



## FREQUENTLY ASKED QUESTIONS

### **QUESTION: What types of asbestos containing building materials do not have to be removed in a building, prior to demolition?**

**ANSWER:** Federal EPA NESHAP regulations require asbestos inspections of any institutional, commercial, public or industrial building/structure prior to demolition. NESHAP also requires specific work practices (such as wetting, no visible emissions, and proper waste disposal) to protect the general public from from airborne asbestos fibers. Notification must also be submitted to the applicable state and local agencies and/or the EPA before all demolition (regardless if asbstos is present) and before renovations of buildings where specific threshold amounts of asbestos have been identified.

What specific ACM that can remain during demolition is primarily a function of individual state requirements as well as what ACM the landfill chosen for disposal will accept. However, in all cases where intentional boring is to occur, all ACM must be removed.

### **Here are 4 state examples of the differences of what ACM can remain during demolition:**

- 1. PA...** requires all regulated asbestos containing materials (RACM) which are friable to be removed. This includes:
  - Surfacing materials such as fireproofing, plasters, acoustical materials, etc.
  - Thermal system insulation such as pipe insulation.
  - Category II Non-friable ACM subject to grinding, sanding or abrading.
  - Category II Non-friable ACM such as transite including siding on structures.

#### *Specific ACM items which can remain including:*

- Flooring materials
  - Roofing materials
  - Mastics
- 2. DE/NJ/NY..** requires all ACM identified during a pre-demolition survey to be removed from the subject structure in advance of demolition; regardless of quantity or classification of the ACM and without exception.

**Note: In New Jersey,** if the structure to be demolished is deemed structurally unsound by a State Licensed Professional Engineer and pre-demolition abatement is therefore not able to be conducted, the entire demolition must be performed under the supervision of a Licensed Asbestos Abatement Contractor employing a Certified Asbestos Abatement Supervisor and the entire waste stream generated by the demolition of the structure must be disposed of as asbestos.

Before leaving any asbestos materials behind, I suggest that you contact your state and local agencies regarding any interpretations they may have for materials to remain or be abated.

When you need professional help or advice, email Alan Sutherland, CIH, CHMM at [a.sutherland@aetinc.biz](mailto:a.sutherland@aetinc.biz) or call 610-891-0114. We provide nationwide services; phone consultations are free. Check out the full range of environmental contracting/consulting services we provide at our website [www.aetinc.biz](http://www.aetinc.biz)