

# *Chapter 13*

## *Pre-Inspection Planning*

Pre-inspection planning and preparation help ensure that an inspection is conducted smoothly, efficiently, and professionally. The following describes both generalized pre-planning activities and those specific to the conduction of high-quality asbestos NESHAP compliance inspections.

A comprehensive inspection equipment checklist has been included as an appendix in this manual.

### *Inspector Responsibilities*

During pre-inspection planning, an inspector should:

- Gain an understanding of the objectives of the inspection and the specific areas to be investigated.
- Arrange logistics, including travel to and from the site, any special travel needs, and hotel accommodations.
- Assemble materials and equipment.
- Coordinate with supervisors, attorneys, states, or others as appropriate.
- Review pertinent regulations.
- Gain an understanding of the Agency's:
  - standard operating procedures (SOPs);
  - health and safety plan;
  - quality assurance/quality control program.
- Acquire appropriate credentials.
- Make arrangements with the laboratory for the analysis of samples.
- Conduct an agency file and compliance data systems review.

### ***Notification Review***

Review each notification relative to the requirements of §61.145(b). Conducting such a review will help determine whether the asbestos NESHAP regulation applies to the facility/activities reported and will assist in the selection of personal protective equipment. Pay particular attention to the:

- location of the facility;
- schedule for demolition or renovation;
- planned work practices; and
- types and quantity of ACM involved in the demolition or renovation project.

When a notification regarding asbestos removal operations at a school is received, contact the Regional Asbestos Coordinator for information regarding the site's compliance with AHERA and WPR regulations.

### ***Non-Notifier Identification***

The worst violation of the notification requirements of §61.145(b) is complete failure to notify. Use of the following techniques can help inspectors identify non-notifiers:

- Respond to complaints from the general public, employees, or competitors who may have recognized a very low bid award (which could yield non-compliant work). Also use cross-referral information from other federal, state and local agency inspectors.
- Note locations where demolition or renovation activities appear to be in progress. The presence of a roll-off box for disposal of construction debris is strong evidence of such activities.
- Observe trucks entering a landfill and question their origin if suspected asbestos debris is on board. Regularly review asbestos receiving records at landfills since these can provide information on contractors who may not have notified.
- Review demolition or renovation permits written by the local building department.
- Review trade internet sites and journals, newspapers, and internet media, etc., for ongoing or past projects.

### ***Inspection Equipment/Materials Preparation***

In order to ensure the most efficient and complete inspection possible, an inspector must gather and pack all equipment necessary for the inspection. While many items on the following list are true necessities (inspection checklists, PPE), other items (office supplies, shipping supplies) should be used as needed.

- **Copy of notification** – Compare information provided to on-site conditions.
- **Site map/building diagrams** – Use to help find worksite.
- **Inspector credentials** – Bring identification, authorization forms, business cards, respirator fit-test and medical monitoring certification, training certificate, etc.
- **Copy of asbestos NESHAP regulation** - Discuss areas of concern and leave a copy with the owner/operator if necessary.
- **Inspection checklists** - See appendices to this manual for copies of representative checklists.
- **Bound notebook and writing implements** – Leave paper notebooks and checklists outside contaminated areas such as active removal projects. Use plastic clipboards and overhead projector transparency sheets to record inspection information (general observations, interview notes, samples obtained, photographs taken, etc.). Be sure to bring waterproof (permanent) marking pens which will write on plastic. Complete appropriate paper checklists/reports following the inspection.
- **Camera (waterproof, with flash)** - Take photographs of sample locations and visible emission sources and debris. Digital photography is recommended and often employed. Be sure to bring extra memory cards and batteries. If using a film camera, bring extra film and batteries and “Please return film to: (your name and address)” sheet. (Take a photo of this sheet as your first shot on your roll of film. This enhances the possibility of your receiving your pictures in the event your film and identifying information accidentally part company at the processor.)
- **Flashlights (large/penlight -waterproof, intrinsically safe)** - Use in areas with inadequate lighting such as basements, above drop ceilings, and in buildings where the electricity has been turned off. Bring extra batteries/bulbs.
- **Binoculars** – To observe site from afar.
- **Measuring device** – Use to accurately quantify the amounts of RACM at the site. Ordinary metal tape measures are difficult to decontaminate and will rust, so use electronic devices or plastic/fiberglass measuring tapes (on a stainless-steel spool) available at many major home supply stores and specialty shops. For sites that are relatively flat, a walking measuring wheel can be very helpful. These too can be purchased at major home supply stores. As an alternative, use a pre-measured pace or building diagrams to determine amounts of RACM seen.
- **Chain-of-custody forms and labels** -Use these to properly distinguish each sample and to maintain a record of sample possession and transfer.
- **Shipping supplies** -Ship samples from the field if quick analysis is necessary.

- ***Sampling equipment*** -Use the following when taking bulk samples:
  - sample containers
  - spray bottle, leak proof
  - tamperproof tape or labels
  - tools (needle-nose pliers, slotted and Phillips head screwdrivers, locking-blade penknives, laboratory spatula)
  - plastic drop cloth
  - wet wipes
  - resealable plastic bags (qt., gal.)
  - disposable towels
  - water activated repair (lag) cloth, containers of pre-mixed encapsulant (available through abatement supply vendors), or bathroom-type caulking; use as necessary to repair sampling sites if area is to remain occupied
  - labeled waste disposal bag
  - paper towels for wiping tools etc.
  
- ***Office supplies***
  - manila folders/envelopes
  - pens/pencils
  - highlighting marker
  - plain paper
  - spiral-bound notebook
  - stickable notes in a variety of sizes
  - paper clips
  
- ***Waterproof watch***
  
- ***Compass*** -Use to detail site/sample locations, wind direction, etc.
  
- ***Asbestos warning signs/tape***
  
- ***Miscellaneous materials/tools***
  - crowbar
  - locking plastic box (to secure samples for chain-of-custody purposes)
  - equipment containers (e.g., duffle bags, rolling carry-ons, tackle boxes, 5-gal. buckets)
  - extendible mirror (to see above, behind or beneath)
  - utility knife
  - marking paint
  - small pickax/mattock
  - glovebag (to use if sealed waste bags must be opened and sampled where no containment area exists)

## ***Personal Protective Equipment/Supply Preparation***

Since it is very difficult to determine precisely what PPE will be needed at an inspection site, be sure to have the following available:

- ***Respiratory protection***

Select appropriate respirator for the anticipated hazard. A PAPR is required minimum protection for an operating OSHA Class I work area.

- respirator cartridges (HEPA or P-100, HEPA or P-100 combination cartridges for ammonia, organic vapors, acids)
- respirator disinfectant (pads, powder)
- spectacle kit

- ***Coveralls (disposable, full-body, hood and foot covers)***

- ***Gloves***

- work (cotton, leather)
- disposable (latex, polyethylene)

- ***Footwear***

- steel-toed/steel-shank rubber boots or safety shoes
- over-boots (latex)

- ***Head protection***

- hardhat
- hearing protection
- safety glasses (clear/tinted)
- hat (sun protection)

- ***Survival/medical gear***

- medical identification bracelet or necklace ("diabetic", "allergic to...", etc.)
- first aid kit
- snakebite kit
- water, potable (for drinking or decontamination)
- water bottle
- food
- sunscreen/long-sleeved shirt
- insect repellent
- sanitary wipes
- cooler

- foul weather gear (raincoat, umbrella, waterproof boots, etc.)
- *Pocket Guide to Chemical Hazards*, 2007. (visit: <http://www.cdc.gov/niosh/npg/>)

- **Shower supplies**

- shower thongs
- comb/brush
- shampoo
- soap, liquid
- towels, disposable
- bathing suit or equivalent (disposable underwear)

- **Miscellaneous**

- duct tape
- climbing harness/lanyard\*
- inspection itinerary (sites to be visited and when -be sure to leave copy with supervisor or colleague)
- belt, (one that can be cleaned or disposable; for personal sampling pumps, PAPR batteries etc.)

\*As was discussed in chapter 7, many work sites have very specific safety requirements regarding fall protection, ladder & scaffold safety, etc. to which the asbestos NESHAP inspectors will be subject. Because safety and climbing items are commonly not provided because of liability issues, you will have to bring these items with you (and be properly trained in their use).