The Department of State Health Services (DSHS) focus on compliance with EPA asbestos regulations for bridge projects is an ongoing challenge for TxDOT.

Asbestos is widely recognized as a potential health hazard, causing respiratory diseases when the small, sharp fibers are released and inhaled. On TxDOT structures, concrete coatings have proven to be the most common (and troublesome to remove) asbestos containing material (ACM). Other types of coatings, bearing pads/gaskets, joint materials, roofing felt, mastics/adhesives and asbestos-cement pipes have also been identified as ACM.

Although most bridges do not have ACM, many projects are affected by inspection and notification requirements. In addition, the many regulatory requirements can be confusing.

The focus of this article is to provide a guide to simple, effective asbestos management.

Steps to Successful Asbestos Management

For successful asbestos management, use the following five steps:

1) Identify
Identify all bridge demolition or renovation projects early in the project planning process. Early action may prevent future project delays.

2) Survey
Survey each bridge project for ACM. Generally, a trained and licensed asbestos consultant is best qualified to perform the inspection and collect samples of suspect materials. However, qualified TxDOT personnel may screen a structure for ACM using the Initial Asbestos Assessment Form found on the Bridge Division Intranet site at Field Operations/Construction and Maintenance/Asbestos Procedures or Asbestos Procedures. (Link is available to internal users only.)

For assistance in acquiring an asbestos consultant, contact the Environmental Affairs Division, Pollution Prevention and Abatement Branch (ENV-PPA).

3) Abate
When ACM is identified, abate any material which might be disturbed by project activities prior to construction, when possible. A licensed asbestos abatement contractor must be used for this task. The consultant that performed the asbestos inspection may be used to assist with specification development, proposal evaluation and project monitoring of the abatement. Depending upon the nature and extent of material, the abatement process may be time-consuming and costly.

4) Notify
Most importantly, notify DSHS prior to demolition of any bridge structure, even when no asbestos is present. Notification must be made using the appropriate DSHS form postmarked at least 10 working days prior to commencing the work.
Although DSHS understands that TxDOT construction schedules tend to flex, the 10 working day minimum notification requirement is strictly enforced. DSHS expects an amended notification if the actual demolition start date moves up, or if the start date is delayed enough that at least preparatory activities are not occurring at the site on the given start date.

5) Pay
Pay the DSHS notification fee for each notification promptly upon receipt of the invoice.

Other Activities that May Disturb ACM
Although the DSHS focus with regard to highway asbestos has been on bridge demolition and renovation, the potential for disturbing ACM should always be considered. Activities which might abrade, cut or otherwise disturb suspect materials should be avoided if the asbestos content is not known.

Contact Information
For additional assistance, contact:
- Brian Merrill, P.E. (BRG), 512/416-2232
- John Jameson (CST), 512/416-2432 or
- Rodney Concienne, P.G. (ENV), 512/416-3012