



NORTHERN
SONOMA COUNTY
AIR POLLUTION CONTROL DISTRICT

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Asbestos FAQ

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Please Note: Sonoma County has two Air Districts: the Northern Sonoma County Air Pollution Control District and the Bay Area Air Quality Management District. Both Districts implement the federal asbestos rules (NESHAP), but the Bay Area has additional, regulatory requirements of its own. The Bay Area uses a "J" number to approve asbestos notification; the Northern Sonoma does not. You must provide the required notification to the Air District where your project resides. Verify what Air District you belong to at www.NoSoCoAir.net.

What is the purpose of the Asbestos NESHAP regulation?

The purpose is to protect the public health by minimizing the release of asbestos when facilities which contain asbestos-containing materials (ACMs) are demolished or renovated.

Are single-family private residences regulated by the Asbestos NESHAP?

No.

Are mobile homes or mobile structures regulated by the Asbestos NESHAP?

Mobile homes used as single-family dwellings are not subject to Asbestos NESHAP. Mobile structures used for non-residential purposes are subject to NESHAP.

What is a "facility?"

As defined in the regulation, a "facility" is any institutional, commercial, public, industrial or residential structure, installation or building (including any structure, installation or building containing condominiums, or individual dwelling units operated as a residential cooperative, **but excluding residential buildings having four or fewer dwelling units**); any ship; or any active or inactive waste disposal site. Any building, structure or installation that contains a loft used as a dwelling is not considered residential. Any structure, installation, or building that was previously subject to the Asbestos NESHAP is not excluded, regardless of its current use or function.

If I renovate several two-family units, are the units defined as a "facility?"

Residential buildings which have four or fewer dwelling units are not considered "facilities" unless they are part of a larger installation (for example, an army base, company housing, apartment or housing complex, part of a group of houses subject to condemnation for a highway right-of-way, an apartment which is an integral part of a commercial facility, etc.).

What is the difference between demolishing a facility and renovating it?

"Demolition" and "renovation" are defined in the regulation. You "demolish" a facility when you remove or wreck any load-supporting structural member of that facility or perform any related operations; you also "demolish" a facility when you burn it. You "renovate" a facility when you alter any part of that facility in any other manner. Renovation includes stripping or removing asbestos from the facility.

How much asbestos must be present before the Asbestos NESHAP work practice standards apply to renovation projects?

Asbestos NESHAP regulations must be followed for all renovations of facilities with at least 80 linear meters (260 linear feet) of regulated asbestos-containing materials (RACM) on pipes, or 15 square meters (160 square feet) of regulated asbestos-containing materials on other facility components, or at least one cubic meter (35 cubic feet) of regulated asbestos-containing materials on other facility components where the amount of RACM previously removed from pipes and other facility components could not be measured before stripping. These amounts are known as the "threshold" amounts.

How much asbestos must be present before the Asbestos NESHAP work practice standards apply to demolition projects?

Asbestos NESHAP regulations must be followed for demolitions of facilities with at least 80 linear meters (260 linear feet) of regulated asbestos-containing materials (RACM) on pipes, 15 square meters (160 square feet) of regulated asbestos-containing materials on other facility components, or at least one cubic meter (35 cubic feet) of regulated asbestos-containing materials on other facility components where the amount of RACM previously removed from pipes and other facility components could not be measured before stripping. However, all demolitions must notify the appropriate regulatory agency, even if no asbestos is present at the site, and all demolitions and renovations are "subject" to the Asbestos NESHAP insofar as owners and operators must determine if and how much asbestos is present at the site.

Who is responsible for submitting a notification -- the owner of the building which is being demolished or renovated, or the contractor?

The NESHAP regulation states that either the owner of the building or operator of the demolition or renovation operation can submit the notification. Usually, the two parties decide together who will notify. If neither provide adequate notice, EPA can hold either or both parties liable.

When a condominium complex is being renovated, who as owner, is responsible for submitting a notification?

While owners and operators share responsibility for proper notification, the condominium or co-op board is responsible as the owner. The board should ensure that they are told when work takes place on individual units, so that they can comply with notification (and other EPA) requirements, especially if multiple operators are involved.

Do demolitions of facilities in which no asbestos is present require notification?

Yes. All demolitions that meet the definition of facility must notify.