



January 20, 2021

## CMU Block Filler Paint Alternative Work Practice Model Language Version 2

The analytical results of an accredited asbestos laboratory (bulk sample(s) layer by layer analysis result(s), attached) reported regulated levels of asbestos in block filler paint on concrete masonry unit (CMU) block at the project site. The alternative work practice request (AWPR) applicant requests that the category II non-friable asbestos-containing block filler paint be left in place during the demolition of the structure as allowed for with category I non-friable asbestos-containing materials. It is the premise of the applicant that the asbestos-containing block filler paint is most similar to category I non-friable asbestos-containing material. The block filler paint will remain adequately wet during all phases of the demolition process which is proposed to be performed by a back hoe, track hoe, or other similar demolition equipment. The equipment operator will be restricted from crushing or running over CMU block that has block filler paint.

The consultant will determine wind direction at the start of the project and on each additional day of the project. The consultant will set air sampling pumps in the upwind and downwind locations on each day of the project. A minimum of two additional sampling locations collected at ninety degree angles to the upwind and downwind sampling sites and a sampling pump cassette on the demolition equipment (a total of five daily samples) must be collected. Additional sampling locations must also be collected to adequately capture dust from the demolition activities at any and all locations of the project site.

The demolition equipment sampling pump cassette will be located on the outside of the demolition equipment and on the front, articulating arm, or bucket side of the demolition equipment. The demolition equipment sample must be collected using a personal sampling pump calibrated to run at 2.0 liters per minute (LPM) +/- 0.2 LPM. The surrounding area samples will be collected using high-volume sampling pumps calibrated to 4.0 LPM +/- 0.2 LPM. Sampling pump cassettes will be visually inspected at least every two hours or less for signs of overloading. If darkening of the filter is noted, a final calibration check will be made on the cassette and a new cassette calibrated for the remaining portion of the shift.

Samples will be initially analyzed using phase contrast microscopy (PCM) and transmission electron microscopy (TEM) will be used, if necessary. All PCM samples will be sent 1-day delivery or hand carried to an accredited asbestos laboratory that is participating in a Quality Assurance Program (such as AIHA or an equivalent nationally-recognized interlaboratory

comparison program) within 24-hours of sample collection on business days (defined as the time period between Monday at 12:00:00 AM to Friday at 11:59:59 PM excluding state or federal holidays). All PCM samples will be sent with requested analysis of 24-hours or less of receipt on business days by an accredited asbestos laboratory, as defined above. Electronic copies of all accredited asbestos laboratory analytical results, including chain-of-custody forms, will be sent to the Utah Division of Air Quality (DAQ) within 24-hours of receipt on business days.

If PCM sample fiber counts from the demolition site rise above 0.0075 fibers per cubic centimeter (f/cc), the consultant will submit all samples above 0.0075 f/cc for analysis by TEM. All TEM samples will be sent 1-day delivery or hand carried to the accredited asbestos laboratory within 48-hours of determining PCM sample analysis results above 0.0075 f/cc on business days. All samples will be sent with requested analysis of 24-hours or less of receipt by the accredited asbestos laboratory on business days. Electronic copies of all accredited asbestos laboratory results will be sent to the DAQ within 24-hours of receipt on business days.

If the first six TEM sample results are below the AHERA clearance criteria of 70 structures per square millimeter (S/mm<sup>2</sup>) based on a 1199 liter sample for a 25 mm cassette or on a 2799 liter sample for a 37 mm cassette, the consultant may propose to the DAQ raising the TEM analysis trigger level to the PCM accredited asbestos laboratory level of 0.010 fibers per cubic centimeter (f/cc). If the sample volume is less than 1199 liters, the AHERA clearance criteria of 70 S/mm<sup>2</sup> will be reduced proportionally. The AWPR applicant will submit all samples above 0.010 f/cc for analysis by TEM through an accredited asbestos laboratory, as defined above. Air sampling results above the appropriate TEM analysis trigger level will require an immediate evaluation of engineering controls by the AWPR applicant, demolition contractor, the building owner, and DAQ to discuss dust and fiber suppression options with the results of the evaluation submitted in the form of a written report to the DAQ.

A final report must be submitted to the DAQ within 20 business days after all requirements of the AWPR have been completed. At a minimum, the final report must include all air sample (PCM and TEM) accredited asbestos laboratory reports, pump calibration records, site wind and dust observations, a summary of the results of all air samples analyzed including accredited asbestos laboratory detection limits, and all other information required by the AWPR.

Approval of this AWPR to leave category II non-friable asbestos-containing block filler paint during demolition is contingent on the applicant following all procedures listed above. This AWPR is only for relief from the requirement to remove category II non-friable asbestos-containing block filler paint prior to the demolition of the structure identified in the AWPR. All other applicable rules remain in effect for this project including the proper disposal and not reuse, recycling, or repurposing, etc. of components with category II non-friable asbestos-containing block filler paint without prior approval of the Director of the Utah Division of Air Quality.

DAQA-026-21