

# 2025 Demolition/Asbestos Contractors' Meeting



**SAINT LOUIS COUNTY**  
Public Health

# Program Staff Contacts

- **General Inquire/Status Updates**

- Phone: 314-615-8924
- Fax: 314-615-8951

- **Waste Management Program**

- Robert Boaz 314-615-4065 [RBoaz@stlouiscountymo.gov](mailto:RBoaz@stlouiscountymo.gov)
- Michael Viles 314-615-4032 [MViles@stlouiscountymo.gov](mailto:MViles@stlouiscountymo.gov)
- John McCormick 314-615-4120 [JMcCormick@stlouiscountymo.gov](mailto:JMcCormick@stlouiscountymo.gov)

- **Air Pollution Control Program**

- Ari Yarovinski 314-615-8953 [AYarovinskiy@stlouiscountymo.gov](mailto:AYarovinskiy@stlouiscountymo.gov)
- Tom Markowski 314-615-4035 [TMarkowski@stlouiscountymo.gov](mailto:TMarkowski@stlouiscountymo.gov)
- David Rosene 314-615-8912 [DRosene@stlouiscountymo.gov](mailto:DRosene@stlouiscountymo.gov)
- Aaron Cadman 314-615-8916 [ACadman@stlouiscountymo.gov](mailto:ACadman@stlouiscountymo.gov)

## 2025 Program Changes/Updates

- In person submittals- Still Berkeley Only! (email is preferred method)
  - Submit ALL DEMOLITION APPLICATIONS/NOTIFICATIONS to [demolition.dph@stlouiscountymo.gov](mailto:demolition.dph@stlouiscountymo.gov)
  - Submit ALL ASBESTOS PAPERWORK to [asbestosamendments.dph@stlouiscountymo.gov](mailto:asbestosamendments.dph@stlouiscountymo.gov)
    - By using the above groups, all our staff receive your email
  - Please put address in subject line
  - Please include all DPH paperwork with emails
- Program Staff Updates
  - David Rosene, Air Pollution Representative
  - Brenda Williams, Office Services Specialist
- New Appendix A2 for Ordered Demolition Requirements
- Emphasis on the NESHAP regulation's applicability to commercial renovations

# Federal, State, and Local Regulations

## Local Health Regulations:

- 607.130 *Demolition and Construction Waste*
- 607.310 *Waste Must be Deposited at a Licensed Landfill, Licensed Waste Processing Facility, Licensed Transfer Station, Licensed Compost Facility, or Licensed Yard By-Product Compost Facility*
- 607.865: Application for the generation of demolition waste shall be submitted to the Director by the person possessing or generating the demolition waste...
- 612.530 *Asbestos Abatement Rules and Regulation –Registration, Notification and Performance Requirements*

## • State Regulations:

- 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*
- 10 CSR 10-6.241 *Asbestos Projects–Registration, Notification and Performance Requirements*
- 10 CSR 10-6.250 *Asbestos Projects–Certification, Accreditation and Business Exemption Requirements*

## • Federal Regulations:

- Title 40 Protection of Environment, Part 61 National Emission Standards for Hazardous Air Pollutants, Subpart M – National Emission Standard for Asbestos (NESHAP)

## Regulation(s) by Structure Types

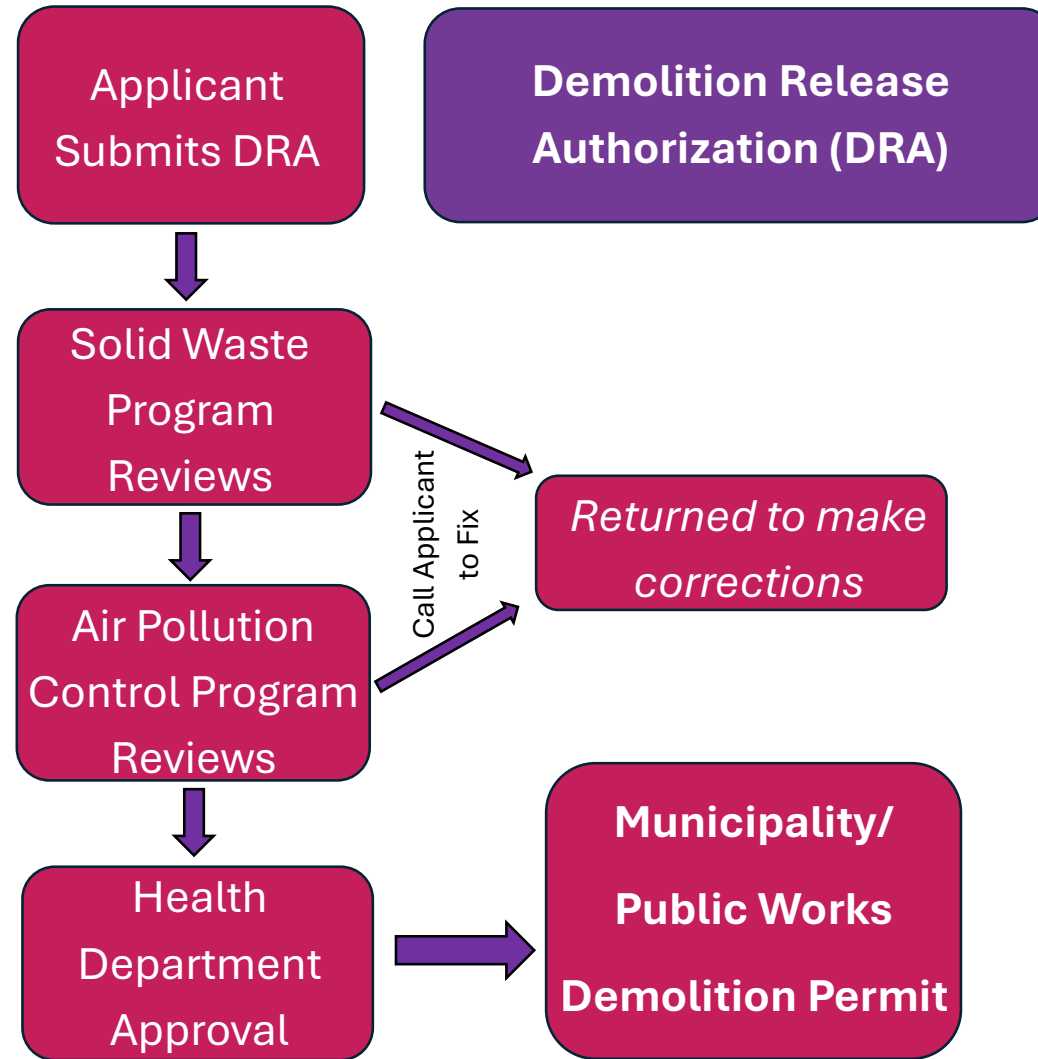


### **If the parcel of land is...**

- Non-NESHAP (Local Regulations)
  - Single family residence
  - Multi-tenants (4 or fewer units/dwellings)
- NESHAP (Federal Regulation)
  - Greater than four (4) units/dwelling structure
  - Commercial structures
  - Mixed-use or public structure
  - Structures associated with a Project or Installation
- Parcel information comes from Department of Revenue's Real Estate Search ( <https://revenue.stlouisco.com/ias/> )

**If parcel was previously classified as commercial/agricultural then it is still subject to NESHAP regulations**

# Demolition Release Review Process



## Demolition Waste Application and Release Authorization (DRA) Requirements

- **D**emolition **R**elease **A**uthorization (DRA)
  - Health Department's ok for a demolition to proceed
  - You still need a demolition permit from either Public Works or the Municipality
- DRA Requirements Include:
  - Number of structures at each address
  - \$50 application fee per structure (120 square feet or greater)
  - Licensed Waste Hauler
  - Licensed Waste Facility for disposal or recovery
  - Special/Hazardous Waste Removal:
    - Commercial Checklist required for commercial, public, institutional
      - Not for residential parcels of land
    - Report quantities, method and documentation for disposal/recovery
    - Mercury-containing devices: lamps, ballasts, thermostats, etc.
    - List of special/hazardous waste required for removal is subject to change

# Waste Demolition Application Fee Waivers

- Waivers Include:
  - Owner-occupied residential property owner conducting his/her own demolition of any accessory structure (only) at said residence shall be exempt from the \$50 fee.
  - Application fee is waived for demolitions resulting by State or Federal government declared natural disasters such as tornado, flood, earthquake, etc.
  - Per the Waste Code, renovation projects are not required to submit a demolition waste application
    - See next slide



# Demolition vs Renovation

*(per 40 CFR 61.141)*

- “Structural member” means any load-supporting member of a facility, such as beams and load supporting walls; or any nonload-supporting member, such as ceilings and nonload-supporting walls.
- “Demolition” means the wrecking or taking out of any **load-supporting structural member** of a facility together with any related handling operations or the intentional burning of any facility.
- “Renovation” means altering a facility or one or more facility components in any way, including the stripping or removal of RACM from a facility component.
- **Operations in which load-supporting structural members are wrecked or taken out are demolitions.**
- If you are going to open an exterior wall before DRA approval, you will need to request a waiver from DPH

## Clean Fill Policy

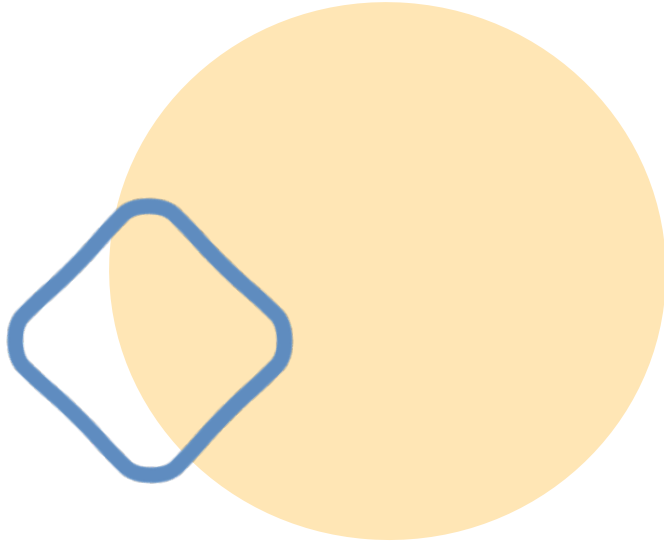
- MDNR- “Uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinder blocks, brick, minimal amounts of metal, and inert solids as approved by rule or policy of the department for fill, reclamation, or other beneficial uses.”
- Painted materials will be considered for clean fill following a risk-based assessment (analytical testing)
- US Banned lead-based paint in 1978
  - Any painted concrete built prior to 1978 must undergo analytical testing before it can be considered clean fill
- Analytical testing
  - Wet Chemistry (EPA SW 846, Methods 601B and 3050B)
  - SPLP Test (EPA SW 846, Method 1312)
  - X-Ray Fluorescence (XRF) Testing

## Clean Fill Policy Continued

- Residential only need to test for lead
  - Lead  $\geq$  5,000 ppm shall not be used as clean fill
- Non-Residential must test for the 8 RCRA heavy metals
  - Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver

- **ONLY NEED TO TEST IF YOU WANT TO USE MATERIAL AS CLEAN FILL**

- Most common occurrence is demolished pool material and basement foundations being used to fill in the excavation
  - See Public Works for size requirements needed for drainage
- If material is going to be landfilled, no need to test it



# Waste Demolition Application Compliance

- Failure to obtain an approved demolition waste application prior to demolition for each structure ( $\geq 120 \text{ ft}^2$  or greater):
  - Citation & monetary penalty
    - \$300 first offense, increased amounts for repeat violations
  - Referral to County Counselor for prosecution
- If an application is approved with any conditions, such as the need to submit a demolition notification, then failure to meet those conditions will result in a citation
  - Read your cover letter!

# Waste Program Questions?

Reminder to use  
[demolition.dph@stlouiscountymo.gov](mailto:demolition.dph@stlouiscountymo.gov)



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## Air Pollution Control Program Demolition Release Review

- Every Demolition Release Authorization (DRA) submitted is required to have a recent asbestos inspection
- Asbestos Inspection Requirements:
  - Performed by a MO Certified Inspector
  - **Minimum of 3 samples** of homogenous materials (including miscellaneous materials)
  - Thorough Description of structure
    - Type of structure, use of structure, size of structure
    - Describe exterior siding, roofing, flooring, windows, walls, insulation, HVAC system, etc.

# Air Pollution Control Program Demolition Release Review

- Demolition Release Review:
  - Chain of custody
    - Sample number, location, etc.
    - Inspector name and signature
    - Date samples taken
  - Lab results
    - Original Lab Report
    - Type and percent asbestos
  - Thorough description of asbestos containing materials
    - Quantity
    - Condition: If condition not described, it is considered regulated
  - All regulated asbestos shall be notified and removed prior to demolition



## Asbestos Inspection Requirements for Commercial/NESHAP Project Renovations

- CFR 40 Part 61.145(a) “To determine which requirements ... apply to the owner or operator of a demolition or renovation activity and **prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos**, including Category I and Category II nonfriable ACM.”
- The only way to know if a commercial (or project’s) renovation is subject to the NESHAP reporting requirement is to test for asbestos containing material
  - Only need to test suspect materials being impacted by the work
- If material is positive for asbestos → NESHAP notification and abatement is required prior to renovation activity
- If material is negative for asbestos → NESHAP not required
  - Every commercial renovation project should have a copy of the asbestos inspection on site for review



## Air Pollution Control Program Demolition Release Review

- Demolitions subject to NESHAP shall submit NESHAP Notification of Demolition form:
  - NESHAP Notification of Demolition form shall be submitted/post dated and complete a minimum of 10 business days prior to scheduled demolition.
  - Demolition Release Authorization will not be signed until the 10 business day period has elapsed.
  - NESHAP Demolition Notification Fee.....\$100.00

# Asbestos Notifications

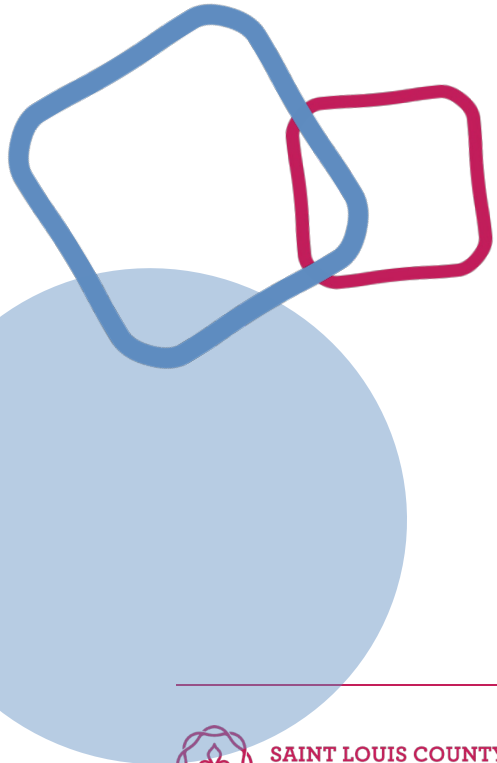
- **Asbestos Thresholds**
  - Saint Louis County:
    - Asbestos containing material (ACM) must be abated before demolition
    - Asbestos regulations pertinent and notification and permit need for quantities of ten (10) SF or sixteen (16) LF or greater of friable/regulated ACM
  - State and Federal:
    - Asbestos regulations pertinent and notification and permit need for quantities of 160 SF or 260 LF or greater of friable/regulated ACM
    - Asbestos-containing roofs greater than 5,580 Sq Ft are regulated.
    - ACM roofs less than 5,580 Sq Ft see Appendix B
      - See next slide for details

## Appendix B: Non-friable Roofing Materials

- Permit conditions for demolitions with non-friable asbestos containing roofing materials.
  - Structure must be demolished (and its waste management) in a manner that minimized damage to the roofing material
    - Increased application of water or other dust suppressants
    - Place roofing material on ground instead of dropping it from height
    - Ensure operators refrain from driving over material
    - Keep material in largest workable pieces
  - Once structure is down, all roofing material must be separated and deposited into its own, separate waste container
    - Properly labelled and lined/covered with 2 layers of 6 mil poly
    - Properly disposed of at a sanitary landfill licensed to accept asbestos

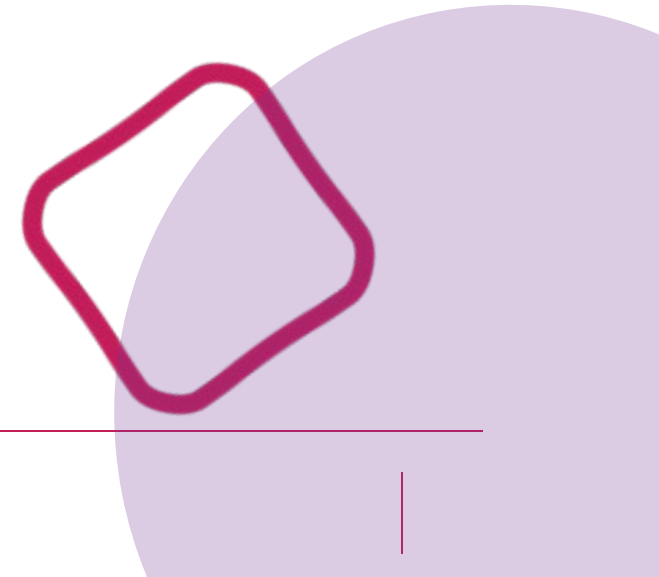
# Asbestos Notifications

- What ACM is Regulated?
  - All ACM that is deemed friable (pulverized by hand pressure)
  - All ACM that is deemed in poor condition
  - All ACM that will be render friable or damaged by the removal process (e.g.: transite material, caulk) is regulated and requires submittal and approval of notification and removal prior to demolition



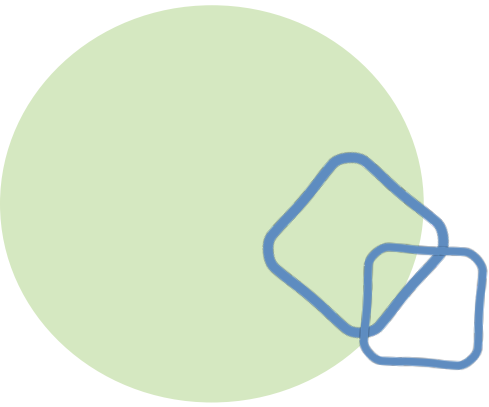
# Asbestos Notifications

- Asbestos Notifications:
  - Required for all regulated ACM removal
  - Must submit a complete and accurate notification (by a MDNR licensed asbestos abatement contractor) and associated fees
  - Asbestos Abatement Permit Fee - Less than 160 square feet; Less than 260 linear feet; Less than 35 cubic feet.....\$100.00
  - Asbestos Abatement Permit Fee - 160 square feet or greater; 260 linear feet or greater; 35 cubic feet or greater.....\$200.00
  - Ten (10) business day review process
  - Asbestos Notification expires one year after issuance



# Asbestos Notifications

- Shall be complete - this includes the following:
  - All waivers requested (Part B 2) should explain request on Part F Supplemental Information
  - Name of Air Sampling Professional (ASP) not the name of their company. The ASP may send an air sampling tech who works for them, but that air tech should be able produce documentation of training and verification that they are working for a particular ASP (Part B-3)
  - Part C - Project Description shall be completed fully. Section 13 should be completed. Work Practices may be referenced from regulation, however, the correct reference should be clear.



# Asbestos Notifications

- Project Notification Requirements:
  - Chain of custody
    - Sample number, location, etc.
    - Inspector name and signature
    - Date samples taken
  - Lab results
    - Original Lab Report
    - Type and percent asbestos
  - Thorough description of asbestos containing materials
    - Quantity
    - Condition: If condition not described, it is considered regulated



# Exemptions from Asbestos Regulations

- Exemptions Include:
  - Renovation of owner-occupied residential structures
  - For demolition projects; When a property owner occupies a residence at a single-family residential property, any structures which are not the primary residence may be exempt from Asbestos Regulations. Structures being demolished cannot be viewed as owner occupied.
  - Unsafe Structure
    - Health and Safety
- **Even if qualified, to obtain an exemption from Saint Louis County Asbestos Regulation an approved Demolition Waste Application and Release Authorization is still required.**

**Citations will be issued if DRA not obtained prior to demo**



## Owner-Occupied Single Family Residential Properties: Accessory Structures

- When a property owner occupies a residence at a single-family residential property, any structures located on the property which are not the primary residence may be exempt from asbestos abatement regulations. These structures include pools and detached garages.
  - Verification of Owner-Occupied Status must be submitted (listed owner with revenue or occupancy permit)
  - Asbestos inspection or abatement of asbestos prior to demolition is not required.
  - Owner must submit Owner Occupied Residence Request for Exemption form, signed by the owner.

# Public Health and Safety Exemption

- Public Health and Safety Exemption
  - Must be requested by a Municipality or County Public Works in writing by a competent person
  - Must have documentation/justification
  - Asbestos Inspection or abatement not required if approved
  - Must be geographically isolated, Non-NESHAP and cannot be part of a redevelopment project
  - May be requested on a private owner's behalf
  - Approval of Public Health and Safety Exemption is not guaranteed.



# Public Health and Safety Exemption

- Would apply to:
  - Single Family buildings only which are not subject to NESHAP
  - Isolated abandoned buildings
  - Public Safety concern (e.g. chemical exposure)
  - Fire damaged structure
  - Structurally unsound building



## Public Health and Safety Exemption

- Public Health and Safety Exemptions commonly denied for:
  - Projects (multiple structures under same grant – case by case)
  - Non-Geographically dispersed structures
  - Commercial structure or 4+ Family dwellings
  - Structurally sound residence with exterior asbestos

**Exterior asbestos shall be abated prior to demolition if building is structurally sound**

# Ordered Demolition

- An Ordered Demolition means a demolition of a structure that is known to have, or suspected of having, asbestos containing material and is deemed to be structurally unsound and in danger of imminent collapse under an order of a State or Local Government Agency.
- Ordered Demolitions Require the following documents:
  1. Demolition Waste Application & Release Authorization (DRA)
    - a) NESHAP Notification required to be submitted with DRA
    - b) Commercial Structure Checklist *may* be required for non-residential structures
  2. Asbestos Abatement Permit
- **Shall be applied for and the structure shall be demolished by MO Certified Asbestos Contractor**

## Ordered Demolition

- Ordered Demolitions would apply commercial structures, 4+ Family dwellings, and projects where an asbestos inspection cannot be performed due to the unsafe structure of the property and the property is noted to be “unsafe and in danger of immediate collapse”
- The order submitted to the County must meet the minimum standards of *Appendix A2 Guidelines for Ordering a Demolition*
  - See next slide for details

# Ordered Demolition Guidelines

At a minimum, the order should contain the following information:

**1)** Identify which person has the authority to order the building to be demolished.

a. The letter must be signed by a person with the authority to order the demolition.

E.g. a judge issuing a court order, a mayor, a city administrator, public works director

**2)** Identify which person has the authority to make the determination that the building “is structurally unsound and in danger of imminent collapse”.

a. The determination must be made by a competent person with knowledge of assessing structural integrity

E.g. a structural engineer, Public Works Director

b. If the person with the authority to order a demolition is different from the competent person, then both parties must be identified in the letter.

**3)** Provide any supporting documentation, such as photographs or a Fire Protection District’s incident report, that was used to make the determination that the building “is structurally unsound and in danger of imminent collapse”.

## Ordered Demolition

- All work must be performed by a MO licensed asbestos contractor and utilize MO certified asbestos workers only:
  - Contractor shall notify and obtain an asbestos permit from Saint Louis County
  - Contractor shall notify and obtain a DRA from Saint Louis County Health Department
  - Contractor shall obtain a demolition permit from local municipality or Public Works Department
  - Ten (10) business day NESHAP waiting period will be waived



## Ordered Demolition

- Contractor will be held to “Appendix A” that outlines procedures to demolish structure as follows:
  - Pre-wet w/ amended water 12-18 hr prior to demo
  - Securing the site
  - Control emissions during demo (fire hose, fogging)
  - Control runoff and filter or dispose of as ACM
  - All waste to be disposed of as ACM
  - Air Monitoring may be required
  - Must leave a “clean site” by end of day



# Abatement Contractor

- When the abatement contractor is the demolition contractor the following shall be required:
  - Third party air monitoring
  - Third party completion inspection
  - Third party completion letter
- Third party is an independent company hired by the property owner or a St. Louis County asbestos inspector.
- A St. Louis County asbestos inspector may perform a post asbestos abatement inspection verifying all asbestos has been removed and the structure may be demolished.

# Asbestos Notification Work Practices Waivers

- Work Practice Waivers:
- Shall be submitted on Asbestos Notification form with attachment when further explanation is needed
- If approved, shall be provided in writing by the Air Program in the project permit letter
  
- Approval of Work Practices Waiver is not guaranteed

# Asbestos Notification Amendments

- Submit 24 hours prior to change in operation:
  - May be submitted in person, faxed, phoned in, or e-mailed ([asbestosamendments.dph@stlouiscountymo.gov](mailto:asbestosamendments.dph@stlouiscountymo.gov)). Phoned in amendments shall be followed-up with written copy sent to the Air Pollution Control Program
- Project date and time amendments...
  - ...that are not submitted 24 hours prior to change require a supervisor available at the site during scheduled working time.

## Post Notifications

- 612.530 Section 6.0, Asbestos Project Post-Notification:
  - Within 60 days
  - Signed and dated receipt of asbestos waste generated, issued by the landfill
  - Final clearance air monitoring results

**Failure to submit the required post-notifications within 60 days will cause the permitting of future project notifications to be put on hold until all delinquent post notifications are received.**

# ANNUAL NOTIFICATIONS

- 40 CFR 61.145(b)(3)(ii) At least 10 working days before the end of the calendar year preceding the year for which notice is being given for **renovations** described in paragraph (a)(4)(iii) of this section.
- 40 CFR 61.145(a)(4)(iii) To determine whether paragraph (a)(4) of this section applies to planned renovation operations involving individual nonscheduled operations predict the combined additive amount of RACM to be removed or stripped during a calendar year of January 1 through December 31.

# ANNUAL NOTIFICATIONS

- St. Louis County is consistent with MDNR's annual notification
- Annual notifications will only be accepted for projects on continuous campuses

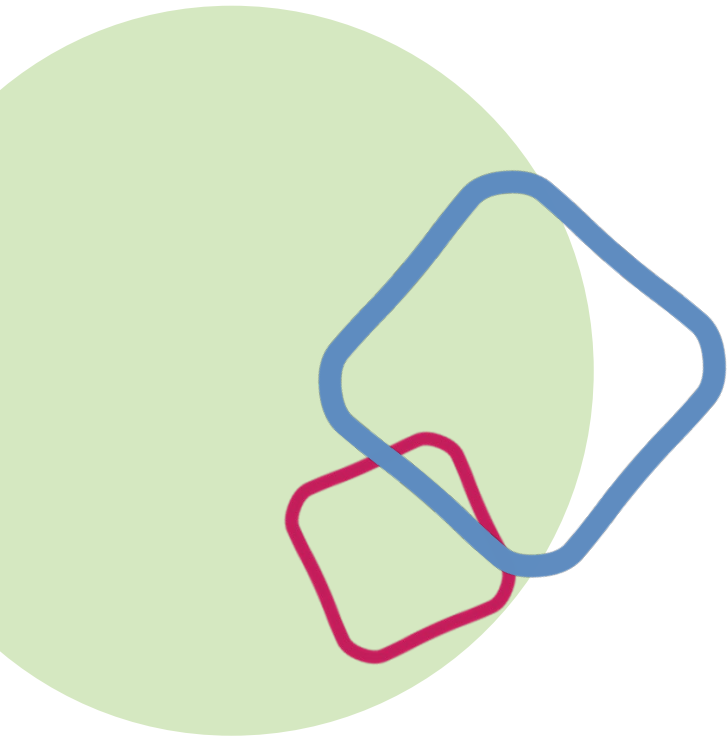


# Demolition Inspections

- Inspections of any Demolition Project can be conducted before, during, or after demolition
- The inspection will be performed to determine compliance with 10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
- A \$200 Demolition Inspection Fee may be charged for any demolition projects
  - Up to two billable inspections per DRA
  - No limit to number of non-billable inspections



## Notification of Demolitions



- County Ordinance, Waste Management Code 607.865 allows for the Department to provide conditions for approval of demolition release authorizations (DRA's).
- A condition of an approved DRA will be to notify the Department (via a provided email) of start of demolition activity.
  - No later than 5pm the day before the demo to begin
- The condition requiring notification of demolition date will be attached to each approved DRA.
- Identify a water source for dust control
- No waiver for sub freezing temperatures

## Demolition Dust Fall Prevention

- It is expected that all reasonable measures be taken to prevent visible airborne particulate matter from crossing property boundaries or be found settled on surfaces beyond property boundaries.
- One reasonable measure to prevent airborne particulate matter from crossing property boundaries is the use of water spray using a large diameter hose from local hydrant or water truck, or appropriately sized mister.

# Asbestos Permitting Questions

Reminder to use  
[asbestosamendments.dph@stlouiscountymo.gov](mailto:asbestosamendments.dph@stlouiscountymo.gov)



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## Air Pollution Control Program Asbestos Inspections

- Asbestos Inspections Can Occur:
  - Prior to asbestos abatement
  - During asbestos abatement
  - Post asbestos abatement
- \$200 per inspection (limit of two billable inspections)



# Asbestos Inspections

- Documentation Required:
  - All workers, supervisors, and air monitoring personnel shall have MO certification verification and photo identification on site
  - Non-certified personnel shall be removed from work area immediately
  - Supervisor on project site at all work times, except notified meal break times.
  - Air sampling monitoring results posted
  - Permit letter on site
  - Waste labels and manifests

# Asbestos Inspections

- Asbestos Waste Handling Requirement:
  - Waste labels and manifest available
  - Adequately wet all waste
  - Transported in an enclosed vehicle, or a five-sided cargo area which is completely covered with 6 mil plastic or equivalent
  - Roll-offs are **NOT** “containers”

Waiver shall be required to use any other type of container or transportation

# Asbestos Inspections

## Some Clarifications:

- Workers/supervisors shall have their MO issued photo certification. You may be asked to exit the work area to verify documentation.
- Where practical, County requires an 18-inch viewing window to allow direct visual observation of the work area from outside containment
- When submitting a notification for an asbestos abatement project, please include
  - The date of the asbestos inspection
  - The name of the inspector
  - The Missouri Inspector Certification number

# Asbestos Inspection Questions?

Reminder to use  
[asbestosamendments.dph@stlouiscountymo.gov](mailto:asbestosamendments.dph@stlouiscountymo.gov)



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Public Health



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