FTV-5 Crawlspace with Dirt Floor Conditions

Case No. 1	ICR 56-7.5 (b)
Case No. 2	ICR 56-7.10 (c)
Case No. 3	ICR 56-7.11(b, e)
Case No. 4	ICR 56-9.1(f)
Case No. 5	ICR 56-9.2 (d)(1)

VARIANCE GRANTED. The Petitioner's proposal for removal of XXX lin. ft. friable ACM pipe and fitting insulation and XXX sq. ft. debris/contaminated soil below the piping from the crawlspaces and pipe tunnels at the subject premises in accordance with the attached X-page stamped copy of the Petitioner's submittal, is accepted; subject to the Conditions noted below:

THE CONDITIONS

Establishment of Restricted Areas

1. The regulated abatement work areas, decontamination units, airlocks, and dumpster areas shall be established consistent with Subpart 56-7.4 and 56-7.5 and shall remain vacated except for certified workers until satisfactory clearance air monitoring results have been achieved or the abatement project is complete.

Crawlspace Debris Cleanup and Friable Removals

- Once the regulated abatement work area is occupied by the abatement contractor, PPE shall be worn as per the Supervisor's instructions in accordance with the OSHA asbestos regulation. The Supervisor shall assess the need for and type of PPE required.
- 3. A personal decontamination enclosure system that complies with Subpart 56-7.5 shall be utilized. A waste decontamination enclosure system that fully complies with Subpart 56-7.5 shall be utilized. These enclosure systems **must be attached (contiguous)** to the crawlspace/basement regulated abatement work area and shall be removed only after satisfactory clearance air monitoring results have been achieved for the regulated abatement work area. Where physical space restrictions limit the decontamination enclosure system allowable size, small asbestos project combined decontamination enclosure systems in compliance with ICR 56-7.5 (c) & 56-7.5(e9) may be utilized.
- 4. The crawlspace floors, walls, ceilings, fixtures, and movable and fixed objects contaminated with asbestos debris shall be cleaned as part of this abatement project.
- 5. Prior to removal of ACM debris, installation of critical barriers as per ICR 56-7.11 (a) and establishment of negative air as per ICR 56-7.8 shall be completed. All visible accumulations of ACM in the area of the critical barriers shall be cleaned as per ICR 56-7.10 (c)(1) prior to installation of the barriers.

<<if hardwalls not necessary...no public access>>

- 6. Two-layer six-mil fire retardant plastic sheeting may be used as critical barriers/isolation barriers in lieu of temporary hardwall barriers normally required as per ICR 56-7.11(b). These plastic sheeting isolation barriers shall be adequately supported for the duration of the asbestos project. All critical barriers and isolation barriers shall remain in place until receipt of satisfactory clearance air results for the regulated abatement work area.
- 7. A minimum of 8 air changes per hour must be observed once the negative air has been established. A minimum four-hour pre-abatement settling period as per 56-8.2(b) shall elapse once the negative air has been established.
- 8. One layer of 6-mil fire retardant plastic sheeting shall be used as a dropcloth below ACM removal locations. The dropcloth may be limited to beneath the immediate removal locations and the surrounding ten (10) feet.
- 9. Glovebags shall be utilized for all intact ACM pipe and fitting insulation removals, consistent with ICR 56-8.4(a) and OSHA 29 CFR 1926.1101.
- 10. Installation of crawlspace/basement wall and ceiling plastic sheeting is not required where existing non-porous cleanable wall and ceiling surfaces are located within the work area, and not required for surfaces that are potentially contaminated and shall be cleaned as part of the asbestos project.

Soil Cleanup:

- 11. Soil cleanup shall include, all visible asbestos or suspect asbestos debris. Soil removal shall meet ASTM 1368 (latest edition), Section 9.1.1-9.1.5 inspection criteria.
- 12. No pieces of ACM shall be present on top of the soil.
- 13. Visibly contaminated soil or soil suspected of being contaminated shall be removed down to the level where no visible contamination is noted or the underlying hardpan or sub-grade.
- 14. Pieces of ACM that have impacted into the surface of the hardpan or sub-grade shall be removed to the extent that no such material is visible.

Cleaning and Clearance:

15. During Phase IIC, in addition to the requirements of Subpart 56-4.9(c), air monitoring within the work area shall be conducted daily for the entire workshift. The number of required inside work area air samples shall be consistent with the size of the work area (i.e. 1-minor, 3-small, 5-large). The inside work area sample locations shall be distributed throughout the work area. These additional samples will be used in accordance with Conditions # 16 & 17 below.

- 16. Encapsulation of any asbestos removal surfaces **shall not** be performed, except for soil floors, until satisfactory clearance air sample results have been obtained.
- 17. The contractor shall observe, at a minimum, eight-hour waiting (settling/drying) periods.
- 18. One thorough cleaning as described in ICR 56-9.1(e) and one settling, waiting period shall suffice, except when an air test fails.
- 19. In lieu of post-abatement clearance air monitoring in compliance with ICR-56-9.2(d), the most recent daily abatement air samples collected during cleaning operations (Phase II C) in the regulated work area, shall be used for comparison with ICR 56-4.11 clearance criteria. All other applicable provisions of ICR 56-4 shall be followed for the duration of the abatement project.
- 20. After removal and cleanings are complete and a minimum drying period has elapsed, an authorized and qualified Project Monitor shall determine if the area is dry, the scope of work complete, and the work area free of visible asbestos debris/residue. If the area is determined to be acceptable and the most recent daily abatement air sample results meet 56-4.11 clearance criteria, the final dismantling of the site may begin.
- 21. After abatement of the asbestos and asbestos debris, all plastic sheeting and tape will be treated as contaminated material and properly disposed of asbestos waste at the end of the project.
- 22. Usage of this variance is limited to those asbestos removals identified in this variance or as outlined in the Petitioner's proposal.