

The Asbestos NESHAP

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Background:

The Federal asbestos NESHAP is contained in 40 CFR 61, Subpart M. In California, EPA has delegated the enforcement authority to the State or local APCD's. San Luis Obispo APCD is delegated authority to administer and enforce this regulation. In general, the regulation is here to protect the public and the environment. It does so by regulating the asbestos material from cradle to grave; that is, from initial identification to ultimate disposal.

District Program:

All regulated facilities (schools, industrial and commercial sites, government facilities, etc.) must be thoroughly inspected, sampled and a survey report completed before proceeding with any activities that could disturb the asbestos materials; this includes demolition, moving structures, or interior renovation. State law requires that this inspection, sampling and survey report be done by a California Asbestos Consultant or a Site Surveillance Technician (CAC or SST).

All demolitions, and those renovations that disturb 160 or more square feet or 260 or more linear feet of Regulated Asbestos Containing Material (RACM), must submit a written notification to the APCD before work begins. RACM means that the asbestos material is greater than 1% asbestos and is friable. Friable means "able to be reduced to powder by hand pressure." That being said, many non-friable asbestos-containing materials can be rendered friable by mechanical means. An example would be the removal of floor tile by a mechanical chipper. Before demolition or renovations, all RACM must first be removed by a licensed asbestos abatement contractor. The RACM must be kept wet at all times and sealed in special, labeled bags. Once bagged, the asbestos is placed in lined, labeled waste containers and disposed of at a licensed landfill.

The landfill must be approved to receive regulated asbestos by the EPA and other State and Local regulatory agencies. Landfills that accept this type of waste must adhere to the landfill requirements of the NESHAP. The landfill must adhere to very stringent record keeping and operational requirements for obvious safeguards and tracking purposes. The regulation also specifies closure and post-closure monitoring and mitigation measures.

District staff are trained by EPA in the NESHAP and are asbestos certified annually by the State. The District also is a key participant in the State Asbestos Taskforce.