

demolition. You also asked three additional questions. We would now like to modify our answer to question 2, in order to be consistent with other Regions.

Question 2 asked whether or not all asbestos-containing material must be removed before demolition. We answered that "non-friable asbestos-containing material which will remain non-friable during the demolition and/or the move process need not be removed. However, all friable asbestos-containing material and all asbestos-containing material that will become friable during the demolition and/or the move process must be removed before the demolition." We now modify our position to state "all Regulated Asbestos Containing Material (RACM) must be removed from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal."

This determination has been coordinated with EPA's Office of Enforcement and Compliance Assistance. Thank you for the opportunity to discuss these matters and clarify the asbestos NESHAP requirements. If you have any questions regarding this letter, please contact Brenda South, of my staff, at 303-312-7076.

Sincerely,

Martin Hestmark, Director
Technical Enforcement Program

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