

A guide to asbestos compliance for

RENOVATIONS



Air Pollution Control District
San Luis Obispo County

Background

The San Luis Obispo County Air Pollution Control District (APCD) implements the asbestos National Emission Standards for Hazardous Air Pollutants Regulation (NESHAP). **Before renovating a regulated structure, the NESHAP requires that a survey be conducted for Asbestos Containing Materials (ACM) by a Certified Asbestos Consultant (CAC).** This survey must be completed prior to any work being done. See our [Survey Checklist](#) for survey requirements. Depending on the results of the survey, the project may also be subject to notification requirements.

Renovation or Demolition?

The NESHAP defines a “renovation” as the altering of a facility or facility components in any way, including the stripping or removing of ACM. A demolition is defined as the removal of any load supporting structural member; many projects that are typically thought of as “renovations” are considered demolitions under this regulation and are subject to different reporting requirements. (See Demolition Flyer [here](#).)

Regulated Structures Subject to the NESHAP

Commercial structures are always subject to the NESHAP. Single family residences and apartments with four or less units are not subject to NESHAP unless they fall in the categories below:

- Any government owned structure
- Any residential structure that is part of “public housing”
- Two or more residential structures as part of a single project
- Any structure that was previously subject to the regulation regardless of its current use or function. For example, a single-family residence that was previously used as an office.

Am I Subject?

A survey is required for all renovations of regulated structures. In addition, APCD notification is required for renovations of regulated structures that will disturb greater than 160 square feet or 260 linear feet of Regulated Asbestos Containing Material (RACM). The survey will indicate if RACM is present. Material is considered RACM if it is “friable” and contains more than 1% asbestos. “Friable” means it is crushable with hand pressure, for example, dry wall, “popcorn” ceiling material, and thermal insulation. Non-friable asbestos can become friable RACM when mechanical removal is involved, for example asbestos-containing mastic that is subject to mechanical grinding.

Notification Requirements

If notification is required, the [form](#) and applicable fees must be submitted to the APCD at least 10 working days prior to performing any asbestos abatement. This notification shall also include the asbestos survey conducted by a CAC identifying the ACM present. For additional information regarding submittal requirements, please visit our website.

Further Information

Your project may be subject to further requirements under OSHA regulations. The APCD maintains a list of CACs, contractors, and laboratories [here](#).

For notification forms or to see if you are subject to NESHAP visit SLOCleanAir.org or call us at 805-781-5912.