



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

July 10, 1998

Mr. Ronald Area, Director
ChemScope
15 Moulthrop Street
North Haven, CT 06473-3686

Subject: Request for Regulatory Clarification

Dear Mr. Arena,

The is in response to your April 30, 1998 correspondence in which you requested clarification of regulatory requirements associated with notification of demolition activities. The questions you detailed in your correspondence and the response of the Department of Public Health (DPH) are outlined below.

Case #1: Demolition contractor unknown at time of DPH notification:

A building with asbestos identified in excess of DPH notification requirements is to be demolished and the DPH has already been duly notified of an asbestos removal : Does the demolition contractor later have to file a separate EPA notification (asbestos now removed) or does DPH get an amended notification once the demolition contractor is known?

DPH Response: Although not expressly stated in your correspondence, it is the understanding of the DPH that this question applies to facilities subject to the asbestos National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61). A single notification may be submitted to the DPH provided that such notification satisfies the provisions of Section 19a-332a-3 of the Regulations of Connecticut State Agencies. Once all asbestos-containing material has been removed, the demolition contractor is not required to file a separate notification to the US Environmental Protection Agency (EPA). Further, the DPH need not receive an amended notification once the demolition contractor is known.

Case #2: Demolition contractor known at time of DPH notification:

If the demolition contractor is known at the time of the initial DPH notification and he is added as Other Operator on this initial notification (and all the dates are known) : is further notification required?

DPH Response: As stated in response to #1, a single notification may be submitted to the DPH provided that such notification satisfies the provisions of Section 19a-332a-3 of the Regulations of Connecticut State Agencies. Once all asbestos-containing material has been removed, no further notification is required.



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Mr. Ronald Arena
July 10, 1998

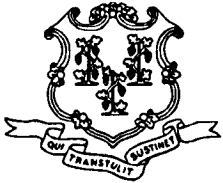
I hope that this information is useful to you in ensuring regulatory compliance.
Please contact me should you need further assistance.

Sincerely

A handwritten signature in cursive script that reads "Ronald Skomro".

Ronald Skomro
Supervising Environmental Sanitarian
Indoor Air Program
Division of Environmental Health

cc: Wayne Toland, EPA Region I



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

MEMORANDUM

TO: Asbestos Abatement Project Designers
Asbestos Abatement Contractors
Interested Parties

FROM: Ronald Skomro, Supervising Environmental Sanitarian
Indoor Air Program

DATE: February 18, 1998

SUBJECT: Policy Concerning Submission of Alternative Work Practice Applications

This is to advise you of a new policy established by the Connecticut Department of Public Health concerning the submission of alternative work practice applications. Effective as of this date, alternative work practice applications associated with non-emergency asbestos abatement projects shall be postmarked or hand delivered at least ten (10) days before the project start date. In the case of applications associated with emergency asbestos abatement projects, the application shall be submitted as soon as possible prior to the intended project start date. Alternative work practices shall not be utilized without prior written approval of the Department of Public Health.

This policy is intended to provide the Department of Public Health with adequate time to conduct its review of the application. The issue of the timely submission of alternative work practice applications has become increasingly problematic. Adherence to this policy is necessary to ensure that an appropriate measure of asbestos emission control and regulatory compliance are achieved.

Thank you your attention to this policy matter. Please contact the Indoor Air Program at (860)509-7367 should you have any questions regarding this matter.



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