

## ASBESTOS FREQUENTLY ASKED QUESTIONS (FAQs)

(Updated June 4, 2025)

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## **I. GENERAL INFORMATION**

### **What is asbestos?**

Asbestos is a group of naturally occurring fibrous minerals that are resistant to heat and corrosion. Chrysotile asbestos (or white asbestos) is the most common type used in construction applications. Asbestos is heat resistant, very strong, and has remarkable insulating properties, making it a desirable material in construction.

Friable asbestos-containing material – any material that contains asbestos in an amount greater than 1% asbestos by weight, area, or count and friable, and that falls into one or more of the following categories, as defined in Bay Area Air Quality Management District's (Air District or Bay Area Air District) Regulation 11, Rule 2, Section 222:

- A material that can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure (example: sprayed-on fireproofing).
- A material that can be rendered to a crumbled, pulverized or powdered state when dry, by crushing, sanding, sawing or shot-blasting or other demolition or renovation techniques.
- A material in which asbestos fibers are bound into a matrix, if such material has been rendered to a powdered state, when dry, by crushing, sanding, sawing or shot-blasting or other demolition or renovation techniques, or by severe weathering.

Non-friable asbestos-containing material – any material that contains asbestos in an amount greater than 1% asbestos that cannot be crumbled or pulverized under hand pressure. Note: non-friable asbestos-containing material may be rendered friable via the techniques described above.

### **Where is asbestos typically found in a structure and how can I be certain asbestos is present?**

Asbestos can be found in various locations throughout a structure. Some examples include, but are not limited to, acoustic ceilings, taping mud on sheetrock, joint compound, plaster, flooring, mastic, heating ducts, stucco, flue pipes, pipe lagging, and roofing. Anything that is not wood, metal, glass, rubber, or a combination thereof is considered suspect for asbestos. To determine the presence of asbestos, a sample must be taken to a laboratory and tested; polarized light microscopy (PLM) is one of the most common asbestos testing methodologies.

### **What are the health effects of asbestos exposure?**

Asbestos exposure has been known to cause a number of adverse human health effects, including disabling and fatal diseases such as asbestosis, lung cancer, and mesothelioma. Asbestos-related diseases typically develop years after exposure to asbestos. There is no safe level of exposure to asbestos; therefore, all exposure to asbestos should be avoided.

There are three exposure routes for asbestos fibers: (1) inhalation via the respiratory system; (2) ingestion via the mouth, associated with asbestos fibers in drinking water; and (3) skin contact.

### **When was asbestos banned in the United States?**

In 1989, the United States Environmental Protection Agency (U.S. EPA) issued the Asbestos Ban and Phase-Out Rule (ABPR), which banned the manufacturing of asbestos-containing products, but this rule was overturned in 1991. It is only recently (in March 2024) that the U.S. EPA finalized the risk management rule for chrysotile asbestos. This rule prohibits the ongoing use of chrysotile, the only known form of asbestos currently imported, processed, and distributed in the United States ([U.S. Federal Bans on Asbestos](#)).

There is no international ban on asbestos use and some countries, from which the United States imports construction materials, still permit asbestos use (*Source:*

[https://pmc.ncbi.nlm.nih.gov/articles/PMC2920923/#:~:text=Because%20there%20is%20no%20international,use%20asbestos%20\(USGS%202009a\)\)](https://pmc.ncbi.nlm.nih.gov/articles/PMC2920923/#:~:text=Because%20there%20is%20no%20international,use%20asbestos%20(USGS%202009a)))).

### **Who regulates asbestos?**

The U.S. EPA and the Occupational Safety and Health Administration (OSHA) are the primary federal agencies that regulate asbestos in the United States. At the state level, the California Air Resources Board (CARB) and California Contractors State License Board (CSLB) regulate asbestos. At the local level, air pollution control districts or air quality management districts, such as the Bay Area Air Quality Management District (Bay Area District or Air District), regulate asbestos.

## **II. AIR DISTRICT ASBESTOS REGULATION 11, RULE 2 (Reg. 11-2)**

### **Why does the Bay Area Air Quality Management District regulate asbestos?**

In 1946, the California Legislature enacted the first air pollution control law authorizing the formation of county air pollution control districts. In 1955, the Bay Area Air Pollution Control Law was adopted, establishing the Bay Area Air Pollution Control District (later renamed the Bay Area Air Quality Management District) as the first regional air pollution control agency in the nation. The Air District has delegated authority to enforce the federal asbestos regulation. In 1976, the Air District developed its own asbestos regulation (Reg. 11-2), which is more stringent than the federal regulation.

**Where can I find a copy of the Air District asbestos regulation?**

You can find a copy of Air District Regulation 11, Rule 2 on the [Air District's website](#).

**Does Reg. 11-2 apply to me? i.e., am I under the Bay Area Air District's jurisdiction?**

Please visit the [map of the Air District's jurisdiction](#), which consists of the following 9 counties: Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano (southwest portion only), and Sonoma (southern portion only).

**Who is on the Air District Board of Directors?**

The Air District Board of Directors is made up of representatives from each county within the Air District's jurisdiction. Please visit the Air District [Board of Directors page](#) for further information.

**What is Regulated Asbestos Containing Material (RACM)?**

Regulated Asbestos-Containing Material is defined in Section 11-2-233 of Reg. 11-2.

*11-2-233 Regulated Asbestos-Containing Material (RACM):*

*233.1 Friable asbestos-containing material, as defined in Reg. 11-2, Sections 11-2-222 or,*

*233.2 Category I nonfriable (asphaltic) asbestos-containing material that has or will become friable, or that has been subjected to sanding, drilling, grinding, cutting, or abrading.*

*233.3 Category II (cementitious) nonfriable asbestos-containing material that may become or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation work.*

**What is the difference between demolition and renovation?**

Reg. 11-2 defines demolition as the wrecking, dismantling, or intentional burning of a structure. Renovation is the removal or abatement of RACM.

*11-2-216 Demolition:* Wrecking, intentional burning, moving or dismantling of any load-supporting (or load bearing) structural member, or portion thereof, of a building, facility or ship. This includes, but is not limited to, any related cutting, disjoining, stripping or removal of structural elements.

*11-2-235 Renovation:* An operation other than demolition in which RACM is removed or stripped from any element of a building, structure, plant, ship, installation or portion thereof.

**At what percentage does Asbestos Containing Material (ACM) become regulated?**

Greater than 1% by weight, area, or count and friable.

**III. JOB NUMBER (J #) NOTIFICATION**

**What is a job number? The City/County building department requires an Air District job number prior to structural demolition and asked that I apply for a J #.**

Section 11-2-401.3 of Reg. 11-2 requires that for every demolition of load-supporting/load-bearing structure OR for every renovation involving the removal of 100 square feet (sq. ft.)/100 linear feet (linear ft.)/35 cubic feet (cu. ft.) or greater of Regulated Asbestos Containing Material (RACM), a notification must be made to the Air District by the property owner or contractor at least 10 working days prior to the commencement of a demolition/renovation. For residential buildings of four or fewer dwelling units, a 72-hour prior notification is acceptable with the payment of an additional fee.

The J # is proof that the notification requirements of Reg. 11-2 have been met. This information then allows Air District staff to conduct an inspection to determine compliance with all other requirements of Reg. 11-2.

**Is a demolition permit from a City/County building department the same as the J #?**

No. A demolition permit from a City/County building department is different from the Air District's J #. A J # is one of the requirements to get a demolition permit from a City/County.

**How do I know if a J # exists for a site?**

Please contact the Air District's [Public Records](#).

**What are the different types of J numbers?**

There are two different types of J numbers. A **Demolition J number** is required for every demolition of load-supporting/load-bearing structures. A **Renovation J number** is required for the removal of 100 sq. ft./100 linear ft./35 cu. ft. or greater of Regulated Asbestos Containing Material (RACM). Renovation J numbers are further classified as Renovation, Planned Renovation, and Cumulative Renovation.

**Does the Air District issue Letters or Certificates of Exemption if I do not need a J #?**

No. The Air District does not issue formal Letters or Certificates of Exemption related to asbestos.

**What should I do if I need to change or correct the information for my J # after I have already submitted it?**

While some fields are editable by the applicant (contractor information and the schedule within constraints), some fields are only editable by the Air District Asbestos Technicians (e.g., the project site address), others have a process that must be followed (e.g., total removal amount), and some are not editable by either the applicant or Air District staff (e.g., the Job Name/Title , Property Type, and J number type). Please email the Air District Asbestos Technicians at [asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov) with any questions about allowable changes.

**A. ONLINE ACCOUNT CREATION AND MANAGEMENT****Where do I apply for a J #?**

You may apply for a J # through the [Air District's Asbestos website](#).

**How do I get to the Air District's Online Asbestos Notification System?**

The Air District's Online Asbestos Notification System, also known as MyAirOnline, can be accessed through the [Air District's Asbestos website](#) or through the [MyAirOnline](#) direct link. You must create an account in order to use the portal.

**Where can I obtain an asbestos Renovation or Demolition notification form?**

The Air District only accepts online applications through the [MyAirOnline](#) portal.

**How do I edit my User Account Contact information or change my password?**

Once signed in to your account, click 'My Account' in the upper right-hand corner of the Customer Portal Home Page. From there, you may edit your Contact Information or change your password.

**What are the criteria for a valid password?**

Minimum of 8 characters, which must include at least 1 number and 1 uppercase letter.

**What if I forgot my password?**

Please click the “Forgot password” link from the login page. An email will be sent to the email address you provided for instructions to reset your password.

**What if the system says my e-mail address is invalid during account creation?**

1) Please check your spelling. The system expects an email address in the following format: XXXXXXXX@XXX.XXX

2) Try another e-mail address. If you still have problems, contact the Asbestos Help Desk (Email: [asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov); Phone: 415-749 4762).

**How do I apply for a J #?**

After creating an account and/or logging into the system, click on Apply for a Renovation or Demolition Job (Asbestos J # Notification) – which is the brown box towards the bottom of the screen. That will bring you to the 6-step application. Fill out the information and pay for the fees. Once paid for, the J # should be available for download.

**How long does it take to get a J #?**

Contractors and property owners with approved notifications will immediately receive an Asbestos Demolition/Renovation J # from the Air District with an Acknowledgement Letter available to download and print.

If the notification is not approved within 5 minutes of successfully submitting payment, please email the Air District Asbestos Technicians at [asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov) with the application number so that the Air District can determine what additional processing is needed.

**What browser should I use to access the Air District’s Online Asbestos Notification System?**

The Air District’s Online Asbestos Notification System is optimized for access through the Google Chrome or Microsoft Edge browsers on a computer.

**What should I do if the Air District’s Online Asbestos Notification System isn’t working as expected?**

Our portal is optimized for access through the Google Chrome or Microsoft Edge browsers on a computer. Please make sure you are using the most recently updated version of the browser. It is not optimized for access on a tablet, phone, or other browsers, like Safari, Firefox, or Internet Explorer, so you might encounter more issues if using those devices or browsers.

Next, please try 1) clearing your cache and cookies, 2) restarting your browser, and 3) restarting your computer.

If you are still getting an error message or encountering an issue, please take a screenshot of the issue, email it to the Air District Asbestos Technicians at [asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov) and include information about the steps you took before the error occurred. A screenshot is best so the Air District Asbestos Technicians can see exactly what you are seeing.

## **B. FEES AND PAYMENTS**

### **Is there a fee associated with a J #?**

Yes. [Air District Regulation 3, Schedule L](#) imposes a fee as authorized by the California Health & Safety Code.

### **Are J # fees refundable? Is there a cancellation fee?**

Notification fees are refundable if the job is withdrawn through the Air District's Online Asbestos Notification System **prior to the start date** notified to the Air District. A cancellation fee applies.

### **Is there a Fast-Track Fee for a J # application?**

Yes. For renovation or demolition projects at single-family dwellings or residential buildings with 4 or fewer units, J # applicants can pay an additional fee, known as an expedited fee or fast-track fee, that allows for the start of the respective renovation or demolition project within 72 hours of Air District application approval.

### **Can I pay online?**

Yes. Payment is only accepted online, and credit card payment is now integrated into the Air District's Online Asbestos Notification System. Contractors and property owners of approved notifications will immediately receive an Asbestos Demolition/Renovation J # with an Acknowledgement Letter from the Air District, available to download and print.

### **Can I send a check for payment?**

No. Since November 9, 2022, manual payments including checks and money orders are no longer accepted by the Air District. Acceptable payment options include credit cards, eChecks, and debit cards.

**What credit cards can I use to pay?**

Visa, Master Card, or Discover. Our payment provider currently doesn't accept American Express.

**What is the current asbestos fee schedule?**

Please see Air District [Regulation 3, Schedule L](#).

**Can I apply for a J # if I don't have a work Start Date?**

Yes. However, you must provide a 10-working day notice and an estimated work Start Date. Once you receive a J #, you may revise the work Start Date (NOTE: revisions must be made prior to 11:59 PM of the work Start Date originally notified to the Air District and cannot be back dated).

**If I did not perform the work, can I get a refund of my J # payment?**

Notification fees are refundable if the job is withdrawn through the Online Asbestos Notification System prior to the Start Date notified to the Air District. A cancellation fee applies.

**If I did not perform the work, can I use my J # for a future project?**

No. J numbers are exclusive for each project and may not be used for future projects.

**C. WORK SCHEDULE****What does it mean that the Start and End Dates specified on my J # are not a work window?**

This means that the renovation or demolition project should begin on the Start Date and finish on the End Date specified in the J #.

**The City/County where my project is located requires that I apply for a J # as part of my application for a demolition permit. I do not know exactly when I will start my demolition project. What should I do?**

You can put dates in advance as a placeholder in your J # application. Once you determine the exact start and end dates of your demolition project, you need to adjust these dates accordingly in your Air District's portal to reflect the accurate Start and End Dates of the

project. The two constraints are that you cannot backdate the dates, and the changes must be made before the respective date in the system has passed. Failure to do so may result in the issuance of a Notice of Violation.

**I have not started my renovation/demolition project, why am I getting a Notice of Violation? I have not polluted the air.**

If a J # is active (i.e., a demolition or renovation activity is assumed to be occurring based on the specified start and end dates on the J #) in the Air District's system, an Air District Air Quality Specialist may conduct an unannounced site inspection of the project. If the Air Quality Specialist does not observe any activity on site when a J # is active in the Air District's system, the notifier may have forgotten to revise the dates in the Air District's portal to reflect an accurate start date. A Notice of Violation may be issued for violating Air District Section 11-2-401.5 of Reg. 11-2, which states:

*Schedule Changes and Up-dates: Any changes to any aspect of a notification submitted in accordance with Section 11-2-401.3 must be reported to the APCO. These changes shall include, but are not limited to, changes in the notified starting or completion dates, changes of amounts of RACM to be removed, and changes of contractor or waste disposal site. It shall be the responsibility of the person making the initial notification of intent to remove asbestos or perform demolition activity to ensure that the APCO is notified of any such changes. If a job starts prior to the reported starting date or continues past the completion date as shown in the notification of intent to remove asbestos or to demolish, this shall constitute a failure to notify. Failure to notify the APCO of a job cancellation or postponement will result in the imposition of such asbestos operations fees as would have been due had the job not been cancelled or postponed.*

**What should I do if I can't change my Start Date on the Air District portal?**

If the work Start Date in the system has NOT passed and you can't change the Start Date on your Air District portal, email the Air District Asbestos Technicians ([asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov)) a screenshot of the issue as well as the desired work schedule and they will change it for you.

If the work Start Date in the system has passed, you will not be able to change it on your Air District portal because you are locked out and may be in violation. You are only allowed to change your work Start Date prior to 11:59 PM of the work Start Date specified in your J #. In such cases, you will need to contact the Air District's Air Quality Specialist assigned to your job or email the Air District's Asbestos Technicians at [asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov).

**What if I need to pause my project? Where should I specify it in the portal?**

If on the initial application you selected Planned Renovation, you could upload a work schedule to the Air District portal that shows when the project is paused and when it resumes.

If it is NOT a Planned Renovation and you need to pause the work for unforeseen circumstances, email the Air District Asbestos Technicians ([asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov)) as soon as possible to inform them when the work will be paused and when it will resume. The Air District Asbestos Technicians will put a note in your notification of the pause and resumption of the work. A specific resumption date is required; an estimated date can be a placeholder until the specific date is known. If a pause needs to be extended, the request should be emailed before the resumption date specified on the current notification.

**IV. ASBESTOS SURVEY/LABORATORY REPORT****How do I know if there is asbestos in the structure I want to demolish or remodel?**

Air District Section 11-2-303.8 of Reg. 11-2 requires that an asbestos survey be performed prior to the start of demolition work to determine whether RACM is present at the demolition site. The person(s) who perform(s) the asbestos survey must be Cal-OSHA certified and must have taken and passed a U.S. EPA approved building course. In the case of residential buildings having four or fewer dwelling units, the owner/operator can sample and test suspected asbestos-containing materials rather than hire a certified consultant.

**Where can I obtain a list of asbestos consultants/technicians who are certified to perform the asbestos surveys?**

This list can be obtained by calling the California Division of Occupational Safety and Health at 916-574-2993 or [going to their web site](#).

**As a property owner, can I take my own samples?**

Yes. You can take your own samples provided you take appropriate safety measures to minimize potential asbestos exposure.

**When am I exempted from testing my building materials for asbestos?**

If the construction materials of the building you are planning to disturb or demolish are made up of wood (uncoated), rubber, metal, or glass or a combination of these materials, you are exempt from testing these construction materials for asbestos, as they do not contain asbestos. An Air District Specialist may visit the site and verify if the building is exempt from asbestos

testing or you may be requested by an Air District staff to send photos of the building for review.

### **What if my building burnt down; do I still need to test for asbestos?**

Not necessarily. Although if you do not test the fire-damaged building, you are required to treat all debris as Regulated Asbestos Containing Material (RACM) and dispose of the debris according to Reg. 11-2 and may need to apply for a Renovation and Demolition J #. Email [asbestosjobs@baaqmd.gov](mailto:asbestosjobs@baaqmd.gov) for further assistance.

### **Can the Air District recommend a company or a laboratory that tests for asbestos?**

No. The Air District does not endorse any company or laboratory that tests for asbestos. National Voluntary Laboratory Accreditation Program's (NVLAP's) website has a searchable directory of accredited laboratories: <https://www.nist.gov/nvlap>.

CalOSHA also maintains a database of Certified Asbestos Consultants (CAC) and Site Surveillance Technicians (SST) on their [website](#).

### **The building I will demolish is fairly new; do I need to test for asbestos?**

Yes. Asbestos-containing construction materials can be found in newer buildings as well as old ones.

### **When does the Air District check an asbestos survey/lab report?**

The Air District may check an asbestos survey/lab report prior to, or on, the day a renovation or demolition project starts. Failure to show an Air District Air Quality Specialist an asbestos survey/lab report prior to or on the start date of a demolition/renovation project may result in the issuance of a Notice of Violation.

### **I will disturb less than 100 square feet of suspect materials in a structure built after 1980, am I exempted from testing it for asbestos?**

No. Testing for asbestos is still required. You are not required to notify the Air District, i.e., apply for a J # because the material disturbed is less than 100 sq. ft. but all remaining sections of the Air District asbestos regulation (Reg. 11-2) are applicable, i.e. containment, negative air and wet methods, etc.

Section 11-2-303.8 of Reg. 11-2 outlines the survey/testing requirements:

#### 11-2-303.8

*Surveys: Except for ordered demolitions, prior to commencement of any demolition or renovation, the owner or operator shall thoroughly survey the affected structure or portion thereof for the presence of asbestos-containing material, including Category I and Category II nonfriable asbestos-containing material. The survey shall be performed by a person who is certified by the Division of Occupational Safety and Health, and who has taken and passed an EPA-approved Building Inspector course and who conforms to the procedures outlined in the course. The survey shall include sampling and the results of laboratory analysis of the asbestos content of all suspected asbestos-containing materials. This survey shall be made available, upon request by the APCO, prior to the commencement of any RACM removal or any demolition. This subsection shall not apply if the owner or operator asserts that the material to be renovated is RACM and will be handled in accordance with the provisions of Sections 11-2-303, 304 and 401. The requirement for certification by the Division of Occupational Safety and Health shall not apply to in-house health professionals within a specific nonasbestos related company who perform occasional surveys only for that company as part of their regular job responsibilities*

*8.1 When a structure, or portion thereof, is demolished under an ordered demolition, the survey must be done prior to, during, or after the demolition but prior to loading or removal of any demolition debris. If the debris contains regulated asbestos-containing material, all of the debris shall be treated as asbestos-containing waste material pursuant to Section 11-2-304.*

*8.2 For renovation or demolition of residential buildings having four or fewer dwelling units, a survey is not required. A sample and test of the material will be required only when any of the following will be removed or disturbed: heating, ventilation, air conditioning ducting and systems; acoustic ceiling material or acoustic plaster; textured or skim coated wall surfaces, cement siding or stucco, or resilient flooring. Where the material is found to contain greater than 1 percent asbestos and is friable, the material must be handled in accordance with Section 11-2-303.*

#### **How old of an asbestos survey/lab report would the Air District accept?**

The Air District currently considers older surveys during the review of demolition/renovation projects. There is no hard and fast age limitation for an asbestos survey; however, the survey must be complete and the condition of the materials on site, as well as the materials themselves, must have remained consistent with what was described in the asbestos survey.

Additionally, asbestos survey reports are submitted prior to abatement projects and commonly do not document previous abatement work. Under these circumstances, when the project owners failed to retain documentation, or the documentation was not transferred to the new owner to prove the abatement work has been performed, the Air District requires a current asbestos survey or an asbestos survey plus addendum updating changes and the current condition of the materials (including supporting documentation, photos, abatement clearance report, etc.).

## **V. RENOVATION PROJECTS**

### **Can a property owner remove asbestos?**

Yes. Although strongly discouraged, a property owner may remove asbestos. However, if asbestos is determined to be RACM, the property owner is required to comply with the removal, disposal, and administrative requirements contained in Reg. 11-2. It is challenging for an inexperienced property owner to set up containment under negative air pressure with high efficiency particulate air (HEPA) exhaust, to possess a hazardous waste transportation license for disposal, and to ensure compliance is achieved with all the requirements in Reg. 11-2.

### **Does asbestos have to be removed?**

No. If it is in good condition and is not being disturbed, it is best to leave it undisturbed. For asbestos to be a health hazard, it must be friable (i.e., can be crumbled, pulverized, or powdered by hand pressure when dry), or made friable during removal, and released from the product (matrix) into the air where it can be inhaled.

### **Does my contractor have to be licensed to remove asbestos?**

Yes. The California Contractors State License Board requires that a contractor has a valid and current contractor's license and certificate for asbestos abatement work issued by the State of California. The CSLB maintains a list of certified contractors [on its website](#).

### **Can I get a list of certified asbestos contractors from the Air District?**

No. The Air District does not have a list of certified asbestos contractors. Cal-OSHA maintains a database of Certified Asbestos Consultants and Site Surveillance Technicians on its website: [https://www.dir.ca.gov/databases/doshcaccsst/caccsst\\_query\\_1.html](https://www.dir.ca.gov/databases/doshcaccsst/caccsst_query_1.html) and a list of registered firms here: <https://www.dir.ca.gov/databases/doshacru/acruelist.asp>.

**When is a dry removal of asbestos allowed/permitted?**

A dry removal of asbestos is allowed/permitted if wetting the suspect asbestos materials could pose a safety hazard, such as an electrical shock. It is also allowed/permitted where wetting would result in equipment damage or cause a safety hazard (e.g., electrical equipment), or for shot blasting/bead blasting of floor tile mastic. All dry removal is subject to the Air District Air Pollution Control Officer/Executive Officer (APCO) approval even if the removal amount is less than 100 sq. ft./100 linear ft./35 cu. ft. An approval for dry removal of asbestos from the APCO may be obtained by submitting a work plan to the Air District and having it approved by the APCO.

**The asbestos-containing materials found in my building/structure are considered non-friable. Do I still need to apply for a Renovation J #?**

It depends. If you are going to remove the non-friable asbestos by mechanical means, which renders it friable, you need to apply for a renovation J # if the amount of asbestos-containing materials is greater than 100 sq. ft./100 linear ft./35 cu. ft. If you are removing the asbestos-containing materials with hand tools, you do not need to apply for a Renovation J #. Any demolition of a load-bearing structure will need a demolition J # regardless of asbestos content.

**When is a Cumulative Renovation J # applicable?**

Cumulative Renovation is a series of small (typically less than 100 sq. ft./100 linear ft./35 cu. ft.) renovations or removals of RACM performed during a calendar year at a single site or facility which, taken together, would add up to a reportable amount under the provisions of Reg. 11-2. This renovation J # type is usually used in refineries.

A Cumulative Renovation has the same fees and validity (valid up to the End Date entered in the system or one year from the initial Start Date entered in the system – whichever is soonest) as a regular Renovation. The only difference is that a Cumulative Renovation project requires a cumulative record be kept, reflecting the amount of material abated, and does not exceed the square footage/linear feet/cubic feet under the Air District fee schedule applied for.

**What is a Planned Renovation?**

Section 11-2-232 of Reg. 11-2 states that *“a planned renovation is a renovation, or a number of such operations, in which the amount of RACM that will be removed or stripped at an installation within a maximum time of one year can be predicted. Operations that are individually nonscheduled are included, provided a number of such operations can be predicted*

*to occur during a given period of time based on operating experience. The minimum period of time shall be 30 days”.*

A work schedule is required to be submitted to the Air District if you have a Planned Renovation. If a work schedule cannot be determined at the time of the J # application, you need to notify the Air District when the renovation project is paused or resumed.

**I’m a homeowner. Do I need to be certified to remove asbestos myself?**

No. A homeowner is not required to be certified to remove regulated asbestos-containing materials from his/her home, although the Air District strongly discourages it for safety reasons. Note: The Air District’s asbestos regulation (Reg. 11-2) remains applicable and requires notification for specific removal quantities, removal under containment and negative air, and transport and disposal by a U.S. EPA licensed hazardous waste transporter.

**Is removal of asbestos cement (transite) siding and roofing products regulated by the Air District?**

Siding and roofing products made of cement mixed with asbestos are commonly referred to as transite and are common in the Bay Area. These products are considered Category II asbestos-containing materials under both the federal (NESHAP) and Air District asbestos regulations. When it is intact and in good condition, Category II asbestos-containing materials are not considered regulated asbestos-containing materials (refer to the February 28, 2012, [Compliance Advisory Removal of Asbestos Cement \(Transite\) Siding and Roofing](#)).

However, weathering and improper removal practices (e.g., cutting, abrading, hammering, sanding, grinding, “shotblasting,” dropping from a significant height or other methods that lead to breakage) can result in the release of asbestos fibers to the air. These damaging activities may render the material “friable”, and it is then deemed RACM and subject to regulation under the federal and Air District regulations. Note that the demolition of any structure containing these materials renders them friable and will be considered RACM and subject to these regulations.

## **VI. DEMOLITION PROJECTS**

### **Is a demolition permit from a City or County the same as the J #?**

No. The demolition permit from a City or County is not the same as the J # issued by the Air District. A J # is usually a requirement to apply for a demolition permit from the City or County. The Air District checks for a valid J # during a demolition inspection.

### **What is a load-supporting or load-bearing structural member?**

A load-supporting or load-bearing structural member is a part of a structure that supports the weight of the roof, floors, and other elements. A load-supporting or load-bearing structural member, includes, but not limited to, the walls, foundation, roof support structures, slab, rafters, porch pillars, chimneys, etc.

### **If there is no asbestos in the structure, do I still need to notify the Air District of the demolition of a load-bearing structure?**

Yes. Section 11-2-401.3 of Reg. 11-2 requires that a notification of demolition of a load-bearing structure be made to the Air District even if there is no asbestos present.

### **Do I have to apply for a J # if my demolition project doesn't involve regulated asbestos?**

Yes. Any demolition of a load-supporting/load-bearing structural member requires an application of a demolition J # regardless of the asbestos content, size, or age of the structure.

### **Do I have to apply for a Demolition J # if I will only demolish a car port?**

Yes. Any demolition of a load-supporting/load-bearing structure requires a demolition J # regardless of the asbestos content, size, or age of the structure.

### **I have an unpermitted structure on my property and the City/County where my property is located requires me to demolish it. Should I notify the project as a Government-Ordered Demolition?**

No. You cannot notify as a government-ordered demolition. According to Air District Section 11-2-218 of Reg. 11-2, a Government Ordered Demolition is when the *"demolition is carried out pursuant to an order of a federal, state, or local government agency issued a demolition order because the building is structurally unsound and in danger of imminent collapse or has been declared a public nuisance"*. A regular unpermitted structure on your property that is structurally sound does not fall under this category.

## **VII. COMPLAINTS**

### **How do I file an asbestos complaint?**

You may call 1-800-334-ODOR (6367) or file a complaint online on our [Complaints webpage](#).

**Someone filed a complaint about the soft demolition project I have. I did not apply for a J # because I'm not demolishing a load-supporting/load-bearing structure or part of a structure. Do I have to apply for a J # now?**

You may not need a Demolition J #, but an Air District Air Quality Specialist that investigates the complaint may require an asbestos survey/lab report to verify the asbestos content in the materials being disturbed. If you did not conduct asbestos testing, an Air Quality Specialist may require you to test the materials for asbestos. An Air Quality Specialist may also secure samples of the materials being disturbed as part of the complaint investigation process.

### **How much is the fine if I get a Notice of Violation?**

The fine or penalty depends on such things as the severity of the violation, the extent of harm caused by it, the frequency of past violations, the promptness of getting back into compliance, and any mitigating circumstances surrounding it. This is by no means a complete list of items considered when determining a penalty. An Air District Air Quality Specialist/Inspector will not know the penalty amount. The violator will receive a settlement letter from the Air District with the respective penalty amount by mail.

## **VIII. EMERGENCY SITUATIONS**

### **What if my building/structure burnt down? Do I still need to test it for asbestos?**

The Air District recommends testing for asbestos if safe to do so. Materials not tested should be assumed suspect and will need to be treated as Regulated Asbestos-Containing Material (RACM) and disposed of according to the requirements of Reg. 11-2.

**My house partially burned down; do I still need to apply for a Demolition J # to demolish the rest of the structure?**

Yes. You still need to apply for a demolition J # to demolish the rest of the burned structure.

**A tenant in one of the units in the apartment complex I manage left a few days ago without notice. I need to renovate/demolish a structure in the unit as soon as possible before renting it out again. Can I apply for an emergency renovation/demolition J #?**

No. This is not considered an emergency renovation/demolition. You must apply for a J # and wait for the mandatory 10-working day period before you start your renovation or demolition work.