

Explanation of:  
**Description of Demolition / Renovation**

The asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) governs the removal and handling of asbestos containing material (ACM), which is categorized as a Hazardous Air Pollutant. The following will explain the necessity to provide a “Description of the Planned Demolition or Renovation” as part of the NESHAP’s notification requirements. This description should be provided on line No. 14 of the District’s notification form.

**40 CFR 61.145(b)(4)(x)**

- “Description of planned demolition or renovation work to be performed and methods to be employed, including demolition or renovation techniques to be used and description of affected facility components.”
- 40 CFR 61.140 –
  - o Demolition – 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 a facility.
  - o Renovation – Altering a facility or one or more facility components in any way, including stripping or removal of Regulated Asbestos Containing Material from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

**Plain English:**

- Describe what demolition or renovation work will take place. Include in your description the methods and techniques to be used, and identify the areas and building components that will be altered.
  - o A demolition is the wrecking or taking out of any load-supporting structural member and/or burning.
  - o A renovation is anything that is not a demolition.

**Checklist:**

- 1 – Describe the demolition or renovation generally.
  - a – Ex: full/partial demolition, full gutting for renovation, replacing, repairing, disassembling, installing, replacing, etc.
- 2 – Specifically:
  - a – What methods/techniques will be used to perform the work?
  - b – What areas will the work take place in?
    - i – “Throughout the facility” is only acceptable in limited circumstances.
    - ii – Floor number, room number, east or west hallway, etc.
  - c – What facility components will be affected by the work?

### **Goal of Demolition/Renovation Description:**

The goal of the District's asbestos program is to abate ACM before or take precautions not to disturb ACM during demolition or renovation projects (DRP). Thus, the demolition/renovation project description should describe what areas or components of the building will be altered and what activities will be performed in sufficient enough detail to enable the District to identify areas and activities that might disturb ACM. An insufficient description can lead to other insufficiencies elsewhere on the notification.

For instance, the detailed description of a demolition/renovation project sets the scope of the asbestos survey. This means the survey should cover all building areas and components identified in the description, and should be as destructive as the demolition/renovation project activities listed to be used. **The crucial goal shared between the detailed description and the asbestos survey is to ensure that all areas, components, and activities have been identified and surveyed. The inspector should be able to state there is no asbestos in the project area other than what is identified on the survey, and “the demolition/renovation project will not disturb any other materials containing asbestos other than that which will be abated or protected from disturbance.”**

### **Example:**

A demolition/renovation project proposes to replace an existing sprinkler system inside a factory. The District would want to know if “replace” means removing the existing system, installing a new system, or replacing certain components. Also, the District needs to know the following: In what parts of the factory will work take place; what methods will be used to remove the existing system; how will the new system be installed; what factory components will be altered; whether or not these areas and components contain ACM; and **MOST IMPORTANTLY, that removal and installation will not disturb any other asbestos other than that which will be abated.**