



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

To: Interested Parties

From: Ronald Skomro, Supervising Environmental Sanitarian
Connecticut Department of Public Health
Indoor Air Program

Subject: Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) Asbestos Notification Program

Date: October 7, 1997

The asbestos NESHAP notification requirements outlined in 40 CFR Subsection 61.145 (b) require each owner or operator of a demolition or renovation operation to provide the Administrator of the United States Environmental Protection Agency (EPA) with written notice of intent to demolish or renovate. Connecticut Department of Public Health (CTDPH) requirements compel these same owners/operators to provide this and additional information to the CTDPH. Since these requirements are substantially similar to 40 CFR Subsection 61.145 (b), the EPA and the CTDPH view this as a duplication of effort and an unnecessary burden to the regulated community.

Therefore, effective October 1, 1997, **except as noted below**, the regulated community in Connecticut will no longer be required to provide written Notification of Demolition and Renovation to the EPA, pursuant to 40 CFR Subsection 61.145 (b), as long as such notices are delivered to the CTDPH. The EPA will view notification to the CTDPH as having satisfied the federal notification requirement and conversely, will consider non-notifiers to the CTDPH as being in violation of the federal notification requirement as well.

Written notices must be submitted to the CTDPH in accordance with the requirements of Section 19a-332a-3 of the Regulations of Connecticut State Agencies. Notice must be made on the enclosed asbestos abatement notification form prescribed by the CTDPH. Blanket notifications must be updated on a quarterly basis in accordance with the procedures detailed in the enclosed memorandum dated March 24, 1997.

The exception to the transfer of notification receipt procedures will apply to regulated facilities, as defined by the asbestos NESHAP at 40 CFR Subsection 61.141, where a demolition is to occur but where asbestos is present below the CTDPH notification threshold amounts. This exception applies to those demolitions involving less than or equal to ten (10) linear feet of asbestos-containing material or less than or equal to twenty-five (25) square feet of asbestos-containing material. This exception would also apply to those demolitions believed to involve zero asbestos. **Notices subject to this exception must be submitted to EPA directly as presently required.**

EPA has published a notice in the Thursday, October 2, 1997 Federal Register which details this same information to the regulated community and the general public. A copy of that notice is also enclosed. The CTDPH will be working with the EPA to ensure that all of the notice requirements of the federal asbestos NESHAP are incorporated into the state regulations. If you have any questions concerning the NESHAP asbestos notification program, please contact the CTDPH, Indoor Air Program at 860-509-7367 or Wayne R. Toland, EPA Region I asbestos NESHAP Coordinator at 617-565-3260.

cc : Wayne R. Toland, NESHAP Coordinator
EPA Region I

Phone:

Telephone Device for the Deaf (860) 509-7191

410 Capitol Avenue - MS # _____

P.O. Box 340308 Hartford, CT 06134

An Equal Opportunity Employer





STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Memorandum

To: Asbestos Contractors
From: Ronald Skomro, Supervising Environmental Sanitarian
The Indoor Air Program
Subject: Blanket Notifications/New Update Form
Date: March 24, 1997

The enclosed revised update form should be used by contractors when submitting quarterly updates for blanket notifications. Please use this form in place of the existing update form.

A review of the blanket notifications submitted during 1996 revealed common problems associated with the reports received. The following information is provided as a guideline and will hopefully eliminate some of the confusion in filing a blanket notification. As a reminder, all updates are due no later than fifteen (15) days following a completed quarter, even if no work has been performed.

- Ideally, blanket notifications are to be filed from January 1- December 31 of a calendar year. This allows the contractor, facility owner and the Department to follow the notification and payment schedule with the most ease. Please note, the notification must be postmarked or hand delivered at least ten (10) days before the start of asbestos abatement.
- When a blanket notification is submitted and it does not coincide with the start of a quarterly period, if the notification is for one calendar year, the Department would require a fifth report. The first report due would cover the quarter in which the notification was filed. As an example, a notification is filed with a start date of June 1 ending May 31 of the next year. The first report would be due July 15, the second due October 15, the third due January 15, the fourth due April 15 and the fifth due July 15 of the following year, covering work through May 31. The Department requires an update form for the notification period originally filed. If work ends prematurely, then a revised blanket must be filed indicating it is over.

Please note the change in number 5 of the form; it is not requested that a running tabulation be made of amounts of material removed during the year. Please only fill out what was abated for that quarter for which the report is being made. In numbers 6b and 7b, only report amount for the current notification period. Several reports received have mistakenly reported abatement costs and fees submitted for previous blanket notifications submitted for the same facility.



Phone: (860) 509-7367 / FAX (860) 509-7378
Telephone Device for the Deaf (860) 509-7191
410 Capitol Avenue - MS # 51 AIR
P.O. Box 340308 Hartford, CT 06134
An Equal Opportunity Employer



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

BLANKET ASBESTOS ABATEMENT PROJECT QUARTERLY UPDATE FORM

State use

Date	_____
check #	_____
amount	_____

This form is to be used for quarterly update reporting where blanket asbestos abatement notifications have been filed. Quarterly reports are due no later than fifteen days after the quarter ends.

1. Name of Abatement Contractor _____
 Address _____
 City _____ State _____ Zipcode _____
 Phone _____ Contact: _____

2. Facility Name _____
 Address _____
 City _____ State _____ Zipcode _____

3. Original Start date _____ Completion date _____

Indicate (X) for Quarter Period

- 1. January - March _____
- 2. April - June _____
- 3. July - September _____
- 4. October - December _____

4. Number of Individual Projects Completed this quarter _____ to date _____
 (Current blanket)

5. Type and Amount of Asbestos Abated this quarter:

FRIABLE

- A. Sprayed or Troweled On _____ Ft²
- B. Boiler Insulation _____ Ft²
- C. Tank Insulation _____ Ft²
- D. Breeching Insulation _____ Ft²
- E. Duct Insulation _____ Ft²
- F. Ceiling Tiles _____ Ft²
- G. Other (specify) _____ Ft²

NON FRIABLE CATEGORY I

- I. Floor Covering/Tiles _____ Ft²
- J. Roofing Material _____ Ft²
(Specify) _____
- K. Gaskets/Packings _____ Ft²

CATEGORY II

- L. Transite Board _____ Ft²
- M. Other (specify) _____ Ft²

H. Pipe Insulation _____ Linear feet
 _____ Ft²

N. RACM off Components _____ Ft²

6. (a) Cost of Abatement (for this quarter only, if none, state "0") _____
 (b) Total Cost of Abatement to Date _____

7. (a) Fees submitted (for this quarter only, if none, state "0") _____
 (b) Total Fees Submitted to Date _____

blankupd.frm03/21/97



Phone: (860) 509-7367/ FAX (860) 509-7378
 Telephone Device for the Deaf (860) 509-7191
 410 Capitol Avenue - MS # 51 AIR
 P.O. Box 340308 Hartford, CT 06134
 An Equal Opportunity Employer



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

STATE USE ONLY

Postmark/Delivery
Date: ___/___/___
Check #: _____
Amount: \$ _____
Record #: _____

ASBESTOS ABATEMENT NOTIFICATION FORM

This form is to be completed and filed with the Connecticut State Department of Health Services ten (10) days before the start of asbestos abatement (except for emergency notifications) as required by Section 19a-332a-3 of the Connecticut State Regulation concerning Standards for Asbestos Abatement. EPA may also require notice before the start of asbestos abatement as per Title 40, Code of Federal Regulations, Part 61.

MAIL TO:

Connecticut Department of Public Health
Division of Environmental Health
Indoor Air Program
410 Capitol Avenue - MS# 51AIR
P.O. Box 340308
Hartford, CT 06134-0308

(Fill In/Circle Each Item)

1. Type of Notification: Connecticut License Number: _____

- A. New
- B. Blanket
- C. Cancellation
- D. Revised-Items Revised: _____
- E. Emergency-Describe: _____

2. Name of Abatement Contractor _____

Address _____

City _____ State _____ Zip _____

Phone() _____ Contact Person _____

3. Facility Owner/Operator _____

Address _____

City _____ State _____ Zip _____

Phone() _____ Contact Person _____

4. Facility Name _____

Address _____

City _____ State _____ Zip _____

5. Abatement Project Start Date _____ Completion Date _____

6. Total Abatement Cost _____
(For Abatement Projects 160 Square Feet or Greater)



Phone: (860)509-7367 fax(860)509-7378

Telephone Device for the Deaf (860) 509-7191

410 Capitol Avenue - MS # 51-AIR

P.O. Box 340308 Hartford, CT 06134

An Equal Opportunity Employer

Revision Date 02/25/97

7. Use Of Facility:

- A. School (K-12)
- B. Public Building
- C. Manufacturing
- D. Office
- E. College
- F. Commercial
- G. Church/Synagogue
- H. Residential-Number Of Dwelling Units: _____
- I. Other (Specify) _____

8. Building Data: Ft.² _____ Number Of Floors _____ Age _____

9. Abatement Classification:

- A. Renovation
- B. Demolition
- C. Ordered Demolition-Agency Issuing Order: _____

10. Abatement Technique:

- A. Full Containment With Negative Air
- B. Alternative Work Practice (Pre-Approval Required)
- C. Exterior Abatement

11. Abatement Method: A. Removal B. Encapsulation C. Enclosure

12. Type Of Decontamination System: A. Contiguous To Work Area B. Remote

13. Type And Amount Of Asbestos To Be Abated:

FRIABLE

- A. Sprayed Or Troweled On _____ Ft.²
- B. Boiler Insulation _____ Ft.²
- C. Tank Insulation _____ Ft.²
- D. Breeching Insulation _____ Ft.²
- E. Duct Insulation _____ Ft.²
- F. Ceiling Tiles _____ Ft.²
- G. Other _____ Ft.²
(Specify) _____

NON-FRIABLE CATEGORY I

- I. Floor Covering/Tiles _____ Ft.²
 - J. Roofing Material _____ Ft.²
(Specify) _____
 - K. Gaskets/Packings _____ Ft.²
- NON-FRIABLE CATEGORY II**
- L. Transite Board _____ Ft.²
 - M. Other _____ Ft.²
(Specify) _____

H. Pipe Insulation _____ Total Linear Feet

Pipe Diameter	Linear Feet	X	CF*	=	Ft. ² Of Pipe Insulation
_____ In.	_____ Ft.	X	_____	=	_____ Ft. ²
_____ In.	_____ Ft.	X	_____	=	_____ Ft. ²
_____ In.	_____ Ft.	X	_____	=	_____ Ft. ²
_____ In.	_____ Ft.	X	_____	=	_____ Ft. ²
_____ In.	_____ Ft.	X	_____	=	_____ Ft. ²
					_____ Total Ft. ² Of Pipe Insulation

* See Notification Conversion Table For Conversion Factor (CF)

14. Waste Disposal Site _____

Address _____

City _____ State _____ Zip _____

Owner/Operator _____

15. Hauler/Waste Transporter _____

Address _____

City _____ State _____ Zip _____

[Federal Register: October 2, 1997 (Volume 62, Number 191)]
[Notices]
[Page 51654-51655]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr02oc97-57]

ENVIRONMENTAL PROTECTION AGENCY

[FRL-5901-9]

Asbestos NESHAP State Notification Procedures Change

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice to regulated community.

SUMMARY: The Environmental Protection Agency, Region I Office, Boston, MA, has notified in writing the EPA--New England states of Maine, New Hampshire, Massachusetts, and Connecticut that effective October 1, 1997, all owners or operators of a demolition or renovation activity subject to the asbestos NESHAP and who provide written notification to the states 10-working days in advance of commencing with the renovation or demolition activity, will not have to provide similar notification to the EPA Administrator as required pursuant to 40 CFR 61.145(b). Important exceptions to the Federal and state notification procedures change are discussed below. In brief, such exceptions require regulated entities to continue to submit asbestos NESHAP notifications to the EPA for all demolitions involving asbestos below each respective State's regulatory threshold amount, including all demolitions believed to involve no asbestos.

Background

The asbestos National Emissions Standard for Hazardous Air Pollutants (asbestos NESHAP) was promulgated pursuant to section 112 of the 1990 Clean Air Act as Amended and is codified at 40 CFR, part 61, subpart M. Among other things, the asbestos NESHAP [40 CFR 61.145(b)] requires all owners or operators of a demolition or renovation (demo/reno) activity that is subject to the asbestos NESHAP, to notify the Administrator in writing, at least 10-working days before asbestos stripping or removal work or any other activity begins, such as site preparation that would breakup, dislodge or similarly disturb asbestos material. Since the states of Maine, New Hampshire, Massachusetts and Connecticut were fully-delegated EPA asbestos NESHAP states, pursuant to section 112(d) of the Clean Air Act prior to the 1990 amendments, EPA made a determination that enabling legislation and promulgated regulations these states had in place governing demo/reno activities at the time of delegation were adequate for the purposes of effectively implementing the and enforcing the asbestos NESHAP. Included in this was

[[Page 51655]]

the requirement that these same owners or operators of a demolition or renovation activity, notify in writing the designated state agency in advance of commencing with the demo/reno activity. EPA views this as a duplication of effort. EPA also believes that the costs, in terms of time and resources, of providing dual notification to both the state and federal government represent an unnecessary burden for the regulated community. Therefore, effective October 1, 1997, and with the exception referenced below, EPA will no longer require the regulated community in Maine, New Hampshire, Massachusetts, or Connecticut, to provide written Notification of Demolition and Renovation to EPA, pursuant to 40 CFR 61.145(b), as long as such notices are delivered to

[Federal Register: October 2, 1997 (Volume 62, Number 191)]
[Notices]
[Page 51654-51655]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr02oc97-57]

ENVIRONMENTAL PROTECTION AGENCY

[FRL-5901-9]

Asbestos NESHAP State Notification Procedures Change

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice to regulated community.

SUMMARY: The Environmental Protection Agency, Region I Office, Boston, MA, has notified in writing the EPA--New England states of Maine, New Hampshire, Massachusetts, and Connecticut that effective October 1, 1997, all owners or operators of a demolition or renovation activity subject to the asbestos NESHAP and who provide written notification to the states 10-working days in advance of commencing with the renovation or demolition activity, will not have to provide similar notification to the EPA Administrator as required pursuant to 40 CFR 61.145(b). Important exceptions to the Federal and state notification procedures change are discussed below. In brief, such exceptions require regulated entities to continue to submit asbestos NESHAP notifications to the EPA for all demolitions involving asbestos below each respective State's regulatory threshold amount, including all demolitions believed to involve no asbestos.

Background

The asbestos National Emissions Standard for Hazardous Air Pollutants (asbestos NESHAP) was promulgated pursuant to section 112 of the 1990 Clean Air Act as Amended and is codified at 40 CFR, part 61, subpart M. Among other things, the asbestos NESHAP [40 CFR 61.145(b)] requires all owners or operators of a demolition or renovation (demo/reno) activity that is subject to the asbestos NESHAP, to notify the Administrator in writing, at least 10-working days before asbestos stripping or removal work or any other activity begins, such as site preparation that would breakup, dislodge or similarly disturb asbestos material. Since the states of Maine, New Hampshire, Massachusetts and Connecticut were fully-delegated EPA asbestos NESHAP states, pursuant to section 112(d) of the Clean Air Act prior to the 1990 amendments, EPA made a determination that enabling legislation and promulgated regulations these states had in place governing demo/reno activities at the time of delegation were adequate for the purposes of effectively implementing the and enforcing the asbestos NESHAP. Included in this was

[[Page 51655]]

the requirement that these same owners or operators of a demolition or renovation activity, notify in writing the designated state agency in advance of commencing with the demo/reno activity. EPA views this as a duplication of effort. EPA also believes that the costs, in terms of time and resources, of providing dual notification to both the state and federal government represent an unnecessary burden for the regulated community. Therefore, effective October 1, 1997, and with the exception referenced below, EPA will no longer require the regulated community in Maine, New Hampshire, Massachusetts, or Connecticut, to provide written Notification of Demolition and Renovation to EPA, pursuant to 40 CFR 61.145(b), as long as such notices are delivered to