



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

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# COMPLIANCE & ENFORCEMENT

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**Policy & Procedures**  
**Asbestos Demolition / Renovation /**  
**Waste Disposal**  
Regulation 11, Rule 2

Effective May 7, 2019  
Supersedes: June 2000

Approved by:

A handwritten signature in black ink that reads "Jeff Gove". The signature is written in a cursive, flowing style.

Jeff Gove  
Director, Compliance and Enforcement

# Contents

<b>INTRODUCTION</b> .....	1
<b>AUTHORITY AND REFERENCES</b> .....	1
<b>GENERAL PROCEDURES</b> .....	1
Job Notification .....	1
Inspection Form .....	1
Inspection Safety .....	1
Equipment .....	1
<b>SCOPE OF REGULATION 11, RULE 2</b> .....	2
Demolition .....	2
Renovation .....	2
Regulated Asbestos Containing Material .....	3
RACM includes ALL friable ACM .....	3
RACM includes Category I nonfriable ACM under some circumstances .....	3
RACM includes Category II nonfriable ACM under some circumstances .....	4
Exempt Activities .....	4
<b>REQUIREMENTS FOR BOTH DOMOLITIONS AND RENOVATIONS</b> .....	5
Introduction .....	5
Exempt Notification .....	5
Scheduled Changes and Updates .....	5
Emergency Notifications .....	5
Fees .....	6
Visible Emissions .....	6
Clean Work Site Requirements .....	7
Survey Requirements .....	8
Surveys for Renovations .....	8
Surveys for Demolitions .....	8
Who Performs the Survey .....	9
Survey Procedure .....	9
Enforcement of Survey Requirements .....	10
Waste Handling .....	10
<b>REQUIREMENTS FOR RENOVATIONS</b> .....	11
On-Site Representative .....	11
Containment .....	12
Wetting and Removal .....	13

Dry Removal ..... 14

**REQUIREMENTS FOR DEMOLITIONS** ..... 14

    RACM Removal Requirement ..... 14

    RACM Discovered After Demolition ..... 15

    Ordered Demolition ..... 15

**REQUIREMENTS FOR WASTE DISPOSAL SITES** ..... 16

    Introduction ..... 16

    All Sites ..... 16

    Active Sites ..... 16

    Inactive Sites ..... 16

**NOTICE OF VIOLATIONS** ..... 16

    Typical Violations ..... 16

    Whom to Cite ..... 17

**SAMPLING POLICIES FOR NOVS** ..... 18

    Introduction ..... 18

    When Samples are Required ..... 18

    Forensic Analytical Analysis ..... 18

    Other Lab Analysis ..... 19

    Necessary Lab Findings ..... 19

    Taking Samples ..... 19

    Lab Reports ..... 19

**ENFORCEMENT** ..... 20

    One-Day Violations ..... 20

    Multiday Violations ..... 20

    Citation of Multiple Subsections ..... 20

    Reports ..... 20

**AGENCY REFERRALS** ..... 20

    Environmental Protection Agency ..... 20

    CAL / OSHA ..... 21

    Local Health Department ..... 21

**SINGLE FAMILY DWELLINGS NTC POLICY** ..... 21

**EXHIBITS** ..... 22

    Exhibit I – Sample Job Notification ..... 22

    Exhibit II – NPS Inspection Form ..... 24

## INTRODUCTION

This policy and procedures are inspection guidelines for Regulation 11, Rule 2, for Asbestos Demolition, Renovation and Waste disposal activities. The guidelines are to be followed when inspecting demolition jobs, renovation jobs, and waste disposal facilities for potential asbestos emissions. Staff is expected to use their training, good judgment, and experience when conducting inspections.

## AUTHORITY AND REFERENCES

Bay Area Air Quality Management District (Air District) Regulation 11, Rule 2 specifies various work practices to be used to minimize asbestos emissions in demolition and renovation, manufacturing, and disposal of asbestos-containing waste. This rule was last amended on October 7, 1998.

United States Environmental Protection Agency (EPA) has delegated authority to BAAQMD to enforce EPA's National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos found at 40 Code of Federal Regulations Part 61, Subpart M. Numerous provisions of the BAAQMD rule are more restrictive than those in the federal standard.

## GENERAL PROCEDURES

Upon arrival, take 2 photographs of the worksite to document renovation or demolition activity. Survey the area for potential hazards before entering the job site. If safe, proceed to the location of the inspection and contact the on-site representative. The rule requires the presence of an on-site representative with specialized training any time regulated asbestos containing material is being removed or disturbed. Though it may be necessary to question other personnel, the on-site representative should be the primary contact.

Identify yourself and give them your business card. Explain why you are there and state the nature of your visit. Let them know that they will be advised of the results at the completion of the inspection. Proceed with your inspection.

### Job Notification

Job notification information will be sent to the inspector's Surface tablet through the New Production System (NPS). Inspectors are expected to log into the NPS each day and update the job notification information. Additional updates from the NPS may be necessary during the day if a potential violation is observed and it becomes necessary to ensure the most current information is available to determine compliance. (see Exhibit I for an example.)

### Inspection Form

The inspection form (Exhibit II) is integrated into the job notification information in the NPS and provides a guideline for the inspector to use when conducting the inspection. All appropriate boxes must be completed before submitting it to your supervisor for approval.

### Inspection Safety

Asbestos inspectors are provided with specialized training by attending the AHERA Inspector or Contractor/Supervisor course. In addition, inspectors receive HAZWOPER and respirator training. Inspectors are required to use personal protective equipment as appropriate when performing inspections and taking samples. (See also Section 9F).

### Equipment

The following equipment and reference materials are needed to properly conduct an asbestos inspection.

- Safety equipment – safety shoes, safety glasses, hard hat
- Photo identification card and business cards
- Surface tablet
- Tyvek suit
- Sample bags with labels and seals
- Latex gloves
- Negative air respirator, full face
- Camera/cell phone
- Forceps
- Spray bottle with water
- Four-gas monitor

## SCOPE OF REGULATION 11, RULE 2

Regulation 11, Rule 2 applies to all demolitions, even where no asbestos is present, and to renovations involving RACM (regulated asbestos-containing materials). The definitions of the term's "demolition", "renovation", and "RACM" are therefore crucial in determining whether the rule applies to a situation.

### Demolition

A demolition is the "wrecking, intentional burning, moving or dismantling of any load supporting structural member, or portion thereof, of a building, facility or ship. This includes, but is not limited to, any related cutting, disjuncting, stripping, or removal".

In practice, the term only applies to the removal of the primary structural elements of a building without their replacement. It applies to tearing down or burning of a building, but not to a remodel. It would not apply to the removal and replacement or relocation of a non-load supporting interior wall, roofing material, a window, or a door. However, the removal of a roof to allow for the building of an additional floor would be considered demolition. It also applies to the dismantling or demolishing of a portable or mobile home structure (with or without wheels) if the structure cannot be licensed by the DMV to travel on the road. The EPA has determined that moving a building constitutes demolition, since a major structural element - the foundation - is dismantled and not replaced.

### Renovation

A renovation is "an operation other than demolition in which RACM is removed or stripped from any element of a building, structure, plant, ship or installation or portion thereof." (Section 11-2-235.) The term includes operations such as but not limited to the:

- stripping,
- disturbing or
- removal of RACM and
- operations where RACM removal is a prerequisite to or incidental to other activities.

The rule only applies to (Regulated Asbestos Containing Material) RACM. The terms ACM (asbestos-containing material) and RACM are defined in the rule.

## Regulated Asbestos Containing Material

ACM is "any building material which contains commercial asbestos in an amount greater than 1% by weight, area, or count...."

RACM is ACM that is subject to the rule. There are three types of ACM subject to the rule:

- Friable ACM
- Category I nonfriable ACM under some circumstances
- Category II nonfriable ACM under some circumstances

### RACM includes ALL friable ACM

Definition:

**Friable ACM** means ACM "that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure."

Materials Included: Thermal system insulation, fireproofing, acoustical plaster/insulation, surfacing/finishing materials, ceiling tiles, resilient floor covering backing, non-asphalt-saturated roofing felts, asbestos-containing paper, and joint compounds are the most common.

**Note:** EPA has determined that joint compound in combination with wallboard is a single material and asbestos content may be determined by a composite sample of the combined joint compound, tape and wallboard system. Composite sampling is not permitted for surfacing/finishing materials such as texture or skim coats.

### RACM includes Category I nonfriable ACM under some circumstances

Definitions:

**Category I nonfriable ACM** means "asbestos-containing packings, gaskets, mastics, resilient floor covering, and asphalt roofing products containing more than 1 percent asbestos...."

**Resilient floor covering** means "asbestos-containing floor tile, including asphalt and vinyl floor tile, and sheet vinyl floor covering containing more than 1 percent asbestos...."

**Grinding** means to reduce to powder or small fragments and includes mechanical chipping or drilling.

**Cutting** means to penetrate with a sharp-edged instrument and includes sawing, but does not include shearing, slicing, or punching.

Materials Included: Stated in definition. These materials contain asbestos in a binder of asphalt, vinyl, or resins.

Category I nonfriable ACM is RACM only if it:

- Has become friable (as determined by a lab) or
- Will be or has been subjected to sanding, grinding, cutting, abrading, or demolition forces that cause the material to be pulverized (as determined by the inspector).

If the lab determines that a sample of Category I nonfriable material has not become friable, the material is not RACM unless the inspector can document that the material was subjected to the above work practices.

The following work practices **will not** make Category I material in **good** condition friable:

- Removal, without extensive breakage, of vinyl or asphalt floor tiles by scraping using water or solvents, by infrared heating, or slicing with a sharp utility knife and removal in sections still attached to particle board or plywood subfloor.
- Removal of asphalt roofing materials using shovels or other hand tools; light wetting is recommended.
- Removal of gaskets from flanges using solvents and scrapers.
- Demolition of a structure containing Category I floor tile by heavy equipment. (Unless the material is made friable by the force of the equipment as determined by the inspector.)

### RACM includes Category II nonfriable ACM under some circumstances

#### Definition:

**Category II nonfriable ACM** means "asbestos-containing material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos...that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure."

Materials Included: Transite, pipe and other asbestos cement products, plaster, stucco, paint, and other materials not included in Category I. Most of the materials in this category contain asbestos in a binder of Portland cement. Paint that is weathered or in poor condition (such as flaking) could be considered RACM.

Category II nonfriable ACM is RACM only if it:

- Has become friable (as determined by a lab) or has become crumbled, pulverized, or reduced to powder (as determined by the inspector) or
- Has a high probability of becoming crumbled, pulverized, or reduced to powder by the forces expected to act on it during demolition or renovation (as determined by the inspector).

Since Category II material is generally extremely strong and cannot be "crumbled, pulverized, or reduced to powder by hand pressure", the lab will usually state that it cannot draw a conclusion regarding friability for a sample. Occasionally, a sample is in such poor condition that the lab will determine that it is friable, but, in most cases, the inspector must document work practices that will make the material subject to the rule.

The following work practices **will** make Category II material subject to the rule:

- Demolition with the material left in place.
- Sanding, grinding, cutting, drilling, shot blasting, or abrading.
- Dropping from a significant height.

The following work practices **will not** make Category II material subject to the rule:

Removal using hand methods, provided the material is carefully removed without significant damage (i.e., removal by pry bar or hammer claw of one piece at a time, even if each piece is broken into two or three pieces, would be permitted, but use of hammer or sledgehammer blows to break material away would not).

### Exempt Activities

Work practice requirements for demolition, renovation, and removal (Sections 303.1 through 303.7) do not apply to maintenance or decontamination procedures where no removal of RACM takes place.

Maintenance or decontamination refers only to HEPA vacuuming and/or wet wiping areas of RACM debris, i.e., RACM below old furnace pipes or RACM fireproofing material on or in the plenum which is not the direct result of removal, renovation, or demolition activities.

Renovations where the amount of RACM removed or disturbed is less than 100 square or linear feet or less than 35 cubic feet are not subject to notification requirements but are subject to work practice and waste handling requirements. Regardless of amount, all dry removals, bead blasting, and shot blasting projects, are subject to the notification requirements and District approval with work plan prior to the start of the removal.

## REQUIREMENTS FOR BOTH DEMOLITIONS AND RENOVATIONS

### Introduction

Requirements for demolitions and renovations differ in an important respect. Because the rule requires removal of RACM prior to demolition, the demolition requirements do not specify demolition practices to be used. The renovation requirements are primarily work practice requirements that must be followed when removing RACM. This section deals only with those requirements applicable to both demolitions and renovations.

### Exempt Notification

Air District notification is not required if the project does not meet the definition of demolition (11-2-216) or renovation (11-2-235). The Air District will no longer process or issue Exempt Notification Letters. Local agencies may contact the Air District if there is a question regarding whether a project requires a notification, or it is exempt from the notification requirements in Regulation 11 Rule 2 Section 401.3.

### Scheduled Changes and Updates

Update with the new production system. After a completed notification is received the notification information will be available in the NPS. The acknowledgment letter will be available to the notifier for download in their NPS user account. The applicant is responsible for making revisions, schedule changes and other updates to the original notification.

- **Start Date**  
A project that starts prior to the start date is in violation of Regulation 11-2-401.3. A project that does not commence on the start date and is not revised on or before the start date is in violation of Regulation 11-2-401.5.
- **End Date**  
The “end date” can only be revised on or before the stated end date in the original notification or prior revision. A notification is expired once the end date has elapsed or after one year from the original start date.

A project that continues after the notification expires and a new notification is not submitted is in violation of Regulation 11 Rule 2 Section 401.3.

Where the District was not notified of changes, issue a one-day NOV citing Regulation 11-2-401.5. However, where the actual start date is prior to the notified start date and no new start date was reported or the new date was reported after the original start date, the NOV should cite Regulation 11-2- 401.3.

### Emergency Notifications

The 10-working day requirement may be waived by the APCO if the demolition or renovation is an emergency.



To qualify as an emergency demolition, the demolition must be declared an emergency by a Federal, State or local government agency stating that the building is structurally unsound and in danger of imminent collapse or has been declared a public nuisance. The notifying party shall provide a letter from a public official documenting the declaration.

To qualify as an emergency renovation, an operation must be due to a sudden, unexpected event. The following events, defined in Section 219, would qualify:

- Operations necessitated by equipment failures.
- Removals resulting from the unanticipated discovery of asbestos during demolition or renovation or construction activities where the failure to discover the asbestos was reasonable. If a job has started, friable asbestos is discovered, and the project becomes subject to Section 303, the job would qualify as an emergency. The intent of this section is to avoid holding up a project while waiting 10 days.
- The conversion of previously nonfriable ACM to friable.
- Removals due to fire, water, earthquake damage, or conversion of previously nonfriable ACM to friable.
- Emergency clean-up jobs, where disturbed friable asbestos is found, and a health hazard might exist if the project were delayed.
- Removal of asbestos from schools or other public buildings.
- Removals from SFDs if the removals are required to complete a real estate transaction.

Emergency notifications must be provided as early as possible, but not later than the first working day following the emergency renovation. Contractors must submit written notifications for emergency demolitions or renovations as soon as possible.

Inspectors must verify the validity of the emergency. Where the claim of emergency is not valid, the normal 10-day notification requirement applies.

If the claim of emergency is invalid and the notification was sent less than 10-working days prior to the start date, issue an NOV citing Regulation 11-2-401.3. If no RACM removal has started, the notifier will be advised to revise the notification to meet the 10-day requirement and an NOV will not be issued

## Fees

Regulation 11-2-405 and Regulation 3, Schedule L authorize fees for demolition/renovation operations. Fees must be paid at the time of notification.

Failure to pay invoiced fees constitute violation of Regulation 11-2-405 and Regulation 3-317.

## Visible Emissions

The standards of Regulation 11-2-302 differ from visible emissions standards set forth in Regulation 6-301 in that they do not require the taking of a Plume Evaluation Record. They are more comparable to the standards set forth in Regulation 6-305 regarding visible particles

### Enforcement Policy:

- If an inspector observes the emission of RACM debris from a regulated asbestos abatement job, it is a violation of Regulation 11-2-302. The debris must be outside the containment area, in the ambient air (not simply within the building).

- If an inspector observes removal of non-friable ACM in such a manner as to render the material friable, and the removal is taking place in the ambient air (not simply within the building), it is a violation of Regulation 11-2-302. For example, removal of transite siding from a building such that the transite is excessively broken into small bits is a visible emission violation.
- If an inspector observes RACM debris outside a containment area but inside the building or simply observes the debris but does not observe the actual emission of debris, it is a violation of Regulation 11-2-304.1.

**Note:** In all the above cases, the inspector should sample the debris to document the violation.

## Clean Work Site Requirements

Section 303.7 is intended to ensure that no friable asbestos related to a demolition or renovation remains at a work site after demolition or renovation. The other sections of the rule cover work practices to be followed in removing RACM and handling the resulting waste which is directly handled by the contractor. Section 303.7 primarily applies to RACM not directly handled by the contractor, i.e., pre-existing debris and RACM not removed but disturbed by demolition or renovation.

Where RACM is found at a site in its original condition and undisturbed by demolition or renovation, there is no violation of the rule. Where it remains in place but has been disturbed, it is a violation of Section 303.7 unless the RACM has been encapsulated. Where RACM has been removed from its original location but left in the work site, it is waste and violates Section 304.1. Where RACM left in the work site is pre-existing debris, it is a violation of Section 303.7.

The phrase "related to a specific demolition, renovation, or removal" used in this subsection means anywhere in the work area. The work area includes areas of containment, the path to the disposal bins, truck, etc., as well as any area used or crossed during the abatement job. For example, during an abatement of furnace ducts in the basement, if the contractor needs to dispose of the material via the stairs through the kitchen and out through the front yard to the waste bins, these areas are considered part of the work site.

Examples:

### Pre-existing debris

- A fire has occurred at a single-family dwelling. Fire fighters have axed through the roof and ceiling disturbing the RACM. In the process, asbestos ceiling material is thrown out on the balcony or into the yard. A contractor is hired to clean the house. The contractor's failure to properly handle the RACM debris in the yard and balcony is a violation of Section 303.7.
- A contractor is hired to abate pipe insulated with RACM buried four feet below some dirt. RACM debris is scattered on the dirt above the pipe. The contractor's failure to abate/decontaminate the debris prior to the pipe abatement is a violation of Section 303.7.

### Asbestos disturbed but not removed or encapsulated

- A contractor is hired to remove RACM-covered heating ducts from a basement. The contractor properly removes the ducts, leaving the furnace behind. The contractor leaves the plenum attached to the furnace as required in the contract but fails to encapsulate the cut edge of the pipe insulation where the duct was removed from the plenum. This is a violation of Section 303.7.

### Violations of Other Sections

- A contractor is hired to abate asbestos from the ceiling of a room. The contractor leaves some RACM on the ceiling because it is difficult to reach and remove. They encapsulate the RACM. Some RACM which fell to the floor after being scraped from the ceiling is overlooked. This remains behind and is not encapsulated. The encapsulated RACM on the ceiling is not a violation but the RACM on the floor violates Section 304.1.
- A contractor lets some RACM being removed from a ceiling fall through a breach in the containment to the floor outside the containment. If the RACM is dry, it is a violation of Sections 303.1 and 304.1. If the RACM is properly wetted, it is a violation of Section 304.1.

### No Violation

- A contractor is hired to abate asbestos in the bedroom of a house. The contractor's failure to remove debris in the basement is not a violation.

## Survey Requirements

Section 303.8 requires a survey for asbestos before any demolition or renovation work can be performed.

### Surveys for Renovations

Although the rule states that a survey must be done before any renovation, the rule's definition of "renovation" is narrow. Under the rule, a renovation is "an operation...in which RACM is removed or stripped...." In actual practice, a survey is not required for many activities that a contractor, homeowner, or planning department would call a renovation (a remodel). Where no RACM is involved, the activity is not a "renovation" under this rule, and no survey is required.

There is one explicit exception to the survey requirement for renovations:

- No survey is required for a renovation if the owner or operator states that the renovation involves asbestos, identifies the material that contains asbestos, and certifies that all ACM will be handled in accordance with the District rule.

### Surveys for Demolitions

Surveys are required prior to all demolitions.

Under an ordered demolition, as defined in Regulation 11-2-228, the survey must be done prior to, during, or after the demolition but prior to loading or removal of any demolition debris. Any RACM debris must be treated in accordance with Regulation 11-2-304.

Less stringent survey requirements apply to demolitions of residential buildings having four or fewer dwelling units. For these demolitions, a formal survey by a Cal/OSHA-certified consultant is not required. Instead, the owner or contractor is required to take samples of the following materials, where present, and have them tested by a laboratory. These include, but are not limited to:

- Heating, ventilation, air conditioning ducting or system insulation
- Acoustic ceiling material or acoustic plaster
- Textured or skim coated wall surfaces
- Cement siding or stucco

- Resilient flooring
- Concrete pads

For demolitions of all other buildings, the formal survey requirements of Section 303.8 apply.

### Who Performs the Survey

Surveys must be done by a person who meets all the following requirements:

- Is certified by the Division of Occupational Safety and Health (Cal/OSHA).
- Has taken an EPA-certified building inspector course (AHERA training is the only such training to date).
- Applies the procedures outlined in the EPA-certified course.

There is one exception to these certification requirements. Certification is not required of in-house health professionals within a non-asbestos-related company who perform occasional surveys only for that company as part of their regular job responsibilities. This exception applies only to a regular employee of a company, typically an environmental engineer or occupational health professional, and does not apply to a consultant, contractor, or part time or temporary employee (Certifications are required if you are a State employee performing these services for your agency).

Cal/OSHA maintains a list of "certified" consultants. Only individuals, not firms, may be "certified." A person or firm merely "registered" with Cal/OSHA does not meet the requirements of the BAAQMD rule. To determine whether a person is certified by Cal/OSHA, check their website at <http://www.dir.ca.gov/DOSH/dosh1.html>, or call Cal/OSHA at (916) 574-2993. You also could ask the person if he or she is a Cal/OSHA "certified" asbestos consultant. Any person who is certified should be able to produce a signed certificate from Cal/OSHA.

### Survey Procedure

Surveys must conform to procedures set forth in EPA-approved Building Inspector courses (AHERA training is currently the only approved training). EPA requires that these courses teach the procedure outlined in EPA's Guidance for Controlling Asbestos-Containing Materials in Buildings (the "Purple Book," USEPA 1985). The procedure is also described in Section 504 of the California Air Resources Board Manual Asbestos Demolition and Renovation.

The EPA procedure requires the surveyor to:

- Identify all friable materials and group them into homogeneous sampling areas. A homogeneous sampling area contains material that is uniform in texture and appearance, was installed at one time, and is unlikely to consist of more than one type or formulation of material. EPA permits one exception: joint compound, tape, and wallboard may be treated as a single composite material.
- Prepare diagrams of each sampling area to allow selection and documentation of sampling locations.
- Divide the sampling area into nine equally sized subareas. This is done to obtain samples that are representative of the entire sampling area.
- Determine the number of samples. Nine samples (one per subarea) are recommended. When cost or any other constraint limits the number of samples that can be collected, a minimum number of samples based on the size of the sampling area is specified.
- Determine the sampling locations. The locations are chosen to obtain a representative sample and to avoid biases that could be introduced if personal judgement alone were used.
- Collect samples. Follow guidelines designed to minimize fiber release.

- Follow a quality assurance program. This involves collecting extra samples to ensure reliability of the laboratory analysis.
- Send the samples to a qualified laboratory for analysis by polarized light microscopy (PLM).
- Interpret the results. If any sample has more than 1% asbestos, then either assume that the entire sampling area contains asbestos or collect additional samples to determine more precisely the extent of the RACM.

## Enforcement of Survey Requirements

Surveys and certifications are no longer received and accepted in the District office. All surveys and certifications must be posted and/or available on the job site for inspector review.

Inspectors should check to make sure the person who did the survey is Cal/OSHA-certified. Inspectors should also examine the survey to ensure that it complies with EPA requirements. One thing to look for is the inappropriate grouping of ACM with non-ACM in a "homogeneous" sampling area so that the asbestos content appears to be zero if the non- ACM area is sampled.

Unless the job is a renovation for which the owner or contractor has certified that asbestos is present and will be handled properly, an NOV citing Regulation 11-2-303.8 should be issued if:

- No survey was done.
- The survey was improperly done. In such cases, the NOV may be issued to a consultant. Prior approval by supervisor is required.
- The survey was not done by a Cal/OSHA-certified person or by an in- house person as set forth in the regulation.

## Waste Handling

The waste handling provisions of the rule (Section 304) apply to both demolitions and renovations. As a practical matter, because the rule requires removal of RACM prior to demolition, the waste handling provisions do not usually come into play for demolitions. However, where RACM is discovered during a demolition, the rule requires debris to be handled pursuant to these provisions

Section 304.1 states that all asbestos waste and RACM must be sealed in leak-tight containers prior to being removed from containment. RACM become "waste" once they are removed from their original location (on a pipe or duct, on a ceiling, etc.) by a contractor. Therefore, any RACM that has been removed from its original location and is found as debris at a site, unless it is pre-existing debris, violates Section 304.1. Section 304.1 should therefore be cited in most cases where debris is found in the work area. Where the debris is pre-existing debris, the appropriate citation is Section 303.7.

Waste material must be kept wet and must be sealed into leak-tight waste containers while still wet. The containers must be labeled with the OSHA approved asbestos warning label as specified in OSHA regulations in 29 C.F.R. Parts 1910 and 1926 and if there is a containment, prior to removal from the immediate area. Containers must also be labeled with the waste generator's name and location and if there is a containment, prior to removal from the immediate area. Unless located within a contained area, glove bags are removed from containment when they are removed from the OSHA-regulated area. Both the OSHA warning label and the waste generator's label must be applied as follows:

- Upon removal of the waste from containment, or
- Upon removal of the waste from the OSHA-regulated area, or
- Upon removal from the immediate site, or
- Upon removal of a glove bag from an element.

Although the generator label need only be legible, the warning label must meet certain requirements. The label must comply either with requirements set forth in the District's Manual of Procedures, Volume 1, Section 3.1, or with federal OSHA requirements.

The Manual of Procedure specifies only that the label state:

**CAUTION**  
Contains Asbestos  
Avoid Opening or Breaking Container  
Breathing Asbestos is Hazardous to Your Health

The OSHA regulations say that the label must state:

**DANGER**  
Contains Asbestos  
Fibers May Cause Cancer  
Causes Damage to Lungs  
Do Not Breathe Dust  
Avoid Creating Dust

The inspector shall determine compliance with the wetting requirement by inspecting the sealed bags for evidence of moisture (if clear plastic bags) and presence of complete labels.

Asbestos-containing waste material must be deposited at a suitable waste disposal site which is operated in accordance with Regulation 11, Rule 2 and applicable State and Federal regulations. The landfill is designated in the notification and in the asbestos inspection materials.

## REQUIREMENTS FOR RENOVATIONS

### On-Site Representative

There must be at least one on-site representative (e.g., foreman, management-level person, or authorized representative) who will be present during stripping and removing of RACM.

The on-site representative must have received training regarding:

1. Applicability of the regulation
2. Notifications
3. Procedures
4. Material identification
5. Control procedures for removals including:
  - Adequate wetting
  - Local exhaust ventilation and HEPA filtration
  - Negative pressure enclosures
  - Glove-bag procedures
  - Waste disposal work practices

- Reporting and record keeping requirements

Evidence that the training has been completed shall be posted on-site and made available for inspection.

EPA has urged, though not required, completion of the AHERA Model Accreditation Plan course titled Asbestos Abatement Contractor/Supervisor to satisfy the NESHAP training requirement for on-site representatives.

To comply with the District rule, AHERA training or other training meeting the above requirements is acceptable.

The inspector's report must identify the on-site representative, and document the evidence of training (OSHA, AHERA, in-house, etc.) presented by the contractor.

## Containment

The purpose of containment is primarily for decontamination and to prevent the migration of asbestos fibers to the atmosphere. The nature of the containment will vary from job to job, depending upon the type and size of the job. For some smaller jobs, glove bags or mini-enclosures, rather than full containment, may be sufficient. Full containment is required except in the following circumstances:

- When a glove bag is used for the entire job.
- When a mini-enclosure is used for the entire job.
- When units or sections are removed and cutting, or disjuncting is contained with a glove bag or mini-enclosure (e.g., removal of pipe or duct covered with lagging or asbestos paper).
- When one square foot or less of RACM is removed using wetting and a local HEPA exhaust.
- When an alternative method is approved by the APCO.

Full Containment consists of barriers, viewing ports and negative air.

### Physical Barriers

Typically, the physical barriers are constructed with plastic sheeting applied to all sides of a room and the floor when removing ceiling RACM, to all sides when removing floors or floor mastic, to all sides and the ceiling for dry removals, and to sides, ceiling, and floor in most other cases. In addition, all penetrations must be sealed with plastic sheeting. Breach of containment of glove bag is a violation of regulation 11-2-303.6.

Windows, vents, and doors must be sealed. This constitutes a critical barrier. Critical barriers alone do not satisfy containment requirements.

### Viewing Ports

Viewing ports must allow observation of stripping and removal of RACM. Inspectors must determine whether the viewing ports at a site are feasible or sufficient to meet this standard.

There are no specifications in the rule regarding size or physical standards for viewing ports. Several commonly used methods for providing viewing ports are:

- Use of transparent plastic for the entire containment.
- Taping clear rigid plastic to a hole cut out of the plastic sheeting.
- Taping plastic sheeting containment material directly to an existing window or a window in a temporary wall erected for the job.

These methods are adequate if compliance with work practice standards may be determined.

If there are no viewing ports, inspectors should note in the observations section of the report the locations where viewing ports were possible. Pictures and diagrams may be used to document noncompliance.

If possible, inspectors should obtain statements from contractors to support these observations. If viewing ports are inadequate because they prevent full observation, inspectors must report the facts that support this conclusion.

### **Negative Air/Local HEPA Exhaust Ventilation**

The contractor must maintain negative air pressure inside the containment from the beginning of removal until completion of final clean-up (after the removal job). During this period the negative air machine must be operated continuously and there must be indicators of negative pressure (such as containment bowing inward and/or a manometer). Where an NOV is issued for no negative pressure, the inspector must include facts in the report to support this conclusion. Where possible, the inspector should examine any manometer readings maintained by the contractor. EPA recommends a pressure differential of 0.2 inches of mercury.

Exceptions may exist where negative air pressure must be turned off at the end of the day (safety, power, location, etc.). If met, as determined by inspector, all waste material must be properly bagged, labeled and secured prior to leaving the job site. Also, all access into the containment must be sealed as not to allow entrance into the area from the outside.

### **Glove Bags**

Inspectors should ensure that the procedures set forth in OSHA worker safety rules found in 29 C.F.R. Part 1926., were followed. If an inspector suspects that OSHA guidelines are not being met, the inspector should contact the local OSHA district office.

### **Mini-enclosures**

Inspectors should ensure that the procedures set forth in OSHA worker safety rules in 29 C.F.R. 1926, were followed.

Issue an NOV citing Regulation 11-2-303.6 under any of the following circumstances:

- No containment of any sort present when containment is feasible.
- Significant breach of containment. Document size and number of breaches.
- Negative air not operated continuously after start of removal.
- No negative pressure.
- No viewing ports when such viewing ports are feasible.
- Viewing ports inadequate to allow full observation.

## **Wetting and Removal**

The inspector shall determine if the RACM is adequately wetted as defined in Section 202. Techniques to verify adequate wetting include but are not limited to observing use of a hose, portable sprayer, spraying water on plastic sheeting, condensation or standing water in waste bags, clumped material in waste bags and change in color of material in waste bags.



If wetting is not being done as required, issue an NOV citing Regulation 11- 2-303.1.

#### Removal in Units

RACM may be removed in units or sections provided the RACM exposed during cutting and disjoints is adequately wetted or encapsulated during cutting or disjoints. The RACM must be carefully lowered to ground level and placed into sealed leak tight labeled containers for proper disposal or abated in accordance with Section 303.1. This subsection permits the removal of asbestos-wrapped pipes from an overhead pipeway, for example.

In some cases, full containment will be necessary when RACM is removed in units. When the job is a small scale, short duration job, the use of glove bags or mini-enclosures during disjoints may be sufficient.

Pipes or ducts being removed in units must be wrapped with polyethylene sheeting and sealed with duct tape prior to disjoints. Pipes or ducts should be cut or separated at uninsulated locations where possible. Where RACM insulation is continuous, small sections may be stripped by the glove bag method prior to disjoints or cutting.

Where full containment is being used to remove pipes or ducts in units, issue an NOV citing Regulation 11-2-303.1 if ducts or pipes are disjoints without wetting. Where there is no full containment and glove bags are being used for disjoints units, issue an NOV citing Regulation 11-2-303.4 if units are not wrapped in polyethylene or otherwise encapsulated.

#### **Dry Removal**

Where the APCO has approved dry removal, RACM must be handled in accordance with Section 303.2.

All dry removal is subject to APCO approval. This applies even if the removal amount is less than 100 square or linear feet. The contractor must submit a written notification of intent to perform dry removal in addition to the required notification under Section 401.3. Dry removal is allowed where wetting would result in equipment damage or cause a safety hazard (e.g., electrical equipment), or for shot blasting/bead blasting of floor tile mastic.

Upon APCO approval, a letter from the District will be provided, setting forth specific conditions for the job. For all dry removals, the following conditions must be met:

1. All requests for dry removal should include a map or floor plan of the specific areas to be abated dry.
2. A HEPA exhaust and collection system shall be operated at the point of removal to capture friable asbestos and prevent any visible emissions.
3. Separate full containment with negative air shall be maintained continuously to prevent emissions to outside areas. This includes covering the ceiling where appropriate.
4. All asbestos containing waste material shall be handled pursuant to Section 304.
5. For shot blasting, the mastic must be misted with water prior to and during operations.

A copy of the APCO approval for dry removal shall be kept at the work site and made available for inspection. The Inspector will determine if all the conditions of dry removal are being met.

If proper procedures are not followed for an approved dry removal, issue an NOV citing Regulation 11-2-303.1.

## **REQUIREMENTS FOR DEMOLITIONS**

### **RACM Removal Requirement**

All RACM must be removed prior to demolition.

- **RACM**

All RACM as defined in Section 222, must be removed prior to demolition.

- **Category I Nonfriable Material**

Category I nonfriable materials are not RACM unless they have been made friable, or unless subjected to sanding, grinding, cutting, or abrading (see definition of RACM in Section 3). Consequently, the rule, in most cases, does not require the removal of Category I materials prior to demolition unless the equipment used will render the material friable. Thus, asbestos-containing floor tiles, mastic, and asphaltic roofing materials in good condition need not be removed prior to demolition. If debris from a demolition is to be recycled, all Category I material must be removed.

Where a building is to be burned or to be used for military target practice, Category I materials must be removed.

- **Category II Nonfriable Material**

Category II nonfriable materials are not RACM unless they have a high probability of becoming or have become crumbled, pulverized, or reduced to powder by the forces expected to act on them during demolition (see definition of RACM in Section 3). Category II material must be removed prior to demolition because demolition will render it friable.

Removal by hand tools prior to or during demolition will not render the material friable if done carefully. The use of heavy machinery will make Category II material friable.

Where a building is to be burned or to be used for military target practice, Category II materials must be removed.

- **RACM Encased in Concrete**

Removal of RACM encased in concrete or other similar material is not required to be removed prior to demolition but should be adequately wetted whenever exposed during demolition or renovation and disposed of as RACM as required in Section 304.

### **Enforcement Policy**

If RACM is found at a demolition site during or after demolition, issue an NOV citing Regulation 11-2-303.3. If RACM has been disturbed during a demolition, there may be violations of Regulation 11-2-303.1, 303.6, 303.9 and 304.1.

### **RACM Discovered After Demolition**

If RACM is discovered after demolition has begun and the RACM may not be removed safely, the owner or operator must comply with the standards outlined in Sections 303.1, 304, and 401.3 (wetting, disposal and notification). If practical, the owner or operator shall also comply with Section 303.6 (containment). Where a proper survey pursuant to Section 303.8 was not done, compliance with Sections 303.1, 303.6 and 401.3 will not preclude an NOV being issued under Sections 303.3 or 303.8 for failure to perform a survey or failure to remove the RACM prior to demolition.

### **Ordered Demolition**

If RACM is discovered after demolition has begun and the RACM may not be removed safely, the owner or operator must comply with the

## REQUIREMENTS FOR WASTE DISPOSAL SITES

### Introduction

Waste disposal sites where ACM is deposited must meet the no visible emissions standard in all cases. Active sites must use signs and fences and employ specified work practices. Inactive sites must use signs and fences or employ specified work practices.

### All Sites

Inspectors will check for visible emissions when inspecting all waste disposal sites.

### Active Sites

Inspectors will check to make sure that there are signs and fences or that natural barriers deter access and either of the following:

1. Once every 24 hours ACM is covered with at least 6" of compacted non- ACM or with a resinous or petroleum-based dust suppression agent. Crankcase oil is not considered a dust suppression agent for purposes of this section.
2. An alternative emission control method approved by the APCO is used. Inspectors will also examine site records to ensure compliance with the rule's record requirements.

### Inactive Sites

Inspectors will check to make sure that there are signs and fences or that natural barriers deter access or any one of the following:

1. ACM is covered with at least 6" to 2' of compacted non-ACM and a vegetation cover is maintained.
2. For inactive waste sites for asbestos tailings, a resinous or petroleum-based dust agent that binds to the material and controls wind erosion shall be applied. Crankcase oil is not considered a dust suppression agent for purposes of this section.

An alternative emission control method approved by the APCO is used.

## NOTICE OF VIOLATIONS

### Typical Violations

Below are typical violations for each section of the rule. Though other sections could be cited for many of these violations, the sections noted are the most appropriate citations. The list of violations for each section is not exhaustive; other violations may be appropriately cited under many of the sections.

- 303.1 RACM not wetted during removal  
RACM wetted inadequately (particles released)
- 303.2 No prior approval by the APCO for dry removal  
Failure to follow proper dry removal procedures  
Visible emissions during dry removal
- 303.3 Failure to remove RACM prior to demolition

- 303.4 Failure to adequately wet or encapsulate RACM during cutting or disjoints  
Failure to carefully lower units, if elevated
- 303.5 Failure to keep RACM not removed in units wet while lowering to ground  
Failure to use leak tight chutes or containers when lowering
- 303.6 Improper containment Breach in containment No viewing ports  
Viewing ports inadequate to allow proper observation No negative air
- 303.7 Failure to abate pre-existing RACM debris in the work area  
Failure to encapsulate or make nonfriable RACM disturbed but not handled or removed by contractor (i.e., RACM still in its original location)
- 303.8 No survey  
Inadequate survey  
No certification where required  
Failure to provide survey to the District
- 303.9 No on-site representative  
On-site representative without proper training
- 303.10 RACM discovered after demolition and not properly abated and reported pursuant to Sections 303.1, 303.6, and 401.3
- 303.11 Failure to follow proper wetting and disposal procedures for ordered demolition
- 304.1 No generator labels RACM debris (i.e., RACM not in pre-job location) in work area RACM not sealed in leak-tight containers  
(Note: Do not cite this section for RACM disposal at a landfill not operating in accordance with Section 304.3)  
Excessive breakage of Category II material such as transite
- 304.3 Failure to dispose of RACM at a landfill which operates in accordance with the rule
- 401.3 Failure to give 10-day notification. Failure to meet emergency criteria will constitute a violation  
Failure to notify is a single-day violation. Job started prior to original start date and no new date reported  
Job started prior to original start date and new date not reported 10 days prior to actual start
- 401.5 Job started after original start date and no new date reported  
Job started after original start date and new date not reported prior to original start date  
Job continued past notified completion date Change in contractor not reported  
Change in removal amounts not reported.

## Whom to Cite

**The enforcement practice is to issue NOVs to the most responsible party, typically the entity or individual doing the work unless unusual circumstances dictate otherwise.**

The rule's scope is broad, and would, in many cases, allow issuance of an NOV to more than one of the parties involved in a demolition or renovation. This is because the rule's work practice provisions apply to the "owner or operator of a demolition or renovation." This phrase is all-inclusive and means "any person who owns, leases, operates, controls or supervises the stationary structure being demolished or renovated, or any person who owns, leases, operates, controls or supervises demolition or renovation, or both."

In some cases, it may be more appropriate to issue the NOV to someone other than the party doing the work. For example, if a party doing a demolition has failed to provide notification of the demolition, but produces a contract indicating that the general contractor had the contractual obligation to notify, the better practice would be to issue the NOV to the general contractor. However, unless information is provided to the inspector prior to the issuance of the NOV, the inspector will not be expected to investigate this sort of possibility. Where the inspector determines that issuance to another party may be appropriate, the inspector should check with their supervisor before issuing the NOV.

When citing a contractor, subcontractor, or owner, the inspector should make sure that the proper party is cited. The name of the contractor, subcontractor, or owner should be entered on the "Issued To" line of the NOV. The name of an employee of a contractor, subcontractor, or owner should not be entered on this line. The contractor's license number of any contractor to whom an NOV is issued should go in the report.

## **SAMPLING POLICIES FOR NOVS**

### **Introduction**

Regulation 11, Rule 2 requires certain work practices in handling RACM. To establish many violations of the rule, inspectors must be able to document that the material involved is RACM. This will generally be done by taking a sample and submitting it to Forensic Analytical Laboratories for analysis. Inspectors will wear appropriate personal protective equipment such as a respirator, Tyvek suit or gloves, when sampling suspect ACM. In cases where it is not possible to get a sample, the presence of RACM can be established by obtaining results from sampling done for the survey or for other purposes.

### **When Samples are Required**

If feasible, a lab analysis is required to establish Section 302, 303 and 304 violations, except for viewing port and generator label violations. Although it is unlikely that anyone will set up containment or use asbestos generator bags unless RACM is involved, it is nevertheless good practice to obtain a lab analysis for viewing port and generator label violations.

A lab analysis is required for Section 401.3 violations involving renovations. All other violations of the rule's administrative requirements (400s Sections) do not require a lab analysis.

A lab analysis is required for Section 401.3 violations involving renovations. All other violations of the rule's administrative requirements (400s Sections) do not require a lab analysis.

### **Forensic Analytical Analysis**

Forensic Analytical lab requires a minimum of four grams (one teaspoon or 1 inch) of suspected asbestos material to determine friability and asbestos content (%). Inspectors shall not open sealed bags to obtain a sample. Instead, they should have the bag contents sampled by the contractor inside of containment or a glove bag.

Asbestos samples taken by inspectors are for documenting violations. Inspectors should warn owners or operators that they may be in violation for every day that the debris remains. Inspectors should advise potential violators that they should take a sample to a testing lab so that they can know immediately whether the material is ACM and how to handle it

appropriately. In cases where an inspector suspects that a violation may occur but hasn't yet, the inspector may take a sample to be analyzed later. In such case, the inspector should transport the sample to Forensic Analytical lab and request that the sample be held until the sample is analyzed or disposed of.

## Other Lab Analysis

### Proper Survey Done

If the violator did the survey required by Section 303.8, work practice violations can be documented by referring to the survey and attaching a copy of the pertinent page(s).

### No Survey or Improper Survey

Where no survey or an improper survey was done, the inspector may be able to obtain a bulk analysis by a certified lab from the contractor, owner, or consultant.

## Necessary Lab Findings

To establish any violation, regardless whether the lab analysis is done by Forensic Analytical:

- The lab must conclude that friable material is greater than 1% asbestos, or
- For category I and category II non-friable material, the lab must conclude that asbestos content exceeds 1% and either the inspector or the lab must establish, pursuant to Section 222, that the material has been made friable through deterioration or by demolition or renovation work practices (see RACM definition in Section 3).

## Taking Samples

Inspectors must follow the sampling procedures found in the Sampling Guidelines of the Enforcement Division Policies and Procedures Manual.

Inspectors may not enter the containment area while work is in progress or at any other time when a known hazard may exist. In most cases, the inspector should have the on-site representative obtain the sample.

In cases where the inspector must collect a sample, the inspector must:

1. Don negative pressure respirator and latex gloves (and disposable suit if appropriate).
2. Wet material to be sampled.
3. Collect sample with gloved hand or forceps and place sample directly into whirl-pak bag. If multiple samples are taken, properly clean forceps and/or replace gloves so that no cross contamination may not occur.
4. Ensure that sample identification label is completed and affixed to the bag exterior and break seal is over the top.
5. Remove latex gloves and dispose of them in on-site asbestos waste bags.
6. Remove respirator.
7. Decontaminate sampling and safety equipment.
8. Complete laboratory analysis and chain of custody forms Determining Friability of Samples.

## Lab Reports

Inspector will submit signed Chain of Custody and Final Lab Report to supervisor. The Chain of Custody and Final Lab Report will be placed in Enforcement/ASBESTOS/Lab Report and COC folder in the H: drive.

## ENFORCEMENT

### One-Day Violations

The following violations are normally treated as one day violations:

- Failure to notify of renovation and/or demolition.
- Failure to notify of changes in the original or current notification.
- Failure to perform a proper survey.

### Multiday Violations

Any violation of work practices, waste handling or waste disposal site operations, which is cited for more than the day of observation and sampling, will be documented to establish correct liability for penalties.

Each section which has a multiday component must have an independent compliance determination although only the latest date will still be the single CV date for each NOV.

### Citation of Multiple Subsections

Where the inspector can document the violation of more than one subsection of Section 303 or Section 304, the inspector should not cite multiple subsections. Instead, the inspector should cite Section 303 or Section 304, as appropriate, and note the subsections violated on the "details" line of the NOV and specify details in the text of the report.

### Reports

the appropriate level of detail. Reports should give the reader a clear picture of the site, the nature of the material involved, and the action or inaction that establishes the violation. Essential elements of a report include:

- Identify if a NESHAP violation.
- Description of site.
- Location of RACM.
- Type and condition of RACM, type of building material, whether in good condition or deteriorated, whether wet or dry.
- If Category I or Category II nonfriable, observations establishing friability.
- Quantity of RACM.
- Action or inaction by contractor.

## AGENCY REFERRALS

While performing inspections, it is not uncommon that inspectors will identify problems that may come under the jurisdiction of other agencies. In such cases, it is appropriate that referrals to those agencies be made. If the inspector is uncertain if such a referral is appropriate, the inspector shall confer with his/her supervisor.

### Environmental Protection Agency

Asbestos NESHAP Coordinator (415) 744-1145  
AHERA Coordinator (415) 744-1122

## CAL / OSHA

Contractor Registration Unit (916) 574-2993  
Consultant Certification Unit (916) 574-2993  
District offices (for emission-related issues)

- Foster City (650) 573-3812
- Oakland (510) 622-2916
- San Francisco (415) 557-0100
- American Canyon (707) 649-3700

<http://www.dir.ca.gov/DOSH/dosh1.html>

### Local Health Department

Individual cities and counties often have staff trained to handle asbestos issues and to enforce local ordinances.

## SINGLE FAMILY DWELLINGS NTC POLICY

The following minor violations are subject to issuance of NTCs only if they occur at single family dwellings (SFDs), as defined by CFR Title 40, Volume 7, part 61-61 (A building with 4 or fewer units on a single parcel of land) by the homeowner. This section does not apply to licensed/professional contractors.

1. Failure to remove regulated asbestos containing material (RACM) prior to demolition where work practice has not disturbed the RACM.  
**Regulation: 11-2-303.3**
2. Viewing ports inadequate to allow proper observation.  
**Regulation: 11-2-303.6**
3. Failure to have or provide a survey to the District prior to commencement of any demolition or renovation.
  - Inadequate survey.
  - Survey conducted by a non-certified individual.**Regulation: 11-2-303.8**
4. No labels with name and address of waste generator.  
**Regulation: 11-2-304.1**
5. Small amount of RACM debris (< 1 square inch)  
**Regulation: 11-2-304.1**
6. Job started prior to original start date and no new date reported or not reported 10 days prior to actual start date.  
**Regulation: 11-2-401.3**
7. Job started after original start date and no new date reported or not reported prior to original start date.  
Job continued past notified completion date.
  - Change in contractor not reported.
  - Change in removal amounts not reported.**Regulation: 11-2-401.5**



# EXHIBITS

## Exhibit I – Sample Job Notification

**ASBESTOS JOB NOTIFICATION**

ASBESTOS JOB NOTIFICATION & TASK NUMBERS

[Change Job Details](#)

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**Task No #ASE189230**

**Job No #ASB100007**

**Bug 33554 020918 UAT: 464438**

[View Summary](#)

**RENOVATION**

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**SITE INFORMATION**

**Site #5701577**

375 Blake St, #600, San Francisco, CA 94105

County: **SAN FRANCISCO COUNTY**

**Change Log**

Comment	Date & Time	Username
Closed Task Completed	02/09/18, 3:24:26 pm	System Account
Task Reassigned	02/09/18, 3:24:18 pm	System Account
Reassign Task reassigned for approval.	02/09/18, 3:24:18 pm	System Account (1)
Completed No note provided	02/09/18, 3:24:18 pm	Joy Chen (845)
Updated No Note Provided	02/09/18, 3:22:57 pm	Joy Chen (845)
Reassign User Assigned Asbestos Investigation Task	02/09/18, 3:08:17 pm	Joy Chen (845)

Add Comment...  Enter

---

**JOB DETAILS**

**Job Details**

Job Name: **Bug 33554 020918 UAT**

Date Submitted: **2/9/2018**

Work Schedule Start: **2/27/2018**

Work Schedule End: **3/6/2018**

Night Work: **No**

Weekend Work: **No**

Building Type:

**Job Notification Fees**

Invoice Due: **N/A**

Balance Due: **N/A**

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**Renovation Details**

First Comment Job? **No**

NOV/Isaac? **No**

Material Description: **Acoustic ceiling**

Method of removal: **Wet Methods**

Total Removal Amounts: **100 square feet**

**Waste Transporter Information**

Name: **Test Transporter**

EPA ID: **9123456789**

609 ELLIS ST

SAN FRANCISCO, CA 94102714

**415 771-6000**

asbestosdemolition@gmail.com

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**Disposal Site Information**

Name: **Altamont Sanitary Landfill**

10840 Altamont Pass Road

Livermore, CA 94551

**CONTACTS**

**Job Notification Applicant**

**Asbestos Demo User1**  
Asbestos Test Company  
375 BEALE ST. STE 000  
SAN FRANCISCO, CA 94105-2097  
415 771-6000  
asbestosdemo1@gmail.com

**Billing Contact**

**Asbestos Demo User1**  
Asbestos Test Company  
375 BEALE ST. STE 000  
SAN FRANCISCO, CA 94105-2097  
415 771-6000  
asbestosdemo1@gmail.com

**UPLOAD PHOTOS & DOCUMENTS**

**Contractor Company Information**

**Asbestos Test Company**  
License: 132456  
Corporation

**Contractor Contact Information**

**Asbestos Demo User1**  
Asbestos Test Company  
375 BEALE ST. STE 000  
SAN FRANCISCO, CA 94105-2097  
415 771-6000  
asbestosdemo1@gmail.com

**PHOTOS & DOCUMENTS**

Status	Date	Changed By	Note
Approved	2/9/18	Asbestos Demo User1	No note provided
Submitted	2/9/18	Asbestos Demo User1	No note provided

Exhibit II – NPS Inspection Form

Closed

Job # ASE189220

Job # ASB100007

Application # 464438

Project Type

Project Type: **Renovation**

Building Type: **Commercial**

% Renovation: **Renovations**

Emergency Renovation Type: **Emergency Renovation**

File or Contact Job?: **No**

Project Details

Job Start Date: **2/27/2018**

Job Completion Date: **3/6/2018**

Material Description: **Asbestos ceiling**

Removal Amount: **100 square feet**

Disposal Site: **Altamont Sanitary Landfill**

Night Work: **No**

Weekend Work: **No**

Contact Information

Company Name: **Asbestos Test Company**

Contractor Name: **Asbestos Demo User1**

Contractor Phone No: **415 771-1000**

Contractor Email: **asbestosdemo1@gmail.com**

SITE INFORMATION

Site # **45701577**

375 Beale St #600, San Francisco, CA 94105

INSPECTION DETAILS

Reporting Inspector: **Joy Chen (648)**

Inspection Date: **2/9/2018**

Is there an Inspection Contact?

Yes  No

Comments

complaint # 123456, work in progress, supervisor had #.

UPLOAD PHOTOS & DOCUMENTS

Please upload photos and any supporting documents. For digital copies of an NTCNOV, set File Type to "NTCNOV". For violation-related documents, set File Type to "Evidence". For photos, set File Type to "Other Documents."

Documents	Uploaded By	Uploaded On	Actions
 <input type="button" value="UPLOAD A PHOTO OR DOCUMENT"/>			

2. CHECKLIST  
ASBESTOS INSPECTION CHECKLIST

ALL ASBESTOS JOBS

11-2-401.3: Notification - 10 working days? Fast track?  
 11-2-401.5: Accurate Starting Date

RENOVATION

11-2-303.1: Adequate Wetting during removal?  
 11-2-303.2: Dry removal approved? Conditions of approval met?  
 11-2-303.4: Removal units properly lowered? Removal units wetted or encapsulated?  
 11-2-303.5: Chutes/ containers with NAM/ HEPA?  
 11-2-303.6: Containment? Negative Air? Viewing Ports? Glove Bag?  
 11-2-303.7: Clean Work Site?  
 11-2-303.9: On Site Representative?  
 11-2-304.1: RACM sealed in leak tight containers? Generator Labels?  
 11-2-304.6: Waste shipment record?

DEMOLITION

11-2-303.3: RACM removed prior to demolition?  
 11-2-303.7: Clean Work Site?  
 11-2-303.8: Survey?  
 11-2-303.11: Ordered Demolition?  
 11-2-303.12: Fire Training?