



## ASBESTOS REGULATORY CLARIFICATIONS

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Environmental and Consumer Safety Section  
Regulatory Services Division  
ARC – 005  
February 2001

### Subject:      The Utilization of Large Consolidated                   Waste Containment Systems (LCWCS)

#### BACKGROUND

Large consolidated waste containment systems (LCWCS) are often used on large asbestos abatement projects. This clarification addresses when LCWCS may be used and how to meet the minimum standards set forth in the rules applicable to the project. These systems have historically been referred to as burrito bags, bladder bags, taco wraps, and liners. Some of the systems are large capacity bags with sealed seams, which are maintained in the regulated area under negative pressure. These systems have been purported to be more efficient than smaller, standard asbestos waste bags, due to their ability to contain large components such as wallboard, lumber, and flooring materials that may be contaminated with asbestos. The LCWCS often accommodate up to a forty cubic yard rigid container. When filled, they are often sealed under a pressure differential and maintained leak tight during transport and disposal.

#### RESPONSE

In asbestos abatement projects performed in accordance with 25 TAC §295.60, which applies to **public buildings**, the LCWCS may be used for consolidation of the individually packaged asbestos waste material. However, the LCWCS may not be used in lieu of the individual bags, fiberboard drums, or individual wrapping that is required by that section. In addition, the LCWCS may not be substituted for the outer bag required by the rule when fiber drums are not used. The bags or wrapped components shall not be placed in the LCWCS until properly decontaminated in accordance with 25 TAC §295.60(j)(1). The LCWCS shall not be used in lieu of these decontamination procedures.

If removing asbestos floor covering material in a **public building** using the Resilient Floor Covering Institute (RFCI) removal method referenced in 25 TAC §295.36(a), the LCWCS may be used. The use of LCWCS in accordance with the RFCI method must meet the leak-tight requirements described in the RFCI work practice.



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When asbestos is removed in facilities which are not *public buildings* as defined by 25 TAC §295.32(73), the LCWCS may be used in accordance with the NESHAP, 40 CFR Part 61 Subpart M, §61.150. The NESHAP standard requires the waste to be adequately wet and placed in a leak-tight container. In addition, the NESHAP standard references the OSHA standard [29 CFR §1910.1001(j)(2)(iii)] that requires the container to be labeled with a sign/label of sufficient size and contrast to be readily visible and legible.

This Regulatory Clarification supercedes any previous clarification/guidance/policy letters on this subject and remains in effect until changed in writing by the the Texas Department of State Health Services. Attributed use or reproduction of this information is freely granted.

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