

Mississippi Department of Environmental Quality
Policy for Handling
Demolitions of Structures to Address Potential Asbestos

January 3, 2006

Disclaimer: *This guidance supersedes MDEQ December 16, 2005, "Guidance for Handling Asbestos during Demolition" and all previously issued MDEQ guidance on handling asbestos during demolition related to Hurricane Katrina. This guidance has been reviewed by the U.S. Environmental Protection Agency (EPA), and is consistent with federal NESHAP requirements.*

Asbestos Related Demolitions

Buildings damaged by Hurricane Katrina, but still standing may contain asbestos. Some of these buildings may need to be demolished. This document generally explains how demolition of these buildings must be handled in compliance with federal asbestos NESHAP requirements in order to avoid exposure to potentially harmful asbestos fibers.

The federal asbestos regulations are contained in 40 CFR sections 61.140 through 61.160. In addition, the OSHA regulations on asbestos are also applicable. Plain language guidance on regulations concerning demolition and disposal of structures that contain asbestos may be found in *Guide to the Asbestos NESHAP*.

Residential Structures

1. For an individual residence being demolished by the homeowner, none of the asbestos NESHAP requirements apply. However, since asbestos is a known carcinogen, homeowners should protect themselves as much as possible against the inhalation of asbestos fibers caused from the demolition and handling of structures containing materials such as asbestos-containing floor tile, transite siding, and insulation products. We recommend that you obtain and review materials on handling asbestos. Some of these materials are located at <http://www.epa.gov/asbestos/pubs/ashome.html#4> By sufficiently wetting these materials and keeping them wet during all demolition and handling activities, the homeowner can reduce the possibility of creating a fiber release episode. In addition, such materials should not be crushed, pulverized, abraded, grinded or sawed.
2. Residential structures containing asbestos may not be burned, unless all asbestos-containing material is removed in accordance with the asbestos NESHAP prior to burning.

Ordered Demolition of Residential Structures That Are Structurally Unsound and in Danger of Imminent Collapse

1. A government ordered demolition of residential structures that are structurally unsound and in danger of imminent collapse pertains to the demolition of “installations” in the asbestos NESHAP. “Installations” are defined in the asbestos NESHAP as any group of buildings or structures, which includes residential structures, at a single demolition site that are under the control of the same owner or operator (or owner or operator under common control) including a contractor hired to demolish this group of structures. All structures that comprise the installation shall be wetted before and during demolition to reduce the potential for air migration of asbestos fibers. MDEQ recommends that each structure be knocked down wall by wall, folding the structure in on itself in order to minimize excess breakage of asbestos material. Debris should be moved in a way to minimize excess breakage.
 - a. If a residential structure that is part of an installation will be demolished pursuant to an order of a State or local government agency, issued because the structure is structurally unsound and is in danger of imminent collapse, the removal of the asbestos prior to the commencement of the demolition is not required. In such situations, a person certified by the Mississippi Department of Environmental Quality (MDEQ) shall be on-site to supervise the demolition activities. If necessary, MDEQ may be contacted at 601/961-5554, prior to the commencement of any demolition activities.
 - b. Notice of such demolition that includes all the information specified in the asbestos NESHAP notification provisions is required as early as possible before, but not later than the following working day.
2. With respect to Jackson, Harrison, Hancock, Pearl River, Stone, and George counties:
 - a. For any residential structure with transite or asbestos-containing siding that is not removed prior to a demolition occurring under an order of a State or local government agency because the facility is structurally unsound and in danger of imminent collapse, the demolition debris from the entire demolished structure must be disposed of in a NESHAP approved (Subtitle D) landfill.
 - b. For any residential structure with transite or asbestos-containing siding that is removed, but not made friable prior to a demolition occurring under an order of a State or local government agency because the facility is structurally unsound and in danger of imminent collapse, the demolition debris from the entire demolished structure must be disposed of in an upgraded Class I

Rubbish Disposal Site or in a NESHAP approved (Subtitle D) landfill.¹

- c. For any residential structure with transite or asbestos-containing siding which is removed, and made friable, prior to demolition under an order of a State or local government agency because the facility is structurally unsound and in danger of imminent collapse, the transite or asbestos-containing siding must be disposed of in a NESHAP approved (Subtitle D) landfill, and the remainder of the demolition debris from the demolished structure can be disposed of in a upgraded Class I Rubbish Disposal Site or in a NESHAP approved (Subtitle D) landfill.
- d. For any residential structures without transite or asbestos-containing siding being demolished under an order of a State or local government agency issued because the facility is structurally unsound and in danger of imminent collapse, the demolition debris from the entire demolished structure can be disposed of in an upgraded Class I Rubbish Disposal Site or in a NESHAP approved (Subtitle D) landfill.
- e. Additional wetting of the debris is required at all times after demolition and during handling and loading for transport to a disposal site. During the loading and unloading of asbestos-containing materials, each waste hauling vehicle should have a placard reading: **“Danger Asbestos Dust Hazard, Cancer and Lung Disease Hazard, Authorized Personnel Only.”** These signs must be visible during the loading and unloading of the waste and must be displayed in such a manner and location that they can easily be read. The debris must be trucked to a NESHAP approved (Subtitle D) landfill or upgraded Class I Rubbish Disposal Site allowed to accept asbestos in accordance with the instructions set forth above and records of waste shipment in the form specified in the asbestos NESHAP must be maintained by the owner or operator of the demolition activity and the owner and/or operator of the NESHAP approved (Subtitle D) landfill or upgraded Class I Rubbish Disposal Site.
- f. Procedures on demolition practices shall be communicated through training provided by MDEQ in partnership with EPA, to contractors, subcontractors, and MDEQ certified asbestos personnel. At a minimum, these training sessions will cover work practice standards, emission control procedures, and collection and disposal of demolition debris. In addition, MDEQ will routinely inspect all Upgraded Class I Rubbish Disposal Sites during operating hours.

Nonresidential Buildings (e.g., Commercial and Public Buildings) and

¹ Upgraded Class I Landfills (a/k/a Class I Rubbish Sites) are those facilities that require incoming materials to be inspected, placed in a pre-designated area, and covered with six inches of non-asbestos containing soil and compacted once per day. In meeting these “upgrade” requirements, as well as the remainder of the asbestos NESHAP requirements that pertain to active asbestos waste disposal sites (i.e., recordkeeping, closure, etc.), these landfills will be in compliance with the active asbestos waste disposal site standards set forth in the asbestos NESHAP.

Residential Buildings with Five or More Dwelling Units

1. The building must be inspected by a person certified by MDEQ to identify the presence of asbestos-containing materials prior to the commencement of demolition.
2. MDEQ must be notified for each property subject to demolition or renovation activity ten working days prior to the commencement of any demolition activity. The notice must include all the information specified in the applicable asbestos NESHAP notification provisions.
3. Only persons certified by MDEQ may abate or remove asbestos at a nonresidential building or residential building with five or more dwelling units. If asbestos is present, the trained MDEQ-certified asbestos removal experts should be contacted. All regulatory provisions for emission control are applicable and typically require asbestos removal in advance of demolition.
4. If a building will be demolished pursuant to an order of a State or local government agency, issued because the facility is structurally unsound and is in danger of imminent collapse, the removal of the asbestos prior to the commencement of the demolition is not required. In such situations, a person certified by MDEQ shall be on-site to supervise the demolition activities. If necessary, MDEQ may be contacted at 601/961-5554, prior to the commencement of any demolition activities.
5. During the commencement of any demolition, MDEQ recommends that each structure be knocked down wall by wall, thereby folding the structure in on itself in order to minimize excess breakage of asbestos material. Debris should be moved in a way to minimize excess breakage. To ensure full compliance with the Asbestos NESHAP, all the wastes should be treated as asbestos-containing waste materials and sent to a NESHAP approved (Subtitle D) landfill unless asbestos has been segregated from the debris. The asbestos-containing waste materials, or all the wastes if there has been no segregation, should be covered and must be kept wet during transport to prevent dust and debris from being released. Occupational Safety and Health Administration (OSHA) requirements apply to the workers.
6. Asbestos-containing waste originating from demolition of nonresidential buildings or residential buildings with five or more dwellings units must be disposed of at a NESHAP approved (Subtitle D) landfill. For the coastal region these sites include Pecan Grove Landfill (228-380-1081), Central Landfill (601-795-2500) and MacLand Disposal Center (228-475-9747) A complete listing of NESHAP landfills can be found at [http://www.deq.state.ms.us/MDEQ.nsf/pdf/Air_Air-Neshapasbestoslandfills/\\$File/418NESHAP%20Landfills.pdf?OpenElement](http://www.deq.state.ms.us/MDEQ.nsf/pdf/Air_Air-Neshapasbestoslandfills/$File/418NESHAP%20Landfills.pdf?OpenElement).

7. Additional wetting of the debris is required at all times after demolition and during handling and loading for transport to a disposal site. During the loading and unloading of asbestos-containing materials, each waste hauling vehicle must have a placard reading: **“Danger Asbestos Dust Hazard, Cancer and Lung Disease Hazard, Authorized Personnel Only.”** These signs must be visible during the loading and unloading of the waste and must be displayed in such a manner and location that they can easily be read. The debris must be trucked to a NESHAP approved (Subtitle D) landfill allowed to accept asbestos and records of waste shipment in the form specified in the asbestos NESHAP must be maintained by the owner or operator of the demolition activity and the landfill owner and/or operator.
8. Structures containing asbestos may not be burned, unless all asbestos-containing material is removed in accordance with the asbestos NESHAP prior to burning.