



FREQUENTLY ASKED QUESTIONS

QUESTION: My company is purchasing real estate which includes a commercial bank building and three adjacent homes. All buildings will be demolished and the site will be redeveloped into apartments? Is an EPA NESHAP inspection for asbestos required prior to demolition? Especially for the residential structures.

ANSWER: EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) Regulation (i.e., 40 CFR Part 61 Sub-Part M) requires an asbestos inspection for any institutional, commercial, public or industrial structure/building prior to demolition. Condominiums, apartment buildings, or individual dwelling units operated as a residential cooperative must also be inspected.

Residential homes including mobile homes, are not regulated by NESHAP. Unless (1) they are being converted to non-residential use, (2) consist of more than 4 dwelling units, or (3) residential home demolition is part of a larger redevelopment project such as a right-a-way, apartment or housing project, or other urban renewal.

In your case, all properties (including the homes) are regulated by NESHAP. The homes are part of a larger redevelopment project involving commercial use. Note that, State and Local regulations can always be stricter than Federal regulations. It is always good practice to check with State and local officials regarding specific requirements for your site.

Federal EPA NESHAP regulations require an inspection for asbestos 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 asbestos is present) and before renovations of buildings where specific threshold amounts of asbestos have been identified.

When you need professional help or advice, email Roy Mosaicant, CIH at r.mosaicant@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.

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