Wildfire Asbestos Survey Guidance

Best practices for accredited asbestos inspectors sampling burned structures

The following information applies solely to properties burned by the 2020 wildfires:
Almeda Fire, Archie Creek Fire, Beachie Creek Fire, Brattain Fire, Echo Mountain Complex Fire, Holiday Farm Fire, Lionshead Fire, Mosier Creek Fire, North Cascade Complex Fire, Powerline Fire, Riverside Fire, Slater Fire, South Obenchain Fire, Two Four Two Fire, White River Fire

DEQ asbestos rules require a survey before renovation or demolition. A survey is required for all commercial facilities, and for all residences with four or fewer dwelling units built before Jan. 1, 2004, to prove that no asbestos is present in ash and debris. However, materials may be presumed to contain asbestos and disposed as asbestos-containing materials without a survey. The materials must be packaged, labeled, transported and disposed according to the requirements in Oregon Administrative Rule (OAR) 340-248-0280.

DEQ recommends the accredited inspector do the following:

- Attempt to identify room locations (such as kitchen, bathrooms, etc.) to map homogeneous areas.
- Construct a grid system to identify homogeneous areas.
- Distinguish the difference between fine ash and burned suspect building materials.
  - Identify the materials to the best of your ability, for example “presumed drywall” or “presumed vinyl flooring.”
- Make a best effort attempt to safely locate suspect materials that may be hidden beneath ash and debris.
  - Burned but identifiable building materials should be sampled and analyzed for asbestos.
- Use professional judgement to determine the correct number of samples to obtain for the survey.
  - DEQ regulations (OAR 340-248-0270(3)) require at least one bulk sample of any homogeneous material and at least three random samples of sprayed or troweled on materials.
  - DEQ recommends using the 3-5-7 Sampling Rule as is described in EPA 40 CFR 763.86 (Surfacing Material) to ensure representative samples are obtained.
    - 3 samples for less than 1,000 sq. ft.
    - 5 samples from 1,000-5,000 sq. ft.
    - 7 samples for greater than 5,000 sq. ft.
- Use a qualified analytical laboratory.
  - If a lab analysis is completed and identifies asbestos at greater than one percent, all ash and debris from the structure must be handled, packaged, labeled, and disposed as asbestos-containing waste material.
    - Some materials, such as metal, may be separated, cleaned, and disposed of as non-asbestos containing material.
  - If asbestos is identified at quantities less than or equal to one percent, the material is not regulated by DEQ; however, Oregon OSHA rules may still apply for contractors conducting cleanup.
  - DEQ regulations require a quantitative analysis to identify asbestos in a sample. However, due to difficulty in sampling and the mixing of ash and debris materials, a qualitative analysis may be sufficient to identify the presence of asbestos. If this is performed, and the lab analysis identifies asbestos in any of the materials, DEQ recommends all ash and debris be considered asbestos-containing and abated properly.

Other considerations for sampling hazardous materials:

- In addition to surveying for asbestos-containing materials, disposal facilities may require additional testing and documentation for other hazardous materials.

Additional Resources
State of Oregon Wildfire Cleanup Page
https://wildfire.oregon.gov/cleanup

DEQ Wildfire Page
https://www.oregon.gov/deq/wildfires/Pages/default.aspx
DEQ Asbestos Information
https://www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Asbestos-Information.aspx

List of DEQ Licensed Asbestos Abatement Contractors

List of Accredited Asbestos Inspectors

Lane Regional Air Protection Agency (LRAPA) Wildfire Page
https://www.lrapa.org/324/Ash-Cleanup

Alternative formats
DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.

Asbestos Program Contacts

<table>
<thead>
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<th>Office</th>
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<th>Phone</th>
<th>Counties</th>
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<tbody>
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<td>503-229-5982 or 800-452-4011</td>
<td>Clackamas, Clatsop, Columbia, Multnomah, Tillamook, Washington</td>
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<td>Salem</td>
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<td>Benton, Lincoln, Linn, Marion, Polk, Yamhill</td>
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<td>Medford</td>
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<td>Coos Bay</td>
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<td>541-269-2721, Ext. 222</td>
<td>Coos, Curry, Western Douglas County</td>
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<td>Bend</td>
<td>475 NE Bellevue Dr. Suite 110</td>
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<td>Pendleton</td>
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<td>Lane Regional Air Protection Agency</td>
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<td>Lane</td>
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