

RACM Demolition Assessment Guidelines for START and Demolition Contractors, Where Applicable

Introduction

Before a hurricane damaged house can be demolished, the parish or Corps (Corps of Engineers) contractor must determine if the house contains RACM (Regulated Asbestos Containing Material).

If samples can be taken from the house, then this will determine if RACM is present. If samples cannot be taken, due to the house being unsafe to enter or structurally unsound, then the house is assumed to contain RACM. You will be performing assessments on houses that either tested positive for RACM or are assumed to contain RACM because samples could not be taken.

On your demo schedule (provided daily by the demo contractor), you will also see C & D demolitions listed. These properties either tested negative for asbestos or were “down by the storm” (meaning that no walls were left standing after the hurricane). In either case these are nonregulated demolitions, as are demolitions performed by a homeowner, home owner’s contractor or those performed by a volunteer group. Although nonregulated, insofar as DEQ Asbestos Regulations are concerned, C& D demolitions must still comply with DEQ Solid Waste and Air Regulations.

Note: This document is applicable for START Contractors as well as Demolition Contractors. See pertinent information where applicable.

Finding the Site (For START Contractors)

- Generally speaking, the demo schedule you receive will list the contractor’s crews and the order in which they will demolish their assigned houses. Just start with the first house assigned to the crew for that day.
- We will provide a contact list for the contractor that you are working. If you have trouble finding a crew, the best way to track them down is to call the contractor.
- At times you will arrive at a site only to find that the demolition has been held up due to equipment problems, broken gas or water lines, still connected power lines, etc. In these cases, move on to the next crew on your list rather than trying to “wait the problem out” at the site and return later in the day.

Arriving Onsite (For START Contractors)

- Before exiting the vehicle, make sure you are wearing proper PPE. This includes steel-toed boots, hardhat, wrap-around safety glasses (or glasses with side shields), and a Type 2 safety vest if working in a Corps run parish (Jefferson and Orleans Parishes). A Type 1 safety vest will suffice in St. Bernard and Plaquemines Parishes.

- Introduce yourself to the asbestos supervisor, the prime contractor representative, and the Corps Q.A. (Quality Assurance) monitor (in Jefferson & Orleans) or the parish demo monitor (if in St. Bernard Parish). Note: The parish monitors in St. Bernard parish work for a private company called BBEC.
- Never cross the hot zone barrier and enter into the hot zone.
- Try to stay upwind while observing demolition activities.

The Hot Zone (START and Demolition Contractors, where applicable)

- The containment area, or “hot zone”, must have a barrier.
- The size of the hot zone will vary from contractor to contractor (we do not have the regulatory authority to determine the hot zone size).
- All persons actively engaged in the demolition of a RACM house must be accredited. Normally this will be the equipment operators, the asbestos site supervisor and his crew, and the person performing air monitoring at the site. Note: START Contractors, you may see nonaccredited individuals (truck drivers, FEMA archeologists, contractor personnel, etc.) in the hot zone during periods when the demolition is not in progress (lunch, breaks, etc.). This is OK. We are only interested in those individuals actively engaged in the RACM demo and who are performing air monitoring, supervising the hot zone crew, or who are working in the hot zone during the RACM phase¹ of the demolition.
- LDEQ does not regulate the use of PPE (respirators, Tyvec, etc.) or involve ourselves with safety issues at RACM sites. These are OSHA concerns.
- The “burrito wrap” may be completed in the hot zone or an adjacent (and contiguous) work zone. You should never enter the hot zone. You can, however, enter the work zone in order to inspect a completed burrito wrap. Only enter the work zone after the burrito wrap is complete and the barrier tape has been dropped. Note: Wrapping asbestos tape around a truck does not meet our definition of a work zone.
- The hot zone barrier tape may be lifted up or untied to allow the trucks in or out of the containment area and should be replaced immediately afterwards.
- Once the hot zone has been set for the day, and the demolition has begun, the contractor cannot shrink the hot zone. Note: In Orleans Parish, the contractor will sometimes have a taped off “work zone” adjacent to the hot zone. This “work zone” (sometimes just used as a barrier to keep people away from the site) can be adjusted as the Contractor sees fit.

Asbestos Accreditations (START and Demolition Contractors, where applicable)

- Hot zone workers (the site asbestos supervisor, his crew, and the equipment operators), and the individual performing air monitoring, must have their DEQ Certificate of Accreditation² (or a copy) and a photo ID, or their DEQ accreditation photo ID³ onsite. You need to check each of the above individuals for these documents.

¹ Once all of the RACM debris (i.e., all of the debris associated with the house) has been removed from the site, then any remaining material is considered C & D debris and our RACM rules do not apply. This being said, in sector 2 of Orleans Parish (sites South of I-10) the Corps & ECC (the prime contractor) have elected to treat the remaining debris as RACM and as such must follow our RACM guidelines.

² See page 15 for a copy of a DEQ certificate of asbestos accreditation certificate.

- In the case where a copy of the DEQ certificate of accreditation is used as proof of accreditation, be sure to check a photo ID to insure the individual's identity. Always ask for a driver's license or some other government issued ID. If this isn't available, I've also accepted photo IDs that were issued by the organization that provided the individual's asbestos training.
- Air monitors and asbestos supervisors are required to have proof of their contractor/supervisor accreditation onsite. Their accreditation # will contain "S", as in 7S01194. Note: An asbestos supervisor may supervise more than one site as long as they are adjacent to each other. In some cases you may find that the person performing the air monitoring, or the equipment operator, is also acting as the asbestos supervisor. This is permitted as long as he has the DEQ contractor/supervisor accreditation, stays on site during the demolition, and is actually supervising the hot zone crew.
- Other hot zone workers need to have, at the least, a worker accreditation. A worker accreditation # will contain "W", as in 7W01192. In some cases you will find that these people will have a contractor/supervisor accreditation, but are just employed as hot zone workers. This is acceptable.
- Be sure to check the equipment operators for proof of accreditation. Often, the asbestos supervisor will not have proof of their accreditation as the equipment operators normally work for a different subcontractor.
- A hose operator may be nonaccredited as long as he remains outside the hot zone while demolition activities are taking place. If this is the case, look to make sure that the debris is being adequately wetted as it may be hard to reach all areas of the demolition from outside of the hot zone.
- START Contractors, do not rely on a demolition contractor provided list showing that they have checked onsite accreditations. These lists may be incorrect. A current LDEQ list is periodically updated and submitted to the SERO. Demolition contractors, please see a current accreditation list on the Asbestos and Lead website at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2251>.
- START Contractors, you have the right to inform site personnel that they cannot work in the hot zone if nonaccredited; however, you don't have the authority to shut down a demolition.
- If you need to check accreditations of individuals working in the hot zone, do not shut down the work in order to perform your check. Instead, have the workers come out of the hot zone one at a time in order to prevent a delay in the demolition. Note: Before you can talk to the hot zone workers they may have to remove their PPE in a decontamination zone first.
- If you find a nonaccredited worker onsite, note this in the FIF (Facility Interview Form) and include the individuals name and his job at the site (hot zone worker, equipment operator, etc.). Also note on the FIF if you observed the individual working in the hot zone and include the names of onsite personnel with whom you discussed the Area of Concern. Note: In the Corps run parishes, Jefferson & Orleans, always be sure to discuss the Area of Concern with the onsite Corps Q.A. monitor and document same.

³ See page 16 for a copy of a DEQ accreditation photo ID card.

- Becky Barbier and Juan Franquiz (both at LDEQ Headquarters) are in charge of issuing asbestos accreditations. If a contractor has accreditation questions, Becky can be reached at 225.219.0932 and Juan at 225.219.3179.

Air Monitoring (START and Demolition Contractors, where applicable)

- Air monitoring is not a DEQ requirement. Ask if it is being performed and, if it is, check to make sure the person performing the monitoring has a contractor/supervisor accreditation from the DEQ (our only requirement concerning air monitoring). Note: You will not see air monitoring taking place at every RACM site. Once a contractor has accumulated thirty days of historical data showing “under the limit” asbestos fiber counts, OSHA may suspend air sampling requirements. For our purposes it is sufficient to just note whether this activity is taking place at the site.

Rolling on RACM Debris with Heavy Equipment (START and Demolition Contractors, where applicable)

- Never permissible (well...almost, see below) without prior approval from Mickey Drury. Mickey can be reached at 504.736.7712 (office) or 985.373.7481 (cell). Note: If a contractor has permission to roll on RACM at a site you will be informed of this when you get your morning assignment. If a contractor tells you that he’s gotten permission to roll on RACM and this is the first you’ve heard of the variance, then chances are that they didn’t get permission from the DEQ; please call us if this situation arises.
- A bobcat with rubber tires/treads cannot roll on RACM, however, it may roll on VAT (Vinyl Asbestos Tile) that is still fixed in place on a slab.
Note: This exception only applies to floor tile that is in good condition. If the floor tile has been exposed to UV rays for an extended period of time it may crumble under the weight of a rubber tired bobcat.
- If heavy equipment is observed rolling on RACM⁴, then you should write on the FIF that the “excavator (bobcat, skid-loader, etc.) was observed rolling on RACM debris at the site”. Discuss the issue with onsite personnel (asbestos supervisor, prime contractor representative and Corps Q.A. monitor or parish monitor, if applicable) and document same (be sure to get the names).
- RACM, as mentioned above, is any part of the house (meaning house debris) that is still onsite. Once the house has been removed, the site is technically a C & D site and our regulations do not apply (the exception being where the contractor has elected to treat lot clean-up debris as RACM).
- If possible, try to get a picture of the heavy equipment on top of the RACM debris.

⁴ See page 17 for pictures of heavy equipment rolling on RACM debris.

Recycling of Non-RACM Debris

(START and Demolition Contractors, where applicable)

- The salvaging of materials, incidental to a RACM demolition, has long been recognized as a good practice to conserve landfill space and recycle usable material. In order to qualify as non-RACM, the material has to pass a visual inspection. If no suspect material is visually detected, it can then be reused. So far, this issue has only been raised twice. In one case a homeowner who wanted to save the pilings that his house was built upon and the other case involved a homeowner who wanted to salvage some cypress beams. In all cases, contractors should get approval from the DEQ to recycle Non-RACM debris from RACM sites.

Wetting of Debris (START and Demolition Contractors, where applicable)

- The structure must be wetted⁵ down before and during the demolition. The exception being when the structure is already sufficiently wet due to rainfall.
- The excavator/bobcat should not be working unless someone is manning the water hose, ready to spray water if necessary.
- If two pieces of equipment are working, then two water hoses may be needed to ensure adequate control of dust emissions.
- If there are visible dust emissions⁶, then wetting is not adequate. The criterion is no visible emissions. If emissions are observed, then you should write in the FIF that “dust emissions were observed rising from the RACM debris during the demolition of the house”. Also note whether the emissions were observed leaving the hot zone and document your discussions with onsite personnel about the Area of Concern. Note: In the Corps run parishes (Jefferson & Orleans) always be sure to discuss the problem with the onsite Corps Q.A. monitor and document same.
- If possible, try to get a picture of the dust emissions.

The Burrito Wrap (START and Demolition Contractors, where applicable)

- You must wait for the loaded trailer to leave the hot zone before checking the burrito wrap.
- The idea is to create a leak-tight bag⁷ that will slide out of the truck in one piece at the landfill. Currently, all of the RACM debris being generated in Jefferson, Orleans,

⁵ The EPA, in their latest “No Action Assurance” letter recommends thoroughly wetting the interior of structures to the extent possible through windows and door openings and/or through openings made into the attic spaces and/or walls from the exterior prior to demolition. Where field conditions allow, the EPA also recommends that amended water be used for wetting, as this significantly reduces the potential for asbestos release. The surfactant added to the water provides better wetting than regular water and helps ensure that the “no visible emissions” standard is met. An example of how to use a wetting agent can be found in EPA’s “Guidance for Controlling Asbestos-containing Materials in Buildings”, EPA-560/5-85.024 (Purple Book). This publication can be found at the following link: www.epa.gov/nscep/

⁶ See page 18 for pictures of dust rising from RACM debris.

⁷ See page 19 for a picture of a good burrito wrap

Plaquemines, and St. Bernard Parishes is being sent to River Birch Landfill in Jefferson Parish.

- Our regulations require that the plastic used for the burrito wrap be transparent or clear. The reason for this is that once the RACM is sealed in the burrito wrap, evidence of adequate wetting is considered to be the formation of water droplets on the inside of the wrap. As such, the plastic should be clear enough to observe these water droplets. This being said, some of the plastic that you will see the contractors using has a noticeable white tint and the plastic could be described more as opaque rather than clear. While out in the field don't make an issue of the plastic's transparency unless the plastic is a solid color, such as white or black. As a test, if you lay single layer of plastic over your hand and can still see your hand, then the plastic meets our requirements.
- DEQ does not regulate poly thickness. We only care that the burrito bag retains its integrity during its trip to the landfill.
- The poly cannot be glued to the side of the truck or taped to, or over, the center crossbar of the trailer. Note: Center crossbars are only found in the large eighteen wheeler "type" trailers.
- The contractors will use either custom manufactured drop in plastic bags or will "make" a bag in the trailer by using two or more separate pieces of plastic. If the bag is made from separate pieces of plastic, the bottom and corner seams of the bag must be sealed in order to form a leak-tight container. This is usually accomplished through the use of tape and/or glue.
- A generator label, preferably written with an indelible marker directly on the plastic, and an asbestos warning label must be applied to the top of the burrito wrap. The generator label must state the origin of the debris (Ex: Corps/ECC), the address of the demolition site, and the date. Note: Our regulations do not specify any standards for the generator label other than the information required. As such, the generator information may be hand written on a sheet of paper and attached to the burrito wrap. The asbestos warning label should be an OSHA approved tri-color sticker (usually black, red, and white). Without getting into the OSHA standards, if the warning sticker is a tri-color commercially supplied product, consider it to be adequate. Also, the asbestos warning sticker may have blanks for the generator label information. If these blanks are filled in with the proper information, a separate generator label is not needed. In Orleans and St. Bernard Parishes, the generator label and/or asbestos warning label can be found on the top of the burrito wrap in the front/left quadrant of the loaded trailer (the corner closest to the driver).
- Before checking a burrito wrap, ask the asbestos supervisor if the truck is "ready to leave the site". This way, if we find a problem, the contractor cannot say that we checked the truck before they were finished with it. Just be sure to document the conversation in the FIF.
- When checking a burrito wrap, you want to make sure that there are no visible openings in the top of the burrito wrap and that the debris (pipes, 2X4s, etc.) is not sticking-up out of the trailer in a way that might puncture the wrap while in transit. Normally a burrito wrap can be fixed by the crew if there are problems with the wrap, the exception being a burrito wrap where the plastic was not sealed where it overlaps in the corners of a trailer or the seams have broken open due to inadequate sealing. In this case the burrito wrap cannot be fixed without dumping the load (back onto the RACM site), relining, and

reloading the truck. You have the authority to make this call (please call Kevin, Mr. Anis, Lisa, or Mickey before taking this step). Just be sure that the corners of the burrito wrap were not sealed. The best way to determine this is to watch a trailer being lined, as it can be hard to determine if the corner seams have been sealed when looking into a loaded trailer.

- In the Corp. run parishes (Jefferson & Orleans) do not climb directly on the loaded trailers. Ask site personnel for an appropriate sized ladder and a spotter.
- You might be asked if it's OK for a partially loaded RACM trailer to be moved to another site without burrito wrapping the load (note the plastic flaps should still be draped over the RACM, they just doesn't have to be sealed). The general rule of thumb here is that the sites must be within three blocks of each other. Our intent here is that any movement of a partial load, as described above, be kept to an absolute minimum and that said truck should not travel on our cross a major street. Note: if a contractor commingles RACM debris from two sites, in the same trailer, then two generator labels need to be placed on the burrito wrap (one for each address).
- If possible, try to get a picture of the defective burrito wrap.
- Discuss the Area of Concern with onsite personnel and document same in the FIF.

Leaving RACM Debris Overnight on the Demolition Site (START and Demolition Contractors, where applicable)

- In some cases a contractor will have to leave RACM debris onsite overnight due to the inability to finish a demolition on the same day that it was started. This is OK provided that: the debris is wetted; the debris is covered with plastic that has been secured in place; asbestos warning stickers have been placed on all four sides of the plastic covering the debris pile; a barrier is in place around the RACM debris; and, the site is the first on the schedule to be started the next day.
Note: The barrier placed around the RACM debris must be labeled "Danger Asbestos".
- In populated areas, temporary construction fencing (with asbestos warning signs, warning stickers or warning tape) must surround the RACM.
- If part of the house is still standing (in a populated area), then the house should be surrounded by the temporary construction fencing as well. Note: If a demolition site has fencing (chain link, etc.) bordering the site, then the temporary construction fencing need only be placed across the non-fenced part of the property. In both cases above, when using the orange construction fencing or the site fencing, the fencing must be labeled with "danger asbestos". The asbestos warning tape normally used to surround a hot zone during demolition will suffice for this purpose.
- RACM debris storage on a demolition site is not permitted for a time period beyond one overnight period of storage.

Staging of Full or Partial RACM Loads Overnight (START and Demolition Contractors, where applicable)

- Trucks containing demolition debris from RACM houses may be stored overnight at a truck stop or other parking area near the hotel where the truck drivers are staying. The demolition debris must be wrapped in a polyethylene lining covered by a heavy tarpaulin with straps tying down the load. The dumpsters must be labeled for overnight storage. Because the debris is wrapped in such a manner, tarped, strapped, and labeled, and the dumpsters are approximately 13' in height, the Dept. feels that this procedure meets the regulation regarding "secure area" in LAC 33:III.5151.J.1.a.vi of the Louisiana Air Quality Regulations.
- In unpopulated areas, partial or full loads may also be left overnight at a RACM demo site provided that the truck is parked in the hot zone and the hot zone barrier tape is in place.
- In both of the cases above, the driver of the RACM load will need two ADVFs: one for the day of storage and one for the day of disposal.

Truck Labeling Requirements (START and Demolition Contractors, where applicable)

- Vehicles used to transport asbestos containing waste must be marked during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements detailed in LAC 33:III.5151.I.4.a.i, ii, and iii.
- However, please note that the OSHA citation has changed and is currently under 29 CFR [1926.1101\(k\)\(8\)\(iii\)](#):

Labels shall be used in accordance with the requirements of 29 CFR 1910.1200(f) of OSHA's Hazard Communication standard, and shall contain the following information:

DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

ADVF (START and Demolition Contractors, where applicable)

- Copy the ADVF and attach the LDEQ generated Addendum Form for each load. There is one ADVF per contractor, per parish, per day for FEMA financed demolitions only. This is a rolling ADVF number used to track the load(s) at the landfill. The onsite asbestos supervisor should be able to provide this ADVF number or a copy of the ADVF for each day of demolition. Each truck **must** have a copy of the ADVF designated for that day with them prior to leaving the site. START Contractors, other than checking for the ADVF (Asbestos Disposal Verification Form), do not spend any time on this issue.

Debris Management (START Contractors)

- START Contractors, while observing the demolition, make sure that the contractor is removing HHW (household hazardous waste), EW (electronic waste), white goods (household appliances), tires, & gasoline powered equipment (if these items are present). Note: The contractor should not be crushing, or rolling over, refrigerators or room air conditioning units. Doing so could result in the release of Freon.
- If you see anybody evacuating Freon directly into the atmosphere from a central air conditioning system, please call Kevin, Anis, Wayne or Mickey immediately.

Asbestos Removal & Abatement Contractor's Licensing Requirements (START and Demolition Contractors, where applicable)

- In accordance with the LDEQ Air Quality Regulations, LAC 33:III.5151.F.1.f, any contractor performing removal (demolition or renovation) of asbestos containing material that involves Regulated Asbestos Containing Material (see definition in LAC 33:III.5151.B) must become licensed by the Louisiana State Licensing Board for Contractors. You may contact this agency by phone 225-765-2301 or view their web site for additional information at <http://www.lslbc.state.la.us>
- NOTE: The LDEQ only requires an asbestos removal and abatement contractor's license for the contractor(s) or subcontractor(s) who are actually performing the RACM demolition, however, the Louisiana State Licensing Board for Contractors requires that all parties involved in asbestos removal and abatement (both primes and subcontractors) be licensed (LA R.S. 37: 2150.1.4.c).

Paperwork (START Contractors)

- FIFs⁸ need to be filled out if any Areas of Concern are found at the demolition site. This includes problems or issues that are corrected during the site visit. This is important in order to get an overall view of how a contractor is performing and so that the prime contractor and /or the Corps are aware of Areas of Concern.
- Before you leave the site, have the asbestos supervisor sign the FIF and give him the yellow copy. The pink and yellow copies should be left with the prime contractor site representative and the Corps Q.A. or Parish Monitor.
- Complete one 214⁹ for the entire day.
- A checklist needs to be completed for each active site. If you arrive at a site and the work is complete, or it is a C & D demo, make a note of the site visit on the 214 but do not complete a checklist.

⁸ See page 20 for details on how to fill out a FIF.

⁹ See page 21 for a copy of a properly filled out 214.

- Please be sure to fill in all of the blanks on the checklist, including the name of the town or city that the demo is occurring in. In St. Bernard Parish, you can ask the demo crew for the “city” information (this information should be on the demolition site paperwork).
- If a checklist item is not applicable, make a note why. For example, write “no trucks on site” for not checking off the block addressing placing debris in visqueen.
- Two copies of the 214, checklist, and FIF (if used) are needed for each assessment performed (please staple each set), along with the originals. Please place the originals and the copies into the “demo box” located in the “demo room”.
- Please turn in your paperwork by the following workday.
- For those of you who prefer to type their reports; let me know and I’ll send you electronic copies of the check lists and the 214.

Miscellaneous (START and Demolition Contractors, where applicable)

- Be sure to leave your cell phone number or beeper number with Kevin Cousins or Anis Abdelghani so that we can contact you with possible changes in the day’s schedule (we’ve had days when the demos get called off due to rainouts, etc.)
- Do not share contractor contact phone numbers with other contractors. I’ve been told that they will use this information to try to hire employees from the competition.
- Photos should be placed into a photo template and attached to the report (or e-mailed to me so that I can attach them to the report, if you’re from out-of-town). Ask Kevin to email a photo template to you if needed.
- Try to hit one of the crews on your list twice in the same day. We don’t want them to think that they’re “home free” for the day after our initial assessment. Detail the second visit on the 214, but don’t fill out a checklist unless you find a problem. Also, it won’t be necessary to check the accreditations again unless you observe new personnel working at the site in the hot zone.
- If you find an “Area of Concern” at a site, be sure to bring this to the attention of Kevin Cousins or Anis Abdelghani as soon as possible (we like to address these problems as quickly as possible).
- You should be equipped with a box of disposable gloves for use when checking burrito bags in loaded trailers.
- Questions? Call Kevin or Mr. Anis first and then Mickey if necessary...our phone numbers are printed at the bottom of the Demolition Assessment Checklist.

ADDENDUM ONE
RACM DEMOLITION GUIDELINES
FLOOR TILE REMOVAL
11/14/2006

The following guidelines apply to floor tile and sheet goods (the two products hereafter referred to as “tile”) removal on slab foundations to which they are glued. This addendum pertains to the “After the Fact” VAT on slabs from houses that were not initially removed during the initial demo. These tiles are in poor condition due to exposure to the elements for about a year. Observation of a tile removal revealed that, when removed by hand scrapers, the tiles were easily crumbled and, therefore, are RACM. The following guidelines have been developed to assist with regulatory compliance during the removal process.

- Questions regarding the ADVF needed for the removal should be addressed to Jodi Miller at (225) 219-3004.
- The Demo Protocol document is in full effect, including the use of water as containment. It is not necessary to “tent” the slab.
- Since the RACM is bagged, instead of being loaded in bulk into a roll-off box, each bag shall have a generator label and marked with the Danger Asbestos signage. The bag containing RACM will be of burlap or synthetic fiber. This prevents the tile from cutting the poly bag. The bag containing the RACM does not have to be clear. The first bag is then put into the clear, labeled bag. The leak-tight wrapping standard applies to each bag.
- The adequately wet standard, as applied to bagged material, is that water droplets (condensation) should be observed inside of the bag.
- When the removal is finished, the slab shall be cleaned of all loose debris (LAC 33:III.5151.F.3.1.). The use of a squeegee would assist in the cleanup and eliminate pooled water that would interfere with the next step.
- The removal area shall be encapsulated¹⁰ with a nonwhite pigmented product compatible with the contact surface. Its ability to withstand the elements should be considered.
- The “hot zone” barrier shall not be taken down until the encapsulant has dried. When dry, the slab and the adjacent area become nonregulated.
- The absence of houses in the removal area provides a clean sightline. For this reason one Contractor/Supervisor is permitted to manage two tile removal sites, no more than one block apart in any direction.

¹⁰ *Encapsulation*—the treatment of asbestos material with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers by the encapsulant creating a membrane over the surface (bridging encapsulant) or penetrating the material and binding its components together (penetrating encapsulant).

ADDENDUM TWO
CONSTRUCTION DEBRIS AND RACM DEMOLITION GUIDELINES
PRE-CLEANING OF THE SURROUNDING AREA
1/3/07

Category I and II materials, primarily floor tile and transite shingles, are being found in the area surrounding demolition sites, both C&D and RACM. They are incidental, random pieces, probably blown off of or floated away from adjacent properties. The equipment associated with a demolition may cause these materials to become regulated. The following measures are required to be performed prior to staging equipment.

Clear the surrounding area of all material that is suspect for asbestos. The surrounding area is defined as anyplace where a piece of equipment, used in the demolition process, could roll over suspect material thereby causing that material to become regulated. An example of surrounding area is the route to and from the backhoe's transportation trailer.

The word "clear" means to visually inspect the area for suspect materials and remove it if there is potential for impaction. Clearance air monitoring is not part of this work plan.

If suspect material is found to be prevalent, the contractor may elect to sweep the area. The area swept shall be kept adequately wet while sweeping.

If a pile of debris will have to be rolled on, then the pile shall be reduced to a single layer to enable an inspection or removed in toto.

The intent in the above guidelines is that non-regulated asbestos-containing materials not be made regulated during the course of demolition activities at the site.

This is a "stand alone" document for pre-cleaning. Nothing in this document changes the initial "Guidelines" document or Addendum One.

ADDENDUM THREE
HURRICANE KATRINA RACM DEMOLITION GUIDELINES
REMOVAL OF VINYL ASBESTOS FLOOR TILE (IN GOOD CONDITION)
1-31-07

Flooring that contains asbestos, when intact and in good condition, is generally considered non-friable and non-regulated.

Any intentional removal of vinyl asbestos floor tile (VAT) by mechanical means would make the VAT regulated. However, during the course of demolition and in trying to remove Construction and Demolition (C&D) debris from single dwelling residential structures, any (VAT) that comes up will be considered incidental. Following debris removal at the site, use of hand tools such as hand chippers, flat head shovels, etc. to remove VAT from the structure will be considered non-regulated material, and should be disposed with other C&D material from the site.

If the material cannot be removed by hand tools, and mechanical means must be used to remove the VAT, the VAT material will be considered regulated.

As always, although the LDEQ does not enforce OSHA regulations, OSHA worker protection guidelines shall be followed as appropriate.

ADDENDUM FOUR
HURRICANE KATRINA RACM DEMOLITION GUIDELINES
DEMOLITIONS OF COMMERCIAL BUILDINGS
3/13/07

This addendum refers to FEMA financed demolitions of commercial buildings. Existing RACM Demolition Assessment Guidelines for Contractors will be used as a guide for commercial demolitions financed by FEMA with the following exceptions:

1- The commercial structure must be inspected and Regulated Asbestos Containing Material (RACM) removed prior to demolition unless "...the facility is being demolished under an order of a state or local government agency, issued because the facility is structurally unsound and in danger of imminent collapse" or "the facility demolition is financed by FEMA and cannot be inspected because it is structurally unsound and unsafe to enter." Commercial structures that are deemed environmentally unsound only cannot be considered the same as structurally unsound. RACM removed prior to demolition will require one, unique, ADVF for each load. The one ADVF per day is not allowed.

2- RACM from commercial structures cannot be disposed at "Enhanced Landfills", and must be properly disposed in Type I or II disposal facilities recognized to accept this type of waste.

3- Emergency notifications for FEMA financed commercial structures will be accepted based on the definition, in part: "a demolition or renovation operation was not planned but results from a sudden unexpected event that, if not immediately attended to, presents a safety or public health hazard..."

4- Due to the large number of commercial structures that will be demolished in a short timeframe, the "1 ADVF Procedure" will be allowed. This applies to a structure that cannot be inspected and the entire structure is demoed as RACM.

5- The LDEQ will continue charging \$66 for emergency notifications for FEMA financed commercial structures, rather than \$99.

To view a copy of the guidelines mentioned above, see the LDEQ, Asbestos and Lead page at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2251>.

**APPLICABLE GUIDELINES/REGULATIONS FOR
KATRINA RELATED DEMOS**

6/5/07

