

Considerations

While pipe bursting may reduce short term costs, the long-term costs are significant when leaving regulated Asbestos waste in place. Future renovations, repairs, or land management triggers Asbestos related costs; training, licensing, medical surveillance, project permitting, pollution liability, decontamination of equipment, and potential depreciation of property values. These future considerations should be accounted for in project design cost estimates.



Options

- 1) Abandon the existing AC pipe in place and develop a separate pipeline.
- 2) Careful excavation of the pipeline for non-regulated removal and disposal.
- 3) Permit the project and remove as regulated asbestos, dispose, and clear.

Currently, Asbestos materials rendered regulated can not be left in place.

Regulatory Considerations

EPA has the ability to accept an “Administrator Approved Alternate” to the federal standards. However, congressional approval would be required to change the National Emission Standard for Hazardous Air Pollutants (NESHAP), the federal regulations that deal with the management of AC pipe. Additionally, NESHAP requires deed notations to be made if regulated Asbestos remains in the ground.



Industry representatives have met with EPA in an attempt to reduce the regulatory requirements in effect for AC pipe. Montana’s Department of Environmental Quality would have considerations that would span into multiple state environmental programs, rules, and potentially statute. Considerable review is required prior to allowing for the creation of “active waste disposal sites” and after one year of inactivity to allow for “inactive waste disposal sites.”

ASBESTOS

CEMENT PIPE

To Burst or Not to Burst



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What you need to know

Asbestos Cement Pipe

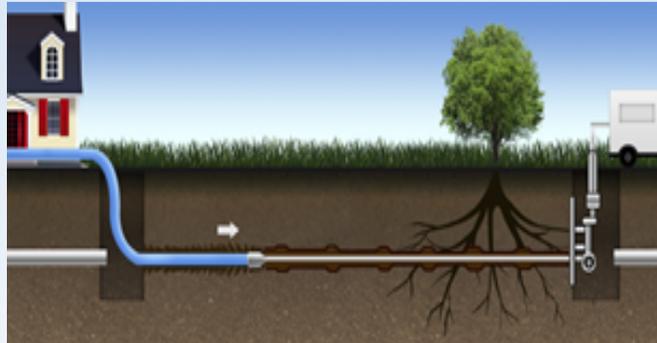
Asbestos Cement (AC), otherwise known as Transite, became a viable material for water, waste water, and storm drainage systems in the mid-1940s. Typical AC pipe consists of cements, silicas, and up to 50 percent asbestos fibers.



It is estimated that more than 600,000 miles of AC pipe exist in the United States. The life span of AC pipe ranges from 50 to 75 years. Pipe installed during the 1950's and 1960's has reached, or is reaching, the end of its usable life. Wear and tear from intended use and natural erosion results in corrosion and deterioration.

Pipe Bursting

Pipe bursting is a method of replacing pipeline without trenching the soil. An expander head is placed in front of the old line and pulls the replacement line behind. The expander head breaks up the pipeline into small pieces (rendering the material regulated) to ensure the new line has a clear passage.



The Environmental Protection Agency (EPA) has addressed pipe bursting in several position documents, stating, "The breaking of AC pipe with mechanical equipment would cause the material to become 'Regulated Asbestos Containing Material (RACM)' causing these locations to be considered an active waste disposal site requiring licensing, followed by additional licensing for an inactive waste disposal site.

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Asbestos Regulations

EPA and the state of Montana require an Asbestos inspection prior to any demolition or renovation activity. When three linear feet of AC pipe is rendered regulated, the Administrative Rules of Montana (ARM) require permitting, fees, use of accredited workers, clearances, and proper disposal at a licensed Class II or IV landfill.



Regulated vs. Non-Regulated

Typically, AC pipe is categorized by Asbestos inspectors as a category II non-regulated material with the potential of being rendered regulated.

Removal of regulated materials fall under the ARM due to the health risks and risk to the environment.