



Asbestos

July - August Wildfires / 2024

Public and Commercial Buildings and Buildings subject to the Asbestos NESHAP

Ash and debris from burned structures may contain toxic substances due to the many synthetic and other materials that may have been present in buildings. For example, chemicals, pesticides, batteries, plastic items, and other potentially toxic materials may have been present in the buildings prior to the fire. Public and commercial structures may contain larger amounts of these materials. Entry into buildings that are partially damaged by the fire or handling any ash or debris from buildings is not recommended. At minimum, people should wear protective clothing and equipment to avoid skin contact with debris and inhalation of ash. Those responding to and who are impacted by this wildfire need to make sure they are protected against tetanus. Tetanus vaccine (Tdap, DTaP, or TD) is recommended for anyone who does not have a documented dose within the past 10 years.

One particular concern in handling debris from structures damaged or destroyed by wildfires is the possible exposure to asbestos fibers. Asbestos is a known carcinogen and exposure to asbestos fibers can cause or contribute to the development of various diseases including asbestosis, mesothelioma and cancer. Asbestos fibers have been commonly used in a variety of building materials including, but not limited to, wall and ceiling textures, drywall, insulation, sheet vinyl flooring and floor tiles. Asbestos-containing materials that are in good condition should not pose a hazard. However, materials that are damaged or disturbed can release asbestos fibers creating a potential exposure risk for people working on site or on neighboring sites. To address this, Colorado law has detailed requirements related to the proper identification, handling and disposal of asbestos-containing materials.

Colorado enforces asbestos requirements under Colorado Regulation No. 8, Part B. It is also delegated the authority and obligation to enforce the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) regarding asbestos in public and commercial buildings. For residential properties, including commercial residential buildings with four or fewer dwelling units, the Colorado Department of Public Health and Environment is able to temporarily suspend enforcement of certain asbestos requirements of Colorado Regulation 8, Part B. Please see the specific documents developed for residential properties affected by this wildfire. Colorado cannot waive federal requirements for public and commercial buildings and other structures subject to the federal NESHAP.

I. **Addressing asbestos in public and commercial buildings and buildings subject to the Asbestos NESHAP that have been completely destroyed by these fires where only ash and debris remain (no portion of the structure still standing).**

Safe handling of ash and debris

The ash/debris should be handled in a manner that will minimize potential exposure to asbestos fibers and other hazardous materials in the debris.

- Ash/debris must be wetted to minimize dust; packaged inside a container (such as an end-dump roll-off or truck) lined with double 6-mil plastic sheeting with the sheeting completely closed over the material and sealed once the container is loaded.
- Soil under/surrounding the building should be scraped to ensure that all ash and building debris has been removed from the site.
- Contractors should consult with the Occupational Safety and Health Administration (OSHA) at (303) 844-5285 (Denver) to determine training and personal protective equipment that will be required for those handling this material.

Disposal of ash and debris

Ash and debris from buildings that were completely destroyed by the fire must be disposed of at an approved landfill. The following landfills can accept ash and debris from public and commercial buildings completely destroyed by this fire.

Tower Landfill, Inc.
8480 Tower Road
Commerce City, CO 80022
Steve Derus, 720-590-4046

Denver Arapaho Disposal Site
3500 S. Gun Club Road
Aurora, CO 80018
Chris Anderson: 720.876.2633

Buffalo Ridge Landfill
11655 WCR 59
Keenesburg, CO 80643
Michelle Wittenbrink: 303-229-8085

Larimer County Landfill
5887 S. Taft Hill Road
Fort Collins, CO 80526
Duane Penney: 970-498-7560

No other landfills are currently approved to accept ash and debris from buildings completely destroyed by this fire. In order to get approval to accept these materials, landfills must request and receive permission from the Hazardous Materials and Waste Management Division (HMWMD) which will include agreement to implement certain best management practices designed to protect landfill workers and nearby public from potential asbestos hazards. If additional landfills are approved, names, locations and contact information will be issued separately.

- Please contact the landfill before loads are taken there to confirm waste acceptance, alert them that the material is coming, and initiate a waste profile. The landfill should be informed that the material has come from the July/August Wildfire areas and may contain suspect asbestos-containing materials or other hazardous materials. Please take wetted and packaged debris directly to the landfill.

Notification and Permitting Requirements

State demolition permitting requirements are waived. However, the building owner or contractor must submit written notification to CDPHE's Indoor Environment Program. This notification should be done using the Disposal Notification Form - Public and Commercial Buildings and Buildings subject to the Asbestos NESHAP. There is no fee required for submission.

II. Addressing asbestos in damaged public and commercial buildings and buildings subject to the Asbestos NESHAP where the building or portions of the building must be demolished and where sampling building materials for the presence of asbestos cannot be done safely.

Building owners should work with appropriate local officials overseeing the fire response to determine whether a partially damaged structure can be safely inspected. A building that is structurally unsound and in danger of imminent collapse waives the requirements to inspect and remove regulated asbestos-containing material. However, all debris must be treated as friable asbestos waste.

- **If possible, provide written notification (10 working days in advance) to the Indoor Environment Program for all demolitions. Emergency provisions will allow notice to be made 24 hours instead of 10 working days.**
- **Ash/debris must be wetted to minimize dust; packaged inside a container (such as an end-dump roll-off or truck) lined with double 6-mil plastic sheeting with the sheeting completely closed over the material and sealed once the container is loaded.**
- **Soil under/surrounding the building should be scraped to ensure that all ash and building debris has been removed from the site.**

- Ensure there is, at minimum, an asbestos trained supervisor on the jobsite with documentation available on site.
- In addition, Contractors should consult with the Occupational Safety and Health Administration (OSHA) at (303) 844-5285 (Denver Office) to determine training and personal protective equipment that will be required for those handling this material.
- All debris must be treated as friable asbestos waste and can only be disposed of in a landfill approved to accept friable asbestos-containing waste. Please see the list of approved landfills on the Air Pollution Control Division's Asbestos webpage at: www.colorado.gov/cdphe/asbestos

Notification and Permitting Requirements

State demolition permitting requirements are waived. However, the building owner or contractor must submit written notification to CDPHE's Indoor Environment Program. This notification should be done using the Disposal Notification Form - Public and Commercial Buildings and Buildings subject to the Asbestos NESHAP, July/August Wildfire areas. There is no fee required for submission.

Recycling of certain materials under Sections I and II

Recycling of metal and concrete foundations is permissible under the following circumstances: Metal debris must be washed clean of ash/debris on site prior to transport for recycling. If you wish to recycle a concrete foundation, the concrete must be inspected by a Colorado certified asbestos building inspector to determine that it is free of asbestos-containing materials prior to recycling.

III. Addressing asbestos in public and commercial buildings and buildings subject to the Asbestos NESHAP that are only partially damaged by the fire and where sampling building materials for the presence of asbestos can be done safely:

Building materials must be inspected by a Colorado certified asbestos building inspector prior to renovation/demolition or debris handling activities impacting the building materials. If asbestos-containing material(s) is present in amounts greater than the trigger levels and these materials would be disturbed by renovation or demolition activities, they must be removed and disposed of in accordance with Colorado Regulation No. 8, Part B - Asbestos.

IV. If there is known asbestos-containing material above regulatory trigger levels in public and commercial buildings and buildings subject to the Asbestos NESHAP, the owner must follow the requirements of Colorado Regulation No. 8, Part B.

For buildings that had been previously inspected and found to contain asbestos-containing materials or were previously known to contain asbestos in amounts greater than the state trigger levels, and if these materials would be disturbed by renovation or demolition activities, they must be removed and disposed of in accordance with Colorado Regulation No. 8, Part B - Asbestos.

Information on Asbestos Consulting Firms (asbestos inspectors), Asbestos Abatement Contractors and Asbestos Landfills can be found on the CDPHE's Asbestos page at: www.colorado.gov/cdphe/asbestos

For additional asbestos information, please contact the CDPHE Indoor Environment Program at: (720) 507-5136 or cdphe.asbestos@state.co.us