

Pinal County Air Quality Control District

ASBESTOS NESHAP REGULATIONS

FOR DEMOLITION & RENOVATION



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Does your Renovation or Demolition qualify for a survey?

Unless the facility is exempt, every renovation or demolition requires a survey. Generally, only an AHERA-certified inspector has adequate credentials to perform the survey.

- ⊕ Residential dwelling units of 4 or fewer units are generally exempt.
- ⊕ Use of a dwelling unit for other purposes, such as a commercial office or commercial storage, will negate the exemption, apparently for all time.
- ⊕ Isolated nuisance abatement projects remain exempt, but systematic urban renewal projects lose the exemption, even if each affected unit would be individually exempt.
- ⊕ Burning an otherwise exempt building for fire-suppression training purposes will negate the exemption.

Categories of Asbestos

- ⊕ Material containing asbestos in excess of 1% constitutes “asbestos containing material,” or “ACM”
- ⊕ Friable ACM constitutes “Regulated Asbestos Containing Material,” or “RACM.” “Friable” means subject to crumbling or pulverization with hand pressure.
- ⊕ Certain ACM materials are presumably not friable:

Category I—Nonfriable ACM generally consists of asphaltic materials, such as roof shingles, roofing paper, caulking compounds, and floor tiles where the asbestos fibers tend to remain adhesively bound by the asphalt material.

Category II—Nonfriable ACM consists of asbestos cement products, such as transite siding or roofing panels; again, the asbestos fibers are generally bound in the product structure.

Category I and Category II ACM become RACM if:

1. They are in “poor condition”
2. The demolition or renovation operations will likely cause any significant quantity of ACM to become friable.

Does your Demolition qualify for a NESHAP Notification?

All demolition activity, except on an exempt facility, requires a notification.

Demolition means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

Does your Renovation qualify for a NESHAP Notification?

Renovation of a nonexempt facility only requires a notification if the project exceeds certain size thresholds:

Renovation includes facility modifications that do not amount to a demolition. A notification is only required if the renovation project will disturb RACM, or likely RACM, that exceeds certain quantities, namely:

1. 260 linear feet on pipes
2. 160 square feet on other building components
3. 35 cubic feet of removed material

Notification & Inspection Fees

The required NESHAP notification form may be obtained from Pinal County Air Quality or downloaded from our website located at:

[Pinal County Air Quality](#)

Pinal County charges a \$100 fee for each notification turned in. The fee must be paid in full when the notification is received by the Air Quality Control District.

All notifications must be postmarked or delivered at least 10 working days prior to beginning activity that would affect RACM.

For the purpose of defraying the District's cost of sampling for asbestos in facilities subject to the asbestos NESHAP the owner or contractor conducting the project shall either:

- ⊕ Perform post-inspection sampling & confirming analysis to verify the absence or presence of asbestos on the site as may be required to support assertions made in the notification.
- ⊕ Reimburse the District for the cost of performing sampling and confirming analysis to verify the absence or presence of asbestos on the site as may be required to support assertions made in the notification.

Control Requirements

If an affected facility is being burned as a method of demolition, all ACM, including RACM, Category I nonfriable ACM & Category II nonfriable ACM, must be removed prior to burning.

When stripping RACM from still-standing facility components, the whole of the RACM must be kept wet unless the stripping operation would cause safety hazards, in which case the contractor must use some other form of pre-approved emission control.

Certain large components, such as steam generators, may be removed without first stripping the RACM, if the removal process will not disturb the RACM, & the component is encased in a leak-tight wrapping & properly labeled.

Wetting the RACM may be skipped if the contractor documents that the ambient temperature was below freezing throughout the workday, and "best measures" are taken to remove the material in sections that are intact.

The removal of RACM must be supervised by an AHERA-certified individual.

If a source has submitted an annual "blanket notification", all renovation activity must fully comply with any applicable control & handling requirements.

Handling & Transportation Requirements

The handling and transport requirements apply to asbestos containing waste material (ACWM), which includes materials tainted with, or potentially tainted with RACM, other than:

Demolition debris that contains a maximum possible RACM content that does not exceed the 260/160/35 thresholds; or

Segregated Category I nonfriable ACWM & Category II ACWM, "that remains in good condition," has not become friable, and will not become friable as a result of the handling & transport.

During the collection & loading of ACWM, no visible emissions are allowed. Emissions should be controlled by keeping the material adequately wet.

During the loading & unloading of any asbestos containing waste, proper warning signs must be displayed on the transport vehicles.

For all ACWM shipped, the owner/operator must properly manifest the material, must follow up if a counter-signed manifest is not received back from a proper disposal facility & must contact the affected regulatory agency if such a return manifest is not forthcoming within 45 days.

Disposal Requirements

All ACWM must be sent to a disposal site operated in accordance with 40 CFR §61.154. As used here, “ACWM” does not include:

- ⊕ Provided they are not friable & remain in good condition, Category I ACWM (e.g. asphalt shingles or vinyl floor tile) is considered exempt from the NESHAP. However, disposal of such materials in a manner that crushes the structure will likely release asbestos & therefore will trigger the NESHAP. That would cause the disposal facility to fall subject to regulation under 40 CFR §61.154. Since typical landfill operations involve mechanically compacting waste materials, the landfill operator has an obligation to either exclude, or knowingly manage, such asbestos materials.
- ⊕ Provided they are not friable & remain in good condition, Category II nonfriable ACWM (e.g. asbestos cement materials such as pipe or siding panels) is exempted by EPA guidance. However, disposal of such materials in a manner that crushes the structure will likely release asbestos & therefore will trigger the NESHAP. That would cause the disposal facility to fall subject to regulation under 40 CFR §61.154. Since typical landfill operations involve mechanically compacting waste materials, the landfill operator has an obligation to either exclude, or knowingly manage, such asbestos materials.

Definitions

AHERA

- ⊕ Asbestos Hazard Emergency Response Act

Asbestos

- ⊕ Means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cumingtonite-grunerite, anthophyllite, and actinolite-tremolite.

CAT I (Category I) nonfriable asbestos-containing material (ACM)

- ⊕ Means asbestos-containing packing, gaskets, resilient floor covering, & asphalt roofing products containing more than 1% asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy.

CAT II (Category II) nonfriable ACM

- ⊕ Means any material, excluding Category I nonfriable ACM, containing more than 1% asbestos as determined using the methods specified in Appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Demolition

- ⊕ Means the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

Friable

- ⊕ Means any material that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

NESHAP

- ⊕ National Emission Standards for Hazardous Air Pollutants

RACM Regulated asbestos-containing material

- ⊕ Means (a) friable asbestos material, (b) Category I nonfriable ACM that has become friable, Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) 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 operations.

Renovation

- ⊕ Means altering one or more facility components in any way, including the stripping or removal of RACM from a facility component.