

AK-10-002-0179



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**JAN 3 1 2011**

REPLY TO THE ATTENTION OF:

Mayor Jay Williams  
City of Youngstown  
City Hall  
26 South Phelps Street  
Youngstown, Ohio 44503

Dear Mayor Williams:

Thank you for your letter of December 3, 2010, concerning residential demolitions in Youngstown, Ohio and compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The U.S. Environmental Protection Agency has consistently interpreted the NESHAP for asbestos regulation as applying to the mass demolition of residential structures. While the regulation has a residential building exemption provision, EPA has interpreted this exemption as being inapplicable when numerous residential buildings are being demolished for reasons of public health, welfare, and safety, as part of a single project, or if such residences meet the definition of an installation. I am enclosing a copy of a recent EPA letter to the Ohio Environmental Protection Agency which contains a more detailed discussion of EPA's position.

On December 1, 2010, EPA held a roundtable in Toledo, Ohio to discuss the problems that municipalities and state agencies are encountering with abandoned houses. EPA is currently evaluating whether there are additional ways we can assist with the environmental issues associated with the large-scale demolition of abandoned houses. We welcome your input as to how we can all meet our obligations more effectively, in a manner that protects public health and the environment.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Ronna Beckmann, or Denise Gawlinski, the Region 5 Intergovernmental Liaisons, at (312) 886-3000.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Hedman', with a long horizontal line extending to the right.

Susan Hedman  
Regional Administrator

Enclosure

cc: Scott J. Nally, Director  
Ohio Environmental Protection Agency  
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