

Asbestos Notification Requirements

[*EPC Guide for Renovation & Demolition Projects \(printable version\)*](#)

[*FDEP Notification Form*](#)

[*State Licensed Asbestos Consultants \(Pinellas and Hillsborough County\)*](#)

[*State Licensed Asbestos Contractors \(Pinellas and Hillsborough County\)*](#)

Common Questions and Answers:

When and How to Notify for Renovation or Demolition Projects in Hillsborough County

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What projects require notification?

Only single, isolated, family residential structures with four dwelling units or less are **exempt** from the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for notification ([40 CFR 61, Subpart M](#)). The residential exemption does not apply if the house was ever used for commercial purposes in the past.

All other structures, or multiple residences, demolished as part of a single project and located on one site, are subject to the notification requirements for demolition whether or not asbestos-containing material (ACM) is present. (See also [Asbestos NESHAP Clarification of Intent - Residential Building Exemption](#)).

Only renovation projects involving regulated asbestos-containing material (RACM) above certain threshold amounts require notification. Written notification is not required for renovation projects where asbestos containing materials are not disturbed or made regulated during the planned activity.

What is Asbestos-Containing Material (ACM) and Regulated Asbestos-Containing Material?

ACM is any material containing more than 1% asbestos as determined using Polarized Light Microscopy (PLM). There are two types of ACM. Category I nonfriable ACM means asbestos-containing packings, gaskets, resilient floor covering and asphalt roofing products. Category II nonfriable ACM means any material, excluding Category I nonfriable ACM.



Example of Category I ACM - Floor Tile

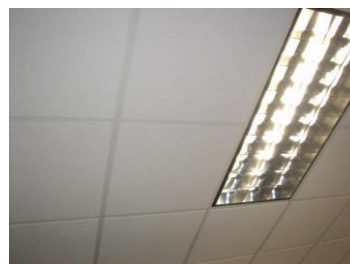


Example of Category II ACM - Cementitious Material

RACM is any friable asbestos-containing material containing more than 1% asbestos as determined using PLM that can be crumbled, pulverized or reduced to powder by hand pressure when dry. RACM also includes Category I or Category II non-friable asbestos material that has become friable prior to, or during, demolition or renovation operations.



Friable Air Cell Insulation on Pipe



Friable Ceiling Tile

In addition, Category I or II ACM that has a high probability of becoming RACM (crumbled, pulverized or reduced to powder) during demolition must be removed prior to the start of the demolition activity.

What are the notification requirements?

Written notification is to be mailed or hand-delivered:

- Ten (10) working days prior to a **demolition**, *even if there is no asbestos present*
- Ten (10) working days prior to a **renovation** activity, if the amount of RACM to be stripped, removed, dislodged, cut, drilled or disturbed is greater than 160 square feet (SF) on facility components or 260 linear feet (LF) on pipes, or 35 cubic feet off facility components where the length or area could not be measured previously

Written revisions, including changes to the start date, may be faxed to our office at (813) 627-2660 and must be submitted no later than the originally notified start date if the activity will fall after the original start date. Otherwise the 10 working day requirement must be met for any proposed activities to start earlier than the originally notified start date.

When is an asbestos inspection required?

A thorough asbestos inspection (survey) is required by a state [Licensed Asbestos Consultant](#) before *any* renovation or demolition activity begins, regardless of the age of the building or the building materials. This requirement also applies to buildings that are damaged by fire or water. Attach a copy of the asbestos inspection or asbestos survey report to all demolition notifications. In addition, a copy of the asbestos (survey) report should be maintained at the job site during all renovation or demolition activities.

Who can remove asbestos-containing material?

A [Florida Licensed Asbestos Contractor](#) must perform all activities involving the removal or handling of ACM and RACM. Licensure is **not** required if certain criteria are met for moving, removal, or disposal of asbestos containing roofing materials, resilient flooring materials, and exterior conduit or piping as specified under [Chapter 469.002, F.S.](#) Supervisors and/or workers must be trained in accordance with [Florida Department of Business and Professional Regulation \(DBPR\)](#) requirements. All employers of workers who require employees to handle asbestos must comply with [OSHA asbestos regulations](#) ([29 CFR Part 1910.1001](#) and [29 CFR Part 1926.1101](#)).



Where do I send notification?

All asbestos notifications for projects to be performed in Hillsborough County must be mailed or hand-delivered to the Environmental Protection Commission (EPC). Include the appropriate Hillsborough County fee and a copy of the asbestos inspection (survey) report with the notice:

[EPC Air Management Division](#)

**Attn: Asbestos Program Coordinator
3629 Queen Palm Avenue
Tampa, FL 33619**

What are the county asbestos fee requirements?

Fees are due at the time of notification. The fee may cover multiple structures, as long as the structures are located on a single site and the project demolition or renovation activities are not phased. *For projects involving renovation and demolition activities, separate fees are due for **each** activity performed at the site.* Make checks payable to the EPC. The Hillsborough County [fee schedule](#) for asbestos is as follows:

- Demolition of structure less than 50,000 SF: **\$200.00**
- Demolition of structure greater than or equal to 50,000 SF: **\$300.00**
- Renovation 160 SF/260 LF up to 1000 SF/LF: **\$300.00**
- Renovation greater than 1000 SF/LF: **\$500.00**

If I obtain a building permit, does this meet the federal asbestos notification requirement?

No, the receipt of a city or county permit is not the same as providing the federally required asbestos notification to the EPC. A copy of the [state asbestos notification form \[DEP 62-257.900\(1\)\]](#) can be obtained from the EPC or from the following website address:

<http://www.dep.state.fl.us/Air/forms.htm>

What if I have an emergency project?

Notification is required as soon as possible before, but not later than the following working day for any emergency renovation operation or emergency demolition (if the building has been declared structurally unsound and in danger of imminent collapse by a State or local governmental agency). The asbestos NESHAP requirements for a thorough asbestos inspection (survey) prior to the start of the demolition or renovation activity and disposal of waste debris in an appropriate landfill are still applicable for all emergency projects. If a thorough asbestos inspection is not done prior to the start of the activity and a means of complying with this requirement is not possible, then all of the building waste materials must be treated as RACM and disposed of in an appropriate regulated landfill per the provisions of [40 CFR 61.150](#). Contact our office for more information.