



## **COMPLIANCE ADVISORY**

### **ASBESTOS NESHAP APPLICABILITY**

### **TO DEMOLITION AND RENOVATION PROJECTS**

In order to reduce the public's potential exposure to airborne asbestos, the Environmental Protection Agency (EPA) established the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation. The asbestos NESHAP regulates the demolition and renovation of buildings containing asbestos materials including, but not limited to fireproofing and insulating materials, paints, cements, joint compounds, and floor tiles. The regulation applies to commercial structures, industrial structures, and housing units having greater than four dwelling units. Single family dwellings are generally exempt. The following is a summary of some of the important NESHAP requirements. Other regulations may apply. For example, CAL/OSHA requires that the asbestos survey be completed by a Certified Asbestos Consultant (CAC) or by a Site Surveillance Technician, under the supervision of a CAC.

#### **Definitions**

**Demolition** – the wrecking or removal of any load supporting structural member of a building. Moving a structure from one location to another and the burning of a structure are also considered demolitions.

**Regulated Asbestos Containing Material** – (a) friable asbestos material; (b) Category I non-friable material that has become friable; (c) Category I material that has or will be subjected to grinding, sanding, cutting, or abrading; (d) Category II non-friable material that has a high probability of becoming crumbled, pulverized, or reduced to powder by forces expected to act upon the material in the course of demolition or renovation operations.

**Renovation** – altering a facility or one or more facility components in any way; this includes and is not limited to the stripping or removal or Regulated Asbestos Containing Material (RACM) from a facility component. Also included are projects on the exterior of a structure, such as façade enhancements or remodels.

Prior to beginning any demolition or renovation activity, the structure must be thoroughly surveyed for the presence of asbestos containing material. Survey must be conducted by an AHERA-accredited Building Inspector (40 CFR 763, Subpart E, App. C).

**For a renovation** - Upon completion of the asbestos survey, determine if the combined amount of RACM to be stripped, removed, dislodged, cut, drilled or similarly disturbed during a renovation is at least 260 linear feet (on pipes), 160 square feet (i.e. flooring, drywall), or 35 cubic feet in volume whichever is least. If the amount of RACM is at least the threshold amounts, District notification prior to the removal is required.

**For a demolition** - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing material of a quantity greater than or equal to the threshold amounts above will be removed prior to demolition, a separate notification is required.

**Other Training Requirements** – *When removing or disturbing RACM, an AHERA-accredited Contractor/Supervisor must be present and all workers must be AHERA-accredited Workers (40 CFR 763, Subpart E, App. C). All training must be current.*

**f Violations of NESHAP regulations can be prosecuted as felony offenses carrying penalties of \$37,500 per day per offense.f**

For further clarification or additional guidance, contact the NCUAQMD office at (707) 443-3093.

# Asbestos Consultants/Contractors

## Certified Consultants

GHD	Eureka	707-443-8326
<del>SHN</del>	<del>Eureka</del>	<del>707-441-8855</del>
Zindar Brunelle	Eureka	707-672-5345
Terry Baker	Yreka	530-842-7987

## Abatement Contractors

New Life Services (Matthew House)	707-444-8222
North Coast Environmental Construction (Jim Crook)	707-442-2032
Wahlund Construction	707-268-0150

\*\*\*\*\* Out of Area Abatement \*\*\*\*\*

American Abatement	(Anderson)	(530) 378-1587
CAL INC	(Vacaville)	(707) 446-7996
Caltec Environmental Inc.	(Napa)	(707) 257-3564
Infinity Abatement Company	(Redding)	(530) 605-8850
Ralph Curran	(Santa Rosa)	(707) 525-0337
Scramaglia Construction, Inc.	(Ukiah)	(707) 468-5100
Systems Abatement Corp.	(Anderson)	(530) 945-4215



**ASBESTOS DEMOLITION AND RENOVATION NOTIFICATION FORM  
GENERAL INFORMATION**

The Asbestos NESHAP, 40 CFR Part 61, Subpart M, requires written notification of demolition or renovation operations under Section 61.145. This form may be used to fulfill this requirement. Only complete notification forms are acceptable. Incomplete notification may result in enforcement action.

*This notification should be typewritten and postmarked or delivered no later than ten days prior to the beginning of the asbestos removal activity (dates specified in Section VIII) or demolition (dates specified in Section IX). Please submit the form, along with the appropriate fee, to:*

**NORTH COAST UNIFIED AQMD  
707 L STREET, EUREKA, CA 95501**

**INSTRUCTIONS:**

- I. Type of Notification: Enter "O" if the notification is a first time or original notification, "R" if the notification is a revision of a prior notification, or "C" if the activity has been cancelled.
- II. Facility Information: Enter the names, addresses, contact persons and telephone numbers of the following:
  - Owner: Legal owner of the site at which asbestos is being removed or demolition planned
  - Asbestos Removal Contractor: Certified asbestos contractor hired to remove asbestos (include DOSH registration #)
  - Other Demolition or Renovation Operator: Demolition contractor, general contractor, or other person who leases, operates, controls, or supervises the site (fire dept if training burn).
- III. Type of Operation: Enter "D" for facility demolition, "R" for facility renovation, "O" for ordered demolition, or "E" for emergency renovation. Fire training burns are considered facility demolitions ("D").
- IV. Is Asbestos Present?: Answer "yes" or "no" regardless of the amount of asbestos present.
- V. Facility Description: Provide detailed information on the areas being renovated or demolished. If applicable, provide the floor numbers and room numbers where renovations are to be conducted.
  - Site Location: Provide information needed to locate site in event that the address alone is inadequate.
  - Building Size: Provide in square meters or square feet.
  - No. of Floors: Enter the number of floors including basement or ground floors.
  - Age in Years: Enter approximate age of the facility.
  - Present Use / Prior Use: Describe the primary use of the facility or enter the following codes: H - hospital; S - school; P - public building; O - office; I - industrial; U - university or college; B - ship; C - commercial; or R - residential.
- VI. Asbestos Detection Procedure: Describe methods and procedures used to determine whether asbestos is present at the site, including a description of the analytical methods employed. **Building inspections must be performed by an AHERA-accredited Building Inspector** (40 CFR 763, Subpart E, App. C). Include copy of current accreditation. If an inspection report has been prepared by a consultant for the facility please include a copy with the notification.
- VII. Approximate Amount of Asbestos, Including: (1) Regulated asbestos containing material (RACM) to be removed (including nonfriable ACM to be sanded, ground, or abraded); (2) Category I ACM not removed ; and (3) Category II ACM not removed. For both removals and demolition, enter the amount of RACM to be removed by entering a number in the appropriate box and an "X" for the unit. For demolition only, enter the amount of Category I and II nonfriable asbestos not to be removed in the appropriate boxes. Category I nonfriable material includes packing, gasket, resilient floor covering, and asphalt roofing materials containing more than one percent asbestos. Category II nonfriable material includes any material, excluding Category I products, containing more than one percent asbestos, that when dry, cannot be crumbled, pulverized, or reduced to powder. Facilities to be used for fire training purposes must have all materials containing more than one percent asbestos removed.
- VIII. Scheduled Dates of Asbestos Removal: Enter scheduled dates (month/day/year) for asbestos removal work. Asbestos removal work includes any activity, including site preparation, which may break up, dislodge, or disturb asbestos material. **These dates must be accurate.** Asbestos removal work occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.
- IX. Scheduled Dates of Demo/Renovation: Enter scheduled dates (month/day/year) for beginning and ending of the planned demolition or renovation. For fire training burns this is the time period when the actual fire training burn will take place. **These dates must be accurate.** Demolition or renovation activity occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.

- X. Description of Planned Demolition or Renovation Work, and Method(s) to be Used: Include here a description of the overall work being done and the techniques being used. A work plan can be attached to address this item.
- XI. Description of Engineering Controls and Work Practices to be Used to Control Emissions of Asbestos at the Demolition or Renovation Site: Describe the work practices and engineering controls selected to ensure compliance with the requirements of the regulation, including removal and waste handling emission control procedures. A work plan can be attached to address this item.
- XII. Waste Transporter(s): Enter the name, addresses, contact persons and telephone numbers of the persons or companies responsible for transporting ACM from the removal site to the waste disposal site. If the removal contractor or owner is the waste transporter, state "same as owner" or "same as removal contractor".
- XIII. Waste Disposal Site: Identify the waste disposal site, including the complete name, location, and telephone number of the facility. If ACM is to be disposed of at more than one site, provide complete information on an additional sheet submitted with the form.
- XIV. If Demolition Ordered by a Government Agency: Provide the name of the responsible official, title and agency, authority under which the order was issued, the dates of the order and the dates of the ordered demolition. Include a copy of the order with the notification.
- XV. Emergency Renovation Information: Provide the date and time of the emergency, a description of the event and a description of unsafe conditions, equipment damage or financial burden resulting from the event. The information should be detailed enough to evaluate whether a renovation falls within the emergency exception.
- XVI. Description of Procedures to be Followed in the Event that Unexpected Asbestos is Found or Previously Nonfriable Asbestos Material Becomes Crumbled, Pulverized, or Reduced to Powder: Provide adequate information to demonstrate that appropriate actions have been considered and can be implemented to control asbestos emissions adequately, including at a minimum, conformance with applicable work practice standards. Typically these will include a work stoppage, wetting of material, and notification to the District.
- XVII. Certification of Presence of Trained Supervisor: Certify that a person trained in asbestos removal procedures and the provisions of this regulation will be on-site and supervise the demolition or renovation. **When handling RACM, the supervisor must be a current AHERA-accredited contractor/supervisor, and the workers must be AHERA-accredited workers (40 CFR 763 Subpart E App. C).** The supervisor is responsible for the activity on-site. Evidence that the training has been completed by the supervisor must be available for inspection during normal business hours.
- XVIII. Verification: Please certify the accuracy and completeness of the information provided by signing and dating the notification form.

**FEES AND OTHER REQUIREMENTS:**

Demolition - **OR** - Renovation Notifications ..... **2 X** (Regulation IV, Rule 401(B))  
 Asbestos Abatement (**with** Demolition Projects) ..... **4 X** (Regulation IV, Rule 401(B))

- All fees must accompany the notification form.
- Notification forms must be mailed or hand delivered to the District office; faxes are acceptable, if followed by the original within three (3) days.
- Notifications must be received or post-marked at least 10 business days prior to the start of demolition or renovation.
- Incomplete forms will be returned for correction. The 10 day clock does not start until a correctly completed notification is received by the District office.
- If a person cancels a notification, they may request a fee refund provided:
  1. the fee has been paid,
  2. the District has not performed an inspection,
  3. the request is in writing,
  4. and the request is made within ten days following cancellation.
- When a Fire Department receives a fee or donation from the property owner of a structure that is to be used for fire training purposes, the notification/inspection fee noted above shall be paid. Coordinated Burn Authorization Permits are required for Fire Department training burns; however they are exempt from the permit fees (Regulation II, Rule 408(C)(4)).
- **Rule 401 (B)** - Where a demolition project includes the removal of Regulated Asbestos Containing Material from a facility prior to the wrecking of the structure, the *removal is treated as a separate renovation project for the purposes of fees*, although they may be included in a single notification. **This requires a second 2 X fee.**
- Any demolition or renovation project that requires physical barriers for the purpose of controlling asbestos emissions (containment) shall install transparent viewing ports which allow observation, to the extent possible, of all stripping and removal of regulated asbestos containing material from outside the containment area.

Questions on completing the asbestos demolition / notification form, or on the NESHAP regulations covering asbestos, can be directed to District staff at (707) 443-3093.

# **Asbestos Testing Labs**

## **AmeriSci Los Angeles**

24416 S. Main St. Suite 308

Carson, CA 90745

Phone (310) 834-4868 Fax (310) 834-4772

jcortes@amerisi.com

## **Asbestos Science Technologies, Inc.**

P.O. Box 505

Bangor, CA 95914

530-518-0934

astinc17@yahoo.com

## **Asbestos TEM Laboratories, Inc.**

630 Bancroft Way

Berkeley, California 94710-2224

Phone (510) 704 8930, FAX (510) 704 8429

Info@asbestostemplabs.com

## **Forensic Analytical Laboratories, Inc.**

3777 Depot Road, Suite 409

Hayward, CA 94545

(800) 827-FASI toll free

(510) 887-8828 phone

(510) 887-4218 fax

info@forensica.com

For residential home owners:

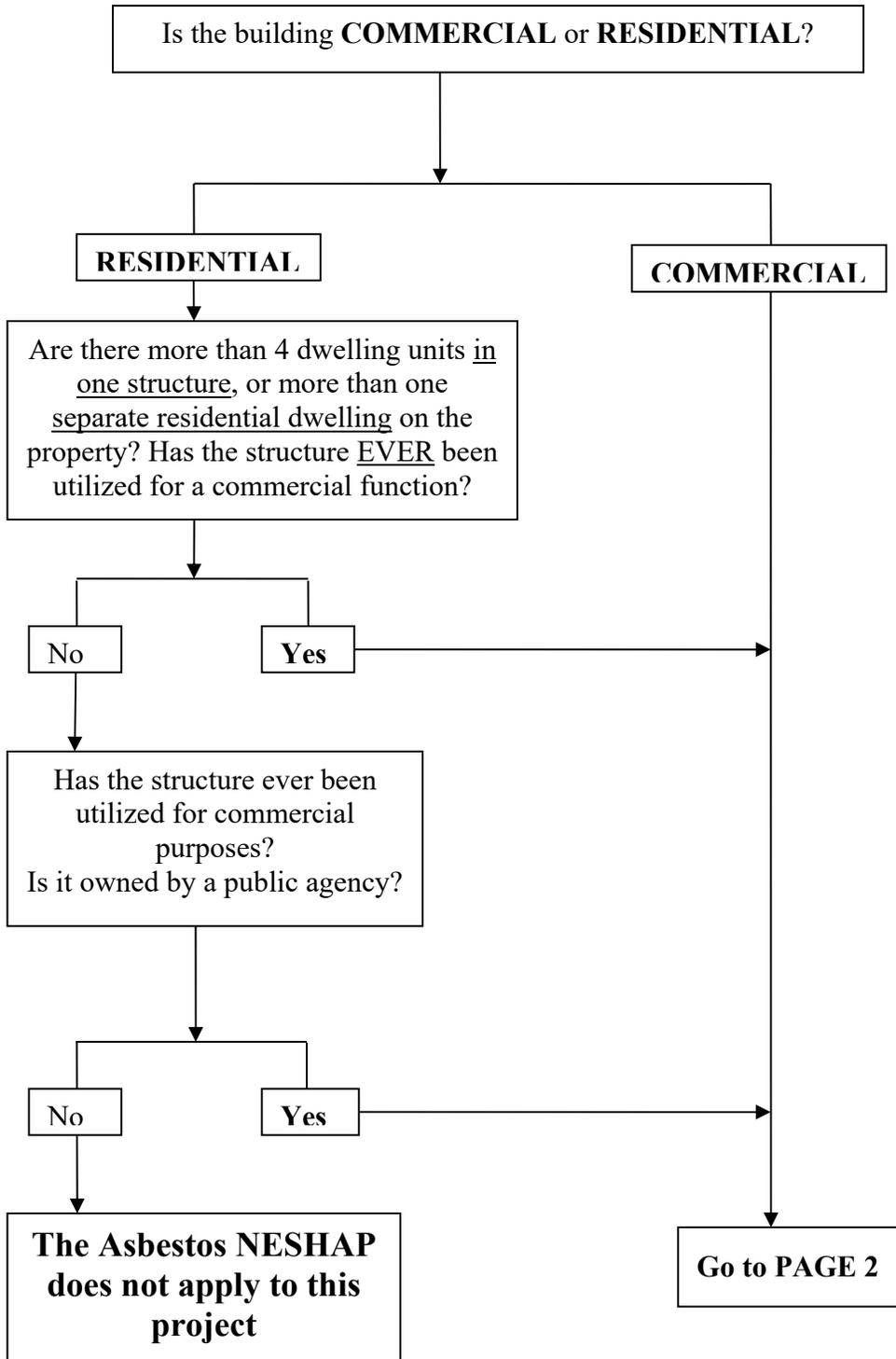
**Asbestos Self Test Kits can be found using Google search @**

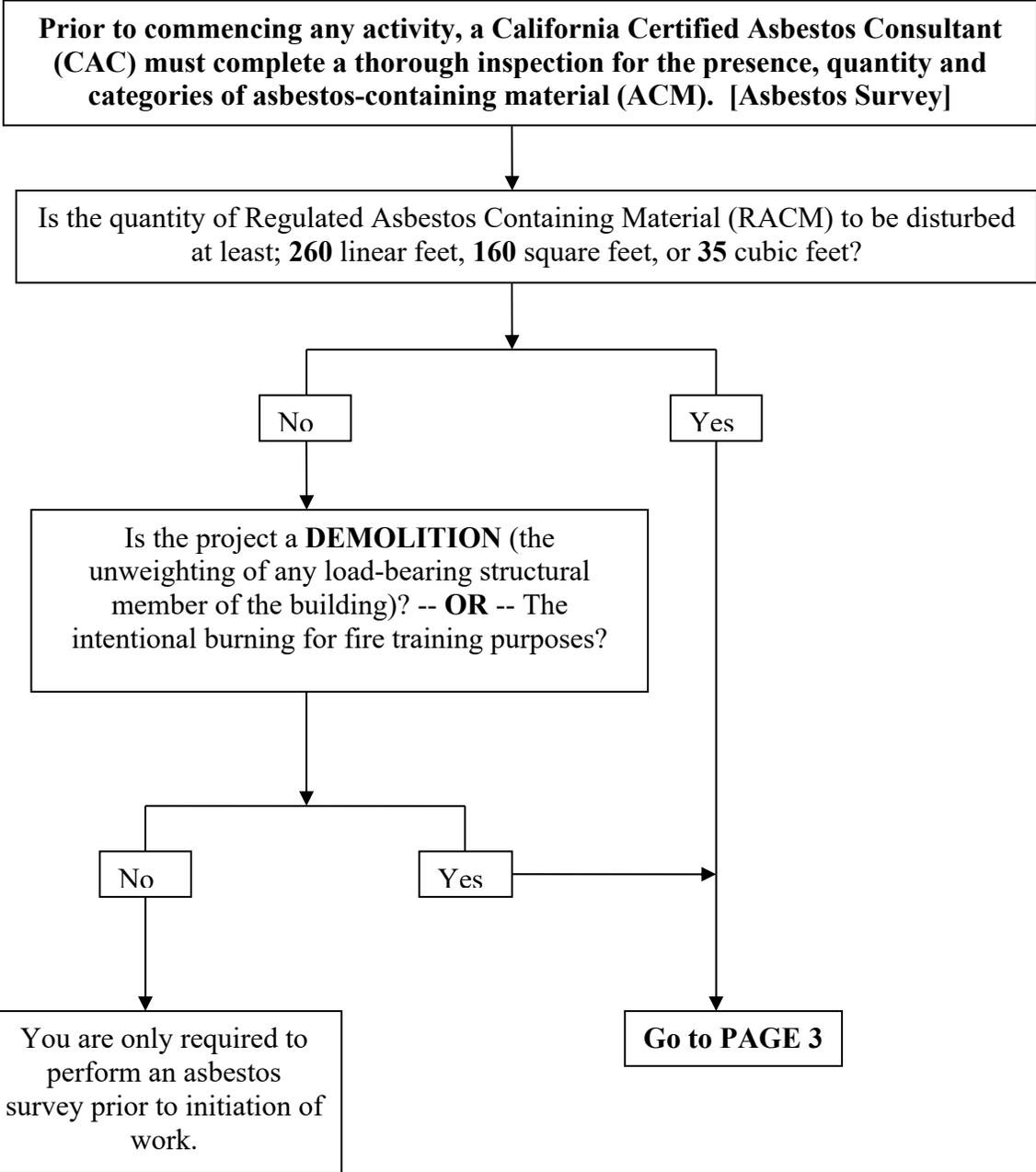
[https://www.google.com/search?q=Asbestos+Self+Testing+Kits&](https://www.google.com/search?q=Asbestos+Self+Testing+Kits&ie=utf-8&oe=utf-8&aq=t&rls=org.mozilla:en-US:official&client=firefox-a)

[ie=utf-8&oe=utf-8&aq=t&rls=org.mozilla:en-](https://www.google.com/search?q=Asbestos+Self+Testing+Kits&ie=utf-8&oe=utf-8&aq=t&rls=org.mozilla:en-US:official&client=firefox-a)

[US:official&client=firefox-a](https://www.google.com/search?q=Asbestos+Self+Testing+Kits&ie=utf-8&oe=utf-8&aq=t&rls=org.mozilla:en-US:official&client=firefox-a)

# GUIDE TO ASBESTOS NESHAP QUESTIONS





## REGULATED RENOVATIONS AND DEMOLITIONS

- 1) You must submit an Asbestos Survey and completed Notification Form at least 10 working days prior to initiating work on the project.
- 2) Demolitions:
  - a) Requires a 2-**X** notification fee (unless the building is donated to a fire department for training purposes).
  - b) (Regulation IV, Rule 401, §1.1.2) An additional 2-**X**\* fee is added if Asbestos Abatement is required **for a Demolition** Project.
- 3) Renovations require only a 2-**X**\* notification fee.
- 4) IF, after notification has been submitted, the quantity of asbestos containing material (ACM) changes by at least 20%, then update the notification.
- 5) IF, after notification has been submitted, the start date changes to a date after the original start date, then notify by phone as soon as possible AND provide written notice as soon as possible AND no later than original start date.
- 6) IF, after notification has been submitted, start date changes to a date earlier than the original start date, then provide written notice at least 10 days prior to the new start date.

**IN NO EVENT SHALL A PROJECT START ON A DATE OTHER THAN THE DATE CONTAINED IN THE WRITTEN NOTIFICATION.**

(40 CFR 61.145 (b) (iv) (C))

\* The **X** value changes annually.  
Call to get current value: 707-443-3093

**NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT**

**NOTIFICATION OF DEMOLITION OR RENOVATION SUBJECT TO ASBESTOS NESHAP's (40 CFR 61.145)**

**IMPORTANT: Notifications must be signed in ink. All numbered items must be addressed, regardless of applicability - e.g., enter N/A where numbered items don't apply to your project. Only originals accepted.**

Operator Project #	Postmark	Date Received	Notification #	
<b>I. TYPE OF NOTIFICATION</b> Circle One: <b>O</b> = Original <b>R</b> = Revised <b>C</b> = Canceled				
<b>II. FACILITY INFORMATION</b> <i>(Identify owner, removal contractor and any other contractors)</i>				
OWNER NAME:				
Address:				
City:	State:	Zip:		
Contact:		Tel:		
ASBESTOS REMOVAL CONTRACTOR:			DOSH Reg #	
Address:				
City:	State:	Zip:		
Contact:		Tel:		
OTHER DEMOLITION OR RENOVATION OPERATOR:				
Address:				
City:	State:	Zip:		
Contact:		Tel:		
<b>III. TYPE OF OPERATION</b> Circle One: <b>D</b> = Demolition <b>O</b> = Ordered Demolition <b>R</b> = Renovation <b>E</b> = Emergency Renov.				
<b>IV. IS ASBESTOS PRESENT</b> Circle One:        (Yes    No)				
<b>V. FACILITY DESCRIPTION</b> <i>(Include building name, number and floor or room numbers)</i>				
Bldg. Name:				
Address:				
City:	State:	Zip:	County:	
Site Location:				
Building Size:	# of Floors:	Age in Years:		
Present Use:		Prior Use:		
<b>VI. PROCEDURE USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL</b> {An asbestos survey performed by a California "Certified Asbestos Consultant", is required to process this notification}				
<b>C.A.C. Certification #</b>		<b>Certification Expiration Date:</b>		
<b>VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING:</b>				
1. Regulated ACM to be Removed		RACM To Be Removed	Nonfriable Asbestos Material To Be Removed	Indicate Unit of Measurement Below
2. Category I ACM to be Removed				
3. Category II ACM to be Removed				
			Category I	Category II
Pipes				Ln Ft:      Ln m:
Surface Area				Sq Ft:      Sq m:
Vol. RACM Off Facility Component				Cu Ft:      Cu m:
<b>VIII. SCHEDULED DATES ASBESTOS REMOVAL</b> (MM/DD/YY)		<b>Start:</b>		<b>Complete</b>
<b>IX. SCHEDULED DATES DEMO/RENOVATION</b> (MM/DD/YY)		<b>Start:</b>		<b>Complete</b>
<b>X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED (attach additional sheets as necessary):</b>				
<b>District Use Only</b>		<b>Date Payment Received:</b>	<b>Payment Method:</b>	<b>Check Number:</b>
				<b>Amount:</b>

**XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION OR RENOVATION SITE (attach work plan, if appropriate):**

**XII. WASTE TRANSPORTER #1**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Tel: \_\_\_\_\_

**WASTE TRANSPORTER #2**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Tel: \_\_\_\_\_

**XIII. WASTE DISPOSAL SITE**

Name: \_\_\_\_\_ Tel: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

**XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY PLEASE IDENTIFY THE AGENCY BELOW (attach copy of demolition order):**

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Authority: \_\_\_\_\_

Date of Order (MM/DD/YY): \_\_\_\_\_ Date Ordered to Begin (mm/dd/yy): \_\_\_\_\_

**XV. FOR EMERGENCY RENOVATIONS**

Date and Hour of Emergency (mm/dd/yy): \_\_\_\_\_

Description of the Sudden, Unexpected Event: \_\_\_\_\_

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden: \_\_\_\_\_

**XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND, OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES FRIABLE:**

**XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING ALL ASBESTOS ABATEMENT, AND EVIDENCE THAT THE REQUIRED CERTIFICATION ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION BY REGULATING AUTHORITIES DURING NORMAL BUSINESS HOURS.**

\_\_\_\_\_ (Print Name of Owner/Operator) \_\_\_\_\_ (Signature of Owner/Operator)

**XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.**

\_\_\_\_\_ (Print Name of Owner/Operator) \_\_\_\_\_ (Signature of Owner/Operator)

Any owner or operator of a demolition or renovation project which is subject to 40 CFR-61, Subpart M (NESHAPS) for asbestos and is required to submit a written notification of the demolition/renovation to the NCUAQMD shall submit the following fee with the notification form (for latest "X" value, go to [www.ncuaqmd.org/index.php?page=rules.regulations](http://www.ncuaqmd.org/index.php?page=rules.regulations)):

- SINGLE DEMOLITION – OR – RENOVATION PROJECTS ..... 2 X**
- ASBESTOS ABATEMENT accompanying a demolition (Regulation IV, Rule 401, §1.1.2) . . . . . 4 X**

Fire Department training burns shall be exempted from the fees noted above.