

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY (ADEQ)
ADEQ CLARIFICATION MEMORANDUM (2015-02)**

FROM: Becky Keogh, Director, Arkansas Department of Environmental Quality
DATE: September 09, 2015
SUBJECT: Containment

Arkansas Pollution Control & Ecology Commission Regulation No. 21, Arkansas Asbestos Abatement Regulation references several terms concerning containment in Chapter 4 to assist the contractor/consultant in understanding what containment is referenced solely by Regulation No. 21.

The following terms are:

“Containment” means a system installed by the owner or operator designed to minimize or eliminate the risk of the release of asbestos fibers from the work area to adjacent areas not involved in the project.

“Encapsulation” means the coating of ACM with a bonding or sealing agent to prevent the release of airborne fibers.

“Glovebag” means a sealed compartment with attached inner gloves used for the handling of asbestos-containing materials. Properly installed and used, glovebags provide a small work area enclosure typically used for small-scale short-duration asbestos stripping operations. Information on glovebag installation, equipment and supplies, and work practices is contained in The Occupational Safety and Health Administration’s (OSHA) final rule on occupational exposure to asbestos (29 CFR 1926.1101).

Chapter nine of Regulation No. 21 discusses general work procedures and work procedure compliance for contractors performing abatement projects

Regulation No. 21 ' 21.901(G) states:

The owner or operator shall cause clearance air monitoring to be conducted inside containment after the completion of any renovation, demolition, or asbestos response action involving RACM for which containment was utilized and which involved projects greater than 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet), or at least one cubic meter (35 cubic feet) where the length could not be measured previously.

Regulation No. 21 ' 21.901(H) states:

The owner or operator shall cause such sampling to be conducted by a person who has met the certification requirements of this regulation for the Air Monitor

discipline as provided in this regulation and is not an employee of the licensed asbestos firm conducting the demolition, renovation, or asbestos activities.

If containment is used for the purpose of removing regulated asbestos then final clearance air monitoring must be performed. The individual conducting final clearance must be certified as an Arkansas certified air monitor.

It should be noted that “*containment*” of an area where regulated asbestos will be removed is not an ADEQ requirement.

Containment is a requirement of OSHA concerning worker protection. Those requirements may be located at http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=10862&p_table=STANDARDS