

Asbestos Awareness Training: EPA Requirements for Construction

5-Minute Talk

EPA Requirements for Construction

The Environmental Protection Agency (EPA) lists asbestos as a hazardous air pollutant and controls asbestos emissions under the National Emission Standards for Hazardous Air Pollutants (NESHAPS) [40 CFR Part 61, Subpart M].

The purpose of NESHAPS, as it relates to asbestos, is to prevent asbestos fibers from becoming airborne by controlling manufacturing, spraying, fabrication, application, removal, and disposal operations.

Whether you are an asbestos abatement contractor doing renovation work or a demolition company, dealing with asbestos is a huge responsibility. It takes a lot of research and knowledge of both EPA, Occupational Safety and Health Administration (OSHA), and Department of Transportation (DOT), rules and the know-how to implement those rules. A quick glance at the EPA rules will give you an idea of the depth of the EPA requirements.

Standard for demolition and renovation (40 CFR 61.145)

This section of the NESHAPS rule determines what level of requirements apply to the owner or operator of a demolition/renovation activity. The determination is made after inspecting a facility for the presence of asbestos. Requirements are based on the amount of regulated asbestos-containing material (RACM) at a jobsite.

Notification requirements (61.145(b)) — Depending on inspection results, an owner or operator may have to:

- Provide the EPA with a written notice of intention to demolish or renovate.
- Update the notice, as necessary, including when the amount of asbestos affected changes by at least 20%.

The notice is complicated and requires all information listed in 61.145(b)(4).

Procedures for asbestos emission control (61.145(c)) — Depending on inspection results an owner or operator may have to comply with the procedures for asbestos emission controls in 61.145(c). Owner/operators must:

Remove all RACM from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal. A list of reasons that RACM would not need to be removed is found in 61.145(c)(1).



The rule also provides for:

- ***Spraying operations*** — Operations in which asbestos-containing materials are spray applied. (61.146)
- ***Installation of insulating materials*** — Operations for installing or reinstalling any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. (61.148)
- ***Disposal*** — Waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations. (61.150)
- ***Reporting*** — Providing information to the EPA. (61.153)

Employee Training

There are no specific training requirements in 40 CFR 61.145 for training asbestos demolition/ renovation workers. Training requirements are in 29 CFR 1926.1101.

Depending on the class of work, as defined in the OSHA rules, training can be OSHA requirements; from EPA's Model Accreditation Plan (40 CFR, Part 763, Subpart E, Appendix C); or 40 CFR 763.92(a), Training of maintenance/custodial employees.

Training Tips

This 5 Minute lesson is an overview of the Environmental Protection Agency's requirements for asbestos demolition/renovation work. The 5 Minute lesson itself is the training. If you are, or are planning to go into installation of materials containing asbestos (e.g., roofing and flooring), or are in demolition or renovation you need to know not only the OSHA rules but also the EPA requirements.

Where To Go For More Information

29 CFR 1926.1101—Asbestos (Occupational Safety and Health).

40 CFR 61, Subpart M—National Emission Standards for Asbestos (EPA).

40 CFR 763—Asbestos (EPA).

