

**GUIDELINE FOR 1984 FIELD AUDIT
OF STATE ASBESTOS INSPECTORS
AIR ENGINEERING SECTION
AIR MANAGEMENT BRANCH
AIR AND WASTE MANAGEMENT DIVISION**

1. Before arriving at the site with the State inspector, determine if he or she has:
 - A. Received proper notification (10 or 20 days, with all information required by 40 CFR 61, Subpart B(d)(1) or (2)). If not, why?
 - B. Received any training related to this type inspection (personal safety, asbestos demolition project inspection courses, etc.).
 - C. The proper safety equipment.
 - Proper respiratory protection.
 - Clothing.
 - Hard hat, safety shoes, safety glasses.
 - D. Notified the appropriate OSHA office. (Will an OSHA representative be present?)
- II. At the asbestos removal project site does the inspector:
 - A. Locate the proper site supervisor (contractor, owner, owner's designee)?
 - B. Properly identify himself to the site supervisor?
 - C. Ascertain the extent of the contaminated area in relation to the rest of the immediate site area, including the heating/cooling duct system, that could possibly contaminate the rest of the building or site? Is asbestos present in other parts of the building or site?

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- D. Assure that proper warning signs and area security measures are in place and being observed?
 - E. Don the proper safety equipment before entering contaminated areas?
 - F. Request the site supervisor accompany him or her during the inspection?
- III. In the Contaminated area, does the inspector check to see if:
- A. The room was properly prepared (remove all removable items, protect walls, windows and floors with construction plastic, seal off all air conditioning ducts, install double-walled entrance/egress shield)?
 - B. The asbestos-containing materials to be removed are being properly wetted (and obtain information on surfactant specifications, mixture ratio, amounts used, note overuse)?
 - C. The material is being properly removed from the adhering surface (so as to minimize fiber emissions)?
 - D. The material is being properly bagged and labeled?
 - E. The workers are properly equipped with respiratory protection, clothing, tools?
 - F. Ambient sampling is being conducted (in contaminated area, outside contaminated area, in other parts of building or site)? By whom?

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- G. The workers are taking care to prevent tracking of asbestos-contaminated materials outside contaminated area and taking proper precaution to contain the asbestos fibers in the contaminated area? (Do they leave contaminated disposable clothing/footwear in contaminated area?)
- H. Personnel showers are installed (is water contained for burial in landfill)?
- I. The no smoking, drinking or eating rule is being observed in work area?
- J. During clean-up all contaminated cleaning materials are carefully removed and placed in plastic bags for shipment to burial site?
- K. The room is sponge-wiped and/or carpets wet-vacuumed or if a HEPA vacuum system is being used?
- L. All contaminated cleaning materials including cleaning water (vacuum water) are properly disposed of?
- M. The waste containers are properly labeled and stored in a secured area for shipment to the landfill?
- N. The waste-hauling vehicle is properly enclosed?
- O. The bags and/or containers are carefully loaded and unloaded on the hauling vehicles with no containers being broken?

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P. The landfill meets the requirements of 40 CFR 61,
Subpart B. (Is the asbestos waste material covered
before the end of the day?)

Q. The burial site is being suitably marked for future
location?

IV. Insofar as the state's asbestos sampling and analysis
capabilities are concerned:

A. Does the inspector ever gather bulk asbestos samples?

B. Does the inspector conduct air sampling for asbestos
fiber concentrations?

C. How is analysis conducted?

V. After the auditor and inspector leave the site, constructive
criticism should be offered to the inspector by the auditor,
taking care to ensure that he or she understands that the
auditor is merely making suggestions rather than dictating
policy or procedure changes. In case of improper state
agency policy, these matters should be resolved between
EPA and Agency directors and followed up during the mid-year
evaluation.

Comments:

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