



Minnesota
Pollution
Control
Agency

NESHAP Guidance for Emergency Demolitions

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The asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) has specific requirements for facilities deemed structurally unsound or in danger of imminent collapse. In these situations an emergency demolition is required.

A “Notification of Intent to Perform a Demolition” (Notification) is required to be submitted to the Minnesota Pollution Control Agency (MPCA) as soon as possible for an emergency demolition. The Notification cannot be submitted later than the next business day after demolition has commenced. The MPCA would prefer that Notifications are submitted prior to work commencing to ensure that all the proper controls and requirements are being followed.

In order to demolish a building due to structural unsoundness or in danger of imminent collapse, a letter from the authority that ordered the demolition must be attached to the Notification when it is submitted to the MPCA. A building will only be allowed to be demolished under an emergency status if a State or local government agency has ordered the building to be demolished.

When a building has been ordered down because of structural unsoundness, it is not possible for a licensed asbestos inspector to enter the building to perform a thorough inspection for the presence of asbestos. Therefore, since the presence of asbestos cannot be determined, the *entire building must be assumed to contain asbestos* and must be handled and disposed of accordingly. All demolition waste from the building must be considered asbestos-

containing waste material (ACWM) and be disposed of at a landfill that can accept ACWM.

A *licensed asbestos contractor* must be on-site as this is considered asbestos-related work. The asbestos contractor must handle all of the ACWM, including watering the ACWM, lining the labeled trucks or dumpsters, and signing the waste shipment records. Contact the Minnesota Department of Health to ensure proper permits are received prior to the demolition.

If a recent asbestos inspection or as-built specifications are available for the building, then it may be possible to use this documentation to prove that no asbestos is present in the building. If it can be proven that no asbestos is present in the building, then the demolition debris does not have to be considered ACWM and a licensed asbestos contractor does not have to be on site to oversee the demolition. The demolition debris may be disposed of as general demolition debris.

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