



Asbestos NESHAP Requirements: A Simple Solution for Location Mapping in Landfills

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Regulatory Context

National

- National Emission Standards for Hazardous Air Pollutants (NESHAP)
- Title 40, Part 61, Subpart M (40 CFR Part 61)
- authorized by Section 112 of CAA
- promulgated 1973, updated 1990
- §61.154 Standard for active waste disposal sites
- §61.151 Standard for inactive waste disposal sites ...



Regulatory Context

North Carolina

15A NCAC 13B .0505 Operational
Requirements for Sanitary Landfills



§61.154 Standard for active waste disposal sites

“ Each owner or operator of an active waste disposal site that receives asbestos-containing waste material from a source covered under §61.149, 61.150, or 61.155 shall meet the requirements of this section; ”



Basic Requirements

- 61.154(e)

“For all asbestos-containing waste material received, the owner or operator of the active waste disposal site shall:



Basic Requirements

- 61.154(e) – continued
- (1) Maintain waste shipment records ... and include the following information:
 - (i) The name, address, and telephone number of the waste generator
 - (ii) The name, address, and telephone number of the transporter(s).
 - (iii) The quantity of the asbestos-containing material in cubic meters (cubic yards).



Basic Requirements

- 61.154(e) – continued
 - (iv) The presence of improperly enclosed or uncovered waste, or any asbestos-containing waste material not sealed in leak-tight containers.
 - (v) The date of the receipt.



Basic Requirements

- 61.154(f)

“Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.”



Basic Requirements

- 61.154(h)

“Submit to the Administrator, upon closure of the facility, a copy of records of waste disposal locations and quantities.”





Basic Requirements

- 61.154(j)
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Basic Requirements

- 61.151(e)

“Within 60 days of a site becoming inactive ... record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser that:”



Basic Requirements

- 61.151(e) - continued
 - (1) The land has been used for the disposal of asbestos-containing waste material;
 - (2) The survey plot and record of the location and quantity of asbestos-containing waste disposed of within the disposal site required in 61.154(f) have been filed with the Administrator; and
 - (3) The site is subject to 40 CFR part 61, subpart M.



State Requirements

- North Carolina 15A NCAC 13B .0505 (11) (d)

“Asbestos waste that is packaged in accordance with 40 CFR 61 ... may be disposed of separate and apart from other solid wastes at the bottom of the working face or in an area not contiguous with other disposal areas, in either case, in virgin soil.”



State Requirements

- North Carolina 15A NCAC 13B .0505 (11) (d)

“Separate areas shall be clearly marked so that asbestos is not exposed by future land-disturbing activities.”



State Requirements

- North Carolina 15A NCAC 13B .0505 (11) (d)

“The waste shall be covered immediately with soil in a manner that will not cause airborne conditions.”



Solution?

A stack of three smooth, grey, rounded stones is positioned on the left side of the image. The stones are stacked vertically, with the top stone being the smallest and the bottom stone being the largest. They rest on a bed of fine, golden-brown sand. In the foreground, a sand mandala pattern is visible, consisting of several concentric, slightly irregular rings of sand. The background is a solid, dark black. The word "Simplicity" is written in a bold, white, sans-serif font in the upper right corner of the image.

Simplicity

A Simple Solution

- Simple data collection
- Collection of adequate information
- Simple data entry
- No special hardware or software reqmts.
- Graphical display of waste location “map or diagram”
- Readily accessible
- Cost effective



Show and Tell

