

ASBESTOS CEMENT PIPE – WHAT DO I DO?

Overview

Exposure to asbestos can result in severe health impacts, and the North Dakota Department of Environmental Quality (NDDEQ) regulates the removal, handling and disposal of regulated asbestos-containing materials during renovation, abatement and demolition activities pursuant to North Dakota Administrative Code (NDAC) 33.1-15-13-02 - Emissions Standards for Asbestos. This document outlines handling procedures for working with asbestos cement pipes (ACP).

Any asbestos material that contains more than 1% asbestos is regulated if, when dry, it can be crumbled, pulverized or reduced to powder by normal hand pressure (defined as friable). NDAC Section 33-15-13-02.2 defines “regulated asbestos-containing material” (RACM) as:

1. Friable asbestos material.
2. Category I nonfriable asbestos-containing material that has become friable.
3. Category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting or abrading.
4. Category II nonfriable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized or reduced to powder by the forces acting on or expected to act on the material in the course of demolition and renovation operation regulated by this section.

ACP is considered a Category II nonfriable asbestos-containing material (ACM) if the pipe remains in good condition. Before removal, the ACP must be inspected by a certified asbestos inspector to determine the condition. A list of current licensed asbestos inspectors in North Dakota can be found at:

<https://deq.nd.gov/publications/WWM/Asbestos/AsbestosContractors.pdf>

Removal of ACP using Hand Tools

The safest way to handle ACP is to make sure the material stays in a nonfriable condition. The use of EPA-approved ACP hand tools used properly will ensure the pipe ends remain nonfriable. The NDDEQ recommends wrapping the pipe in plastic to contain asbestos waste and prevent further damage until the ACP is disposed of properly. A contractor would not be required to be a licensed asbestos contractor if using hand tools. If the material is not RACM, a waste shipment record is not required.

Removal of ACP using Mechanical Methods

If more than 3 linear feet of ACP is disturbed or removed using mechanical grinders or cutters, or the ACP is in a friable condition, the pipe must be removed by a licensed contractor and individuals certified to do asbestos abatement. This material must be removed in accordance with the North Dakota Air Pollution Control Rules. Intentional crushing of a pipe with a bucket is considered demolition by mechanical means and would also be considered a regulated activity. The owner/operator must also notify the NDDEQ by completing and submitting a

Notification of Demolition and Renovation form at least 10 working days prior to removing, cutting or damaging any ACP. The state of North Dakota does not allow pipe bursting. If unexpected regulated ACP is found, work must be stopped immediately, and a licensed asbestos abatement contractor must be contacted. A list of licensed asbestos contractors can be found at:

<https://deq.nd.gov/forms/WM/asbestos/SFN17987.pdf>

Disposal

Since ACP is considered a Category II nonfriable asbestos-containing waste, it must be disposed of at an approved landfill and is prohibited from being recycled. Always contact landfill personnel prior to arrival to confirm they will accept this waste.

ACP that is in a friable condition or removed by mechanical methods must be wrapped and labeled with asbestos warning labels, along with generator information labels. After disposal, a waste shipment record must be sent to the NDDEQ by the owner or operator within 10 days. A copy of the waste shipment record can be found at:

<https://deq.nd.gov/forms/WM/asbestos/SFN58174.pdf>

Abandonment

The abandonment of ACP in place is acceptable if it is not rendered friable during abandonment activities. ACP buried under a roadway or that goes under a structure normally is considered an acceptable reason for abandonment in place. However, the NDDEQ recommends removing and disposing of ACP if it will be uncovered and exposed during renovation or demolition activities. If the abandonment will take place on private property, a Notice of Waste Disposal must be filed with the County Recorder's office, and it must include a statement that asbestos is present. A copy of this notice must be submitted to the NDDEQ after filing with the County Recorder.

If the abandonment of ACP is in a public right-of-way, the owner/operator must keep information on record for as long as the ACP remains in the ground. If the right-of-way is relinquished or abandoned, a Notice of Waste Disposal must be filed with the County Recorder's office and a copy submitted to the NDDEQ. An example of a Notice of Waste Disposal can be found at:

<https://deq.nd.gov/Publications/WM/NoticeOfWasteDisposal.pdf>

OSHA

The NDDEQ does not enforce OSHA rules, and ACP removal may have implications for worker protection that are not covered in this document. Please contact the federal OSHA office at 701-250-4521 for more information.

For more information about ACP rules and regulations in North Dakota, please contact Justin Otto at 701-328-5246 or Jane Kangas at 701-499-5208 with the NDDEQ.