

Checklist for Renovation/Demolition Operations

RENOVATION PROJECTS

Your project may be regulated through the federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) and the following may apply:

- **A thorough asbestos inspection may be required to be performed by an accredited asbestos inspector.**
- **Notification form submittal may be required.**
- **Asbestos abatement may be required.**

DEMOLITION PROJECTS

Demolition projects involving commercial buildings and structures are regulated through the federal NESHAPs. Single family homes may be regulated if part of a public or private project. The definition of demolition in the NESHAPs regulations is as follows:

"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 any facility."

- **All commercial demolitions are regulated through the NESHAPs and a 10 working day notification is required.**
- **An asbestos inspection by an accredited asbestos inspector is required prior to demolition of commercial facilities.**
- **All regulated asbestos containing material must be removed prior to demolition of a regulated facility.**

QUESTIONS?

Please contact the Michigan Department of Natural Resources and Environment if you would like further information and/or forms.

517-241-7463

http://www.michigan.gov/deq/0,1607,7-135-3310_4106-11856--,00.html

Suspect Asbestos Materials

Due diligence may require sampling of the following list of suspect asbestos materials.

Paper Products

- Acoustical ceiling tile
- Lamp sockets
- Burner mats for gas stoves
- Roofing felt (outer layer)
- Pipe and boiler covering
- Vinyl sheet flooring backing
- Radiator top insulation
- Appliance heating shielding (paper)
- Paper sheets for heat insulation
- Millboard
- Soldering and welding blocks
- Iron rests
- Appliance heating shielding
- Fireproof wallboard
- Metal-clad fire doors and partitions
- Tent garments
- Stove pipe rings

Cloth & Woven Products

- Appliance wiring
- Awnings
- Candlesticks
- Catalytic heater mantles
- Cigarette lighter wicks
- Cord
- Seals for high temperature

gaskets

- Valve steam packing
- Insulation for glass handling tools
- Reinforcing for braided wall stem

hose

- Theater curtains
- Felt
- Reinforcements in plastics
- Gaskets
- Reinforcements in tapes
- Secondary insulation in high-temperature wire/cable
- Asphalt-impregnated high-temperature wire/cable
- Asphalt-impregnated roofing felts
- Piano and organ felts
- Flexible air conductors for heating, cooking and ventilation equipment
- Heating pads (element insulation)
- Ironing board pads and covers
- Lamp and lantern mantles
- Pipe and boiler covering
- Pot holders and oven mitts
- Flame-resistant garments

- Stoves—coal and wood-burning
- Tape for pipe insulation
- Braid and rope for pecking
- Motion picture screens
- Tent grommets

Cement Products

- Water, sewer and septic drain field pipe
- Air duct pipe
- Sheet products
- Roofing clapboard
- Siding
- Shingles
- Interior walls
- Boiler and furnace baffles
- Bulk sheeting
- Welding shields
- Baking sheets
- Blackboards
- Laboratory table tops
- Linings for vault, safes, humidifiers and filing cabinets

Various Matrix Products

- Adhesives (glues and epoxies)
- Air duct cement
- Buffing and polishing compounds
- Caulks and putties
- Floor tile cement and mastic
- Auto body filler
- Flashing cement
- Furnace cement
- Glazing compound
- Pipe and boiler coverings
- Roof and driveway coatings
- Stains and varnishes
- Automotive undercoating
- Refrigerant cements
- Automotive muffler repair compounds

Inadvertent Asbestos Contamination

- Driveway gravel
- Fertilizer and lawn care products
- Potting materials (vermiculite)
- Play sand
- Talcs

Miscellaneous Products

- Acoustical and thermal insulation material sprayed
- Ammunition shell wadding
- Automotive mufflers
- Barbecue fire bed
- Boat hull repair kits
- Flower pots
- Friction materials
- Clutch plates
- Brake linings
- Potter's kilns
- Reinforcement in molded plastic and rubber
- Automotive radiator sealant
- Pottery clay
- Powder (asbestos)
- Bulk fiber
- Vinyl asbestos floor tiles
- Abrasive wheels
- Aerial distress flares
- Molded plastics and phenolic laminates
- Paints
- Textured paint
- Cement, drywall and plaster patching compounds
- Artificial gas fireplace emberizing material
- Phonograph records

Consumer Products Possibly Containing Asbestos

Appliances

- Air conditioners
- Dishwashers
- Handled mixers
- Portable electric heaters
- Popcorn poppers
- Refrigerators
- Vacuum cleaners
- Waffle makers

Miscellaneous Products

- Carpet padding
- Fireplaces
- Instant paper mache
- Light fixtures on railroad passenger cars
- Welding masks
- File cabinets

NOTIFICATION OF INTENT TO RENOVATE/DEMOLISH



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
(MDEQ) AIR QUALITY DIVISION
NESHP, 40 CFR Part 61, Subpart M



MICHIGAN DEPARTMENT OF LICENSING AND
REGULATORY AFFAIRS (LARA), ASBESTOS PROGRAM,
P.A. 135 OF 1986, AS AMENDED, Section 220 (1-4) or (8)

DEQ/LARA USE ONLY

Postmark Date ___/___/___ Rec'd Date ___/___/___

Emergency Date ___/___/___ Valid No. _____

OK Send Def Ltr. Date of Def Ltr. ___/___/___

FOLLOW UP ___/___/___ Spoke w/ _____

Comments: _____

Notification No. _____ Trans No. _____

Calculate LARA Asbestos Project Fee: (1% Project Fee)

Total Project Cost: _____ x 0.01 = _____

Type of Contractor: _____ License No.: _____

Licensing Authority: _____

1. NOTIFICATION:

Date of Notification: _____

Date of Revision(s): _____

Notification Type: Original Revised Canceled Annual

Mark appropriate boxes: (both DEQ and LARA may apply):

DEQ (NESHP) [260 In. ft./160 sq. ft. or more is threshold]

Planned Renovation – 10 working days notice

Emergency Renovation

Scheduled Demolition – 10 working days notice

Intentional Burn – 10 working days notice

Ordered Demolition

LARA (MIOSHA) [Will not accept annual notifications]

Demo, Reno, Encap. (>10 In. ft./15 sq. ft.) 10 calendar days notice

Emergency Renovation/Encapsulation

2. PROJECT SCHEDULE:

START DATE END DATE

* Renovation _____ _____

+Asb. Removal _____ _____

+Demolition: _____ _____

Encapsulation: _____ _____

Work Schedule: Please indicate the anticipated days of the week and work hours for the purpose of scheduling a compliance inspection.

Days of the Week Work Hours

Asb. Removal: _____ _____

Demolition: _____ _____

Encapsulation: _____ _____

* Includes setup, build enclosure, asbestos removal, demobilizing, etc.

+Include only those dates you are conducting asbestos removal/demo.

Check here if this is a multi-phased project, attach a schedule showing the start/end date of each phase.

3. ABATEMENT CONTRACTOR: Internal Project #: _____

Name: _____

Mailing Address: _____

City/State/Zip: _____

E-mail: _____

Contact: _____ Phone: _____

4. DEMOLITION CONTRACTOR: Internal Project #: _____

Name: _____

Mailing Address: _____

City/State/Zip: _____

E-mail: _____

Contact: _____ Phone: _____

5. FACILITY OWNER: ("Facility" includes Bridges)

Name: _____

Mailing Address: _____

City/State/Zip: _____

E-mail: _____

Contact: _____ Phone: _____

6. FACILITY DESCRIPTION:

Facility Name: _____

Location Address/Description: _____

If Apt. # of units: _____

City/Twp. _____ State: _____ Zip Code: _____

County: _____ Nearest Crossroad: _____

Size: (sq. ft.) _____ No. of Floors: _____ Floor No.: _____

Age: _____ Present Use: _____ Prior Use: _____

Specific Location(s) in Facility: _____

7. DISPOSAL SITE:

Name: _____

Location Address: _____

City/State/Zip: _____

8. WASTE TRANSPORTER 1:

Name: _____

Address: _____

City/State/Zip: _____

Phone: _____

WASTE TRANSPORTER 2:

9. ORDERED DEMOLITIONS: (See NESHP regulations for definition of "Ordered Demolition.") A copy of the official Order must accompany this notification.

Gov't Agency Ordering Demo: _____

Name/Title of Person Signing Order: _____

Date of Order: _____ Date Ordered to Begin: _____

10. IS ASBESTOS PRESENT? Yes No

To be removed prior to demolition

Estimate the amount of asbestos: Include RACM (Regulated Asbestos Containing Material) to be removed, encapsulated, etc. Also include the amount and type (floor tile, roofing, etc.) of non-friable Category I and/or Category II ACM that will not be removed prior to demolition. (NOTE: In a demolition, cementitious ACM cannot remain in a structure, as it is likely to become regulated in the demolition/handling process. It must be removed prior to demolition.)

RACM to be Removed	RACM to be Encapsulated	Non-friable ACM <u>not</u> removed prior to demo.		Units of Measure	
		Category I	Category II		
				<input type="checkbox"/> Ln. Ft.	<input type="checkbox"/> Ln. M.
				<input type="checkbox"/> Sq. Ft.	<input type="checkbox"/> Sq. M.
				<input type="checkbox"/> Cu. Ft.*	<input type="checkbox"/> Cu.M.*

*Volume (cubic ft./meters) should be used only if unable to measure by linear/square measure (example: asbestos has fallen off of surface).

(continued on reverse side)

NOTIFICATION OF INTENT TO RENOVATE/DEMOLISH (continued)

11. **PROJECT DESCRIPTION:** Complete A) for Renovation (asbestos removal/encapsulation) and/or B) for Demolition:

A) RENOVATION: Mark all surfaces/types of RACM to be removed:

- Piping Fittings Boiler(s) Tanks(s)
 Beam(s) Duct(s) Tunnel(s) Ceiling Tile(s)
 Mag Block Other (describe) _____

Encapsulation (for LARA): Mark surfaces/types to be encapsulated:

- Piping Fittings Boiler(s) Tank(s)
 Beam(s) Duct(s) Tunnel(s) Ceiling Tile(s)
 Other (describe) _____

Method of removal: Describe how the asbestos will be removed from the surface (example: glove bag, scrape with hand tools, cut in sections and carefully lower, etc.): _____

B) DEMOLITION: Describe the method of demolition of facility, bridge, etc., and indicate if complete or partial. If partial, describe which part of facility bridge, etc., will be demolished: _____

12. **ENGINEERING CONTROLS:** Describe work practices and engineering controls used to prevent visible emissions before, during, and after removal, and until proper disposal: _____

13. **UNEXPECTED ASBESTOS:** Describe the steps you intend to follow in the event that unexpected RACM is found or previously non-friable asbestos becomes friable (crumbled, pulverized, reduced to powder, etc.) and therefore regulated: _____

14. **PROCEDURE(S) USED TO DETECT THE PRESENCE OF ASBESTOS:** A) Indicate how you determined whether or not asbestos is in the facility. If analytical sampling was used, describe method of analysis. (The determination of the presence or absence of asbestos must be made prior to submitting a renovation/demolition notification.): _____

B) Name, address, and phone number of company performing asbestos survey: _____

C) Name, accreditation number of inspector, and date of inspection: _____

15. **EMERGENCY RENOVATIONS:** Date/time of emergency: _____ Describe the sudden, unexpected event: _____

Explain how the event caused unsafe conditions, and/or would cause equipment damage and/or an unreasonable financial burden: _____

16. I certify that an individual trained in the provisions of 40 CFR Part 61, Subpart M, will be on-site during the renovation and during demolition involving RACM above the threshold and/or during an ordered demolition. Evidence that this person has completed the required training will be available for inspection at the renovation or demolition site.

Signature of Owner or Abatement Contractor Date

Signature of Owner or Demolition Contractor Date

17. **Signature Requirements for Projects with Negative Pressure Enclosures: (required by LARA)**
Per Section 221(1)(2) of P.A. 135 of 1986, as amended, clearance air monitoring is required for any asbestos abatement project involving 10 linear feet/15 square feet or more of friable material which is performed within a negative pressure enclosure. I (the building owner or lessee) have been advised by the contractor of my responsibility under Act 135 to have clearance air monitoring performed on this project.

Signature of Building Owner or Lessee Date

Signature of Asbestos Abatement Contractor Representative Date

NOTE: It is not mandatory that a signed copy be sent to LARA unless requested. For affected projects, this section of the notification form must be completed, signed, and made part of your records before the project begins.

18. I certify that the above information is correct:

Printed Name of Owner/Operator Date

Signature of Owner/Operator Date

MAILING ADDRESSES/PHONE NUMBERS: (See Item 1 to determine which agency requirements/regulations are applicable to your project.)

For **Public Act 135 of 1986, as amended, Section 220 (1-4) or (8)**, mail to address below. For more info visit: <http://www.michigan.gov/asbestos>

MIOSHA Asbestos Program
LARA, CSHD
P.O. Box 30671
Lansing, MI 48909-8171

517.322.1320 (office), 517.322.1713 (fax)

For **NESHAP Demolitions/Renovations, 40 CFR, Part 61, Subpart M**, mail notifications to the appropriate address below (by county of subject facility): For more info visit <http://www.michigan.gov/deq> click on Air, then Asbestos NESHAP Program.

All Counties (except Wayne County)

NESHAP Asbestos Program
DEQ, AQD
P.O. Box 30260
Lansing, MI 48909-7760

517.241.7463 (Office)
517.373.7064 (Revision Line)

Wayne County Only

NESHAP Asbestos Program
Detroit Field Office, DEQ, AQD
Cadillac Place, Suite 2-300
3058 West Grand Boulevard
Detroit, MI 48202

313.456.4686

Welcome to the new electronic version of the Notification of Intent to Renovate/ Demolish online submission form. The following instructions will help you get started with accessing and using the Michigan Business One Stop site.

Here is the State of Michigan main web site link (click on the link to access the web site):

<http://www.michigan.gov/>

To get to the Michigan Business One Stop site click on the link from the main page.

The screenshot shows the homepage of michigan.gov. At the top left is the logo and the text "michigan.gov official web site for the state of michigan". To the right is a search bar with the text "enter search terms here" and a "GO" button. Below the search bar is a navigation menu with links: HOME, ABOUT MICHIGAN, BUSINESS & ECONOMY, EDUCATION & CHILDREN, RESOURCES & ENVIRONMENT, HEALTH & SERVICES, MICHIGAN GOVERNMENT, SAFETY & SECURITY, and TRAVEL & RECREATION. The main content area features a large banner image of a lake with the text "FALL COLOR IS... PURE MICHIGAN". Below the banner is a navigation bar with links: Headlines, Business (highlighted), Residents, Visitors, and Governor. To the right of the navigation bar is a "Click here" link with an arrow pointing to the "Business One Stop" link in the "Featured Links" section. The "Featured Links" section includes: Voter Information Center, Half-staff Flag Alerts, State web site index, Business One Stop (circled), Economic Development Corporation (MEDC), Michigan eStore, Unclaimed Property, Tribal Governments, State Job Opportunities, and Michigan Lottery. Below the navigation bar is a "Michigan Business News" section with several news items. At the bottom left is the "PURE MICHIGAN" logo and the text "Michigan Economic Development Corporation" followed by a list of links: Michigan Economic Development Corporation (MEDC), Accelerate Michigan Program, Business Start Up Resources, and Michigan Business One Stop.

You will now see the following page.

Michigan Business One Stop

MICHIGAN.GOV
Michigan's Official Web Site

Michigan.gov Home | One Stop Home | Help | Contact Us | FAQs | Search

Printer Friendly | Text Version | Text Size | Share

MICHIGAN BUSINESS ONE STOP!
Now is the perfect time to begin your business relationship with Michigan. Michigan Business One Stop is here to help. It's easy, fast and simple.

RESEARCH & PLAN

- Tools You Can Use
- Business Entity Search
- Financing Your Business
- Employer Resources
- Taxes: General Information
- Take the One Stop Tour
- Try the One Stop Simulator

START & REGISTER

- To get started, you will need to sign up for a One Stop account, then set up your business. These are ONE TIME ONLY activities.
- Get started now! Register for Business One Stop.

REGISTERED USERS

LOG IN NOW TO...

- Apply for new licenses and permits.
- Renew licenses and permits.
- Pay online.

Login ID:

Password:

Forgot Password? **GO**

Announcements

- MDQT - General Spring Weight Restriction Information
- How to Renew a License or Permit

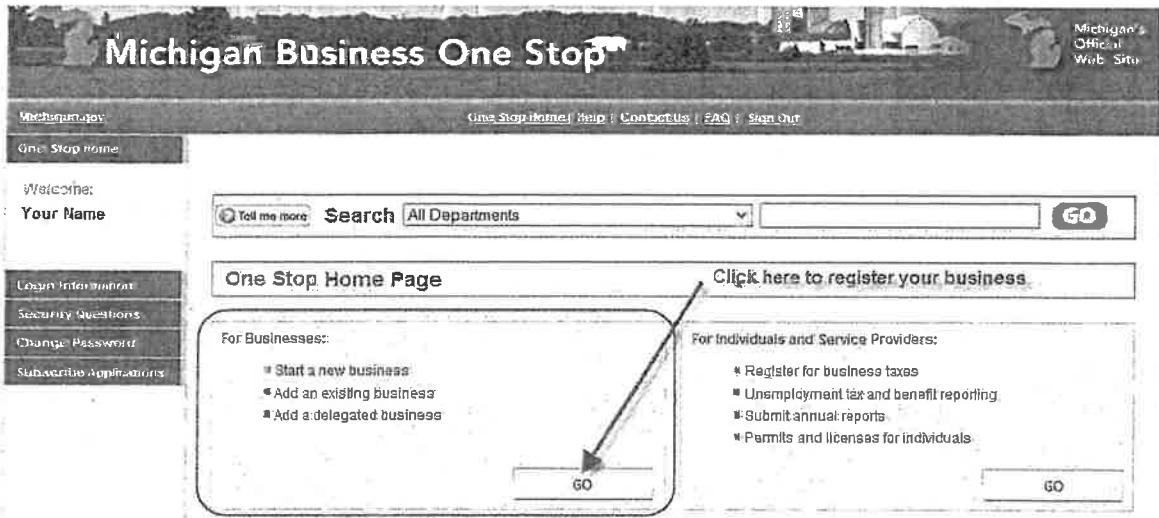
From here you can:

- Access One Stop tutorials
- Take the One Stop tour
- Try the One Stop simulator

For new users, you will need to register for a One Stop identification and password. This process can be started by clicking on the GO button under the Start & Register section.

For registered users with a user ID and password (or after registering) you can enter your user ID and password in the provided entry fields and click the GO button under the Registered User section.

Your final step is to register your business by clicking on the GO button under the For Business section.



Follow the instructions to register your business in One Stop. This is a onetime process that you may need your papers and documents from creating your business.



Understanding the Asbestos NESHAP

Fact Sheet
April 2010

The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (U.S. EPA) to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. The U.S. EPA established the National Emission Standards for Hazardous Air Pollutants (NESHAP) under the authority of Section 112 of the CAA, and asbestos was one of the first hazardous air pollutants regulated. The Asbestos NESHAP was promulgated on April 6, 1973, and it was revised in 1990.

Asbestos was widely used in buildings for fireproofing, thermal and acoustical insulation, condensation control, and decoration. It was sprayed on beams and ceilings, used to cover piping and boilers, and sprayed into ducts. Asbestos was used extensively until the 1970s when U.S. EPA banned certain applications.

The Asbestos NESHAP protects the public by minimizing the release of asbestos fibers during renovation and demolition activities. Accordingly, this regulation specifies work practices to be followed for demolitions and renovations of all structures, installations, and buildings. Privately owned residential dwellings or apartments that are demolished for urban renewal or as part of a public or commercial project would be covered under the NESHAP regulations. Residential dwellings containing four units or less under private control or ownership would not be subject to the NESHAP. In addition, the Asbestos NESHAP contains notification requirements for the owner of the building and/or the contractor. Both the owner and contractor(s) are liable for compliance with the Asbestos NESHAP requirements.

The purpose of this publication is to describe who is subject to the Asbestos NESHAP and to explain the requirements of this standard. A brief glossary is provided at the end of this document to assist in understanding some of the terms (appearing in **boldface text**) discussed in this fact sheet. This fact sheet is to be used only as a guide and is not a substitute for reading and understanding the final rule which is found in Title 40, Part 61, Subpart M of the Code of Federal Regulations (40 CFR Part 61). For a copy of the final rule, see the "Where To Get Additional Information" section on page 10.

WHAT AGENCIES REGULATE ASBESTOS?

There are three state agencies in Michigan that regulate **asbestos**: the Michigan Department of Natural Resources and Environment (DNRE), the Michigan Department of Energy, Labor and Economic Growth (DELEG), and the Michigan Department of State Police (MSP). The DNRE is concerned about the release of asbestos fibers to the outer air and proper waste disposal, while DELEG focuses on worker protection during renovation and demolition activities, contractor licensing, and worker training.

Michigan Department of Natural Resources and Environment (DNRE)

The U.S. EPA has delegated the Air Quality Division (AQD) of the DNRE with the authority to enforce the Asbestos NESHAP in Michigan. In addition, the state of Michigan has adopted the federal regulations into the Michigan Administrative Code (MAC), 1995 AACS R 336.1942 (Rule 942), which is in effect as of December 31, 2003. A violation of the federal asbestos regulations is also a violation of the MAC. AQD administers the Asbestos NESHAP for the entire state. The AQD reviews the notifications, inspects demolitions and asbestos removals, and initiates enforcement actions when violations occur. Approximately 3,500 notifications are received each year by the DNRE and DELEG and are reviewed for completeness and timeliness before being entered into a

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tracking database. Inspections are made based on contractor history, areas of the state, and type of project. Inspections are also performed in response to complaints. U.S. EPA can and does conduct independent inspections of NESHAP projects.

The DNRE also regulates the disposal of asbestos.

- **Michigan Department of Energy Labor and Economic Growth (DELEG)**

The Construction Safety and Health Division of the DELEG implements the Asbestos Abatement Contractors Licensing Act, the Michigan Occupational Safety and Health Act (MIOSHA), the Asbestos Workers Accreditation Act, the MIOSHA Asbestos General Industry Standard, and the MIOSHA Asbestos Construction Standard. Some of the requirements in these acts and standards include work practices, training, and project notification. DELEG also licenses asbestos abatement contractors, approves asbestos training courses, accredits workers, and conducts Asbestos Hazard Emergency Response Act (AHERA) management plan review. For more information about the DELEG Asbestos Program, see the "Where to Get Additional Information" section on page 10.

- **Michigan Department of State Police (MSP)**

The Hazardous Materials and Investigations Unit of the MSP is responsible for enforcing the U.S. Department of Transportation's (U.S.DOT) regulations regarding shipping and transporting of packaged materials by highway. Asbestos, transported for disposal as a hazardous material, is regulated under 49 CFR Parts 100-185. For more information, refer to the "Where to Get Additional Information" section on page 10.

ASBESTOS NESHAP APPLICABILITY

To determine applicability to the Asbestos NESHAP, three questions must be answered:

- ☞ Is the facility regulated by the NESHAP?
- ☞ Is the activity a demolition or a renovation?
- ☞ Does the amount of regulated asbestos-containing material (RACM) meet or exceed the thresholds?

- ☞ **Is the Facility Regulated by the Asbestos NESHAP?**

A facility subject to the NESHAP can be any institutional, commercial, or industrial structure, installation, or building. Examples include, but are not limited to:

- ✓ Bridges;
- ✓ Tunnels;
- ✓ Docked ships;
- ✓ Military installations, including dependent housing;
- ✓ Chemical/power plant installations;
- ✓ Indoor shopping malls;
- ✓ School buildings in a school district;
- ✓ Post office buildings;
- ✓ Apartment buildings containing five or more dwelling units;
- ✓ Certain condominiums, cooperatives, and lofts;
- ✓ Dwellings which are part of an urban renewal project, highway construction, shopping mall, or other private development (which are not privately owned and held);

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- ✓ Groups of residential buildings under control of the same owner/operator and part of the same renovation/demolition project (even if the buildings are not proximate to each other);
- ✓ Amusement parks or state fairgrounds;
- ✓ Jails or prisons;
- ✓ Nursing homes or homes for disabled persons;
- ✓ Parking garages;
- ✓ Farms;
- ✓ Churches, monasteries, convents, or rectories; and
- ✓ Residential dwellings intentionally burned for fire training, etc.

Some examples of facilities not subject to the Asbestos NESHAP include:

- ✓ Privately owned homes, not demolished for urban renewal or as part of a public or commercial project;
- ✓ Privately-owned, multi-dwelling units with four or less dwelling units; and
- ✓ Mobile sources.

☞ **Is the Activity a Demolition or a Renovation?**

A **demolition** is 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 any facility. A **renovation** is altering a facility or one or more facility components in any way, including the **stripping or removal** of RACM from a facility component (excluding operations in which load-supporting structural members are wrecked or taken out). Table 1 lists some examples of demolition and renovation activities.

Table 1. Examples of Demolition and Renovation Activities

Demolition	Renovation
The wrecking or taking out of any load-supporting structural member or the intentional burning of any facility.	Altering a facility or one or more facility components in any way including the stripping or removal of RACM from a facility component, but excluding operations in which load-supporting structural members are wrecked or taken out.
<ul style="list-style-type: none"> • Wrecking or taking out building Beams or load-supporting walls; • Removing the structural steel Supports of outdoor pipe racks; • Intentional burning, including intentional burning for fire training (this includes privately-owned, single-family dwellings); • Wrecking or tearing down a portion of a structure that is load-supporting; or • Renovating or remodeling a facility that includes wrecking or removing a load-supporting wall or component, etc. 	<ul style="list-style-type: none"> • Scraping asbestos insulation off a ceiling; • Removing a boiler covered with friable asbestos from a building; • Removing pipe covered with friable asbestos from a pipe rack; • Gross removal of boiler asbestos insulation; • Glove bag stripping of asbestos pipe wrap; • Drilling through asbestos ceiling plaster to build a dropped ceiling; • Removing soundproofing, ceiling tiles, or plaster containing asbestos; • Removing vinyl asbestos floor tile or any asbestos-containing material that is normally nonfriable that is in poor condition (cracking, peeling, or showing other signs of deterioration). For example, it can be crumbled or pulverized by hand pressure; or • Activities that will render nonfriable material friable, such as grinding, sanding, crumbling, pulverizing, sawing, or other abrasive action, etc.

Understanding the Asbestos NESHAP

☞ *When Must an Asbestos Inspection and Detection Survey Be Completed?*

The Asbestos NESHAP requires that a thorough inspection be conducted for all renovations and all demolitions. All inspections must be completed before the commencement of a subject renovation and/or demolition activity, and the contractor performing the inspection must be listed on the joint DNRE/DELEG "Notification of Intent to Renovate/Demolish" form. Inspections utilizing just visual examination are not acceptable unless the building is primarily steel and concrete materials or no materials in the building are likely to contain asbestos. Both contractors and their legal representatives, as well as owners and their legal representatives, are fully responsible for fulfilling the Asbestos NESHAP inspection requirements.

Although the Asbestos NESHAP does not specifically state that the person who does the inspection and conducts the site survey be trained in recognizing potential asbestos-containing material, the prerequisite of a trained survey inspector still may be a requirement under the Occupational Safety and Health Administration's (OSHA) Asbestos Standards. The federal OSHA Asbestos Standard for Construction (29 CFR 1926.1101) and the OSHA Asbestos Standard for General Industry (29 CFR 1910.1001) are administered by the DELEG's, MIOSHA program. Each standard requires that all **public and commercial buildings** constructed prior to 1981, where employees may enter, work, or contact building materials, must be inspected for **asbestos-containing materials (ACM)**. This includes any houses, garages, apartments, etc. where employees work and may disturb asbestos. Additionally, all such vacant buildings scheduled for renovation or demolition must have an asbestos building survey completed prior to the start of the work.

Inspections under the OSHA standards must also adhere to the AHERA inspection protocol and be performed by a Michigan-accredited asbestos building inspector or a Certified Industrial Hygienist (CIH). The building survey must document the presence, location, and quantity of all "suspect" ACM. Laboratory analysis information should be a part of the building survey document and be kept by the building owner.

Once an asbestos building survey has confirmed or assumed the presence of ACM, all employees who work around, but do not disturb the ACM (i.e., persons conducting janitorial, building maintenance, and/or housekeeping activities) must receive, at a minimum, asbestos awareness training. Additionally, employees who may disturb ACM (i.e., persons working with any of the mechanical systems that have ACM) are required to have additional asbestos-related training. See the section entitled, "Where to Get Additional Information," for further assistance with the standard's inspection, licensing, and training requirements.

☞ *Does the Amount of RACM Meet or Exceed the Thresholds?*

Thoroughly inspect the facility for asbestos, including **Category I and Category II nonfriable asbestos-containing material (ACM)**. Determine if the combined amount of RACM is at or above the thresholds listed in Table 2. RACM includes:

- ✓ Friable asbestos material;
- ✓ Category I nonfriable ACM that has become friable;
- ✓ Category I nonfriable ACM that will be or has been subjected to sanding, **grinding**, **cutting**, or abrading; or
- ✓ Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material during demolition or renovation.

To determine whether **planned renovation operations** involving individual **nonscheduled renovation operations** are subject, predict the combined additive amount of RACM to be removed during a calendar year of January 1 through December 31.

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Table 2. Applicability Thresholds

Location of Asbestos	Threshold Level of RACM
Pipes	80 linear meters (260 linear feet)
Other facility components	15 square meters (160 square feet)
Asbestos that is already off facility components where the length or area could not be measured previously.	1 cubic meter (35 cubic feet)

Any demolition or renovation activity that meets or exceeds the applicability thresholds in Table 2 is subject to all the renovation/demolition requirements of the NESHAP. Demolition activities below the thresholds (even for facilities with no asbestos) are subject to the notification requirement. Figure 1 summarizes the process for determining applicability to the Asbestos NESHAP.

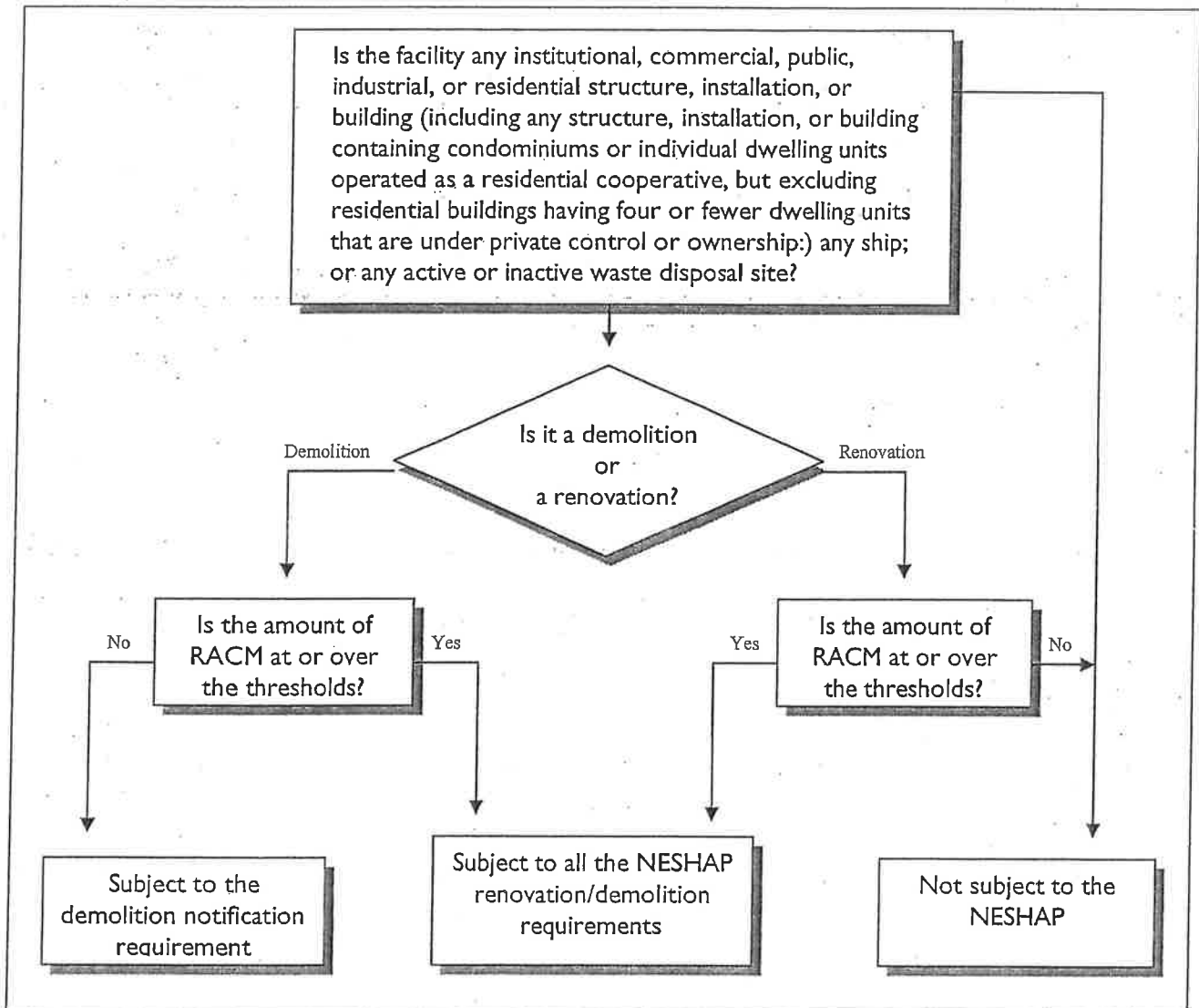


Figure 1. Flowchart for Determining Applicability to the Asbestos NESHAP

Understanding the Asbestos NESHAP

Examples of operations that are neither demolitions nor subject renovations and, therefore, not subject to the Asbestos NESHAP include:

- ✓ Renovation below the threshold levels unless it is above the threshold levels cumulatively in a calendar year (notification may be required by DELEG);
- ✓ Removal of **nonfriable asbestos-containing material**, as long as the material is not in poor condition and it remains nonfriable during all phases of removal, handling, and waste disposal;
- ✓ Asbestos encapsulation (notification may be required by DELEG); and
- ✓ Removal of interior, non-load supporting walls that are not associated with any regulated asbestos-containing material.

ASBESTOS NESHAP NOTIFICATION REQUIREMENT

An important aspect of the NESHAP is the advance notification requirement, which enables the AQD to ensure that all precautions are being taken to minimize asbestos emissions. Building **owners** or contractors must submit notifications for all subject demolitions and for subject renovations where the amount of RACM meets or exceeds the thresholds. Notifications must be postmarked or hand delivered at least ten **working days prior** to beginning demolition or renovation. For planned renovation operations involving individual, nonscheduled operations, the notification is required at least ten working days before the beginning of the calendar year for which notice is being given. Notifications must be delivered or postmarked as early as possible, but not later than the following work day for ordered demolitions and for emergency renovation operations. An **emergency renovation operation** means that the renovation operation was not planned but results from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, is necessary to protect equipment from damage, or is necessary to avoid imposing an unreasonable financial burden.

The notification must include the following information:

- ✓ Date of notification (or date of revision);
- ✓ Type of notification (original, revised, canceled, annual);
- ✓ Type of operation (demolition or renovation);
- ✓ Scheduled starting and completion dates of asbestos removal work;
- ✓ Scheduled starting and completion dates of demolition or renovation;
- ✓ Abatement contractor information;
- ✓ Demolition contractor information (if project is a demolition);
- ✓ Facility owner information;
- ✓ Facility description including location;
- ✓ Disposal site information;
- ✓ Waste transporter information;
- ✓ Ordered demolition information (if project is an ordered demolition);
- ✓ Estimate of amount of RACM to be removed and amount of Category I and Category II nonfriable ACM that will not be removed before demolition;

Understanding the Asbestos NESHP

- ✓ Project description, including surfaces asbestos will be removed from, removal method, and method of demolition;
- ✓ Engineering controls description;
- ✓ Procedure if unexpected asbestos is found;
- ✓ Procedure used to detect asbestos;
- ✓ Emergency renovation information (if project is an emergency renovation); and
- ✓ Certification that at least one trained person will supervise the asbestos stripping and removal.

Michigan's "Notification of Intent to Renovate/Demolish" form should be used to fulfill the notification requirement. For a copy of this form, along with guidelines on how to complete the form, see the "Where to Get Additional Information" section on page 12. Delivery of the notification must be made by the U.S. Postal Service, commercial delivery service, or hand delivery. Telefaxing notifications (or revisions to notifications) is not acceptable.

• **Where To Send Notifications**

Addresses for sending the notifications are listed on the notification form. Please note that in Michigan, a NESHP notification must be sent to the Lansing DNRE. For mailing addresses, see the "Where to Get Additional Information" section on page 12. For all Michigan counties except Wayne County, send the notification to the Lansing DNRE. For those located in Wayne County, notifications should be sent to the Detroit Field Office of the DNRE. It is not necessary to send copies of NESHP notifications to the U.S. EPA for renovation or demolition activities in Michigan.

• **Revising a Notification**

A revised notification should be sent any time there is a change in any of the required information previously submitted. The simplest way is to make a copy of both sides of the original notification (or last revision), mark it as a revision, indicate the date the revision is being sent, cross out the old information, and hand write or type in the new information. Additionally, it is helpful if the changed information is highlighted.

The NESHP specifically requires a revision if the amount of asbestos reported changes by 20% (either a decreased amount or an increased amount). An increased amount refers to additional asbestos unexpectedly found while working on the specific project covered in the notification. If the scope of the project increases, a new notification is required. For example, removing asbestos from an area of the building not covered by the original notification would be considered a change in project scope.

• **Revising Project Dates**

If the project will begin on a date later than the date in the original notice (or latest revision), call before the previously scheduled start date to notify the Lansing DNRE or the DNRE's Detroit Field Office of the new start date and follow up with a written notification postmarked no later than the previously scheduled start date. For projects located in Wayne County call the Detroit Field Office Asbestos Coordinator at 313-456-4686. For all other projects in Michigan call the Lansing Office Asbestos Line at 517-373-7064. If the project will start earlier than the original start date (or latest revision), provide the new start date at least ten working days before beginning the project. **Under no circumstances shall a NESHP project begin on a date other than the date in the notification (or the latest revised notification).**

If a project will be postponed indefinitely and a new start date cannot be predicted, call before the scheduled start date and immediately submit a revised notification canceling the project. For projects located in Wayne County call the Detroit Field Office Asbestos Coordinator at 313-456-4686. For all other projects in Michigan call the Lansing Office Asbestos Line at 517-373-7064. If the project is rescheduled, a new notification must be submitted at least ten working days prior to beginning the project. It is unacceptable to indefinitely postpone a project and then send a revised start date less than ten working days before the project is to begin.

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WORK PRACTICE STANDARDS

For a demolition project, the RACM is not required to be removed or stripped if any of the following criteria are met:

- ✓ It is Category I nonfriable ACM that is not in poor condition, is not **friable**, and a licensed asbestos abatement contractor is made available at the demolition site.
- ✓ It is on a **facility component** that is encased in concrete or other similarly hard material and is adequately wet whenever exposed during demolition.
- ✓ It was not accessible for testing and, therefore, was not discovered until after the demolition began and as a result of the demolition cannot be safely removed.
- ✓ It is Category II nonfriable ACM with low probability of becoming crumbled, pulverized, or reduced to powder during demolition.
- ✓ For large facility components (reactor vessels, large tanks, steam generators, etc. but not beams): the component is removed, transported, stored, disposed of, or reused without disturbing or damaging the RACM; the component is encased in a **leak-tight** wrapping; and the leak-tight wrapping is properly labeled during loading, unloading, and storage.

If a facility is demolished by intentional burning (e.g., fire training), all ACM including Category I and Category II nonfriable ACM is regulated and must be removed before burning.

Remove all RACM from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material. When stripping asbestos from a facility component while it remains in place in the facility, **adequately wet** the asbestos. After a facility component that is covered with asbestos is taken out of a facility, it shall be stripped or contained in leak-tight wrapping. When stripping, adequately wet the component or use a local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material.

The following requirements must be followed for RACM, including material that has been removed or stripped:

- ✓ Adequately wet the material and ensure that it remains adequately wet until collected and contained or treated in preparation for disposal;
- ✓ Carefully lower the material to the ground and floor, not dropping, throwing, sliding, or otherwise damaging or disturbing the material; and
- ✓ Transport the material to the ground via leak-tight chutes or containers if it has been removed or stripped more than 50 feet above ground level and was not removed as units or in sections.

There are two situations for which the requirement for adequately wetting the material does not apply. The first case is when the temperature at the point of wetting is below 32° F. The temperature must be recorded at the beginning, middle, and end of each work day; and these records must be kept for two years. The second situation involves renovation operations where wetting would unavoidably damage equipment or present a safety hazard. For these operations, written approval must be obtained from DNRE (submit a request for a waiver for not wetting in writing to DNRE [address listed in "Where to Get Additional Information" section on page 10]), and the following emission control methods must be used:

- (1) A local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material;
- (2) A glove-bag system designed and operated to contain the particulate asbestos material; and
- (3) Leak-tight wrapping to contain all RACM prior to dismantlement.

WASTE DISPOSAL

The Asbestos NESHAP specifies that no **visible emissions** can be discharged to the outside air from the collection, processing, transport, and disposal of **asbestos-containing waste materials**. After wetting, seal all asbestos-containing waste material in leak-tight containers. If the waste will not fit into containers, it must be placed in leak-tight wrapping. Label the containers or wrapped materials being taken away from the facility using warning labels specified by the Occupational Safety and Health Administration (OSHA) and the U.S. DOT. The label should include the name of the **waste generator** and the location at which the waste was generated. Asbestos-containing waste materials must be deposited as soon as practical to an appropriate waste disposal site. Vehicles used to transport asbestos-containing waste materials must be marked during the loading and unloading of waste. U.S. DOT regulations require the proper identification number of "NA2212" be placed on shipping papers and package marking.

Waste shipment records must be maintained by the owner or operator of a demolition/renovation operation. The following information is required on waste shipment records:

- ✓ Generator name, address, and telephone;
- ✓ Asbestos NESHAP program agency name and address;
- ✓ Quantity of asbestos-containing waste materials (cubic meters or cubic yards);
- ✓ A monitored emergency response telephone number for a person who is knowledgeable of the hazardous material being shipped and has comprehensive emergency response and incident mitigation information, or who has immediate access to a person with such knowledge;
- ✓ Waste disposal site operator name and telephone;
- ✓ Disposal site name and physical location;
- ✓ Transport date;
- ✓ Transporter name, address, and telephone; and
- ✓ Certification.

Provide a copy of the waste shipment record to the disposal site owner or operator at the time of delivery. If a copy of the waste shipment record signed by the owner or operator of the waste disposal site is not received by the waste generator within 35 days, contact the transporter and disposal site to determine the status of the waste shipment. Notify the AQD in writing if a signed waste shipment record is not received from the waste disposal site within 45 days. Keep a copy of all waste shipment records, including the signed copy, for at least two years.

Under Part 115 of Michigan Public Act 451 of 1994, as amended, administered by DNRE, all asbestos-containing material regulated by any state or federal regulations must be disposed of at a Type II (municipal solid waste) landfill. Asbestos-containing material that is nonfriable AND is not in poor condition or will not become friable at any time can be disposed of in a Type III (construction and demolition) landfill. Contact your local DNRE District Office or the Environmental Assistance Center (800-662-9278) if you have waste disposal questions.

TRAINING

Training is required by three different federal and state agencies when it comes to the handling of asbestos, its removal, and the transportation of the material as a hazardous waste. The Asbestos NESHAP requires at least one trained supervisor to be present when asbestos-containing material is stripped, removed, disturbed, or otherwise handled. Training includes, at a minimum: applicability, notification, material identification, control procedures, waste disposal, reporting and recordkeeping, asbestos hazards, and worker protection. Refresher training is required every two years. Evidence of this training must be posted and made available for inspection at the demolition or renovation site. In addition to training supervisors, the DELEG requires that asbestos workers

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receive training. For a list of certified trainers and/or for more information about DELEG training requirements, contact the DELEG Asbestos Program at 517-322-1320. Finally, Hazmat employers are required to certify and document that Hazmat employees (as defined in 49 CFR 171.8) receive training in accordance with 49 CFR Part 172, Subpart H and Part 177. The training requirements would apply to any employee that transports asbestos, offers asbestos for transportation, prepares asbestos for transportation, or certifies a shipping paper or manifest for transportation. U.S. DOT training requirements cover such topics as general awareness/familiarization with 49 CFR Chapter I, Subchapter C; function-specific training for employees; safety methods and emergency response procedures; and security awareness training for risks associated with the transport of hazardous materials.

WHY COMPLY WITH THE ASBESTOS NESHAP

Compliance with the Asbestos NESHAP will reduce the public's and workers' exposure to asbestos and will keep facility owners and contractors operating within the law. Non-compliance with the NESHAP is a significant violation. The AQD attempts to reach a settlement with the owner and operator when violations of the Asbestos NESHAP occur. If a settlement acceptable to the U.S. EPA is not reached in a timely manner, the U.S. EPA may pursue enforcement action at the federal level. The U.S. EPA may decide to pursue an escalated enforcement action on its own. Violations of the NESHAP notification and work practice requirements may result in written warnings, administrative orders, civil penalties up to \$27,500 per day per violation, and/or criminal charges. Typically, violations are resolved with a consent order requiring the facility to pay a \$35,000 - \$50,000 penalty and to comply with the regulations for all future demolitions or renovations. Some owners and operators who have knowingly violated the Asbestos NESHAP have been sentenced to prison terms.

WHERE TO GET ADDITIONAL INFORMATION

Additional information about asbestos is available on the internet through the U.S. EPA's homepage (www.epa.gov/asbestos). In addition, the Asbestos NESHAP notification form, guidelines for completing the form, and regulations are located at www.michigan.gov/air. Select "Clean Air Assistance" and then "Asbestos" under "Federal Regulations." Questions about the federal OSHA standards or the state's asbestos compliance and training requirements can be obtained by visiting the DELEG Asbestos Program's web site at www.michigan.gov/asbestos. Questions related to the transportation of asbestos can be addressed by the U.S. Department of Transportation's (U.S. DOT) Hazmat Information Center at 202-467-4922. You can also visit the U.S. DOT, Pipeline and Hazardous Materials Safety Administration's web site at <http://hazmat.dot.gov>.

- **Government Agency Contacts:**

Lansing NESHAP Asbestos Coordinator
Air Quality Division
Michigan Department of Natural Resources and Environment
PO Box 30260
Lansing, Michigan 48909
517-335-4639 or 517-241-7463.

Detroit NESHAP Asbestos Coordinator
Air Quality Division
Michigan Department of Natural Resources and Environment
Cadillac Place, Suite 2-300
Detroit, Michigan 48202
313-456-4686 or 313-456-4700

Department of Energy, Labor and Economic Growth
Construction Safety and Health Division
Asbestos Program
PO Box 30671
Lansing, Michigan 48909-8171
517-322-1320

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Sgt. Susan M. Fries
Michigan State Police
Traffic Safety Division
Hazardous Materials & Investigations Unit
333 S. Grand Ave.
PO Box 30634
Lansing, Michigan 48913
517-241-0583

US Environmental Protection Agency
Asbestos Coordinator AT-18J
77 W. Jackson Boulevard
Chicago, Illinois 60604
Hotline: 1-800-621-8431 or 312-886-2395

ACRONYMS

ACM..... Asbestos-Containing Material
AQD..... Air Quality Division
CAA..... Clean Air Act
C&E..... Compliance and Enforcement
DNRE..... Michigan Department of Natural Resources and Environment
DELEG..... Michigan Department of Energy, Labor and Economic Growth
NESHAP..... National Emission Standards for Hazardous Air Pollutants
OSHA..... Occupational Safety and Health Administration
PLM..... Polarized Light Microscopy
RACM..... Regulated Asbestos-Containing Material
U.S. DOT..... U.S. Department of Transportation
U.S. EPA..... U.S. Environmental Protection Agency

DEFINITIONS

This section contains a list of definitions from the Asbestos NESHAP. Not all of these terms are used in this fact sheet.

Active waste disposal site: Any disposal site other than an inactive site.

Adequately wet: Sufficiently mix or penetrate with liquid to prevent the release of particulates. If visible emissions are observed coming from asbestos-containing material, then that material has not been adequately wetted. However, the absence of visible emissions is not sufficient evidence of being adequately wet.

Asbestos: The asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite.

Asbestos-containing materials: Any materials containing more than 1% asbestos.

Asbestos-containing waste materials: Mill tailings or any waste that contains commercial asbestos and is generated by a source subject to the Asbestos NESHAP. This includes filters from control devices, friable asbestos waste material, and bags or other similar packaging contaminated with commercial asbestos. As applied to demolition and renovation operations, this term also includes regulated asbestos-containing material waste and materials contaminated with asbestos including disposable equipment and clothing.

Asbestos mill: Any facility engaged in converting, or in any intermediate step in converting, asbestos ore into commercial asbestos. Outside storage of asbestos material is not considered a part of the asbestos mill.

Asbestos tailings: Any solid waste that contains asbestos and is a product of asbestos mining or milling operations.

Asbestos waste from control devices: Any waste material that contains asbestos and is from a pollution control device.

Understanding the Asbestos NESHP

Category I nonfriable asbestos-containing material (ACM): Asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos as determined using Polarized Light Microscopy.

Category II nonfriable ACM: Any material, excluding Category I nonfriable ACM, containing more than 1% asbestos as determined using Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Commercial asbestos: Any material containing asbestos that is extracted from ore and has value because of its asbestos content.

Cutting: To penetrate with a sharp-edged instrument and includes sawing, but does not include shearing, slicing, or punching.

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 any facility.

Emergency renovation operation: A renovation operation that was not planned but results from a sudden, unexpected event that, if not immediately attended to, presents a safety or public health hazard, is necessary to protect equipment from damage, or is necessary to avoid imposing an unreasonable financial burden. This term includes operations necessitated by nonroutine failures of equipment.

Fabricating: Any processing (e.g., cutting, sawing, drilling) of a manufactured product that contains commercial asbestos, with the exception of processing at temporary sites (field fabricating) for the construction or restoration of facilities. In the case of friction products, fabricating includes bonding, debonding, grinding, sawing, drilling, or other similar operations performed as part of fabricating.

Facility: Any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, or building containing condominiums or individual dwelling units operated as a residential cooperative but excluding residential buildings having four or fewer dwelling units); any ship; and any active or inactive waste disposal site. For purposes of this definition, any building, structure, or installation that contains a loft used as a dwelling is not considered a residential structure, installation, or building. Any structure, installation, or building that was previously subject to the Asbestos NESHP is not excluded, regardless of its current use or function.

Facility component: Any part of a facility including equipment.

Friable asbestos material: Any material containing more than 1% asbestos as determined using Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Fugitive source: Any source of emissions not controlled by an air pollution control device.

Glove bag: A sealed compartment with attached inner gloves used for the handling of asbestos-containing materials. Properly installed and used, glove bags provide a small work area enclosure typically used for small-scale asbestos stripping operations.

Grinding: To reduce to powder or small fragments and includes mechanical chipping or drilling.

Hazmat employee: means a person who is employed by a hazmat employer and who, in the course of employment, directly affects hazardous materials transportation safety. This term includes an owner-operator of a motor vehicle which transports hazardous materials in commerce. This term includes an individual, including a self-employed individual, employed by a hazmat employer who, during the course of employment:

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1. Loads, unloads, or handles hazardous materials;
2. Manufactures, tests, reconditions, repairs, modifies, marks, or otherwise represents containers, drums, or packagings as qualified for use in the transportation of hazardous materials;
3. Prepares hazardous materials for transportation;
4. Is responsible for safety of transporting hazardous materials; or
5. Operates a vehicle used to transport hazardous materials.

Hazmat employer: means a person who uses one or more employees in connection with: transporting hazardous materials in commerce; causing hazardous materials to be transported or shipped in commerce; or representing, marking, certifying, selling, offering, manufacturing, reconditioning, testing, repairing, or modifying containers, drums, or packagings as qualified for use in the transportation of hazardous materials. This term includes an owner-operator of a motor vehicle which transports hazardous materials in commerce. This term also includes any department, agency, or instrumentality of the United States, a state, a political subdivision of a state, or an Indian tribe engaged in an activity described in the first sentence of this definition.

In poor condition: The binding or the material is losing its integrity as indicated by peeling, cracking, or crumbling of the material.

Inactive waste disposal site: Any disposal site or portion of it where additional asbestos-containing waste material has not been deposited within the past year.

Installation: Any building or structure or any group of buildings or structures at a single demolition or renovation site that is under the control of the same owner or operator (or owner or operator under common control).

Leak-tight: Solids or liquids cannot escape or spill out. It also means dust-tight.

Malfunction: Any sudden and unavoidable failure of air pollution control equipment or process equipment or of a process to operate in a normal or usual manner so that emissions of asbestos are increased. Failures of equipment shall not be considered malfunctions if they are caused in any way by poor maintenance, careless operation, or any other preventable upset conditions, equipment breakdown, or process failure.

Manufacturing: The combining of commercial asbestos—or, in the case of woven friction products, the combining of textiles containing commercial asbestos—with any other material(s), including commercial asbestos, and the processing of this combination into a product. Chlorine production is considered a part of manufacturing.

Natural barrier: A natural object that effectively precludes or deters access. Natural barriers include physical objects such as cliffs, lakes or other large bodies of water, deep and wide ravines, and mountains. Remoteness by itself is not a natural barrier.

Nonfriable asbestos-containing material: Any material containing more than 1% asbestos as determined using Polarized Light Microscopy, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Nonscheduled renovation operation: A renovation operation necessitated by the routine failure of equipment, which is expected to occur within a given period based on past operating experience but for which an exact date cannot be predicted.

Outside air: The air outside buildings and structures, including, but not limited to, the air under a bridge or in an open air ferry dock.

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Owner or operator of a demolition or renovation activity: Any person who owns, leases, operates, controls, or supervises the facility being demolished or renovated or any person who owns, leases, operates, controls, or supervises the demolition or renovation operation, or both.

Particulate asbestos material: Finely divided particles of asbestos or material containing asbestos.

Planned renovation operations: A renovation operation, or a number of such operations, in which some RACM will be removed or stripped within a given period of time and that can be predicted. Individual, nonscheduled operations are included if a number of such operations can be predicted to occur during a given period of time based on operating experience.

Public and Commercial Building: The interior space of a building that is not a school building, a residential apartment building of fewer than ten units, or a detached single-family home. Public and commercial buildings include, but are not limited to, all of the following: industrial and office buildings, residential apartment buildings and condominiums of ten or more dwelling units, government-owned buildings, colleges and universities, museums, airports, hospitals, churches, preschools, stores, warehouses, and factories.

Regulated asbestos-containing material (RACM): Any all of following: (a) friable asbestos material, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming 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 operations.

Remove: To take out RACM or facility components that contain or are covered with RACM from any facility.

Renovation: Altering a facility or one or more facility components in any way, including the stripping or removal of RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Resilient floor covering: Asbestos-containing floor tile, including asphalt and vinyl floor tile and sheet vinyl floor covering containing more than 1% asbestos as determined using Polarized Light Microscopy.

Roadways: Surfaces on which vehicles travel. This term includes public and private highways, roads, streets, parking areas, and driveways.

Strip: To take off RACM from any part of a facility or facility components.

Structural member: Any load-supporting member of a facility, such as beams and load supporting walls, or any nonload-supporting member, such as ceilings and nonload-supporting walls.

Visible emissions: Any emissions, which are visually detectable without the aid of instruments, coming from RACM or asbestos-containing waste material, or from any asbestos milling, manufacturing, or fabricating operation. This does not include condensed, uncombined water vapor.

Waste generator: Any owner or operator of a source covered by the Asbestos NESHAP whose act or process produces asbestos-containing waste material.

Waste shipment record: The shipping document, required to be originated and signed by the waste generator, used to track and substantiate the disposition of asbestos-containing waste material.

Working day: Monday through Friday including holidays that fall on any of the days Monday through Friday.

Contact Us



Air Quality Division
Field Operations Section
National Emission Standard for Hazardous Air Pollutants (NESHAP), Asbestos Program

NESHAP Asbestos Program
Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7760
Office Hours: 8:00 a.m. - 5:00 p.m.

NESHAP Asbestos Program Staff	Phone Number	Email Address	Responsibility
Karen Kajiya-Mills	517-335-4874	kajiya-millsk@michigan.gov	Program Manager
Kimberly Dohm	517-241-7463	dohmk@michigan.gov	Notification Coordinator, General Information and Complaints
Asbestos Line	517-373-7064	none	Notification Revisions
Joel Asher	906-346-8502	asherj@michigan.gov	Upper & Northern Lower Peninsula Inspector, General Information and Complaints
Tammy Bell	313-456-4686	bellt4@michigan.gov	South East Lower Peninsula Inspector, General Information and Complaints
Sharon LeBlanc	989-894-6212	leblancs@michigan.gov	Northern Lower Peninsula & Thumb area Inspector, General Information and Complaints
Jessica Magro	517-241-6878	magroj@michigan.gov	Central & Western Lower Peninsula Inspector, General Information and Complaints
James Voss	313-456-4687	vossj1@michigan.gov	South East Lower Peninsula Inspector, General Information and Complaints