Figure 1. Example of a Grid Pattern Layout and Sample Diagram