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Indiana Department of Environmental Management
Office of Land Quality
P.O. Box 6015
Indianapolis, IN 46206-6015
OLQ PH: (317) 232-8941

Title: Disposal Facility Contingency Plan for Improperly Packaged Asbestos Containing Materials

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Dates Revised: None

Other Policies Repealed or Amended: None

Citations Affected: 329 IAC 10-8.1-12(e)(4)(E)

Brief Description of Subject Matter: Industrial waste regulation 329 IAC 10-8.1-12 (e)(4)(E) requires that disposal facilities have a contingency plan and be prepared to implement it to safely control torn and broken containers containing asbestos-containing material.

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DISPOSAL FACILITY CONTINGENCY PLAN FOR IMPROPERLY PACKAGED ASBESTOS CONTAINING MATERIALS

Contingency Plan Preparation Guidance

Industrial Waste Regulations 329 IAC 10-8.1-12(e)(4)(E) require that disposal facilities that accept asbestos have a contingency plan and be prepared to implement it to safely control and dispose of torn and broken containers that hold asbestos-containing material.

The following discussion provides guidance on key elements of the contingency plan. Also, attached is a suggested outline for the contingency plan. Each disposal facility's contingency plan will, of course, be organized and worded as is best suited to the facility. The plan, and all parts, should be specific regarding what to do and who to notify .

Contingency Plan Implementation

The contingency plan is a document that sets out an organized, planned, and coordinated course of action. At a minimum, the plan must map out a series of steps to be taken in response to the discovery of torn or broken containers that hold asbestos. Implementation of the plan should occur immediately upon such discovery.

Asbestos Disposal Coordinators

The disposal facility must select at least one (1) employee who is either on the facility premises during normal operational periods or can reach the facility within a short period of time. This employee must be designated the primary asbestos disposal coordinator. The asbestos disposal coordinator is responsible for coordinating all response measures, and for being familiar with:

- The facility's asbestos contingency plan
- All operations and activities at the facility
- All equipment and supplies necessary to appropriately handle and dispose of improperly packaged asbestos containing material

The owner/operator of the disposal facility should also have an alternate asbestos disposal coordinator if the designated asbestos disposal coordinator is unavailable.

Response Procedures for Torn or Broken Containers

The appropriate level of response to a particular incident is largely a matter of professional judgment. However, the full range of response methods to be employed in a variety of potential situations can be anticipated and thus, should be outlined as response procedures. The level of detail appropriate for these response procedures is dependent upon a number of factors including:

- The type of containers
- The type and amount of asbestos in the container(s)
- The extent of damage to the container(s)
- The immediate health and safety effect of the incident upon personnel

The contingency plan must contain elements that address response procedures to be undertaken:

- Immediately upon discovery of a torn or broken container

– During the control phase.

Immediately upon discovery of a torn or broken container, the asbestos disposal coordinator is to warn the operating personnel, because they are likely to be the first group potentially exposed to the asbestos.

In the event of a release of asbestos containing material, the asbestos disposal coordinator must identify the type, exact source, amount, and extent of the release. He/She must also assess possible hazards to the environment and human health.

During the control phase, the asbestos disposal coordinator should accept the waste and cover it immediately with at least six (6) inches of soil, six (6) inches approved daily cover, or six (6) inches of solid waste. The asbestos disposal coordinator must take all reasonable steps necessary to ensure that releases do not occur or reoccur during disposal. Details should be provided to the operating personnel concerning the placement of the waste, the types of on-site equipment to be used and the types of personnel protection equipment to be utilized.

Dedicated equipment and supplies

329 IAC 10-8.1-12(e)(4)(E) specifies that the plan include a list of all dedicated equipment and supplies at the facility to properly handle spilled or improperly packaged or wetted regulated asbestos-containing waste. In addition, the location of the equipment and supplies are to be noted and a physical description of each item is to be provided along with a brief outline of the equipment's capabilities.

Required Reports

Under the National Emission Standard for Asbestos 61.154 (e)(1)(IV), any **regulated asbestos containing material** not sealed in leak-tight containers must be noted on the Asbestos Waste Shipment Disposal Record (WSR). A written report of the problem must also be sent, by the following working day, to the Agency responsible for administering the asbestos NESHAP program for the jurisdiction where the job site is located (identified on the WSR). If the disposal site is in a different jurisdiction than the job site, the written report must also be sent to the agency responsible for the disposal site. The written report must include a copy of the WSR and a detailed description of the improperly packaged waste.

At present, the responsible agency is the EPA and a copy of the WSR and report should be sent to Mr. Andrew Anderson of the U.S. EPA - Region 5, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604-3590. Also, a copy should be sent to Ms. Rosemary Cantwell of the Solid Waste Compliance Branch, and to Mr. Dan Lamberson of the Office of Air Management, 100 North Senate Ave., P.O. Box 6015, Indianapolis, Indiana 46206-6015.

Amendment of the Contingency Plan

The contingency plan must be reviewed, and immediately amended, whenever the following situations apply: applicable regulations are revised; the plan fails during implementation; the facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for releases; the list of asbestos disposal coordinators changes; or the list of dedicated equipment changes.

** Although the contingency plan provides a plan of action upon discovery of improperly packaged asbestos containing material, training is necessary and required to ensure that the correct actions are taken to properly control and dispose of the material.*

Suggested Outline Contingency Plan

1. Facility Identification and General Information
 - a. Name of Facility
 - b. Address of Facility
 - c. Name, Title, Home Address, and Telephone Number (office and home) of Primary Asbestos Disposal Coordinator
 - d. Type of Facility
 - e. Site Plan

2. Asbestos Disposal Coordinator
 - a. Primary Coordinator
 - b. Alternate Coordinator(s) and Telephone Number(s)
 - c. Duties

3. Response Procedures for Torn or Broken Containers
 - a. Immediately Upon Discovery of a Torn or Broken Container
 - b. During the Control Phase

4. Dedicated Equipment
 - a. Dedicated Equipment and Supplies Inventory
 - b. Location of Dedicated Equipment and Supplies (Facility Diagram)
 - c. Equipment Capabilities

5. Required Reports
 - a. Waste Shipment Disposal Record
 - b. Report of Improperly Packaged Regulated Asbestos Containing Material

6. Amendment of Contingency Plan
 - a. Date of Last Revision
 - b. Revised Regulations
 - c. Facility Change
 - d. Emergency Coordinator Change
 - e. Dedicated Equipment Change