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#### Attachments

- 1 Field Data Sheet
- 2 Asbestos Abatement Clearance Confirmation Form

#### WILDFIRE-DAMAGED STRUCTURES ASBESTOS SITE ASSESSMENTS STANDARD OPERATING PROCEDURE (SOP) "CALIFORNIA WILDFIRE ASBESTOS SURVEY"

## 1.0 BACKGROUND

It is well documented that asbestos presents a significant risk to human health if it becomes airborne. Recent structural debris cleanup activities, conducted by CalRecycle from 2007 to 2017, have identified inconsistent interpretation of policies and regulations for conducting emergency debris removal actions throughout the State of California. The main issue is whether or not structural ash and debris from a wildland fire or other large-scale disaster should be treated as asbestos-containing materials (ACM) under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) due to an assumption that the ash and debris may contain asbestos. The California Department of Toxic Substances Control (DTSC) currently classifies ACM as hazardous waste if the waste contains more than one percent (>1%) friable asbestos. Some California Air Quality Management Districts (AQMD) have determined all ash and commingled debris from a structural wildfire event should be managed as a California hazardous asbestoscontaining waste in accordance with federal asbestos regulations (NESHAP) and local air quality regulations. However, other AQMDs have not mandated this requirement and have cited the NESHAP exemption for structures totally destroyed by a natural disaster. While federal asbestos regulations relate to the demolition, transport, and disposal requirements, they do not apply to residential structures completely destroyed by a natural disaster; the regulations do, however, apply to structures and chimneys partially destroyed by a natural disaster.

These varying requirements have resulted in inconsistent cleanup and waste disposal practices for local governments and property owners throughout the state during disasters. This inconsistency has also led to potential asbestos exposures to debris removal workers and others in the community. To reduce the exposure from friable, bulk asbestos, CalRecycle and its Certified Asbestos Consultants (CACs), environmental consultants and Certified Industrial Hygienists (CIH) have developed the following "California Wildfire Asbestos Survey" protocol to be used for residential and commercial properties impacted by a wildfire.

#### 1.1 Goal

The goal of this SOP is to reduce the exposure from bulk asbestos to the debris removal workers; incident management personnel; nearby residents and neighbors in the community; and others handing, transporting, and disposing of the debris. This SOP presents procedures to identify, remove, and properly dispose of bulk asbestos from the waste stream.

# 1.2 Purpose

The purpose of this "California Wildfire Asbestos Survey" SOP is to define procedures that will be followed during a coordinated structural debris removal conducted by CalRecycle and its consultants and contractors. This SOP will be used for all site assessment to identify and remove bulk ACM.

The objectives of this SOP are to establish minimum procedures to verify that the precision, accuracy, completeness, comparability, and representativeness of all data collected throughout the project duration is acceptable; and to ensure that all information and decisions are technically sound and properly documented.

## 1.3 Scope

This SOP presents the policies, organization, objectives, and functional activities designed to complete the objectives of the tasks to be performed during the asbestos site assessments, which will be completed prior to site debris removal. This SOP also addresses the sampling and analytical methods to be used during the asbestos site assessments.

# 2.0 PROCEDURES

#### 2.1 Pre-assessment Preparation

Prior to conducting an asbestos site assessment, personnel will follow the resource, safety, and training procedures described in the following sections, and adhere to requirements listed below.

#### 2.1.1 Requirements and Resources

The following sampling equipment and field supplies are required for asbestos assessments:

- Sharpie pen
- Sample collection bags
  - Ziplock 1-gallon plastic bag
  - Whirlpak -4-ounce sample bag or similar sized Ziplock bag (1 quart)
- Hammer
- Pry bar
- Chisel
- Hand spade or brush
- Bucket (to hold sampling supplies)

The following forms/equipment are needed for field documentation:

- Field Data Sheets (see Attachment 1)
- Asbestos Abatement Clearance Confirmation Form (see Attachment 2)
- Laboratory Chain of Custody (COC)

• Digital camera and memory (greater than 32 MB)

#### 2.1.2 Personal Protective Equipment

A minimum of Level D personal protective equipment (PPE) will be worn in the field. Level D PPE consists of:

- Short or long-sleeve shirt and long pants
- High visibility safety vest
- Safety glasses or goggles
- Sturdy safety-toe work boots
- Hard hat (where overhead hazards are present)

Whenever a member of the asbestos assessment team or the asbestos clearance team enters the contaminated fire debris footprint (i.e., exclusion zone), protective equipment will be worn. Based on the anticipated hazard level, personnel completing asbestos assessments and clearance inspections will wear level C PPE. Level C PPE consists of:

- Disposable coveralls (such as Tyvek)
- Outer gloves (neoprene, nitrile, or other)
- Sturdy safety-toe work boots
- Disposable boot covers or Tyvek-booted coveralls
- Full-face or half-face, air-purifying respirator with National Institute for Occupational Safety and Health (NIOSH)-approved cartridges with a particulate rating of P100 or OVP100 to protect against organic vapors, dust, fumes, and mists.
- Safety glasses or goggles (with a half-face respirator only)
- Hard hat (face shield optional).

#### 2.1.3 Training

CACs and Certified Site Surveillance Technicians (CSST) will have 40-hour HAZWOPER training, a current 8-hour HAZWOPER refresher certificate, a current medical clearance, and a current respirator fit test report.

All personnel scheduled to conduct asbestos assessments will be trained and indoctrinated in all sections of this SOP document and quality control (QC) activities. A field staff orientation and briefing will be held before the initiation of site assessment activities. Replacement personnel brought in during periodic rotations will review and sign off on the SOP and receive asbestos field assessment procedure training from the asbestos field team leader before beginning field activities. The field team leader will ensure that personnel are familiar with the chemical hazards and physical layout of the project site and will assign field and administrative responsibilities. Training will also be provided for the completion of all project documentation and field procedures. Information on safety, security, communications, transportation, and site services and facilities will also be provided. All field and administrative personnel will receive a copy of the SOP in a timely manner to allow for a sufficient review period before working on site.

All inspectors will be field trained by a wildfire debris ACM inspector prior to beginning field surveys. This training will include any specific information needed for performing asbestos site assessments for wildfire damage structures.

## 2.2 Asbestos Assessment

The Primary Environmental Consultant will identify an exclusion zone, contamination reduction zone, and a support zone, as described below.

- An exclusion zone (EZ) contains areas where contamination is either known or likely to be present or, because of work activity, has the potential to cause harm to personnel. The exclusion zone is identified as the debris/ash footprint of each property.
- The contamination reduction zone (CRZ) is an area of the property not visibly contaminated with ash and debris. The contamination reduction zone will be used for doffing PPE.
- A support zone (SZ) may consist of any uncontaminated and nonhazardous part of the property. Donning of clean PPE is completed in the support zone.

The Primary Environmental Consultant will evaluate the property from outside the exclusion zone and generate a plan for assessing the area. Personnel will not enter the exclusion zone without proper PPE.

An assessment of homes in the program will be performed using a modified Asbestos Hazard Emergency Response Act (AHERA) sampling approach on each property for suspect ACM. The modified AHERA approach is outlined in Section 2.3.2 of this SOP. Upon completion of the assessment the assessor will exit the exclusion / CRZ and will remove contaminated PPE and bagged on site. Bagged PPE will either be left on site or disposed of properly.

#### 2.2.1 Visual Assessment

The CAC or CSST will evaluate each property for suspect ACM. The asbestos assessment will begin with the main structure (house), followed by outbuildings, and then the grounds.

All burn areas and ash footprints will be entered to evaluate the structures or areas for suspect materials. Typical suspect construction materials may include; stucco, drywall or plaster wall systems, asphaltic roofing, vinyl flooring, vapor barrier felt and paper, duct and furnace insulation, mortars and grouts, and cementitious asbestos products (siding, roofing, flue pipes, underground pipes, heat barrier panels, etc.). Concrete structures, foundations, chimneys and driveways may also be sampled if the incident management team (IMT) elects to recycle the concrete.

The assessor shall also document and notify the incident management team any structure or debris pile that has a high density of suspected ACM such as transite

siding/roofing or vermiculite insulation or other material. These types of sites will be considered high asbestos hazards parcels.

Minor (less than 1 foot deep) debris and ash may be moved to assess materials beneath where warranted. The CAC or CSST will not move heavy debris, such as appliances and vertical roofing panels, to access suspect materials during evaluation and sampling. Attempts to observe flooring will be made by clearing debris from areas with a hand spade or brush. The inspector will not "dig." The hand spade or brush will only be used to move or gently lift material where suspect asbestos flooring (vinyl floor tile or sheet flooring) may exist, such as in the kitchen, dining room, restroom, laundry room, or entry area of a structure. Appliances such as stoves, furnaces, and ducting will be evaluated for suspect insulation and cementitious materials. Areas around typical plumbing and mechanical structures; water heaters, furnaces, and plumbing structures will be evaluated for flue piping and insulation materials. Other suspect nonconstruction materials will also be assessed; these materials may include automotive brake pads, mid-century electronics, camp stoves, salvaged materials (cementitious transite asbestos pipe), transite siding, or other suspect materials.

#### 2.2.2 Chimney Drop Observation

Since chimneys are considered a free-standing structure, a full NESHAP asbestos survey is required. Each standing chimney on a property will be knocked over using one to two water streams to abate potential dust and exposures. The chimney shall be prewetted along with the fall zone. Once the chimney is safely on the ground, the CAC or CSST shall visually observe the interior of the chimney flue for suspect materials. If no suspected asbestos materials are identified, then the debris removal may commence. If additional suspect materials are identified, they may be abated by a state licensed asbestos abatement contractor at that time as suspect or sampled for confirmation. The debris removal will be postponed until the suspect materials are confirmed as non-ACM or removed from the work area. The CAC or CSST will provide a verbal notice of observation finding to the on-site task force leader or monitor immediately after inspection. The observation findings will be documented and conveyed to the IMT at the end of the day.

## 2.3 Sampling Protocols for Structures and Debris

The type and condition of a structure and debris impacted by a wildfire will determine the asbestos sampling protocol used for this "California Wildfire Asbestos Survey." Based on past CalRecycle structural debris removals, there are five types of asbestos sampling (see Sections 2.3.1 and 2.3.2). All sampling of suspect ACM will be conducted by a CAC or a CSST, working under the direction of a CAC. The CAC or CSST will collect samples of suspected ACM in representative lots specific to each property. The samples will be analyzed by polarized light microscopy or transmission electron microscopy using the methods described in the U.S. Environmental Protection Agency (EPA) Method for the Determination of Asbestos in Bulk Building Materials EPA/600/R-93/116.

All asbestos sampling will be performed using NESHAP regulations and AHERA sampling protocols or using the "California Wildfire Asbestos Survey" protocols described below.

Specific sampling locations will be identified, and samples will be collected from suspect ACM within the ash footprint of each structure and the property. Samples will be placed in resealable plastic bags and labeled with a unique sample number.

During the asbestos site assessments, the Primary Environmental Consultant will collect samples of suspect ACM based on the types described below.

#### 2.3.1 California Wildfire Asbestos Survey

- Type 1. Where debris is on the ground (structure destroyed with less than two contiguous walls standing), a non-AHERA sampling protocol will be utilized as follows:
  - Evaluate each structure's construction materials separately focusing on bulk material that, if not removed, could pose a hazard when loaded into a truck. Bulk is defined as something larger than a cell phone that can be removed by hand and fragments of the ash.
  - Collect one sample of each suspect material to be analyzed for asbestos fibers using EPA Method 600/R-93/116.
  - For materials not associated with a structure, collect one sample per material.
  - For free-standing single walls, consult with the IMT. Some single walls may be supported by heavy equipment or braced or laid down to allow for sampling and removal of ACM. If the wall cannot be rendered safe, the wall will be carefully demolished by the contractor using heavy equipment and water spray. Once the wall is no longer free standing, sample each layer of the wall for ACM.
- Type 2. Chimney structures:
  - Collect one sample per suspect material.
  - Consult with the IMT to determine whether NESHAP notification is required prior to demolition.
  - Conduct a visual assessment of chimney interior (flue) at demolition to determine whether additional suspect materials are present.
- Type 3. Foundations, slabs, and walkways:
  - Sample to determine whether recycling is an alternative to disposal.
  - If materials are contaminated with asbestos-containing mastics, caulks, or other coatings, the concrete components will be flagged as "nonrecyclable."

#### 2.3.2 **NESHAP Protocols**

- Type 4. Where structures are destroyed, but have two or more contiguous walls standing:
  - Evaluate the type of wall construction and stability. Some standing walls may be constructed of masonry block or concrete; however, others may contain multiple types of suspect ACM. If the integrity of the walls is in question, consult an engineer or construction professional with structural building experience to evaluate whether the walls are structurally safe to obtain samples per AHERA protocols. If the walls are not structurally safe, the contractor will use bracing or heavy equipment to ensure wall safety. Once the wall is determined to be safe, collect samples per AHERA protocols. If there are questions, consult with the IMT to determine whether NESHAP requirements apply.
    - If NESHAP requirements apply, collect samples using AHERA materials classification protocols
      - Surfacing: Use the 3-5-7 rule. Collect three samples from a less than 1,000 square-foot area; five samples from a 1,000to 5,000-square-foot area; and seven samples from a greater than 5,000-square-foot area.
      - Thermal systems insulation: collect three samples per homogenous area, one sample per patch
      - Miscellaneous: collect at least one sample from each piece of suspect material
    - If NESHAP requirements do not apply, collect one sample per suspect material (as listed in Type 1 above).
    - Consult with the IMT to determine whether NESHAP notification is required prior to demolition.
- Type 5. Where structures are partially damaged or partially burned:
  - Consult with Operations regarding property status in the demolition program.
    - If the building is included in the demolition program, conduct sampling as listed above in Type 4.
      - If the building is not included, note condition of structure and do not sample.
      - Consult with the IMT to determine whether NESHAP notification is required prior to demolition.

#### 2.4 Abatement Clearance Inspections and Approval

The IMT will develop a list of properties with confirmed or assumed ACM for abatement per the CalRecycle Operations Plan. CalRecycle-approved abatement contractors will remove identified materials from each property.

A Primary Environmental Consultant task force leader or monitor will accompany the abatement contractor during the work day and record the abatement contractor's time at each property on the Asbestos Abatement Clearance Confirmation Form. When abatement is complete, the task force leader or monitor will contact a Primary Environmental Consultant CAC/CSST for visual clearance.

The CAC/CSST will review the asbestos assessment documentation for identified asbestos containing materials and material locations. The CAC/CSST will inspect the removal locations to determine whether all identified asbestos materials have been removed by a state licensed asbestos abatement contractor. If not, the CAC/CSST will provide feedback and location of materials remaining. If other suspect ACM are observed within the ash footprint that have not been previously assessed or sampled, the CAC/CSST will coordinate removal of suspect materials with the abatement contractor and Operations.

Following removal of identified ACM, the CAC/CSST will:

- Count the waste bags for each material removed;
- Identify each line item on the Asbestos Abatement Clearance Confirmation Form:
- Indicate removal is completed;
- Initial each line item; and.
- Sign and date the form.

If the abatement on a property is not completed within 1 day, the CAC/CSST will count bags of waste removed, indicate removal not completed, and initial the form. The CAC/CSST will sign the form only after complete removal has been achieved. The location and details of each property cleared will be reported to Operations at the end of each workday.

## 3.0 DOCUMENTATION

This section describes the field documentation procedures and includes the types of field documentation, instructions on how to correct field documents if errors occur, and the process for documenting deviations from field procedures prescribed in this SOP.

Field documentation for this project will include:

- Field data sheets;
- Photographic logs and summaries; and,
- Sample COC forms.

Information pertinent to the suspect building material samples will include:

• The sampling location;

- Sample identification number; and
- A description of the suspect ACM, including estimated quantity.

#### 3.1 Field Data Sheets

The field staff will be responsible for documenting information from each sampled property on field data sheets that will be maintained for the duration of the project. This information will be manually recorded on the sheets by the asbestos inspection team members and reviewed by the asbestos field team leader at the end of each shift.

Information on the field data sheets will include:

- Type and description of suspect material;
- Estimated ACM quantity;
- A general map of sampling locations and suspect material distribution; and,
- Any limitations to ash footprint and grounds evaluation.

Limitations to the evaluation may include unsafe conditions such as: animal obstruction, structurally unsafe buildings, overhead hazards, underfoot hazards (basements, voids, unstable ground); depth of debris limiting floor assessment, or heavy metal debris covering suspect material areas. <u>ALL limitations to evaluation or sampling MUST be reviewed and approved by the asbestos field team leader and the IMT.</u>

Limitations due to unsafe building access may restrict sampling in partially standing structures, basements, cellars, confined spaces, and other non-accessible areas. Structures with such limitations will be flagged for further CAC investigation during the excavation process at which time any suspect ACM will be removed and disposed of by an abatement contractor working alongside the excavation team on a contractor-assist basis.

# 3.2 Bulk Sample Designation

A sample numbering scheme has been developed that allows each sample to be uniquely identified and provides a means of tracking the sample from collection through analysis. The numbering scheme will use the following three-part code which indicates the:

- Project designation (using a project acronym),
- Property assessor's parcel number (APN) and
- Sequence number of each sample collected from each suspect material.

An example numbering scheme for the XXXX fire would be:

XFI = Project designation acronym for XXXX Fire Incident
010-0-123-456 = Property assessor's parcel number
01 = This is an arbitrary sample number beginning at **01**, sequentially assigned to each sample collected at each property.

The sample number for this example would be written with a permanent marker on the outside of each sample bag, along with a description of the suspected asbestos-containing material collected. For example:

XFI-0100123456-01 Vinyl Floor Tile and Black Mastic

The sample number will be recorded on sample bags, field data sheets, COC forms, and other records documenting sampling activities. Sample identification numbers and material locations will be denoted on the general map of sampling locations on the field data sheets. Sample numbers will be written on sample containers using permanent markers.

An outer sample bag will also be used to contain all the samples collected at each property. The following information should be written with a permanent marker on the outer sample bag:

APN designation, date, and property address (example below): 010-0-123-456 3/2/18 1234 Main Street

## 3.3 Photographic Documentation

During the inspection, color photographs will be taken of each piece of suspect ACM. Photographs will also be taken of each building where suspect ACM is identified. Field team members will organize photographic documentation in a standard method that can easily be retrieved by the data entry teams at the end of the day. The following organizational method will be used:

- 1) Take a photo of the field data sheet, including the property information completed at the top of the form, to designate that subsequent photos are collected at that property.
- 2) Take a photo of the house or main structure.
- 3) Take photos of each suspected asbestos-containing material sampled within the house or main structure.
- 4) Take a photo of the next building with suspect ACM, followed by photos of each suspect ACM sampled in that building.
- 5) Follow this procedure for each subsequent building on the property.
- 6) Review the photos stored in the camera and enter the photo numbers obtained for each sampled material on the field data sheet.
- 7) Take a photo of the completed field data sheet to designate photo collection at the property is completed.

# 3.4 Chain of Custody Procedures

The Primary Environmental Consultant will use standard sample COC procedures to maintain and document sample integrity during collection, transportation, storage, and initial analysis. A COC establishes the documentation necessary to trace sample possession from time of collection through sample analysis and disposition. A sample is in the custody of a person if any of the following criteria are met:

- The sample is in a person's physical possession.
- The sample is in a person's view after being in his or her physical possession.
- The sample was in a person's physical possession and was then locked up or sealed to prevent tampering.
- The sample is kept in a secured area.

The sample collector will complete a COC form to accompany each sample delivery container and will be responsible for shipping samples to the accredited laboratory. The sample collector will provide the project number and the sample collector's signature as header information on the COC record.

For each bulk sample, the sample collector will record the following information on the COC record:

- Project name (XXXX Fire Incident)
- Project number
- Sample identification number
- Date of sample collection
- Name and signature of sampler(s)
- Sample type (bulk or air sample)
- Number of sample containers
- Analyses requested
- Turnaround time
- Signature of individuals involved in custody transfer, including the date and time of transfer
- Air bill number (if applicable)
- Project contact name and phone number

Unused lines on the COC record will be crossed out. When shipping the samples, the sample collector will sign the bottom of the form and enter the time (24-hour format) and date that the samples were relinquished. The sample collector will enter the carrier name and air bill number on the form. A second member of the field crew will review the completed COC to ensure that required information is not omitted and that unused lines are crossed out. The original signature copy of the COC record will be enclosed in a plastic bag and secured to the inside the shipping box. Copies of the chain-of-custody

record and the air bill will be retained and filed by field personnel before the containers are shipped.

# 3.5 Laboratory Data Interpretation

Laboratory data will be reviewed by individuals trained in data interpretation. Laboratory results will be compared with the field data sheet and logged into the IMT data tracking software with the date the results were received, and electronically filed with the COC form.

- Samples with asbestos concentrations detected with results greater than 1 percent asbestos (>1%) will be flagged as ACM for abatement prior to debris removal.
- Samples with asbestos concentrations detected with results less than 1 percent (<1%) will be flagged for further analyzes by 400-point count or it will be assumed to be ACM (>1%) and removed prior to debris removal. (Point count analysis must be approved by IMT).
- Materials confirmed to contain <1% or "asbestos not detected" will be removed during debris removal operations and not flagged for abatement prior to removal

# 4.0 QUALITY CONTROL

Quality assurance (QA) will be required for ensuring that all information, data, and decisions resulting from the sampling activity are technically sound and properly documented. Quality control (QC) procedures will be used to ensure that the QA system is being followed. The primary goal of the XXXX Wildfire Emergency Response asbestos sampling activity will be to provide valid and representative data to characterize ACM in the wildfire-damaged buildings.

## **Quality Program and Review Procedures**

The asbestos field team leader will be responsible for ensuring that all QA/QC objectives are met during the asbestos sampling and building clearance procedures during the project. To ensure that QA/QC procedures are implemented, the field team leader will conduct and monitor:

- Standard sample handling and shipping procedures;
- Standardized forms for recording field and analytical data, prepared sample identification tags, and COC records;
- Field team performance audits;
- Standardized protocols for material sampling and clearance inspection field procedures;
- Standard procedures for sample collection; and,
- Data documentation audits to determine data adequacy.

The asbestos field team leader (or assigned deputy) will be required to sign off on each field data collection sheet as documentation that the field data sheet was reviewed for completeness and data collection quality objectives.

ATTACHMENT 1

FIELD DATA SHEET



Fire Incident:								
Date:	Inspector(s):							
Address:								
Property Information								
Type of Property: Residential Comme								
Number of Structures:								
Property Overview Photo:								
600py V 400py								
000px / 400px								



Field Data Sheet Parcel #

Structure:								
Condition								
Completely Destroyed								
Partially Destroyed NESHAPS Survey Debris Survey								
Yes No Survey will check Operations Review								
Partially Damaged Call to Operations: Yes No								
Construction								
1-Story 2-Story Other:								
Foundation								
Basement Crawlspace None Other:								
Subfloor								
Raised Subfloor Slab on grade Other:								
Frame								
Attached Garage: Yes No Count:								
Concrete								
600px X 400px								
600px × 400px								
Frame Frame Yood Concrete Yes No Cohimney: Yes No Count: Concrete Sidewalk Patio Other  GOOpx X 400px								



Field Data Sheet Parcel #

Structure:			
Patio Image			
600px X 400px			
Other Concrete Image			
600рх X 400рх			
Exterior			
Roofing			
Asphalt Cement Wood Transite Other:			

**ATTACHMENT 2** 

ASBESTOS ABATEMENT CLEARANCE CONFIRMATION FORM

# Asbestos Abatement Clearance Confirmation Form

Address:		_ APN:						
Operations Start Date:	Operations Start Time:	Tas	k Force #:					
Operations End Date:	Operations End Time:	Contractor/ Subcontractor:						
Daily operational detail								
Date	ASR Line Item	Unit Count	Clear	CAC Initials				
			Yes No					

Task Force Leader (print):	Signature:	Date:
CAC (print):	Signature:	Date: