



Ramsey County's Pre-Demolition Inspection Program requires a County inspection to identify hazardous building materials before the start of any demolition, major renovation/remodeling activity. Hazardous materials must be removed and properly managed before demolition or renovation begins, and contractors must provide documentation to verify this has occurred. These requirements help reduce occupational exposure to hazards, encourage building material salvage (and less landfilling of wastes), and create a level playing field for everyone involved in demolition/renovation activity.

The following "Q and A" format explains property owner/contractor requirements for notification, asbestos surveys and abatement, the inspection process, materials management and reporting requirements.

Notification of Demolition/Renovation Activity:

Q: I have applied for or received a demolition permit through the city. Must I notify Ramsey County of my demolition plans?

A: Yes. Ramsey County Ordinance requires immediate notification upon receipt of a permit from the city for the demolition, renovation or deconstruction ("disassembly") of any commercial or industrial structure or any residential structure (including mobile homes).

The property owner or contractor must contact Ramsey County to schedule a pre-demolition inspection **before** beginning any demolition or renovation project. With the exception of an emergency demolition (i.e., following a fire or flood, etc.), notify the county at least two business days prior to scheduling the pre demo site inspection. For emergency demolitions, notify Ramsey County before beginning the demo to determine if it meets the emergency exemption.

Q: I am required to submit a "Notification of Intent to Perform a Demolition" form to the Minnesota Pollution Control Agency (MPCA) prior to any commercial renovation or demolition activity. I (or my asbestos abatement contractor) must also submit a "Notification of Asbestos Related Work" form to the Minnesota Department of Health (MDH) for abatement projects that meet their requirements. Do I need to submit either form to Ramsey County?

A: Yes! The Ramsey County Solid Waste Ordinance requires that the demo contractor submit a completed copy of either form to the County, seven business days before beginning any demo or deconstruction, if:

- the demo activity is commercial or residential, or
- the MPCA considers the structure a "facility" and therefore regulated under the Federal NESHAP Rule, or
- MDH requires a "Notification of Asbestos Related Work."

Asbestos:

Program data continually shows that asbestos is found in about nine out of every 10 structures. Asbestos is still used in some building materials today, so you cannot assume that a newer building is asbestos free. The only

Ramsey County's Pre-Demolition Inspection Program Frequently Asked Questions (FAQ's)

Page 2 of 6

way to know for sure is to test for asbestos. The MPCA and MDH have additional requirements for demolition or renovation of certain structures.

Q: Am I required to have an asbestos survey performed?

A: Yes! An asbestos survey must be completed by an MDH-licensed asbestos inspector before any demolition or renovation activity begins. For more information, see the MDH brochure entitled "***Before You Renovate or Demolish...STOP,***" available on their web site (a link can be found in the **Resources** section). An emergency demolition is the only exemption to this. Contact the county before beginning the demo to find out if it meets the emergency exemption. If an emergency demo is required, all of the demo debris must be managed as asbestos containing material, transported directly to and disposed of at a landfill permitted by the MPCA to receive asbestos containing material. In addition, MDH regulations requires that an emergency demolition of a structure, assumed to contain friable asbestos, be performed by an MDH-licensed asbestos abatement contractor.

Q: What do I have to do if asbestos containing material is present above 1%? What type of asbestos can stay in the structure at time of demo?

A: Category I non-friable asbestos (if fully intact and undisturbed) may stay in the structure if demolition activity will not damage it. If tiles or other Category I material are broken or damaged during demolition, the asbestos will become friable and likely contaminate all demolition debris. All other asbestos above 1%, including Category I in poor condition and all of Category II, must be properly abated by an MDH-licensed asbestos abatement contractor and properly disposed of prior to any demo activity.

- Examples of Category I non friable asbestos include resilient floor coverings, such as vinyl asbestos tile and linoleum, and asphalt roofing products.
- Examples of Category II asbestos include Transite shingles and siding, cement, putties, pipe wrap and insulation, sealants, and certain asbestos-containing adhesives.

Q: What do I have to do if asbestos containing material is present at or below 1%?

A: While Ramsey County does not require abatement of asbestos-containing building materials containing **1% or less** of asbestos, demolition contractors still must protect themselves and other employees at the job site under Federal OSHA rules (CFR 1926.1101). Further, it is appropriate for the contractor to notify the disposal facility that the incoming demolition debris does contain asbestos below the regulated limit. Ramsey County strongly discourages delivery of any asbestos-containing demolition debris to a C&D processing facility or to a solid waste transfer station, as doing so would expose facility workers to unnecessary risks.

Q: How does asbestos affect disposal of demolition debris?

A: Demo debris from a project where asbestos is present may not be delivered to a transfer station or C&D processing facility. Instead, and to protect employees working at transfer stations or C&D processing facilities, it should be delivered directly to a permitted landfill. Ramsey County requires the contractor notify the receiving demolition landfill, prior to arrival, if asbestos is present in the load.

The Pre Demo Inspection:

Q: What happens at a pre demo inspection?

A: When a city issues a demolition permit, or a renovation permit for a commercial structure, they notify Ramsey County. A county inspector contacts the demo contractor, building owner or their designee to obtain details on the project, including project scope, the completion of an asbestos survey, and other related details. Prior to scheduling an inspection, County staff will ask the contractor or owner to submit a copy of the asbestos survey (email is preferable).

At the job site, the pre-demo inspector performs a walk through inspection to identify, document and discuss proper management of hazardous building materials, including suspect asbestos, hazardous or household hazardous wastes, electronics, appliances, municipal solid waste (MSW) and other items that must be removed prior to demolition and managed separately from the demo waste. The inspector provides an inspection report to the contractor to further explain contractor responsibilities. A follow up inspection is generally not required. Ramsey County recommends that you contact the city for any additional requirements.

Following the inspection and once all hazardous materials and asbestos are properly removed and managed, demolition or renovation may begin.

Hazardous Building Materials:

Household Hazardous Waste vs. Hazardous Waste

Q: If hazardous waste is found in a residential dwelling (i.e. house, apartment, mobile home), is it automatically considered household hazardous waste (HHW)?

A: No. Household Hazardous Waste is defined in MN State Statute and MPCA rules, as characteristic or listed wastes, which come from a household activity; it does not include waste from commercial activities that is generated, stored, or present in a household. If the waste came from household activity, it is HHW; if it originated from commercial activity, it is not HHW and must be managed as a fully regulated hazardous waste.

Ramsey County allows HHW from a residential demo site to be delivered, at no charge, directly to Ramsey County's HHW collection site at Bay West in St. Paul. The HHW must go directly from the demo site to Bay West. Transporting HHW to your business location or another alternate location in order to accumulate it is prohibited. Your inspector will be provide you with a copy of an HHW Pre-Demolition form, required for delivery, along with Bay West's hours of operation. Complete the form before arriving, listing only one address per form. ***Remember: this service is restricted to residential demolition sites in Ramsey County only.***

If you come across non-household quantities or types of hazardous waste during a residential demo, contact Ramsey County for assistance in obtaining an HW ID number, identifying proper management methods, and finding licensed or permitted disposal companies. All commercial hazardous waste regulations would apply to this project.

Major Appliances

Q: What is proper management of appliances and electronics?

A: All appliances and electronics must be removed from the building prior to demolition and re-used or delivered to a licensed recycler or processor. The appliances and electronics must be removed intact and undamaged, even if heavy equipment is required for removal. If recycled, you must obtain a receipt. For items that are re-used, you must provide the County with written documentation explaining who and how it will be reused. For HVAC systems and central air conditioning units, documentation must be provided showing that the unit was decommissioned in the field (i.e. refrigerant removed by a United States Environmental Protection Agency's (USEPA)-certified technician, and that PCB capacitors, mercury components and electronics have also been removed and properly managed).

Lead Paint:

Q: Lead paint has been found at concentrations greater than or equal to 0.5% or 5,000 ppm. Now what?

A: Demolition contractors are no longer required to remove or stabilize in place loose and flaking lead paint before beginning the demo. If the building is removed by either demolition or deconstruction, not renovated or remodeled, the (USEPA) Renovation, Repair and Painting (RRP) Standard does not apply. Peeling, flaking or intact lead paint, present at the time of demolition, does NOT require abatement/stabilization and is considered demo debris if removed with the structure and delivered to a MPCA-permitted landfill that is approved to accept this waste.

PCBs:

Q: Where can PCBs be found?

A: PCBs maybe present in older fluorescent lamp ballasts, capacitors, electronic circuitry and major appliances. PCBs have also been identified in caulking used in commercial buildings.

Q: Do I need to remove PCBs prior to demolition?

A: Yes, ballasts or capacitors that are not clearly labeled "no PCBs" must be managed as PCB containing material. All caulk containing more than 50 ppm PCB must be abated and properly disposed of as a hazardous waste. If the structure is non-residential, this waste is considered a fully regulated hazardous waste.

Trash/Municipal Solid Waste (MSW)

Q: Can MSW be left in the building during demo and disposed of with the demo debris? Examples of MSW include garbage, trash, furniture, and miscellaneous non-hazardous debris.

A: No; MSW must be removed before the demolition and managed separately. If the volume or size of the items prevents this or if a health hazard is present, the MSW may be removed during the demo. Mixing of MSW with demo debris is not allowed unless the entire load is managed as MSW by delivering it to an MPCA MSW permitted facility. The cost for disposal of demolition debris mixed with MSW and managed as MSW is subject to the County Environmental Charge (CEC). The CEC is an add-on service charge assessed by licensed waste haulers, and is 28% for residential MSW, and 53% for non-residential MSW. To avoid this charge, contractors should remove MSW and dispose of it separately from demolition debris.

Site Management:

Q: What are Ramsey County's expectations for dust suppression?

A: Ramsey County Ordinance requires that measures be taken to control nuisance dust during demolition and loading. Municipalities and others (MPCA, MDH) may also impose requirements to control dust.

Q: What are Ramsey County's expectations for maintaining site security?

A: Hazardous building materials, including major appliances, electronics, hazardous and household hazardous waste, must be secured while on the job site.

Documentation Submittal:

Ramsey County requires confirmation that all materials identified in an asbestos survey and/or during a pre-demolition inspection are properly managed. To do this, contractors/owners must submit documents showing removal and proper management (e.g., recycling, disposal) of those materials.

Q: What paperwork or documents does Ramsey County need before and after the demo? How should it be submitted and how long do I have to submit everything?

A: *Before the demo:*

- A copy of the city issued demo permit
- A completed copy of the MPCA "Notification of Intent to Perform a Demolition"
- An Asbestos Survey (if applicable)

After submission of these documents and before starting the demo, a Ramsey County pre demo site inspection with the contractor, building owner or their designee must occur.

After the demo:

For items identified in the asbestos survey and/or the pre-demolition inspection, within 30 calendar days after the completion of demo, the following documentation must be submitted:

- A final asbestos disposal manifest and abatement documentation
- Appliance and electronics documentation, showing proper recycling and/or reuse
- Copies of all related MSW and demo debris disposal tickets
- Documentation that refrigerant (central A/C or commercial/built in refrigerant/HVAC units) was properly evacuated on-site by a licensed technician
- Ramsey County's residential Household Hazardous Waste Pre-Demolition form
- Commercial Hazardous Waste disposal documentation (i.e. hazardous waste manifests, bill of lading, recycling receipts)
- Documentation showing proper management of other materials or wastes that could not be disposed of with demo waste

Exceptions may be made to the 30 day deadline, if a written extension is submitted to and approved by the County.

Ramsey County's Pre-Demolition Inspection Program Frequently Asked Questions (FAQ's)

Page 6 of 6

Q: If hazardous materials/items (e.g., appliances) are salvaged from the demolition site for reuse, what type of documentation is required?

A: Written documentation explaining who and how it will be reused is required to be submitted. All documentation may be submitted by e-mail, fax, U.S. Mail or hand delivered.

Resources:

Websites

Minnesota Dept. of Health (Asbestos) – www.health.state.mn.us/divs/eh/asbestos/index.html

MDH asbestos brochure: www.health.state.mn.us/divs/eh/asbestos/factsheets/asbregpamphlet.pdf

Minnesota Pollution Control Agency – www.pca.state.mn.us

Minnesota Dept. of Labor and Industry - Occupational Safety and Health: www.doli.state.mn.us/MnOsha.asp

Ramsey County Environmental Health – www.co.ramsey.mn.us/ph/li/Pre-Demolition_Inspection.htm

Resourceful Waste Management Guide – www.rethinkrecycling.com/businesses/waste-management-guide

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Rev 3/2015