

Asbestos Awareness: EPA Requirements for Construction

Handout

Increasing public health concerns about the effects of exposure to asbestos, primarily through the inhalation of airborne asbestos fibers, resulted in the Environmental Protection Agency (EPA) listing asbestos as a hazardous air pollutant and controlling asbestos emissions under the National Emission Standards for Hazardous Air Pollutants (NESHAPS).

Whether your company does asbestos abatement, renovation work, or you are a demolition company, dealing with asbestos is a huge responsibility. Working with asbestos takes a lot of difficult training and that includes knowledge of both EPA and Occupational Safety and Health Administration (OSHA) rules.

Training requirements are in the OSHA regulations at 29 CFR 1926.1101 for asbestos workers. Depending on the class of asbestos work you are involved in (Class I-IV), your training can be strictly to meet OSHA requirements or it can be an intense 40 hour program from EPA's Model Accreditation Plan for training of maintenance and custodial employees.

If you are involved in asbestos work, you should be very familiar with the OSHA asbestos regulations. Let's take a look at some of the EPA requirements found at 40 CFR 61.145 for owners or operators of demolition or renovation activities.

Standard for demolition and renovation

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 jobsite for the presence of asbestos. Requirements are based on the amount of regulated asbestos-containing material (RACM) at a jobsite.

Depending on inspection results, an owner or operator may have to provide the EPA with a written notice of intention to demolish or renovate. The notice is complicated and requires a lot of information listed in the EPA rules.

Depending on inspection results an owner or operator may also have to comply with the procedures for asbestos emission controls in 61.145(c). Owner/operators must remove all RACM from a jobsite being demolished or renovated before any activity begins that would break up, dislodge, or disturb the material.

The rule also provides for:

Spraying operations — Operations in which asbestos-containing materials are spray applied.



Installation of insulating materials — Operations for installing or reinstalling any insulating materials that contain certain commercial asbestos.

Disposal — Waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations.

Reporting — Providing information to the EPA.

Working with asbestos is difficult because of all the requirements, both OSHA and EPA. However, they are all designed to keep you from developing asbestosis, a disabling and sometimes fatal disease caused by inhalation or ingestion of asbestos fibers.

