



# ENVIRO REPORT

## BUILDING RENOVATION & DEMOLITION

### NESHAP Requirements

In 1990, the United States Environmental Protection Agency, under 40 CFR Part 61, Subpart M (Asbestos NESHAP), revised existing standards for renovation, demolition, and waste disposal where asbestos-containing material (ACM) is present.

***The Asbestos NESHAP requires building owners of regulated structures to thoroughly inspect for ACM that may be disturbed by renovation or demolition activity.***

A regulated structure is defined as installations or buildings involving institutional, commercial, public, industrial, or residential uses. The only exception is residential structures involving a single structure. In general, regulatory agencies have been enforcing requirements for demolition of structures but have not enforced the NESHAP requirements for renovation activities. Recently however, to emphasize and enlighten all entities involved with regulated structures, ***MDNR published a fact sheet in February 2005, outlining these requirements titled "Asbestos Requirements for Demolition and Renovation Projects"***. You may obtain copies of the Air Pollution Control Program Fact Sheet from the department's web site at [www.dnr.mo.gov/alpd/apcp](http://www.dnr.mo.gov/alpd/apcp). The following is provided as a regulatory guide.

If renovating or demolishing a regulated structure, ***you must***, per the Asbestos NESHAP:

- ▶ Conduct asbestos inspection by a Certified Asbestos Inspector
- ▶ Identify all regulated ACM that may be disturbed
- ▶ Plan for removal of regulated ACM prior to renovation or demolition
- ▶ Provide regulatory notification to State or Local regulatory agency
- ▶ Conduct ACM removal to State or Local requirements
- ▶ Properly dispose of asbestos waste material

Activities that could disturb building materials during planned renovation include:

- |  |  |
|--|--|
| ▶ Disturbing plaster or drywall systems on walls or ceilings | ▶ Renovation to or access above suspended ceilings |
| ▶ Mechanical system upgrades/replacement                     | ▶ Roofing repair or replacement                    |
| ▶ Window/door replacement                                    | ▶ Replacing floor coverings                        |

(continued on page 2 )

## NESHAP REQUIREMENTS

(continued from page 1 )

### NPN Environmental Capabilities

**N**PN Environmental has conducted numerous building inspections to determine the presence and location of ACM. As part of performing a pre-demolition or pre-renovation inspection, NPN Environmental can:

- ▶ Conduct the inspection by a Certified Asbestos Inspector under the direction of a Registered Professional Engineer
- ▶ Prepare an Asbestos Inspection Report identifying and quantifying ACM disturbed by renovation or demolition activities with recommendations
- ▶ Develop an asbestos management plan to minimize fiber release
- ▶ Provide project specifications and bid documents for asbestos abatement
- ▶ Provide project management including contractor oversight, air monitoring and clearance sampling

Please contact **Greg DeGrande** by phone at **636-343-1300** or by email at **greg.degrande@npnenv.com** if we can be of any assistance in conducting a pre-renovation or pre-demolition inspection for you.

ENVIROReport is published by  
NPN Environmental  
Engineers, Inc.

Publishers:  
Nicolaus P. Neumann, P.E., RG, DEE  
David B. Rowe, P.E., DEE  
Principals

Contributors:  
Greg DeGrande,  
Senior Project Manager  
Amy L. Stehlin,  
Marketing Coordinator  
Kim A. Polacek,  
Office Manager

The statements in this document are intended solely as guidance and are not intended as regulatory policy. Any technical questions or comments can be sent to **Nic Neumann** at **nic.neumann@npnenv.com** or call **636-343-1300**.



1631 Headland Drive  
St. Louis, Missouri 63026