

San Joaquin Valley
Unified Air Pollution Control District

COMPLIANCE ASSISTANCE BULLETIN

DECEMBER, 1994

ASBESTOS DEMOLITION / RENOVATION - SUMMARY

This is a summary of the attached bulletin. Refer to the bulletin for more details and contact the individuals in the regional offices listed at the end of the bulletin for additional information.

Prior to any **renovation** or **demolition** of a facility subject to the NESHAP, you must do the following:

INSPECT: Conduct an asbestos inspection of the site before:

- Any renovation in which 160 square feet of building materials, or 260 linear feet of pipe insulation will be disturbed , or
- Any demolition of a facility.

Facilities subject to the NESHAP (regulated facilities) include all commercial buildings, apartments with more than four units, other structures and non-portable equipment. Single family dwellings may be exempt, but this must be determined on a case by case basis. **Demolitions** subject to the NESHAP (regulated demolitions) are demolitions of *facilities* described above, whether or not asbestos is present.

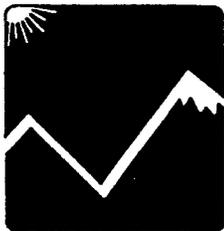
NOTIFY: Submit an asbestos notification form for any regulated renovation or demolition, 10 working days before the activity.

The term *regulated renovation* applies to any activity in which 160 Ft² of regulated asbestos-containing building materials or 260 L Ft. of asbestos-containing pipe insulation is disturbed.

FEES: Fees must be paid to the District with the notification for all regulated renovations and demolitions.

In addition, prior to any demolition:

DEMOLITION RELEASE FORM: For any demolition (regulated or not), you must have a completed a demolition release form. Upon its approval by the District this signed form may be used as proof (needed by the building official) of compliance with, or exemption from, the NESHAP notification requirements. Submit this form to the building department with your application for a demolition permit.



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ASBESTOS NOTIFICATION and INSPECTION REQUIREMENTS

The San Joaquin Valley Unified Air Pollution Control District (District) has adopted regulations and policies to implement the asbestos demolition and renovation requirements developed by the United States Environmental Protection Agency in the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation. The purpose of this bulletin is to explain the NESHAP notification and inspection requirements.

DEFINITIONS

40 CFR, Part 61, Subpart M, § 141

1. **FACILITIES** - Facilities subject to the rule include "all structures, installations, buildings and equipment, except for single family dwellings and apartments with four or fewer dwelling units." However, single family dwellings and apartments are also subject to the regulation if:
 - A. The zoning of the parcel is other than residential, or
 - B. The building had been used for, or is being removed for a commercial or public use, or is to be used as a training burn exercise.

Facilities subject to the NESHAP are often referred to as "regulated."

2. **DEMOLITION** - In addition to the total destruction of a structure, demolitions include "the removal of any structural load-bearing member from a facility together with any related handling operations or the intentional burning of a building" (training burns conducted by a fire fighting agency). Also, the separation of a structure from its foundation prior to relocation is a demolition.
3. **RENOVATION** - means "altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos-containing material (RACM) from a facility component." Renovations include all activities

in which asbestos could be disturbed at a regulated facility, including the clean up and removal of debris from buildings which have burned, other than in fire training exercises.

4. **REGULATED ASBESTOS-CONTAINING MATERIALS (RACM) - include:**
- A. **Friable asbestos-containing material (ACM)**, which is any material containing more than 1 percent asbestos, as determined by Polarized Light Microscopy (PLM) testing, which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.
 - B. **Category I nonfriable ACM** that is in poor condition and "has become friable" or "that has or will be subjected to sanding, grinding, cutting, or abrading." (Category I nonfriable ACM means "asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than 1 percent asbestos as determined by PLM testing that, when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure.")
 - C. **Category II nonfriable ACM** that has a high probability of becoming, or has become, crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation. (Category II nonfriable ACM is "any asbestos-containing material, excluding Category I ACM, containing more than 1 percent asbestos as determined by PLM testing, that, when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure.")

INSPECTION

40 CFR, Part 61, Subpart M, § 145 (a)

An asbestos inspection must be performed by the owner or operator prior to:

- 1. Any regulated demolition.
- 2. Any renovation activity in which more than 160 square feet of any building material or 260 linear feet of pipe insulation will be disturbed. An inspection is not necessary if the material to be disturbed is stipulated to be asbestos-containing and will be removed in accordance with the NESHAP.

Cal-OSHA regulations in the California Labor Code, § 9021.5 through 9021.8 require that inspections must be done by, or under the direction of, a Cal-OSHA certified consultant.

The District requires that inspection reports include:

- A. A schematic showing the location of all tested materials.
- B. The following data for all asbestos-containing materials:
 1. The amount and description of each material.
 2. Percent asbestos content.
 3. Whether or not the material is friable.

A report of the asbestos inspection must be received with the notification.

NOTIFICATIONS

40 CFR Part 61, Subpart M, § 145 (b)

An asbestos notification must be submitted to the District at least 10 working days prior to:

1. Any regulated demolition (see definitions of *demolition* and *facility* above.)
2. Any renovation in which more than 160 square feet or 260 linear feet of RACM will be disturbed.

Notifications will not be considered complete, nor will the 10 working day notice period begin until all of the required information and fees have been submitted to the District.

FEES

SJVUAPCD Rule 3050

District Rule 3050 requires that nonrefundable asbestos fees be received along with asbestos job notifications. The fee schedule (attached) was amended in February 1993. It includes fees for regulated asbestos abatement projects and regulated demolition projects, whether or not asbestos is present. Refer to the definition of *demolition* and *facilities* which describe projects that are regulated.

DEMOLITION RELEASE FORM

The California Health and Safety Code requires that the city or county building official have proof of compliance with, or exemption from, the asbestos notification requirement before he or she issues a demolition permit. In order to facilitate this, the District has developed a Demolition Release Form (attached). After the District has received a demolition notification and is satisfied that the NESHAP notification requirements have been complied with, the District will issue a Demolition Release Form to the person who submitted the notification. The applicant can use the release form as proof of NESHAP notification compliance when applying for a demolition permit from the building department.

RECYCLING AND WASTE DISPOSAL

In addition to providing waste disposal information about RACM, the asbestos notification must identify any building materials which will be recycled after removal from a project. The name of the recycling contractor and location of such activity must be identified.

NO ASBESTOS-CONTAINING OR ASBESTOS CONTAMINATED MATERIAL MAY BE RECYCLED.

The intent of this notice is to help clarify asbestos terminology, how the regulation applies to demolition and renovation of buildings and other facilities, notification and inspection reports and requirements, fees and building department demolition permits. If you have any questions, we encourage you to contact one of our three regional offices.

Northern Region

Merced, San Joaquin and
Stanislaus Counties:

4230 Kiernan Avenue,
Suite 130
Modesto, CA 95356
(209) 545-7000

Asbestos Coordinator:
Ronald Giannone

Central Region

Fresno, Kings and
Madera Counties:

1999 Tuolumne Street,
Suite 200
Fresno, CA 93721
(209) 497-1040

Asbestos Coordinator:
Carlos Esguerra

Southern Region

Kern and Tulare
Counties:

2700 M Street,
Suite 275
Bakersfield, CA
(805) 861-3682

Asbestos Coordinator:
Sherman Yount

San Joaquin Valley Unified Air Pollution Control District

Asbestos Notification

Operator Project #	Postmark Date	Date Received	Fees Received \$	Notification #
I. TYPE OF NOTIFICATION: (PLEASE CIRCLE ONE) Original Revised Canceled Courtesy				
II. FACILITY OWNER INFORMATION:				
OWNER NAME:				
ADDRESS:				
CITY:		STATE:		ZIP:
CONTACT:		TELEPHONE:		
REMOVAL CONTRACTOR:				
ADDRESS:				
CITY:		STATE:		ZIP:
CONTACT:		TELEPHONE:		SITE SUPERVISOR:
OTHER CONTRACTOR:				
ADDRESS:				
CITY:		STATE:		ZIP:
CONTACT:		TELEPHONE:		SITE SUPERVISOR:
III. TYPE OF OPERATION: (D-Demo O-Ordered Demo R-Renovation E-Emergency Renovation):				
IV. IS ASBESTOS PRESENT? <input type="checkbox"/> Yes <input type="checkbox"/> No				
V. FACILITY DESCRIPTION: (Include building name, number, and floor or room number)				
BUILDING NAME:				
ADDRESS:				
CITY:		COUNTY:		ZIP:
SITE LOCATION:				
BUILDING SIZE:		NUMBER OF FLOORS		AGE:
PRESENT USE:		PRIOR USE:		
VI. A COPY OF THE INSPECTION REPORT WITH PROCEDURE, INCLUDING ANALYTICAL METHOD USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL MUST BE INCLUDED WITH THIS REPORT:				
VII. Approximate amount of asbestos, including: 1. Regulated ACM to be removed. 2. Category III ACM not removed. 3. Non-friable ACM to be removed.	RACM <u>to be removed.</u>	Non-friable ACM <u>not to be removed.</u> Category I Category II	Non-friable ACM <u>to be removed.</u> (Courtesy)	
PIPES (Linear Feet)				
SURFACE AREA (Square Feet)				
VOLUME (Cubic Feet-If Lnft or Soft could not be measured)				
VIII. REMOVAL DATES: (MM/DD/YY)	START:	COMPLETE:		
IX. DEMO/RENOVATION DATES: (MM/DD/YY)	START:	COMPLETE:		

X. Description of planned demolition or renovation work, and method(s) to be used:

XI. Description of work practices and engineering controls to be used to prevent emissions at the site:

XII. WASTE TRANSPORTER:

NAME:

ADDRESS:

CITY:

STATE:

ZIP:

CONTACT:

TELEPHONE:

XIII. WASTE DISPOSAL SITE

NAME:

LOCATION:

CITY:

STATE:

ZIP:

CONTACT:

TELEPHONE:

XIV. DISPOSAL OF NON ASBESTOS CONTAINING WASTE MATERIAL (ACWM) - recycling:

NAME:

LOCATION:

CITY:

STATE:

ZIP:

CONTACT:

TELEPHONE:

XV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY, PLEASE IDENTIFY THE AGENCY BELOW:

NAME:

TITLE:

AUTHORITY:

DATE OF ORDER (MM/DD/YY):

DATE ORDER TO BEGIN: (MM/DD/YY):

XVI. FOR EMERGENCY RENOVATIONS

DATE AND HOUR OF EMERGENCY:

DESCRIPTION OF THE SUDDEN, UNEXPECTED EVENT:

EXPLANATION OF HOW THE EVENT CAUSED UNSAFE CONDITIONS OR WOULD CAUSE EQUIPMENT DAMAGE OR AN UNREASONABLE FINANCIAL BURDEN:

XVII. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NON-FRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

XVIII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR, PART 61, SUBPART M) WILL BE ON SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING NORMAL BUSINESS HOURS.

SIGNATURE OF OWNER/OPERATOR

DATE

XIX. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT

SIGNATURE OF OWNER/OPERATOR

DATE

