

Guidance on Asbestos Management

Regulatory Reference. Oklahoma Administrative Code (OAC) 252:515-19-31(c) and OAC 252:515-19-36(d)

Applicability. All Municipal Solid Waste (MSW) and Non-hazardous Industrial Solid Waste (NHIW) landfills specifically authorized by permit to accept nonfriable and/or friable asbestos.

Purpose. To identify the asbestos management requirements of 40 Code of Federal Regulations (CFR) Part 61, Subpart M, as adopted by reference in Oklahoma Administrative Code 252:100-40-5, and Oklahoma Department of Labor requirements of OAC 380:50-17-9.

Technical Discussion. Chronic asbestos exposure can cause severe scarring of the lungs as well as cancer; therefore, landfill operators accepting asbestos must ensure it is managed in accordance with all requirements to prevent unnecessary exposure to landfill employees and customers.

Definition.

Regulated asbestos-containing material (RACM) includes:

- Friable asbestos material
- Category I nonfriable asbestos-containing material (ACM) that has become friable
- Category I nonfriable ACM that will be or has been subjected to sanding grinding, cutting, or abrading
- Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder

Asbestos Packaging.

Friable asbestos received at the landfill must be wetted and:

- Double bagged in 6-mil plastic bags; or
- Single bagged in one 6-mil plastic bag and placed in a disposable drum; or
- Contained in any other manner approved in advance, by the Air Quality Division director of the Department of Environmental Quality (DEQ).

Bulk components containing friable asbestos received at the landfill must be:

- Wrapped with at least two (2) layers of 6-mil plastic and duct tape (or other securing medium)

Asbestos Transport.

Any time RACM is off-loaded, vehicles or trailers must have warning signs visible from all sides with a minimum 20 inches by 14 inches upright format that read:

DANGER
ASBESTOS DUST HAZARD
CANCER AND LUNG DISEASE HAZARD
Authorized Personnel Only

U.S. Department of Transportation Class 9 placards are required on each side and each end of any vehicle or trailer transporting quantities greater than three (3) disposal bags, one (1) disposal barrel, or any amount of wrapped bulk RACM on public roadways.

Asbestos Disposal Procedure.

In accordance with OAC 380:50-17-9, RACM disposal procedures are as follows:

- Trucks are to approach the disposal location as closely as possible for unloading of the asbestos-containing waste;
- Bags, drums, and wrapped components shall be examined as they are off-loaded;
- Bags, drums, and wrapped components shall be placed on the ground at the disposal site, not pushed or thrown out of trucks; and
- Personnel off-loading containers shall wear protective equipment consisting of head, body and foot protection and, at a minimum, half face-piece, air-purifying, dual-cartridge respirators equipped with high-efficiency filters.

Asbestos Daily Cover.

All RACM must be covered with a minimum of six (6) inches of compacted nonasbestos-containing material (i.e. uncontaminated soil) at the end of each operating day. Municipal solid waste, tarps, and alternate daily cover materials do not classify as nonasbestos-containing materials.

The use of a resinous or petroleum-based dust suppression agent as nonasbestos-containing material for daily cover, will require a permit modification and the installation of warning signs and fencing as required by 40 CFR 61.154(b).

Additionally, the facility must cover all nonfriable asbestos with a minimum of six (6) inches of nonasbestos-containing material prior to compaction or other landfilling activities that could create RACM. In the event that RACM is created due to compaction or other landfilling activities, the facility is responsible for fulfilling all National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements.

Reporting.

The facility must:

- Report in writing any significant amount of improperly packaged or uncovered RACM to DEQ, by the following working day. A copy of the Waste Shipment Record (WSR) shall be included with the report.
- Send a copy of the signed WSR to the waste generator as soon as possible and no longer than thirty (30) days after receipt of the waste.
- Attempt to resolve discrepancies between the quantity of waste designated on the WSR and the quantity actually received by contacting the waste generator. If the discrepancy is not resolved within fifteen (15) days after receiving the waste, the facility must immediately report in writing to DEQ. The report should document the discrepancy and attempts to reconcile it. A copy of the WSR shall be included with the report.

Recordkeeping.

WSRs are required for RACM and must contain the following:

- Name, address, and telephone number of the waste generator;
- Name, address, and telephone number of the transporter(s);
- Quantity of RACM in cubic meters (or cubic yards);
- Presence of improperly packaged RACM; and
- Date of receipt.

WSRs and documentation of discrepancies between WSR and actual amounts received shall be maintained in the facility's operating record for a minimum of two (2) years.

The facility must maintain in its operating records, until closure, the location of all RACM including, but not limited to, the following

- The depth and area;
- Quantity in cubic meters (or cubic yards); and
- A map or diagram depicting the location of the asbestos-containing waste.

Asbestos Excavation.

The facility must notify DEQ in writing at least forty-five (45) days prior to excavating or otherwise disturbing any RACM that has been deposited and covered.

The notification must include:

- Scheduled starting and completion dates;
- Reason for disturbing waste;
- Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated RACM; and
- Location of any temporary storage site and the final disposal site.