



SPOKANE COUNTY AIR POLLUTION CONTROL AUTHORITY

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Asbestos Survey Guidance

for AHERA Building Inspectors in Spokane County

When must an Asbestos Survey be conducted by an AHERA Building Inspector and what paperwork must be filed with Spokane County Air Pollution Control Authority (SCAPCA) and Washington State Department of Labor and Industries (L&I) prior to conducting renovation and demolition activities?

	Owner-Occupied, Single-Family Residence^A	All Others
Demolition^B	<ul style="list-style-type: none"> • SCAPCA and L&I require an AHERA building inspector to perform an asbestos survey prior to demolition.^C • If no asbestos is identified in the survey, a Notice of Intent form & copy of the survey are required by SCAPCA along with \$25 fee. 	<ul style="list-style-type: none"> • SCAPCA and L&I require an AHERA building inspector to perform an asbestos survey prior to demolition.^C • If no asbestos is identified in the survey, a Notice of Intent form & copy of the survey are required by SCAPCA along with \$150 fee.
Renovation	<ul style="list-style-type: none"> • L&I requires an AHERA building inspector to perform an asbestos survey prior to renovation.^C • If no asbestos is identified in the survey, no notification is required by SCAPCA or L&I. A copy of the asbestos survey must be kept on-site. 	<ul style="list-style-type: none"> • SCAPCA and L&I require an AHERA building inspector to perform an asbestos survey prior to renovation.^C • If no asbestos is identified in the survey, no notification is required by SCAPCA or L&I. A copy of the asbestos survey must be kept on-site.

^A An owner-occupied, single-family residence is one that the owner of the home lives in both prior to and after renovation/demolition activities. The term excludes rental property, multiple family units, and mixed-use structures that contain a residential unit.

^B SCAPCA's regulations define a demolition project as the wrecking, razing, leveling, dismantling, or burning of a structure (by a fire department for training purposes), thereby making the structure permanently uninhabitable or unusable.

^C If asbestos-containing material is identified in the survey, it must be removed in accordance with local, state, and federal requirements. For example, SCAPCA has an asbestos notification & fee program. Contact SCAPCA and L&I for more information.

SCAPCA Regulation I, Article IX, Section 9.03, addresses the requirement for an *Asbestos Survey* as defined in Section 9.02.G. The attached guidelines were developed to provide guidance for performing an *Asbestos Survey*. The guidelines are not intended to be a substitute for applicable regulations.

GUIDELINES FOR AN ASBESTOS SURVEY

Use of Asbestos Building Inspector

In most cases, the Asbestos Survey must be performed by an AHERA Building Inspector as defined under 40 CFR 763. An AHERA Building Inspector is not required for asbestos surveys associated with the *renovation* of an owner-occupied, single-family residence where the owner of the single-family residence lives in it both prior to and after renovation activities. This exclusion does not apply to rental property, properties involved in a real estate transaction, multiple family units, and mixed-use structures that contain a residential unit. If the residence is to be *demolished*, an AHERA Building Inspector always must be employed.

Field Procedures

- Review any existing information about the structure, including design drawings, as-built drawings, project specifications, and any existing survey and/or laboratory information.
- Utilize the proper equipment in order to examine all accessible spaces (i.e. ladders, flashlights, etc.).
- Confirm with the Owner or Owner's Representative the exact area under investigation, exact nature of demolition/renovation and identify all materials that will be disturbed or accessed.
- Determine the extent to which the building will be renovated and/or demolished.
- Determine and investigate each building's structural, mechanical, electrical and roofing systems.
- Perform a comprehensive investigation of areas to identify materials to be sampled and/or assumed to contain asbestos.
- Clearly note uninspected areas and explain why they were not surveyed (i.e. "confined space," buried materials, restrictions generated by the property owner, etc...).
- Create sampling plan based on suspect materials present and requirements of 40 CFR 763.85 & 763.86.
- Perform destructive investigation to look for hidden materials. (See Destructive Investigation section for guidance)
- Collect bulk samples of all suspect materials that will be disturbed and submit those not assumed to be asbestos to a certified laboratory for analysis. (A "Sample Asbestos-Containing Material List" is included as a last page to these guidelines. Note that this is not a comprehensive list of all potential asbestos-containing materials.)
- Document where asbestos materials exist and record their exact location, condition and approximate quantity.

Destructive Investigation

Many asbestos containing materials are located in concealed areas such as wall cavities, below ground level, and other hidden spaces. In order to provide a sufficient Asbestos Survey, the Inspector must perform destructive testing (i.e. opening walls, etc.) to inspect these areas for suspect materials. The following guidelines are intended to help in locating concealed materials:

- Identify the different building systems which may involve concealed asbestos materials such as the heating/cooling system, domestic water lines, roof drainage lines, miscellaneous piping lines, underlay roofing, etc.
- Open hidden areas and inspect each system in at least three (3) locations for each area of construction.
- Focus your inspection on likely areas for suspect materials (i.e. where insulated pipe enters wall or ceiling, etc.).
- Examine additional areas if results of inspection are inconsistent.
- Clearly list all hidden areas which have not been inspected, and explain why they were not inspected.
- For complex demolitions/renovations where all areas could not be accessed for sampling, recommend to the property owner or owner's representative that a qualified person be on stand-by to address potential of unidentified *suspect* materials becoming disturbed once work begins.

Survey Report Content

Scope of Work:

- Date(s) of field inspection
- Date of report submittal
- Building address
- Building Owner including address and contact person
- Description of area surveyed including any exclusions or limitations (be specific).
- Description of building status after survey, if known (extent to which the building is to be renovated and/or demolished)
- Name or report writer(s) and reviewer(s) including AHERA accreditation information

Building Description:

- Building name, if any
- Type of building (e.g. commercial, warehouse, retail, residential, etc.)
- Special features of building
- Type of business
- Approximate age of structures and dates of past renovations
- Building systems such as structural system, mechanical system, roofing system, non-structural systems, miscellaneous information, etc.

Building Inspector/Firm Affiliation/ Laboratory Information:

- Name(s) of Building Inspector(s) including certification number and certification expiration date
- Inspector firm information including name, address, and phone number
- Laboratory name and NVLAP certification
- Special instructions regarding type of analysis requested such as PLM, point counting TEM

Survey Methodology:

- Description of inspection procedure, including scope of the survey. Inspection must be in accordance with the sampling protocol in 40 CFR 763.85 and 763.86, as required per SCAPCA Regulation I, Article IX, Section 9.02.G and 9.03.
- If hidden or inaccessible areas are to be disturbed or are likely to be disturbed, a destructive investigation must be performed. Provide a detailed description of the procedure used to find hidden suspect materials. For example, if asbestos pipe insulation is suspected in a

wall cavity, describe by location where the wall was opened for examination. It is recommended that each building and non-structural system suspected of having asbestos materials be sampled at a minimum of three locations.

- Description of sampling methods.

Asbestos Identification Process:

- Prepare sample and suspect asbestos material location plan.
- List all materials sampled and tested.
- List all materials assumed to contain asbestos.
- Indicate type and amount of material sampled, be specific.
- Describe suspect material location, friability, and approximate location.
- List all materials not sampled and state why they were not sampled.

Procedure for Communicating Survey Findings to Affected Parties:

A summary of the results of the asbestos survey shall be posted, either by the property owner or the owner’s agent (e.g., general contractor) at the work site or communicated in writing to all persons who may come into contact with the material. A signed acknowledgment by a responsible party (owner or owner’s representative) should be included in or attached to the report. The acknowledgment should be similar to the following:

“I acknowledge that I have read and understand this report. I further acknowledge that hidden asbestos materials may exist in concealed areas that may be exposed during my work. If suspect materials (refer to page 5) are discovered, I will treat the material as asbestos containing until testing proves otherwise.”

Firm Name: _____
Signature: _____
Name: (Print or Type): _____
Title: _____
Address: _____

Phone Number: _____ Date: _____

Limitations of Report:

List any qualifications to the report such as uninspected inaccessible areas, buried materials, areas of building inspected, and why areas were inaccessible.

Sample Asbestos-Containing Material List

- Acoustical ceiling texture (“popcorn”)
- Asphalt flooring
- Base flashing
- Blown-in insulation
- Boiler/tank insulation
- Breaching insulation
- Brick mortar
- Built-up roofing
- Caulking/putties
- Ceiling tiles/panels/mastic
- Cement board/transite
- Cement pipes
- Cement roofing shingles
- Chalkboards
- Construction mastics
- Duct tape/paper
- Ductwork flexible connections
- Electrical cloth
- Electrical panel partitions
- Electrical wiring insulation
- Elevator brake shoes
- Erkot roofing material
- Fire blankets
- Fire curtains/hose
- Fire doors
- Fireproofing
- Furnace insulation
- Gray roofing paint
- High temperature gaskets
- HVAC duct insulation
- Incandescent light fixture backing
- Joint compound/wallboard
- Laboratory hoods/table tops
- Laboratory fume hood
- Mudded pipe elbow insulation
- Nicolet (white) roofing paper
- Packing materials
- Paper fire box in walls
- Paper on backside of fiberglass insulation
- Pipe insulation/fittings
- Plaster/ wall joints
- Poured flooring
- Rolled roofing
- Roofing shingles
- Sink insulation
- Spray-applied insulation
- Stucco
- Sub flooring slip sheet
- Textured paints/coatings
- Vapor barrier
- Vinyl floor tile/mastic
- Vinyl sheet flooring/mastic
- Vinyl wall coverings
- Window glazing

Note: *This list does not include every product that may contain asbestos. It is intended as a general guide to show which types of materials may contain asbestos.*

ASBESTOS SURVEY CHECKLIST

The following is a checklist to help an AHERA Building Inspector perform a thorough Asbestos Survey. The checklist was developed to provide guidance for performing an Asbestos Survey. The checklist is not intended to be a substitute for applicable regulations. SCAPCA recommends that the asbestos survey report include the following:

- The purpose of the inspection (e.g., survey for planned demolition of west wing).
- Survey limitations such as uninspected areas (e.g., Building was occupied and destructive sampling techniques could not be performed. Destructive sampling techniques should be performed prior to demolition). If there were no uninspected areas, it should be noted.
- Any supporting information used for preparing the asbestos survey, including a review of any existing information about the structure(s) such as design drawings, as-built drawings, project specifications, existing survey or laboratory information, etc.
- Date that the inspection was performed.
- Building use.
- Name of the structure, if applicable (e.g., Amazon Retirement Center).
- Address of the structure.
- Name, address and telephone number of the building owner(s) and contact person(s).
- Description of the structure(s) inspected (e.g., bridge, gasoline station canopy, 2 story house, commercial warehouse, etc.)
- Special building features.
- Approximate age of structure(s).
- Dimensions of the structure(s) and the building areas inspected (e.g., drawings, combined with text, generally work very well).
- Dates of past renovations.
- Building systems (e.g., structural system, mechanical system, roofing system, etc.).
- Description of the inspection procedures used to identify the locations of all suspect ACM (e.g., a visual inspection performed during an initial building walk-through that included collecting bulk samples of suspect ACM in accordance with EPA protocol, including destructive sampling techniques.).
- Identification of all homogeneous areas of suspect ACM, including a description of the following:
 - material,
 - quantity,
 - texture,
 - condition (e.g., whether the material is fibrous or non-fibrous, in poor, fair or good condition, etc.)
 - color,
 - exact location (drawings/maps labeled with sample numbers are highly recommended),
 - other pertinent information
- Indication of whether the suspect ACM is surfacing material, thermal system insulation, or miscellaneous material.
- Indicate whether the material is in layers.
- For each homogeneous area that is not assumed to be ACM, collect and submit bulk samples for analysis in accordance with the sampling protocol in 40 CFR Part 763.86 and 763.87. The asbestos survey should show that proper EPA sampling protocol was used. The number of samples required to demonstrate that a suspect material does not contain asbestos is determined by the material type and measured quantity. See the specific categories listed on the enclosed *Sampling Worksheet*.

- List of all materials not sampled and state why they were not sampled (e.g., 400 sq. ft. of acoustical spray-on textured “popcorn” ceiling material in room A45D was assumed to be ACM and was not sampled).
- Laboratory results that show bulk sample asbestos content.
- Identification of ACM as friable or nonfriable.
- Complete documentation from the laboratory, including the following:
 - name,
 - address,
 - telephone number,
 - National Voluntary Laboratory Accreditation Program (NVLAP) certification. It’s important to confirm that the laboratory is currently National Institute of Standards and Technology (NIST) accredited. For more information, go to <http://ts.nist.gov>.
 - all necessary signatures such as microscopist and laboratory manager (e.g., on chain of custody, sample analysis results, etc.)
- AHERA Building Inspector information, including the following:
 - name,
 - address,
 - telephone number,
 - certification number,
 - certification expiration date,
 - report writer(s) and reviewer(s) name and AHERA accreditation information
- A summary page of results at the front of the survey report to help communicate results with the client.
- SCAPCA address, telephone number, and web page address for anyone that has questions regarding asbestos regulations in Spokane County.

Notes:

- Some AHERA Building Inspector training providers may have sample inspection report formats that you can use. Contact your training provider for more information.
- The intent of this asbestos survey is to comply with SCAPCA’s asbestos survey requirements. The intent of any report generated from this guidance is not for it to serve as an asbestos design document for obtaining bids from abatement contractors. Contact an asbestos abatement consultant or contractor for more information regarding getting bids for asbestos abatement.

SAMPLING WORKSHEET

Date _____ Inspector _____ Site Address _____

Homogeneous Surfacing Material

Material Type		Location	Amt.	Presumed ACM	1 Sample Positive	≤1000 sq. ft. 3 Samples	>1000 sq. ft. ≤ 5000 sq. ft. 5 Samples	>5000 sq. ft. 7 Samples	Result + or -
	#1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#4			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#5			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Homogeneous Thermal System Insulation

Material Type		Location	Amt.	Presumed ACM	1 Sample Positive	3 Samples	Result + or -
	#1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#4			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#5			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Homogeneous Patched Thermal Insulation

Material Type		Location	Amt.	Presumed ACM	1 Sample if < 6 In. ft. or sq. ft.	3 Samples	Result + or -
	#1			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#2			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#3			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#4			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	#5			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Mechanical System Insulation

Material Type		Location	Amt.	Presumed ACM	1 Sample Positive	No. of Samples*	Result + or -
	#1			<input type="checkbox"/>	<input type="checkbox"/>		
	#2			<input type="checkbox"/>	<input type="checkbox"/>		
	#3			<input type="checkbox"/>	<input type="checkbox"/>		
	#4			<input type="checkbox"/>	<input type="checkbox"/>		

Miscellaneous Materials (Friable)

Material Type		Location	Amt.	Presumed ACM	1 Sample Positive	No. of Samples*	Result + or -
	#1			<input type="checkbox"/>	<input type="checkbox"/>		
	#2			<input type="checkbox"/>	<input type="checkbox"/>		
	#3			<input type="checkbox"/>	<input type="checkbox"/>		
	#4			<input type="checkbox"/>	<input type="checkbox"/>		

Miscellaneous Materials (Non-Friable)

Material Type		Location	Amt.	Presumed ACM	1 Sample Positive	No. of Samples*	Result + or -
	#1			<input type="checkbox"/>	<input type="checkbox"/>		
	#2			<input type="checkbox"/>	<input type="checkbox"/>		
	#3			<input type="checkbox"/>	<input type="checkbox"/>		
	#4			<input type="checkbox"/>	<input type="checkbox"/>		

CHECK BOX WHERE APPROPRIATE

* Must be one or more samples. See 40 CFR 763.86 - Sampling