

WHO NEEDS AN ASBESTOS SURVEY AND WHY?

Answer: For permitting purposes, anyone remodeling or doing demolition work on commercial or public buildings in the State of Texas is required by State and Federal Regulation to conduct an Asbestos Survey.

What is an Asbestos Survey?

- *What is Asbestos?* Asbestos is a mineral fiber. It can be positively identified only with a special type of microscope. There are several types of asbestos fibers. In the past, asbestos was added to a variety of products to strengthen them and to provide heat insulation and fire resistance.
- *Where is Asbestos?* Most products made today do not contain asbestos. Those few products made which still contain asbestos that could be inhaled are required to be labeled as such. However, until the 1970s, many types of building products and insulation materials used in homes contained asbestos. Common products that might have contained asbestos in the past, and conditions which may release fibers, include:
 - STEAM PIPES, BOILERS, and FURNACE DUCTS insulated with an asbestos blanket or asbestos paper tape. These materials may release asbestos fibers if damaged, repaired, or removed improperly.
 - RESILIENT FLOOR TILES (vinyl asbestos, asphalt, and rubber), the backing on VINYL SHEET FLOORING, and ADHESIVES used for installing floor tile. Sanding tiles can release fibers. So may scraping or sanding the backing of sheet flooring during removal.
 - CEMENT SHEET, MILLBOARD, and PAPER used as insulation around furnaces and woodburning stoves. Repairing or removing appliances may release asbestos fibers. So may cutting, tearing, sanding, drilling, or sawing insulation.
 - DOOR GASKETS in furnaces, wood stoves, and coal stoves. Worn seals can release asbestos fibers during use.
 - SOUNDPROOFING OR DECORATIVE MATERIAL sprayed on walls and ceilings. Loose, crumbly, or water-damaged material may release fibers. So will sanding, drilling, or scraping the material.
 - PATCHING AND JOINT COMPOUNDS for walls and ceilings, and TEXTURED PAINTS. Sanding, scraping, or drilling these surfaces may release asbestos.
 - ASBESTOS CEMENT ROOFING, SHINGLES, and SIDING. These products are not likely to release asbestos fibers unless sawed, drilled, or cut.
 - ARTIFICIAL ASHES AND EMBERS sold for use in gas-fired fireplaces. Also, other older household products such as FIREPROOF GLOVES, STOVE-TOP PADS, IRONING BOARD COVERS, and certain HAIRDRYERS.
 - AUTOMOBILE BRAKE PADS AND LININGS, CLUTCH FACINGS, and GASKETS.
- *How is Asbestos Surveyed?* You can't tell whether a material contains asbestos simply by looking at it, unless it is labeled. If in doubt, treat the material as if it contains asbestos or have it sampled and analyzed by a qualified professional. A professional should take samples for analysis, since a professional knows what to look for, and because there may be an increased health risk if fibers are released. In fact, if done incorrectly, sampling can be more hazardous than leaving the material alone. Taking samples yourself is not recommended. Material that is in good condition and will not be disturbed (by remodeling, for example) should be left alone. Only material that is damaged or will be disturbed should be sampled.

Who needs an Asbestos Survey?

- *Public Buildings:* The interior space of a building used or to be used for purposes that provide for public access or occupancy, including schools, hospitals, prisons and similar buildings. Interior space includes exterior hallways connecting buildings, porticos, and mechanical systems used to condition interior space. The term includes any such interior space during a period of vacancy, including the period during preparations prior to actual demolition. The term does not include commercial buildings or private residences.
- *Commercial Buildings:* industrial or manufacturing facilities, in which access is controlled and limited principally to employees therein because of processes or functions dangerous to human health and safety, a federal building or installation (civilian or military), a manufacturing facility or building that is limited to workers and invited guests under controlled conditions, a building, facility, or any portion of which, prior to demolition, has been determined to be structurally unsound and in danger of imminent collapse by a professional engineer, registered architect, or a city, county, or state government official; or portion of a building which has become structurally unsound due to demolition.

- *Private Residences: (EXEMPT) Exclusions.* Private residences and apartment buildings with no more than four dwelling units are excluded from coverage by these rules. However, contractors working on these dwellings WILL require a limited asbestos survey prior to starting work to ensure they are operating within OSHA and State guidelines.

Why is an Asbestos Survey Required?

- *Regulations -Federal:*
 - *EPA (Environmental Protection Agency):*
 - *NESHAP (National Emissions Standard for Hazardous Air Pollutants):* This rule requires the removal of any regulated asbestos-containing material (RACM) prior to renovation or demolition activities implying the necessity of identification of the building materials to be affected. This rule applies to ALL buildings EXCEPT private residences.
 - *AHERA (Asbestos Hazard Emergency Response Act):* This rule requires local education agencies to identify friable and non-friable asbestos-containing material (ACM) in public and private elementary and secondary schools (K-12) by visually inspecting school buildings for such materials, sampling such materials if they are not assumed to be ACM, and having samples analyzed by appropriate techniques referred to in this rule.
 - *OSHA (Occupational Safety and Health Administration):* this rule requires employers to ensure that no employee is exposed to an airborne concentration of asbestos in excess of the permissible exposure limit (PEL) 0.1 fiber per cubic centimeter of air as an eight (8)-hour time-weighted average (TWA), or in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of thirty (30) minutes as determined by approved air monitoring methods.
- *State:*
 - *TAHPR (Texas Asbestos Health Protection Rules):* This law applies to all buildings which are subject to public occupancy, or to which the general public has access, and to all persons disturbing, removing, encapsulating, or enclosing any amount of asbestos within public buildings for any purpose, including repair, renovation, dismantling, demolition, installation, or maintenance operations, or any other activity that may involve the disturbance or removal of any amount of asbestos-containing building material (ACBM) whether intentional or unintentional. Also included in these rules are the qualifications for licensure of persons, requirements for compliance with these sections and all applicable standards of the United States Environmental Protection Agency and those of the United States Occupational Safety and Health Administration as adopted and referenced in these rules.
 - *Permitting Agencies:* To prevent costly delays in obtaining permits for renovations or demolitions, municipalities will request an asbestos survey for compliance to state and federal laws.

Who can perform/use an Asbestos Survey? According to the EPA, each inspection must be made by an accredited inspector.

- *Asbestos Consulting Agency:* TAHPR states that a company, employing an individual asbestos consultant and one or more additional asbestos consultants, inspectors, project managers, or air monitor technicians must be licensed as an asbestos consultant agency.
 - *Inspector:* An inspection will include a complete visual examination and the careful collection and lab analysis of samples. If asbestos is present, the inspector should provide a written evaluation describing its location and extent of damage, and give recommendations for correction or prevention.
 - *Management Planner:* The AHERA rules require all schools (K-12) to maintain a management plan in which all asbestos activities and location of materials containing asbestos are recorded. Bi-annual periodic surveillances and re-inspections every third year will keep the management plan updated. Similarly, public buildings may maintain an operations and maintenance (O&M) plan to assure that all service contractors are aware of any asbestos hazards on the property.
 - *Project Designer:* When a building owner decides they need to remove ACM prior to a renovation or demolition project, the Consulting agency will design specifications for an asbestos abatement to be utilized by the asbestos removal contractor, professionals trained in handling asbestos material.



CITY OF ALAMO HEIGHTS
Planning and Development Services Department
6116 Broadway, San Antonio TX 78209
(O) 210-826-0516 (F) 210-822-5181

Asbestos Survey Acknowledgement

Texas Department of State Health Services (DSHS) regulations require an asbestos survey to be conducted on all commercial buildings before performing any renovation or demolition on a regulated structure. The City requires proof of the survey prior to issuance of a building permit for all renovation and demolition activities. The City of Alamo Heights Planning and Development Services Department administers this program.

The asbestos survey must be completed by a qualified person licensed by the DSHS to perform asbestos surveys in public building. Qualified surveyors include all individual licensed by DSHS as Individual Asbestos Consultants, Individual Asbestos Management Planners, and Asbestos Inspectors whose reports are co-signed by an Asbestos Consultant or Asbestos Management Planner. In lieu of a survey report, a letter from a professional engineer, registered architect, or properly licensed asbestos professional certifying the absence of asbestos containing building materials may be provided.

Structures exempt from the asbestos survey requirement include industrial or manufacturing facilities with limited access, state or federal buildings, private residences, apartment buildings with four or less units, and any building, facility or portion there of which has been determined to be structurally unsound and in danger or imminent collapse by a professional engineer, registered architect, or city, county or state government official.

A copy of the asbestos survey report, or certification letter, for the same area that requires a building permit, must be provided with the Building Permit Application. Asbestos survey reports are acceptable for an indefinite period following their completion; so long as the building owner can certify that no new building materials that may contain asbestos have been added to the space covered by any previous survey. The most recently completed asbestos survey report is required to be submitted only once for the initial permit. This certification can be used for subsequent renovation permits by simply marking the appropriate space below.

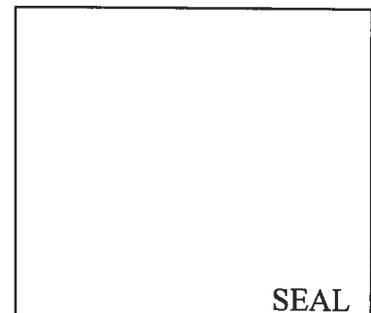
Please check appropriate box and sign below. Attach supporting documents as required.

- I hereby certify, under penalty of law, that the attached asbestos survey report was completed by an individual licensed by the Department of State Health Services to perform asbestos surveys.
- I hereby certify, under penalty of law, that I am a professional engineer, registered architect or properly licensed asbestos professional. I further certify that I have reviewed the material safety data sheets for the materials used in the original construction, the subsequent renovations or alterations of all parts of the building affected by the planned renovation or demolition, and any asbestos surveys of the building previously conducted and that there are no asbestos containing building materials inside or on the building to be renovated or demolished. (Provide signature and seal below)
- I hereby certify, under the penalty of law, that an asbestos survey has been performed and the survey report for this building or space was previously submitted to the Planning and Development Services Department. Additionally, I certify that no building materials that may contain asbestos have been added to the area covered by the survey since the asbestos survey was completed.
- I hereby certify, under the penalty of law, that this permit application is for the construction of an original interior finish-out in a new shell building. No previous installation of building materials has been performed in this space; therefore, no potential ACM (asbestos containing material) will be disturbed by this renovation.
- I hereby certify, under the penalty of law, that the structure to be renovated or demolished under this Building Permit is exempt from the asbestos survey requirement.

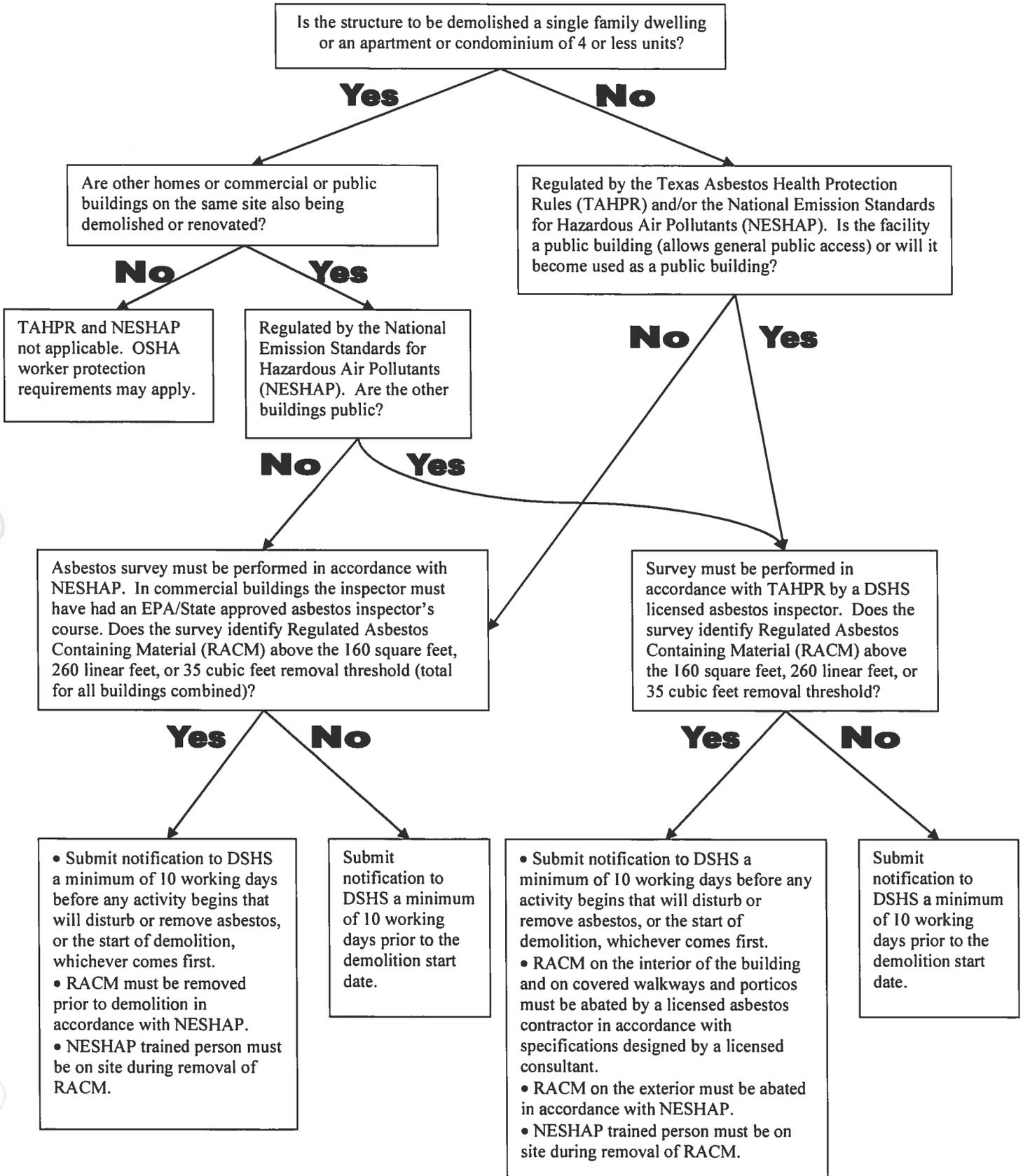
Signature

Printed Name

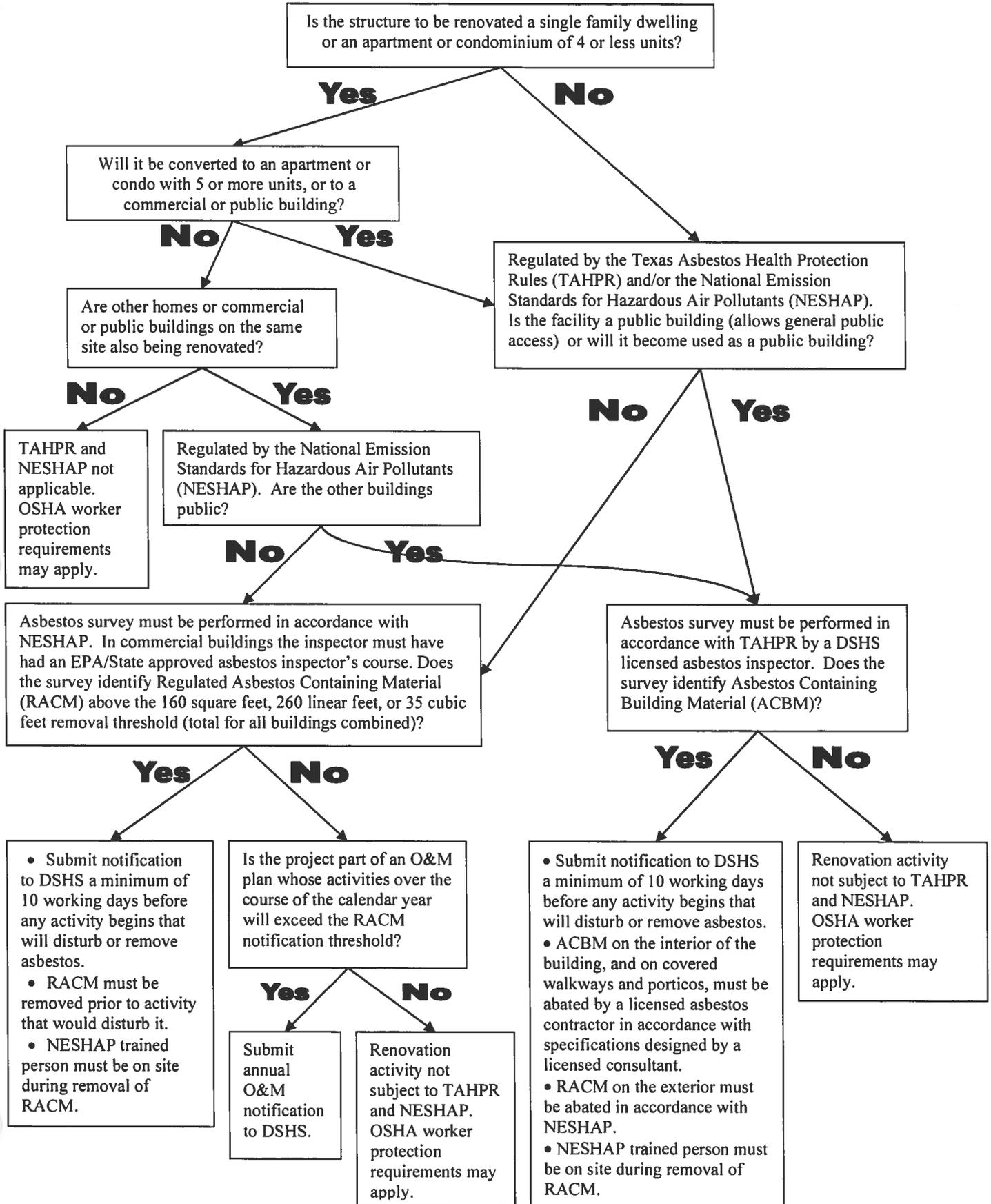
Date



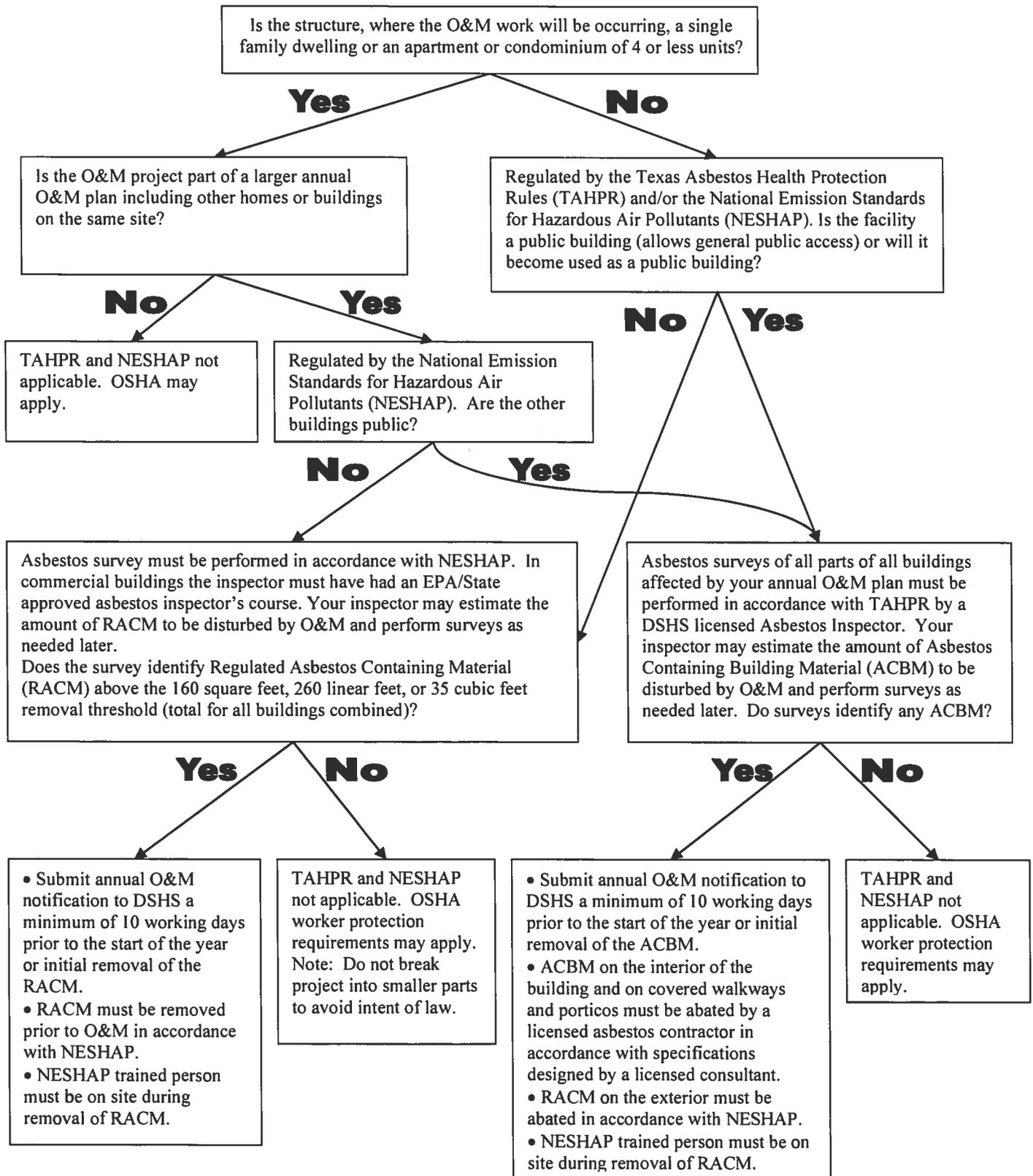
Texas Department of State Health Services Demolition of Buildings



Texas Department of State Health Services Renovation of Buildings



Texas Department of State Health Services Operations and Maintenance Work



Note: Any single project disturbing greater than 160sf, 260ft, or 35cf must be notified separate from the O&M notice.