

Deconstruction & Environmental Regulations

Satisfying Regulations on Tribal Lands to Keep Workers and Residents Safe

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Deconstruction & Environmental Regulations

Demolition = wrecking, or taking out, of any load-supporting structural member of a facility or structure and related handling operations.

Burning a mobile home is also deconstruction/demolition! Not a solution to your environmental problems! NESHAPS still applies.

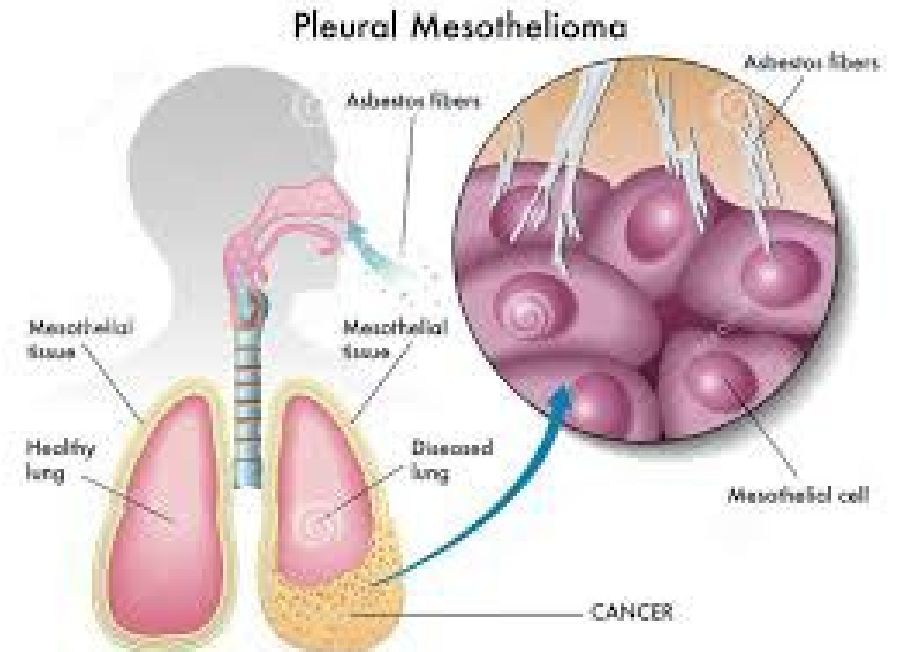


Asbestos phase-out not fully protective

- ‘This trailer isn’t that old, so there’s no risk...’ **WRONG.**
- Asbestos is **STILL** allowed in some consumer products used in construction: Vinyl-asbestos floor tile ... Roofing felt and coatings ... Asbestos-cement products (corrugated and flat sheets, shingles, pipeline wrap) ... etc
- Building materials in a mobile home may have been added after the manufacturing process, so no guarantee that they’re safe
- Bottom line: **we recommend asbestos survey for home of any age**

Asbestos hazards

- Inhalation of asbestos fibers can cause serious illnesses asbestos fibers: microscopic, invisible to the naked eye.
- So small they can bypass the lung's natural filter and lodge deep within lung tissue, irritating and scarring lungs
- Long-term chronic and acute exposure may cause respiratory diseases - lung cancer, asbestosis and mesothelioma. Risks even greater for those who smoke.



Asbestos and deconstruction

- Asbestos containing materials (ACM) are a health hazard when disturbed
- Removing ACM, however carefully, can disturb these tiny fibers
- Fibers imbedded within construction materials and components are inert and do not pose a health hazard if intact
- However, once they are disturbed (through physical contact or building renovation and demolition activities) asbestos fibers may be rendered airborne

Requirements on tribal lands

- EPA recommends asbestos survey by accredited professional for deconstruction / demolition of any structure
- Individual isolated mobile homes are technically exempt
- **HOWEVER: Deconstruction / demolition / renovation of more than one residential structure on the same site (single owner) is an installation and is NOT exempt**
- Asbestos survey is required, plus 10 day notification by licensed asbestos removal contractor to EPA prior to asbestos removal.
- Asbestos survey and removal contractors: sometimes the largest companies will give you a competitive price and will travel long distance to remote areas

Asbestos containing materials (ACM) and fire damage

- When building materials are burned, asbestos fibers may remain in the ash. The ash and remaining building debris may need to be treated as asbestos-containing waste material unless a certified consultant determines that the debris is asbestos-free.
- For tribes, National Emission Standards for Hazardous Air Pollutants (NESHAP) covers handling and proper disposal of debris/ash potentially contaminated with ACM.
- Suspected/known ACM must be removed by a licensed asbestos abatement contractor and disposed of at a landfill approved to receive asbestos.
- A single-family house may be exempt, but not more than one structure on land owned by a single owner (such as the tribe)

Removing burned structures with ACM

- If ACM is present, the debris/ash should be stabilized by wetting and covering with plastic sheeting until it is removed (“burrito wrap”)
- Avoid mixing of asbestos-containing materials with other debris/ash. Use adequate wetting for all debris removals and demolitions.
- For wetting, use a dispenser or water hose with a nozzle for a fine, low-pressure spray or mist. Where necessary, use water mixed with wetting agent, such as liquid soap or other surfactant.
- Remember: you can’t tell if something has asbestos in it just by looking at it. Consider having the debris/ash removed by a certified contractor.

More information on asbestos on tribal lands

Contact EPA's asbestos coordinator for all Region 9 tribes – Kingsley Adeduro

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