

Asbestos NESHAP

Iowa Waste Reduction Center / University of Northern Iowa – An Equal Opportunity Provider and Employer
319-273-8905 or 1-800-422-3109

Do these regulations apply to my operation?

The asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP 40 CFR Part 61) applies to any facility that is an institutional, commercial, public or industrial installation or building, including ships and active waste disposal sites. Residential buildings are also subject if they are demolished or renovated as part of a commercial, public, industrial or institutional project.

The NESHAP requirements apply to the renovation and/or demolition of these facilities.

General Requirements

The Asbestos NESHAP applies to all renovation or demolition projects. The NESHAP requirements exist to prevent the release of asbestos into the outdoor atmosphere. For this reason, most requirements apply **before** renovation and/or demolition occurs. The Asbestos NESHAP requirements fall into the following categories:

INSPECTION

- All buildings must be thoroughly inspected for asbestos-containing material (ACM) prior to renovation or demolition.
- A thorough inspection requires all suspect ACM to be sampled and analyzed in a laboratory for asbestos percentage. If they are not sampled and tested, they must be assumed to contain asbestos.
- Testing will determine if the project is above or below the established regulatory thresholds.
- The entire area to be renovated or demolished must be inspected.
- The inspector must have thorough knowledge of asbestos, sampling techniques, and asbestos regulations.

DEMOLITIONS

- Demolitions are defined as the wrecking or removing of any load-supporting structural member of the facility, together with any related material handling operations, or the intentional burning of a facility.
- All facility demolitions require submission of a complete, timely and accurate demolition notification form to DNR, **even if no asbestos is found**.
- The notification form must be postmarked 10 working days (holidays that fall between Monday and Friday count as a working day) before the start date given in the notification. This allows adequate time for DNR inspectors to ensure the initial asbestos testing was thorough.
- If the total amount of Regulated Asbestos Containing Material (RACM) generated at a facility throughout a calendar year exceeds any of the following threshold amounts, all emission control and waste disposal requirements discussed in this summary apply.
 - 260 linear feet of RACM on pipes;
 - 160 square feet of RACM on other facility components; or
 - 35 cubic feet of RACM off of facility components (presumed to be removed from pipes and other facility components that could not be measured before stripping).

- If the total combined amount of RACM is below these levels, only the notification requirements apply.

RENOVATIONS

- Renovation is defined as an operation that alters a facility or any facility component in any way, including the stripping or removal of asbestos from a facility. Operations in which load-supporting structural members are wrecked or removed are demolitions (see above section).
- If the combined amount of RACM meets or exceeds any of the following threshold amounts, all notification, emission control and waste disposal requirements will apply:
 - 160 square feet of surfacing RACM;
 - 260 linear feet of RACM-insulated pipes; or
 - 35 cubic feet of RACM debris.
- If the total amount of RACM is less than these thresholds, the Asbestos NESHAP requirements do not apply.
- The notification form should be submitted at least 10 working days (holidays that fall between Monday and Friday count as a working day) before asbestos stripping or removal work commences (or other activities such as site preparation that would break up, dislodge or similarly disturb asbestos material).

ASBESTOS REMOVAL

- RACM must be removed from the facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.
- An onsite supervisor or foreman trained in the NESHAP requirements, and able to comply with them must be present during the removal of RACM.
- The RACM must be adequately wet prior to removal to prevent asbestos dust, contained in an airtight, sealed area and disposed of following guidelines below.
 - Adequately wet means: no visible emission discharges are visible to the outside air from the collection, mixing, wetting, and handling operations.
- After removal is complete, the contractor must take air samples to determine if the inside air is free of asbestos before opening the contained area.

DISPOSAL OF RACM

- RACM disposal is usually included in the contract made with the asbestos removal company.
- All RACM wastes generated in Iowa must be disposed of at a permitted sanitary landfill.
- All municipal solid waste landfills are required to abide by the Asbestos NESHAP for the disposal of asbestos-containing wastes.
- A landfill is NOT required to accept RACM, however they must provide alternative disposal options should they choose not to accept it.
- The asbestos removal company is strongly urged to contact the landfill prior to RACM transit to ensure that the landfill will accept the RACM.
- The transporter should supply the receiving landfill with test documentation showing the percentage of asbestos in the waste

material. If not, the landfill operator must automatically assume the waste is RACM.

- A waste shipment record containing the following information should accompany the transport and disposal of RACM:
 - The name, address and telephone number of the waste generator;
 - The name and address of the office responsible for administering the asbestos NESHAP program (Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Road, Suite 1, Urbandale, IA 50322, 515-281-8930);
 - The approximate quantity in cubic meters (cubic yards);
 - The name and telephone number of the disposal site operator;
 - The name and physical site location of the disposal site;
 - The date of waste transportation;
 - The name, address and telephone number of the waste transporter(s); and
 - Certification that the contents of the consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.
- A copy of this waste shipment record must be provided to the disposal site owner at the time the asbestos-containing material is delivered.
- A copy of this waste shipment record, signed by the disposal site owner or operator, must be returned to the waste generator within 45 days of the date the waste was accepted by the initial transporter.
- **The disposal of RACM does not require an individual special waste authorization.**

ADDITIONAL INFORMATION

- For a list of accredited analytical laboratories that can test for asbestos-containing material, contact National Institute of Standards and Technology (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) at (301) 975-4016.
- For a list of accredited asbestos removal companies, contact Ellen Hester at the Iowa Department of Labor (515-281-6175) or visit the IWRC vendor database at <http://www.iwrc.org>.
- For additional guidance, visit the EPA website at <http://www.epa.gov> or contact Mr. Marion Burnside, Iowa Department of Natural Resources at 515-281-8443.