

Ramsey County Pre-Demolition Inspection Program Frequently Asked Questions (FAQ's)



The Pre-Demolition Inspection program addresses the need to identify, remove and properly manage hazardous building materials before building demolitions, deconstructions, or renovations. The establishment of a regulatory standard for demolition contractors creates a level playing field, prevents occupational exposure to hazards and reduces landfilling of wastes. The following Q and A format is intended to provide a clearer understanding of contractor responsibility for notification, identification of hazardous building materials, materials management and reporting to the Ramsey County Pre- Demolition Inspection Program.

Notifications:

Q: I have applied for and received a demolition permit through the city. Am I also required to notify Ramsey County of my commercial or residential demolition, deconstruction, renovation or remodeling plans?

A: Yes, Ramsey County requires that you notify us immediately when you receive a demolition permit from the city for:

- any complete residential demo or deconstruction, including mobile homes, or
- any partial or complete commercial or industrial demo or deconstruction, including major renovation or remodeling activities

Ramsey County pre-demo inspection must be scheduled and conducted with the contractor, property owner or their designee before beginning any demo. With the exception of an emergency demo situation, Ramsey County requires a two business day notice for scheduling the pre demo site inspection. Notify Ramsey County before beginning the demo, to determine if it meets the emergency exemption.

Q: Do I need to provide Ramsey County a completed copy of the Minnesota Pollution Control Agency (MPCA) "Notification of Intent to Perform a Demolition" or MPCA/MDH (Minnesota Department of Health) "Notification of Asbestos Related Work" prior to any demo activity, even though the MPCA or MDH doesn't require it for certain demo projects?

A: Yes! The Ramsey County Solid Waste Ordinance requires that the demo contractor submit a completed copy of either form, regardless of:

- if the demo activity is commercial or residential, or
- if the MPCA considers the structure a "facility" and therefore regulated under the Federal NESHAP Rule, or
- if MDH requires a "Notification of Asbestos Related Work"

A copy of the completed MPCA/MDH form must be submitted seven business days before beginning any demo or deconstruction.

Pre Demo Inspection:

Q: What's involved with the pre demo inspection?

A: A Ramsey County inspector meets the demo contractor, building owner or their designee at the job site. The inspector reviews the available assessments and documentation, performs a walk through inspection to identify, document and discuss proper management of hazardous building materials including suspect asbestos, hazardous or household hazardous wastes, electronics, appliances, municipal solid waste (MSW) and other materials or waste that requires separate management from demolition waste. While onsite, an inspection report form is provided to the contractor to further explain contractor responsibilities. Unless warranted, a follow up inspection is not required. It is recommended that you contact the city to determine if they have any additional requirements.

Hazardous Building Materials:

Asbestos:

Q: Am I required to have an asbestos survey performed?

A: Yes! An asbestos survey must be completed by a MDH certified asbestos inspector. The only exception is an emergency demo. Notify Ramsey County before beginning the demo, to determine if it meets the emergency exemption. If an emergency demo is required, all of the demo debris must be managed as asbestos containing material, transported directly to and disposed of at a landfill permitted by the MPCA to receive asbestos containing material.

Q: What do I have to do if asbestos containing material is present above 1%? What type of asbestos can stay in the structure at time of demo?

A: Category I non-friable asbestos, if fully intact and undisturbed, may stay in the structure if it will not be crushed or pulverized during the demo process. Ramsey County requires the contractor to notify the receiving demolition landfill prior to arrival that category I non-friable asbestos will be present on the load. All other asbestos (above 1%), including Category I asbestos in poor condition and all Category II asbestos, must be properly abated by a MDH certified asbestos abatement contractor and properly disposed of prior to any demo activity. Demo debris resulting from a project where asbestos is present above 1% may not be delivered to a transfer station or C&D processing facility.

- Examples of Category I non friable asbestos include resilient floor coverings, such as vinyl asbestos tile and linoleum, and asphalt roofing products.
- Examples of Category II asbestos include Transite shingles and siding, cement, putties, pipe wrap and insulation, sealants, and certain asbestos-containing adhesives.

Lead:

Q: Lead paint has been found at concentrations greater than or equal to 0.5% or 5,000 ppm. Now what?

A: If the building is removed by either demolition or deconstruction, not renovated or remodeled, the United States Environmental Protection Agency's (USEPA) Renovation, Repair and Painting (RRP) Standard does not apply. Lead paint, adhered to the building at the time of demolition, is considered demo debris. Loose and flaking lead paint must either be removed and disposed of as a hazardous waste or stabilized in place before beginning the demo.

PCBs:

Q: Where should I be looking for PCBs?

A: PCBs maybe present in older fluorescent lamp ballasts, capacitors, electronic circuitry and major appliances. PCBs have also been identified in caulking used in commercial buildings.

Q: Do I need to remove PCBs prior to demolition?

A: Yes, ballasts or capacitors that are not clearly labeled "no PCBs" must be managed as PCB containing material. All caulk containing more than 50 ppm PCB must be abated and properly disposed of as a hazardous waste.

Hazardous Waste vs. Household Hazardous Waste:

Q: If hazardous waste is found in a residential dwelling (i.e. house, apartment, mobile home), is it automatically considered household hazardous waste (HHW)?

A: No. Household Hazardous Waste is defined in MN State Statute as characteristic or listed wastes, as defined under agency rules, which come from a household activity; it does not include waste from commercial activities that is generated, stored, or present in a household.

Ramsey County allows HHW from a residential demo site to be delivered, at no charge, directly to Bay West. Your inspector will provide you with a copy of the Household Hazardous Waste Pre-Demolition form, required for delivery to Bay West, along with information about their hours of operation. Complete the form before arriving, listing only one address per form. Transporting HHW to your business location or holding it at an alternate location in order to accumulate it is prohibited. You must take the HHW directly from the demo site to Bay West. ***Remember: this service is restricted to residential demolition sites in Ramsey County only.***

If you come across non-household quantities or types of hazardous waste during a residential demo, contact Ramsey County for assistance in obtaining an EPA ID number, identifying proper management methods, and finding licensed or permitted disposal companies.

Management Standards for Reuse, Recycling & Disposal:

Q: Can MSW be left in the building during demo and disposed of with the resulting demo debris? Examples of MSW include garbage, trash, furniture, and miscellaneous non hazardous debris.

A: MSW must be removed before the demolition and managed separately from the demo debris. If the volume or size of the items prevents this or if a health hazard is present, the MSW may be removed during the demo. Mixing of MSW with demo debris is not allowed unless the entire load is managed as MSW by delivering it to an MPCA MSW permitted facility.

Q: What is proper management of appliances and electronics?

A: All appliances and electronics must be removed from the building prior to demolition and delivered to a licensed handler or processor. A receipt is required to be obtained and submitted. Even if heavy equipment is required for removal, the appliances and electronics must remain intact and not damaged. If these items are sent for reuse, written documentation explaining who will reuse it and how it will be used is required.

Site Management:

Q: What are Ramsey County's expectations for dust suppression?

A: Ramsey County Ordinance requires that measures be taken to control nuisance dust during demolition and loading.

Q: What are Ramsey County's expectations for maintaining site security?

A: Hazardous building materials, including major appliances, electronics, hazardous and household hazardous waste, must be secured while on the job site.

Documentation Submittal:

Q: What paperwork or documents does Ramsey County need, before and after the demo? How should it be submitted and how long do I have to submit everything?

A: Before the demo:

- A copy of a city issued demo permit
- A copy of a completed MPCA "Notification of Intent to Perform a Demolition"
- An Asbestos Survey (if applicable)

After submitting these documents and before beginning the demo, a Ramsey County pre demo site inspection with the contractor, building owner or their designee must occur.

After the demo:

The following documentation must be submitted within 30 calendar days after the completion of demo, unless a written extension is submitted to and approved by the County:

- A final asbestos disposal manifest and abatement documentation
- Appliance and electronics documentation, showing proper recycling and/or reuse
- Copies of all related MSW and demo debris disposal tickets
- Documentation that refrigerant (central A/C or commercial/built in refrigerant/HVAC units) was properly evacuated on-site by a certified technician
- Ramsey County's residential Household Hazardous Waste Pre-Demolition form
- Commercial Hazardous Waste disposal documentation (i.e. hazardous waste manifests, bill of lading, recycling receipts)
- Documentation showing proper management of other materials or wastes that could not be disposed of with demo waste

Q: If items salvaged from the demolition site are to be reused, what type of documentation is required?

A: Written documentation explaining who will reuse it and how it will be used is required to be submitted. All documentation may be submitted by e-mail, fax, U.S. Mail or hand delivered.

Resources:

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Websites

Minnesota Department of Health (Asbestos) – www.health.state.mn.us/divs/eh/asbestos/index.html

Minnesota Pollution Control Agency – www.pca.state.mn.us

Ramsey County Environmental Health –

www.co.ramsey.mn.us/ph/bs/construction_and_demolition_waste.htm

Resourceful Waste Management Guide – www.rethinkrecycling.com/businesses/waste-management-guide