



Guidance for handling asbestos-containing waste material at active waste disposal sites

This document offers guidance about handling asbestos-containing waste (ACWM) at active waste-disposal sites in accordance with asbestos National Emission Standards for Hazardous Air Pollutants (asbestos NESHAP), Title 40 Code of Federal Regulations (CFR) pt. 61 subp. M as incorporated into Minnesota Rules, Chapter 7011.9920.

This guidance document is not intended to replace reading the rules and regulations to determine their applicability to your specific situation.

What is asbestos-containing waste material?

Asbestos-containing waste material (ACWM) includes any waste that contains commercial asbestos *and* is generated by a source or activity subject to the asbestos NESHAP. Asbestos-containing waste material includes all regulated asbestos-containing material (RACM) waste and any materials contaminated with asbestos – including equipment and clothing.

An active waste disposal site (a.k.a. landfill) is an activity subject to the asbestos NESHAP, therefore all ACM handled at a landfill is considered RACM/ACWM. A landfill typically receives the majority of its ACWM from asbestos abatement projects being performed by licensed asbestos abatement contractors. Some examples of ACWM include pipe insulation, boiler insulation, ceiling tiles, fire-proofing materials, textured ceiling spray, cement asbestos board (Transite), flooring materials, roofing materials, and equipment containment with asbestos.

NESHAP regulations for handling asbestos-containing waste material

The work-practice and record-keeping requirements for handling ACWM at waste disposal sites are found in the asbestos NESHAP 40 CFR § 61.154 (Standard for Active Waste Disposal Sites). This guidance document focuses on work-practice regulations. Additional guidance about the reporting and record-keeping requirements for ACWM can be obtained by calling the Minnesota Pollution Control Agency's (MPCA) Asbestos Program.

The work-practice requirements for ACWM disposal at active waste disposal sites include:

- no visible emissions from any area where ACWM has been deposited
- covering ACWM with six inches of non-ACWM material at the end of each operating day or, for sites operating continuously, within 24 hours of receiving the material. The facility's Industrial Solid Waste Management Plan (ISWMP) maybe more stringent. The MPCA recommends to immediately cover the area after placement; or
- utilizing a resinous or petroleum-based dust suppression agent or other U.S. Environmental Protection Agency-approved, visible-emission control method to achieve dust control at sites where the no-visible emission standard is followed

Everyday application of work-practice requirements

These activities are suggested to help ensure compliance during the disposal of ACWM:

1. **Prepare a disposal location** – The landfill operator should plan in advance where to deposit the ACWM. Some landfills dispose of ACWM in specific trenches or cells, while others utilize the base of the working face. In any case, the operator should ensure that the location is easily accessible to unload and cover the ACWM without excessive handling of the material. If excavation is required, the operator shall check landfill records for past deposits of ACWM. This will prevent the disturbance of previously-buried ACWM.
2. **Inspect the load** – Most shipments of ACWM arrive at the landfill in a roll-off container or are brought in directly by the customer. The landfill operator should inspect each load to ensure that the ACWM is properly sealed in leak-tight containers, appears to be wet and is properly labeled and manifested. If the ACWM is not properly wetted and sealed, the landfill should not accept the load. In addition, if the description of the load on the Waste Shipment Record is not consistent with the observations of the operator, the operator should reject the load.
3. **Carefully unload the ACWM** – The landfill operator should ensure that all containers of ACWM are carefully unloaded in the disposal area to ensure that containers are not damaged in this process.
4. **Cover the ACWM** – The landfill operator must cover the ACWM with at least six inches of non-asbestos cover by the end of each working day, or, if the site is continuously operated, within 24 hours of receipt of the waste. Deposit the ACWM in a location that does not require additional handling of the containers and can be easily covered. Typically, a landfill's ISWMP requires loads of ACWM to be covered immediately upon deposition. Apply cover in a manner that does not damage the containers and disturb the ACWM.
5. **Compact** – Make sure all ACWM in the ACWM-disposal area has been sufficiently covered before attempting to compact. This practice will help prevent exposure of the ACWM.
6. **Record location** – Maintain, until closure, records of the location, depth and area, and quantity in cubic yards of ACWM within the disposal site on a map or diagram of disposal location.

Managing problem situations

In certain instances, the landfill operator may discover that problems have arisen during the disposal of ACWM. The following situations outline the steps necessary to correct problems. **NOTE: If some of these situations occur at an active waste-disposal site, they may be considered violations of the asbestos NESHA. This is not an exhaustive listing of problems and handling methods.**

Disturbance of previously-buried asbestos-containing waste material

Careful planning should prevent disturbance from occurring at a landfill; however, if ACWM is disturbed or excavated, the landfill operator should:

- immediately isolate the disturbed area from employees or landfill patrons
- immediately cover the affected area with at least six inches of non-asbestos-containing cover
- document steps taken by the operator to correct the situation
- call the MPCA's Asbestos Program and the regional Solid Waste Compliance and Enforcement staff member
- if intentionally disturbing or excavating areas with deposited ACWM/RACM, the landfill shall notify the MPCA in writing at least 45 days prior and in accordance with the requirements of 40 CFR 61.154(j)

Arrival of improperly packaged or wetted ACWM

If a landfill receives a load of ACWM that is improperly wetted or sealed, the landfill operator should reject the load and require the generator to correct the situation. The landfill should inform the generator that they must remove and repackage the ACWM; it should also notify the MPCA of the situation. Repackaging will need to be completed by a licensed asbestos abatement contractor. Under no circumstances should landfill personnel handle, repackage or disturb any ACWM.

Disturbance of the ACWM during unloading and disposal

Careful handling should prevent this problem from ever occurring. ***If the ACWM is disturbed during the unloading, covering or compacting of the material, the landfill operator should:***

- immediately isolate the disturbed area from employees and landfill patrons
- immediately and carefully cover the affected area with six inches of non-asbestos-containing cover
- document steps taken by the landfill operator to correct the situation
- call the MPCA's Asbestos Program

Accepting residential asbestos waste

Many landfills choose to accept asbestos-containing materials from citizens who remove ACM from their homes. The most common materials a landfill is likely to encounter from home owners are, cementitious asbestos board (slate) siding and flooring materials. All landfills must follow the procedures listed in their ISWMP for all ACWM – from both commercial and residential sources. Follow the work-practice guidelines for all ACWM.

For more information

For more information about residential asbestos removal, landfill ACWM work-practice requirements or asbestos rules and regulations, call MPCA's Asbestos Program at 651-296-6300 or 800-657-3864.