

Asbestos Removal and Demolition Guidelines for Local, State, and Federal Declared Wildfires

The 2020 wildfire season has caused unprecedented levels of destruction to homes and businesses in the San Joaquin Valley. As a result, property owners, contractors, local, state, and federal agencies are faced with numerous challenges as they coordinate on the necessary clean-up efforts of wildfire debris. Much of the debris has the potential to contain hazardous materials. Proper identification of debris containing hazardous materials prior to disturbance is important in order to protect public health and safety. The San Joaquin Valley Air Pollution Control District (District) is committed to helping with these clean-up efforts and ensuring those involved are aware of the federal requirements regarding asbestos removal and disposal.

Those involved in clean-up efforts should be aware that asbestos was widely used in many building materials prior to 1984 and continues to be used in certain building products to this day. Fire damaged debris and structures may contain asbestos containing materials and when disturbed, may release asbestos fibers that can be harmful if inhaled.

Regulated and Non-Regulated Projects

Properties included as part of a coordinated clean-up effort by local, state, and/or federal agencies

- Demolition/Renovation of Single Family Dwellings (SFDs) organized by local, state and/or federal agencies are considered regulated under the Federal Asbestos NESHAP regulation and are subject to the notification, handling, and disposal requirements.
- Building debris on the ground from structures totally destroyed by natural forces (as opposed to structures demolished in whole or in part by human activities) are not subject to the Asbestos NESHAP notification requirements.
- Clean-up of a SFD(s) where only a masonry chimney(s) remains standing is considered regulated and subject to the notification, handling, and disposal requirements.
- Demolition of commercial, industrial, and/or public structures are considered regulated under the Federal Asbestos NESHAP regulation and subject to the notification, handling, and disposal requirements.

Note: The removal of a load supporting member of a structure is considered a regulated demolition, which includes but is not limited to decorative structural facades, chimney(s), decorative pillars, a roof overhang, and complete demolitions.

Properties NOT participating in a coordinated clean-up effort by local, state, and/or federal agencies

- Single Family Dwellings (SFDs) – Individual owner doing/contracting the clean-up work themselves are not subject to the Asbestos NESHAP Notification requirements
- Commercial properties – Are subject to asbestos NESHAP requirements, including the submittal of an asbestos notification, providing a thorough asbestos survey of the affected property from a certified asbestos consultant prior to commencing work, and complying with all governmental requirements of the handling, removal, and transportation of hazardous debris.

Note: The removal of a load supporting member of a structure is considered a regulated demolition, which includes but is not limited to decorative structural facades, chimney(s), decorative pillars, a roof overhang, and complete demolitions.

Asbestos Notifications

To help facilitate the wildfire clean-up process, the District is implementing the following measures to streamline the submittal of all regulated demolition and renovation projects.

- All wildfire-affected demolition/renovation projects coordinated by local, state, and/or federal agencies will need to submit the standard asbestos notification form, and the multi-property supplemental form listing all properties not completely destroyed that are to be included as part of the clean-up effort.
- All other projects subjects should fill out the standard asbestos notification form and indicate "Wildfire Cleanup" on the top of the form.
- To aid in the wildfire recovery efforts, projects that are part of the wildfire cleanup will be eligible for an emergency asbestos notification allowance and may begin cleanup in as little as 24-hours rather than the typical 10 working days.
- As a result of declared wildfire emergencies in 2020 by local, state, and federal authorities, the District is temporarily waiving District Rule 3050 Asbestos Removal Fees for all affected properties.
- Notification forms may be found on the asbestos section of the District website:
<https://www.valleyair.org/busind/comply/asbestosbultn.htm>
- Completed and revised notification forms may be e-mailed to asbestos.central@valleyair.org or mailed to 1990 E Gettysburg Ave, Fresno CA 93726.

Guidelines for Cleanup

- Avoid mixing of asbestos-containing materials with other debris, unless treating all waste as hazardous materials. Use adequate wetting for all debris removals and demolitions. For wetting, use a dispenser or water hose with a nozzle for a fine, low-pressure spray or mist. Where necessary, use water mixed with a wetting agent.
- Where asbestos containing materials (ACM) are *suspected* to be mixed with debris, the debris may be assumed to be ACM and should be adequately wetted, wrapped in thick plastic sheeting ("burrito-wrapped") and disposed of as ACM. A survey by a certified consultant may be conducted to separate ACM from other debris in order to reduce the amount of debris that needs to be disposed of as ACM.
- Where ACM is *known* to be present, the debris should be stabilized by wetting and covering with plastic sheeting until it is removed.
- Suspected or known ACM must be removed by a licensed asbestos abatement contractor and disposed of at a landfill approved to receive asbestos. Some exemptions may apply to an owner-occupant of a single-family house who plans to conduct their own cleanup.
- Contact the State of California, Department of Toxics Substance Control for proper disposal and transport of asbestos-containing materials at (818) 717-6500.

Other Local Requirements

For property owners who choose to handle the cleanup on their own, rather than participating in a state or local coordinated cleanup response, please check with your County's Environmental Health Division for any other applicable requirements prior to sampling, handling, and disposal of wildfire debris. Disturbing the debris may disqualify the property from participating in a coordinated cleanup program by local and state agencies that would assist property owners with the debris removal.

For more information, please contact the District at [559-230-6000](tel:559-230-6000) or via e-mail at asbestos.central@valleyair.org