

Asbestos Related Notification of Demolition and Renovation

[Form for Notification of Demolition and Renovation in Indian Country, Alaska and Idaho](#)

[What is a notification?](#)

[Whom do I notify?](#)

[How do I notify?](#)

[Are telefaxed or telephone notifications acceptable?](#)

[Is there a form or format for notifications?](#)

[Who is responsible for submitting a notification -- the owner of the building which is being demolished or renovated, or the contractor?](#)

[When a condominium complex is being renovated, who as owner, is responsible for submitting a notification?](#)

[Do demolitions of facilities in which no asbestos is present require notification?](#)

[When I notify regarding a renovation, what date do I consider the start date?](#)

[When I notify regarding a demolition, do I give the start date of the demolition or of the asbestos removal? Which date do I use to determine whether I've met the 10-day waiting period?](#)

[Does the 10-day notification requirement refer to "calendar" days or "working" days?](#)

[What is a "nonscheduled renovation operation"?](#)

[Do I have to notify for non-scheduled operations? When?](#)

[Must I notify the agency again if I know that a specific renovation project involving more than the threshold amount \(including the work covered by the calendar year notice for non-scheduled operations\) is about to occur at a specific time?](#)

[What constitutes an emergency renovation?](#)

[Under what conditions must I notify for emergency renovations? When must I notify?](#)

[When does a notification need to be revised?](#)

[When do I submit a revised notification?](#)

[Tribal Notification](#)

[Go to top of page](#)

What is a notification?

A notification is a written notice of intent to renovate or demolish. Notifications must contain certain specified information, including but not limited to, the scheduled starting and completion date of the work, the location of the site, the names of operators or asbestos removal contractors, methods of removal and the amount of asbestos, and whether the operation is a demolition or renovation. See Section 61.145(b) of the Asbestos NESHAP regulation.

Whom do I notify?

In **Alaska**, send your original notification to EPA Region 10, 1200 Sixth Avenue, WCM-127, Seattle, WA 98101. Please fax an advance copy to: Ray Nye, (206)553-8509.

In **Idaho**, send your original notification to EPA Region 10, Idaho Operations Office (IOO), 1435 N. Orchard Street, Boise, ID 83706. Questions in Idaho? Call (208)323-8287.

In **Oregon**, contact Kevin McCrann of the Oregon Department of Environmental Quality at (503)667-8414 x55018, except in Lane County, OR, where you should contact Tom Freeman at 541-726-2514, Ext. 222.

In Washington, notify the [local air pollution control agency](#) EXIT Disclaimer

How do I notify?

Mail or hand-deliver the notification to the appropriate agency.

[Go to top of page](#)

Are telefaxed or telephone notifications acceptable?

No. Telefaxed notifications are not accepted. Telephone notifications are only acceptable in emergency situations at the discretion of the EPA Regional Office or delegated agency and must be followed with a written copy by the following working day.

Is there a form or format for notifications?

Yes, there is a [suggested form](#) for notifications. You can obtain a form, and instructions on how to fill it out, from your delegated State or local agency or from your EPA Regional Office.

Who is responsible for submitting a notification -- the owner of the building which is being demolished or renovated, or the contractor?

The NESHAP regulation states that either the owner of the building or operator of the demolition or renovation operation can submit the notification. Usually, the two parties decide together who will notify. If neither provide adequate notice, EPA can hold either or both parties liable.

When a condominium complex is being renovated, who as owner, is responsible for submitting a notification?

While owners and operators share responsibility for proper notification, the condominium or co-op board is responsible as the owner. The board should ensure that they are told when work takes place on individual units, so that they can comply with notification (and other EPA) requirements, especially if multiple operators are involved.

[Go to top of page](#)

Do demolitions of facilities in which no asbestos is present require notification?

Yes. All demolitions that meet the definition of facility must notify.

When I notify regarding a renovation, what date do I consider the start date?

For a renovation, the start date is the day that the removal of asbestos-containing material, or any other asbestos-handling activities, including precleaning, construction of containment, or other activities that could disturb the asbestos, will begin.

When I notify regarding a demolition, do I give the start date of the demolition or of the asbestos removal? Which date do I use to determine whether I've met the 10-day waiting period?

For a demolition, the start date is the date that the removal or related activity begins. The date the demolition starts also must be reported. The waiting period should be calculated based on the start date of the removal or the demolition, if no removal is required. The waiting period is necessary to give inspectors time to visit the site before activity begins.

[Go to top of page](#)

Does the 10-day notification requirement refer to "calendar" days or "working" days?

The Asbestos NESHAP regulation specifies "working days." Holidays that fall between Monday and Friday count as "working days."

What is a "nonscheduled renovation operation"?

A "nonscheduled renovation operation" is a renovation operation that is caused by the routine failure of equipment which is expected to occur based on past operating experience, but for which an exact date cannot be predicted.

Do I have to notify for non-scheduled operations? When?

Yes, if you can predict based on past experience that renovations will be necessary during the calendar year and the amount of asbestos is likely to exceed the jurisdictional amount, notification is required. This notification must be submitted at least 10 working days before the end of the calendar year preceding the year for which notice is being given.

Note: Single renovation projects which exceed the threshold amount are not covered by this type of notice. A separate notification is required for these projects.

Must I notify the agency again if I know that a specific renovation project involving more than the threshold amount (including the work covered by the calendar year notice for non-scheduled operations) is about to occur at a specific time?

Yes.

[Go to top of page](#)

What constitutes an emergency renovation?

An emergency renovation is a renovation that was not planned, but results from a sudden, unexpected event that either immediately produces unsafe conditions, or that, if not quickly remedied, could be reasonably foreseen to result in an unsafe or detrimental effect on health or is necessary to protect equipment and avoid unreasonable financial burden. The term includes renovations necessitated by non-routine equipment failures. For example, the explosion of a boiler in a chemical plant might require emergency renovations, since such an explosion would disrupt normal operations. However, renovations involving routine repairs are not emergencies.

Under what conditions must I notify for emergency renovations? When must I notify?

First, inspect the facility and determine the amount of RACM that may have to be removed or disturbed to repair the facility. (If you don't have the time to have samples analyzed, you should assume that all insulation is RACM.) Then, if the amount of RACM is in excess of the threshold amount, you should mail or deliver a notification as soon as possible, but certainly no later than the following workday. A notification which is postmarked more than one working day after the emergency will be considered in violation of the notification requirements. EPA recommends that you send the notice by overnight express mail, and that you phone in a notification as well to the delegated agency and/or EPA Regional Office.

When does a notification need to be revised?

A notification must be revised if information contained in the original notice has changed. For example, you must revise the notification if you change the start date of an operation. If the change relates to the amount of RACM involved, you need only revise the notification if the amount changes by more than 20 percent.

When do I submit a revised notification?

You should telephone EPA as soon as possible after you realize the revision is necessary, and should then mail or hand deliver a written notice. If you delay the start date of a project, EPA must receive the revised notification no later than the original start date. If you plan to begin work before the date specified in the original notice, EPA must receive the revised notice at least 10 working days before the revised start date.

[Go to top of page](#)

Notification of Demolition and Renovation Forms & Procedures

[Notification of Demolition and Renovation Form for Alaska, Idaho, and Tribes](#) (PDF, 21 KB, 2 pgs.)

You will need Adobe Acrobat Reader to view PDF files. See [EPA's PDF page](#) for more information about getting and using the free Acrobat Reader.

Tribal Notification

If you are a Tribe within Region 10 in Oregon, Idaho or Washington, send your original notification to Michele Wright, EPA Region 10, 1200 Sixth Avenue, OCE-127, Seattle, WA 98101. Please fax an advance copy to: Michele Wright at (206) 553-8509.

In **Alaska**, send your original notification to EPA Region 10, 1200 Sixth Avenue, WCM-127, Seattle, WA 98101. Please fax an advance copy to: Michele Wright at (206) 553-8509.

In **Idaho**, send your original notification to EPA Region 10, Idaho Operations Office (IOO), 1435 N. Orchard Street, Boise, ID 83706. Questions in Idaho? Call (208) 323-8287.

In **Oregon**, contact Kevin McCrann of the Oregon Department of Environmental Quality at (503) 667-8414 x55018, except in Lane County, OR, where you should contact Tom Freeman at (541) 726-2514, Ext. 222.

In **Washington**, notify the [local air pollution control agency](#) [EXIT Disclaimer](#) .

For **all** notifications please remember that there is a **ten day** waiting period before any abatement work can begin.