**TO:** General Public and Regulated Community

**FROM:** Jennifer Vogel, Program Manager

Lead-Based Paint and Asbestos Program

**SUBJECT: Recommended Procedures for Bulk Handling of Non-Friable Asbestos-Containing Waste Material in Georgia by Licensed Asbestos Removal Contractors**

The Georgia Environmental Protection Division (EPD) has several Rules which govern the asbestos abatement, licensing and disposal industry within the state. These Rules are the [Rules for Air Quality Control](http://rules.sos.state.ga.us/cgi-bin/page.cgi?g=GEORGIA_DEPARTMENT_OF_NATURAL_RESOURCES/ENVIRONMENTAL_PROTECTION/AIR_QUALITY_CONTROL/index.html), Chapter 391-3-1; the [Rules for Asbestos Removal and Encapsulation](http://rules.sos.state.ga.us/cgi-bin/page.cgi?g=GEORGIA_DEPARTMENT_OF_NATURAL_RESOURCES%2FENVIRONMENTAL_PROTECTION%2FASBESTOS_REMOVAL_AND_ENCAPSULATION%2Findex.html&d=1), Chapter 391-3-14; and the [Rules for Solid Waste Management](http://rules.sos.state.ga.us/cgi-bin/page.cgi?g=GEORGIA_DEPARTMENT_OF_NATURAL_RESOURCES/ENVIRONMENTAL_PROTECTION/SOLID_WASTE_MANAGEMENT/index.html), Chapter 391-3-4. They are enforced by the EPD Lead-Based Paint and Asbestos Program.

The Rules include, among other things, requirements for disposal of asbestos-containing waste material (ACWM) to prevent emissions of particulate asbestos material to the ambient (outside) air. Based on these regulations and operating requirements for waste disposal sites, all ACWM that would normally be considered friable must be sealed in leak-proof containers, such as bags or drums, and have the proper warning label affixed to them. However, ACWM that would normally be considered non-friable such as built-up roofing, asbestos-cement products (including roof and siding shingled) and vinyl flooring, present several problems that have resulted in the need for alternative waste handling procedures. The problems with these non-friable asbestos-containing waste materials (NFACWM) include torn bags from sharp edges and an excessive amount of time and labor necessary to handle large volumes of heavy waste with conventional bagging methods.

Prior to outlining the procedures for bulk handling of NFACWM, a short discussion on removal of these potentially friable ACMs is necessary. The ACM is required to be adequately wetted (i.e. sufficiently mixed or coated with water or an aqueous solution to prevent dust emissions) during removal and subsequent handling to ensure that it remains wet until properly collected for disposal.

**If you have any other questions, please call the Program Duty Officer at 404-363-7026 or visit our websites at** [**https://epd.georgia.gov/lead-based-paint**](https://epd.georgia.gov/lead-based-paint) **and** [**https://epd.georgia.gov/asbestos**](https://epd.georgia.gov/asbestos)**.**