

Explanation of:
Thorough Inspection

The asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) governs the removal and handling of asbestos containing material (ACM), which is categorized as a Hazardous Air Pollutant. The following will explain the NESHAP's requirement to perform a "Thorough Inspection" before conducting demolition or renovation activity that could disturb asbestos.

40 CFR 61.145(a)

- "... prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM.

Plain English:

- Before beginning the demolition or renovation project (DRP) thoroughly inspect the DRP area for the presence of asbestos by performing an asbestos survey.

Checklist:

- 1 – Performed before demolition/renovation project.
 - A – Asbestos Survey must be attached.
 - i – Exception – See Item No. 7.
- 2 – Performed by an accredited Asbestos Inspector certified in Kentucky.
 - A – Must state who performed survey.
- 3 – Identify area surveyed.
 - A – Must inspect areas identified in demolition/renovation project description.
 - B – Specify whether or not survey was destructive or nondestructive.
- 5 – Thoroughly inspect areas and components for:
 - A – Friable ACM
 - B – Category I ACM
 - C – Category II ACM
- 6 – MUST identify:
 - A – Description of ACM sampled (type, color, etc.)
 - B – Location of ACM
 - C – Category of ACM
 - D – Amount of ACM present in are to be altered.
 - Preferably, include:
 - i – Kind of ACM (Chrysotile, Amosite, etc.)
 - ii – Percentage ACM
 - iii – Condition of ACM
- 7 – Must provide Conclusion/Summary Statement:
 - A – All ACM or potential ACM was identified and tested.
 - B – No other ACM or potential ACM is in the area to be altered.

8 – Exception:

A – Assume all material to be disturbed is ACM.

(i) – Still, must inspect project area to ensure demolition/renovation activity will not disturb any other material that may contain ACM.

Goal of Thorough Inspection:

The goal of the District’s asbestos program is to abate ACM before, or take precautions not to disturb ACM during, demolition/renovation projects. As such, ACM in the project area must first be identified, which is the purpose of the thorough inspection. Therefore, a thorough inspection should precede all other activities during the demolition/renovation project.

For the District’s purposes, a thorough inspection is an inspection that is conducted by an accredited inspector. The inspection report should be in the form of an asbestos survey. The survey should, at a minimum, document a description of the ACM (type, color, etc.), location, category of ACM, and amount of ACM. Instead of conducting a survey, material may be presumed ACM. However, an inspector must still examine the project area to ensure the project activities will not disturb ACM not being abated.

As a rule, the scope of the inspection must be the same as the scope of the demolition/renovation project. In other words, the inspection should survey all building areas and components identified in the description, and should be as destructive as the demolition/renovation project activities listed to be used. **The crucial goal shared between the thorough inspection and detailed description is to ensure that all areas, components, and activities have been identified and surveyed. The inspector should be able to state there is no other asbestos in the project area other than what is identified on the survey, and “the demolition/renovation project will not disturb any materials containing asbestos other than that which will be abated or protected from disturbance.”**

Examples:

1. A contractor notifies the District of a renovation project that proposes to replace an existing sprinkler system inside a factory. The District would want to be able to see from a thorough inspection that an accredited asbestos inspector has been on site and inspected the factory. The survey should show the inspector has identified the areas and components that will be involved or altered during the sprinkler replacement. The survey should also include a description of destructive survey techniques used. The techniques should be as destructive as the demolition/renovation project activities that will take place during sprinkler replacement. Obviously, the survey should include a description, categories, locations, and amounts of ACM. Last, **the survey should be expansive enough that the demolition/renovation project operator or building owner can state the removal and replacement of the sprinkler system will not disturb any other ACM other than that which will be abated.**

2. A contractor notifies the District of a renovation project that proposes to replace floor tile inside a factory. The contractor does not perform a thorough inspection. Instead, it will presume that all floor tiles are ACM, and will treat it as such. The contractor states that older flooring, under the existing floor, will also be treated as ACM. **Additionally, the contractor has inspected the area undergoing alteration, and states that no other ACM is present in the area designated for floor tile replacement, and thus, the replacement of the floor will not disturb any ACM other than that which will be abated.**