

ASBESTOS COMPLIANCE TIPS

The information provided below is meant to facilitate the application process for an Asbestos Job Notification Number (J#) from the Air District.

The Air District's Asbestos Regulation 11, Rule 2 (Reg. 11-2) notification requirements apply to all contractors, homeowners, or entities that plan to renovate¹ a structure where more than 100 sq. ft./100 linear ft./35 cu. ft. of friable², regulated asbestos-containing material (RACM) will be disturbed. It also applies to all contractors, homeowners, or entities that plan to demolish a load-supporting structural member, or portion thereof, of a building, facility, or ship, regardless of asbestos content, age or size of the building, facility, or ship.

Asbestos as a Hazardous Pollutant

Asbestos is listed as a hazardous air pollutant by the United States Environmental Protection Agency (US EPA). Exposure to asbestos can occur in a number of ways, but the two most common routes are:

- Inhalation – asbestos fibers could be inhaled, due to them being airborne because they have been disturbed during demolition, renovation, or repair activities.
- Ingestion – airborne asbestos fibers from any source may land on food and/or water and enter the digestive tract.

Asbestos fibers accumulate in the lungs. As exposure increases, so does the risk of diseases like asbestosis, mesothelioma, pleural plaques, lung cancer, and other types of cancer. There is no safe level of exposure to asbestos and all exposure should be avoided.

Asbestos-Containing Materials

Asbestos has been used in a large range of building materials. Some examples of materials that might contain asbestos are thermal and acoustic insulation, fireproofing, concrete (transite), plastic products (vinyl floor tiles), paper products (dry wall joint tape), mastics, gaskets and packaging, roofing felts and papers, electrical insulation, and others.

¹Renovate – the Air District's definition of renovate/renovation is asbestos abatement.

²Friable – materials that can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure.

Asbestos may be present in any material regardless of when the material was produced. The United States has been importing construction materials from other countries where asbestos may not be heavily regulated. Due to this fact, it is important to know that a structure made recently may contain asbestos similar to a structure made decades ago.

Asbestos Survey or Laboratory Report

Whenever there are plans to renovate or demolish a structure, the structure to be disturbed might need to be tested for the presence of asbestos before the actual renovation or demolition work begins. An asbestos survey/lab report will determine if the structure to be disturbed contains asbestos. There are certified laboratories in the Bay Area that test for the presence of asbestos in a structure.

Most of the time, an asbestos survey/lab report is required by the Air District for a project that has an approved J#. If the structure materials are made entirely of wood, glass, rubber, or metal, it does not require asbestos testing, as these materials are not considered suspect asbestos containing materials, and therefore unlikely to contain asbestos; therefore, a survey or a lab report is not required.

Renovation (or Abatement) Project

If the asbestos survey/lab report shows materials that contain >1% RACM and an amount greater than 100 sq. ft./100 linear ft./35 cu. ft. will be removed, you must apply for a **RENOVATION J#** from the Air District and do the following during a renovation project:

- Apply wet methods – all exposed asbestos shall be adequately wet during cutting, stripping, renovation, removal, and handling operations.
- Apply containment – asbestos when disturbed must be isolated by physical barriers which prevent the asbestos migration. These barriers, usually plastic sheeting, need to include a viewing port and a negative air pressure ventilation system or a high-efficiency arresting particulate (HEPA) vacuum.
- Have an asbestos on-site representative – a trained person, familiar with applicable asbestos regulations must be present at all times during the disturbance of any regulated material.
- Dispose properly – RACM must be disposed of properly by double-bagging the hazardous wastes, with labels showing the generator of RACM. RACM should be disposed of in an approved landfill that accepts asbestos. Hazardous waste manifests are checked and inspected by the Air District to verify that RACM will be disposed of in an approved landfill.

Demolition Project

The demolition of any load-supporting structural member, or portion thereof, of a building, facility, or ship, regardless of asbestos content, age or size of the building, facility, or ship is regulated by the Air District. If you plan to demolish a structure, you need to apply for a **DEMOLITION J#** from the Air District and do the following:

- Review the asbestos survey/lab report and determine if RACM is present.
- If RACM is present, (i.e., >1% and greater than 100 sq. ft./100 linear ft./35 cu. ft. will be removed), in addition to applying for a **RENOVATION J#** from the Air District, the renovation tips listed above shall be followed.
- If non-friable, Category I³ or II⁴ materials are present, they still need to be abated prior to starting the demolition work. An application for a **RENOVATION J#**, in addition to a **DEMOLITION J#**, from the Air District may be needed, depending on the method of removal of the Category I or II materials.
- Removal by hand tools – If the Category I or II materials will be removed using hand tools that do not render the material friable (e.g., serrated blades), applying for a **RENOVATION J#** from the Air District is not needed, but the materials must be disposed of as non-hazardous waste. The Air District will verify that the non-friable Category I or II materials have been abated prior to the start of the demolition work by checking the non-hazardous waste manifest.
- Removal by mechanical means⁵ – If the Category I or II materials will be removed using mechanical means, applying for a **RENOVATION J#**, in addition to the **DEMOLITION J#**, from the Air District will be necessary as well as following the renovation tips listed above. The Air District will check the hazardous waste manifest associated with the removal of Category I or II materials that were made friable.
- Please see the demolition project flow chart[‡] below for guidance.

Note: On special circumstances, applications of a renovation J# and demolition J# can be done simultaneously as long as the abatement of asbestos is done prior to the demolition of the load-supporting member of a structure.

³Category I – packings, gaskets, resilient floor coverings, mastics, and asphalt roofing products.

⁴Category II – excluding Category I material, transite board, pipe and asbestos cement products, plaster, stucco, and paint.

⁵Mechanical means – any method using powered equipment.

Renovation or Demolition Schedule

Reg. 11-2 states that the start and end dates of a renovation or a demolition project specified in the J# are not a work window but **confirmed dates** (i.e., a project should start on the start date (not before or after) and should be completed by the specified end date). The J# applicant could revise the start/end dates in the respective applicant portal. The J# applicant has until 11:59 PM on the start date specified in the J# to modify the project dates; otherwise, a notice of violation may be issued by the Air District.

Asbestos Complaints

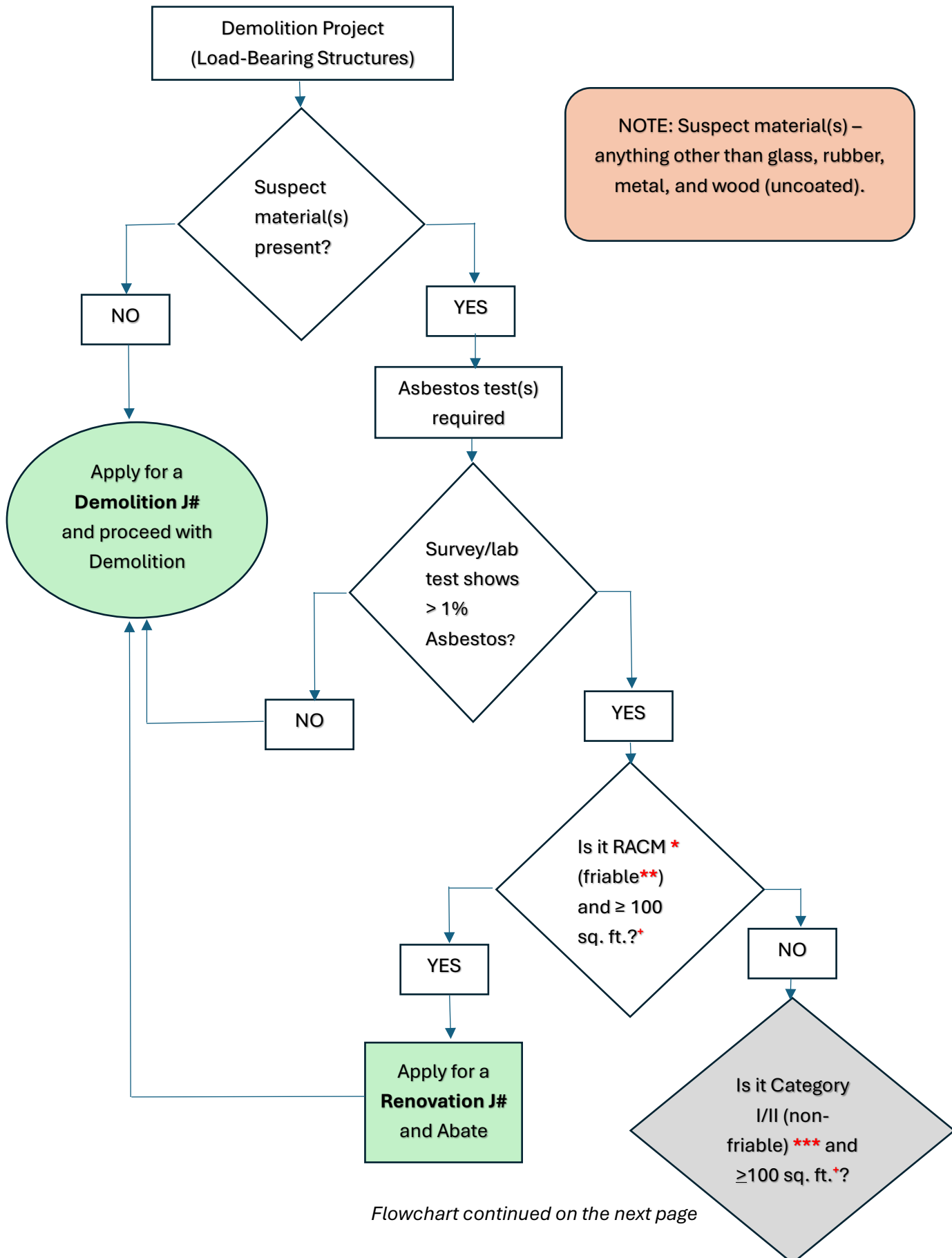
If the Air District receives an asbestos complaint related to a renovation, demolition, or repair project that does not have a J#, the Air District will investigate the complaint and may require the contractor, homeowner, or entity to provide an asbestos survey/lab report. This is to determine if the structure or materials being disturbed contain asbestos. If no asbestos survey/lab report is presented during a complaint investigation, the Air District may advise a contractor, homeowner, or entity to test the materials for asbestos and may determine if the asbestos regulation (Reg. 11-2) is applied properly.

Asbestos Resources

If you have any questions about the Air District's asbestos regulation, please do one or more of the following:

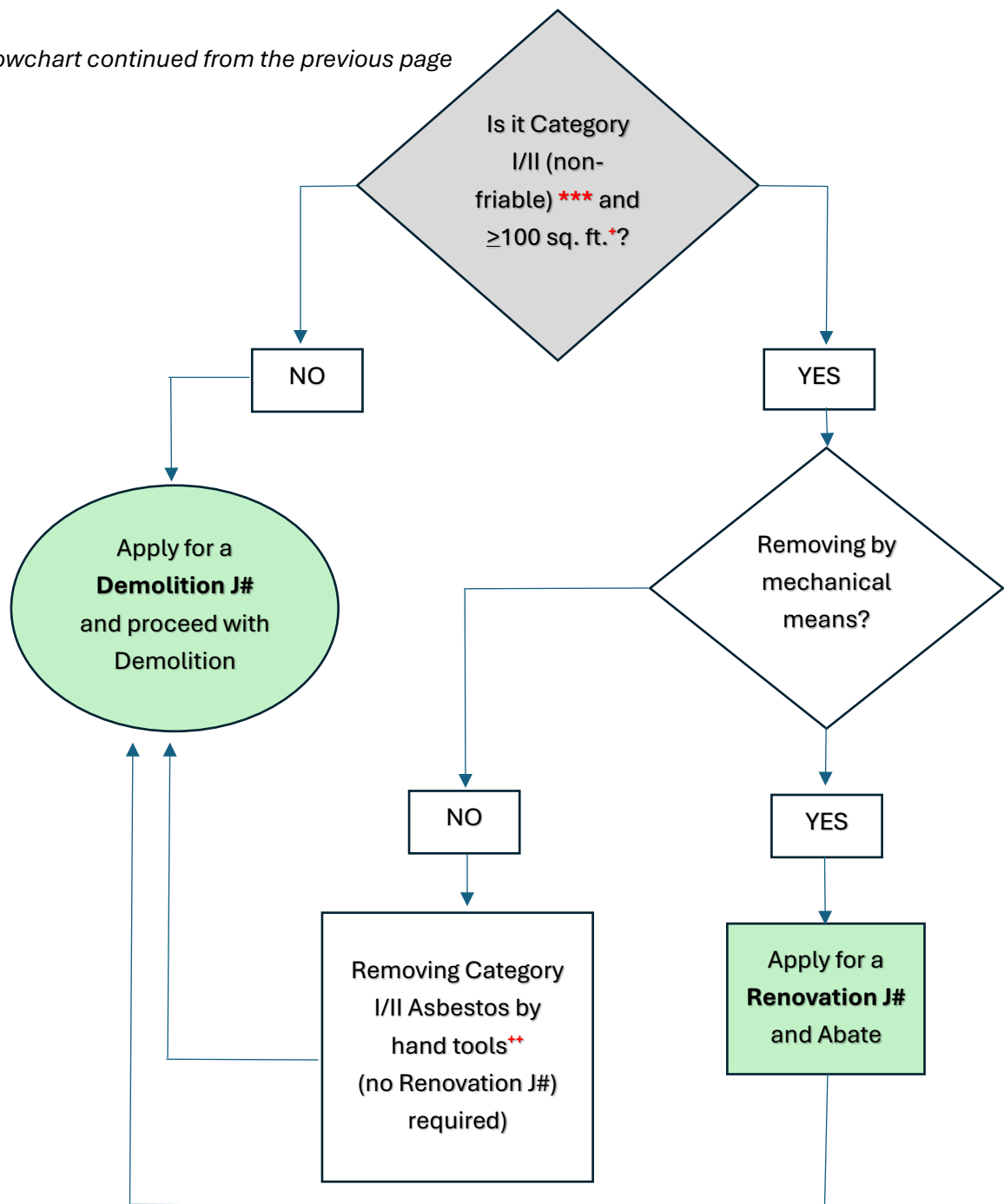
- Read the Air District asbestos Regulation 11, Rule 2 ([Asbestos Demolition, Renovation, and Manufacturing Rule](#)).
- Read the asbestos most Frequently Asked Questions (FAQs).
- Contact the Air District asbestos technicians.
Phone: 415.749.4762 | Email: asbestosjobs@baaqmd.gov.
- Contact the Air District Air Quality Specialist assigned to your project.

‡DEMOLITION PROJECT FLOW CHART



Flowchart continued on the next page

Flowchart continued from the previous page



* RACM (Regulated Asbestos-Containing Material)

** Friable (Materials that can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure)

*** Category I/II nonfriable asbestos-containing material:

(Category I – packings, gaskets, resilient floor coverings, mastics, and asphalt roofing products)

(Category II – excluding Category I material, transite board, pipe and asbestos cement products, plaster, stucco, and paint)

* 100 sq. ft. or 100 linear ft. or 35 ft³

** Hand tool removal that does not render the material friable (example – serrated blades).