

## CITY OF NOME

# ASBESTOS WASTE DISPOSAL INSPECTION GUIDELINES

EFFECTIVE: August 25, 1998

These guidelines are applicable to City of Nome (CITY) employees or contract landfill operators who may be tasked to inspect asbestos waste disposal activities at the Nome Municipal Landfill.

The purpose of these guidelines is to ensure the disposal of asbestos waste material is conducted in the intent of the applicable U.S. Environmental Protection Agency (EPA), Alaska Department of Environmental Conservation and City of Nome regulations, the Nome Municipal Landfill operating permit and Asbestos Containing Materials Disposal Policy. These guidelines are not intended to qualify any City department employee or contract landfill operator to become a state or federally certified asbestos abatement manager, laborer or worker. Other than inspecting for the discrepancies identified below, personnel are not to become directly involved with the off loading of asbestos material. Any disposal inspection activity can be conducted from a distance no closer than 25 feet during the off loading action. **Under no circumstances should a CITY employee or contract landfill operator handle any of the bagged or wrapped material.**

These guidelines concern three general types of asbestos wastes. They are: Category I Non-friable, Category II Non-friable and Friable.

1. Category I Non-friable asbestos is most commonly in the form of asphalt roofing products (felts, shingles, mastics and flood coats), resilient floor coverings (linoleum, floor tile and the mastics used to glue the covering down), gaskets and packings. We will see mostly roofing and resilient floor coverings. Category I Non-friable, because it is bound by either asphalt or vinyl is normally considered a non-regulated asbestos waste. It normally does not have to be specially bagged, wrapped or handled. This is the only type of asbestos waste City allows to be dumped from a transport vehicle directly into the refuse stream.
2. Category II Non-Friable asbestos is most commonly in the form of asbestos cement wallboard, shingles and pipe. While the EPA does not normally regulate this waste unless it is broken when removed, City requires this type of waste to be specially wrapped and handled when brought to the landfill. This asbestos waste is to be hand placed in the normal refuse disposal cell (provided it has not become friable) by the asbestos transporter.
3. Friable asbestos encompasses the remainder of the asbestos wastes City will encounter. Friable means the asbestos containing material, when dry, can be crumbled, or reduced to powder by hand pressure. Examples of friable asbestos wastes are pipe and boiler insulation, spray-on insulation, ceiling tiles, ceiling texture material, it is commonly found in older pre 1960 construction methods in drywall mud and texturing and some lathe and mortar walls, and as filler in fire doors. Friable asbestos must be bagged or wrapped and hand placed in the designated asbestos disposal area by the transporter. Non-friable waste that has become friable through the removal or transportation process must be handled as RACM and disposed of in the designated asbestos disposal area.

Direct the asbestos transporter to the area where you want the asbestos placed and instruct him how and where you want the material placed. The transporter will present you with a copy of the City disposal authorization letter and at least two copies of the asbestos waste shipment record (ASWR). Check to ensure the City authorization number on the letter matches the number on the shipment record. You will fill out blocks 12 and 13 on the shipment record and return it to the

transporter after the asbestos material has been off loaded. The transporter will give landfill operator a copy of the completed shipment record when the transporter checks out. If there are no discrepancies observed during the off load of the asbestos waste, make no comment in block 12 of the shipment record.

The following areas are discrepancies and should be commented about in block 12 of the asbestos waste shipment record presented by the transporter of the asbestos waste:

1. Is the asbestos waste load accompanied with an owner/operator generated waste shipment record?

**YES** \_\_\_\_\_

No \_\_\_\_\_ If No, reject the load and send back to the originator. Do not let it be off-loaded. Call the City Engineer and advise him of your actions.

2. Is the transportation vehicle(s) adequately marked with warning signs during the off loading process?

**YES** \_\_\_\_\_

No \_\_\_\_\_ If No, annotate this fact in the discrepancy section of the waste shipment record.

3. Is the Friable or Category II non-friable asbestos waste contained in leak-tight containers or wrapped in leak-tight wrappings?

**YES** \_\_\_\_\_

No \_\_\_\_\_ If No, direct the transporter to repack, rewrap or remove the asbestos and annotate this fact in the discrepancy section of the waste shipment record.

4. Are the Friable asbestos waste containers being hand placed in the designated asbestos waste area?

**YES** \_\_\_\_\_

NO \_\_\_\_\_ If No, direct the transporter to correctly place the material and annotate this fact in the discrepancy section of the waste shipment record. Note: mechanical placement of sealed drums or oversized wrapped items such as long lengths of pipe, hot water heaters or steam boilers is authorized. Non-friable asbestos waste such as roofing felt material need not be hand placed in the disposal area.

5. Are the friable asbestos waste containers or wrapped materials adequately labeled or marked with the name of the waste generator and the location from which the waste was generated?

**Note: This can be accomplished with a cursory visual inspection of the asbestos waste before the transporter begins to off load the bags or wrapped material.**

**YES** \_\_\_\_\_

NO \_\_\_\_\_ If No, point out this discrepancy to the transporter. If the transporter takes no action to correct this, direct the transporter to cease off loading until the appropriate generation labels are applied and annotate this fact in the discrepancy section of the waste shipment record.

6. Does the actual quantity of asbestos waste material placed in the landfill agree with the quantity annotated on the transporter's waste shipping record?

YES \_\_\_\_\_

NO \_\_\_\_\_ If No, annotate this fact in the discrepancy section of the waste shipment record.

City disposal policy, and state and federal regulations require all asbestos wastes be covered with at least six inches of non-asbestos containing material at the end of the work day that the asbestos waste was placed in the landfill. Once the last scheduled load asbestos waste has been delivered, the landfill operator shall cover the material brought to the disposal site. The cover material is to be carefully placed to preclude disturbing, moving or breaking open the bagged or wrapped asbestos wastes.

Remember you are there to ensure the asbestos waste transporter placed the asbestos correctly in the landfill and that the asbestos wastes are properly covered at the end of the workday it was disposed. If the transporter does not follow your directions or you have any questions at all about these guidelines, immediately call the City Engineer.

