



Saint Paul - Ramsey County Public Health

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MEMORANDUM

July 28, 2014

To: Municipal Building Officials and Fire Marshals

From: Larry Carlson, Supervisor, Solid & Hazardous Waste Compliance Program

Re: Ramsey County's Pre-Demolition Inspection Program – Outcomes, Updates & Information

This memorandum provides an update on Ramsey County's successes and challenges in ensuring asbestos and hazardous wastes present in residential, commercial and industrial buildings slated for demolition or renovation are being managed properly in your community. Further, we want to continue working with your staff to ensure demolition projects are performed in a nuisance-free manner. While the demolition contractors have generally been cooperative, there have been instances where asbestos and hazardous wastes were not properly identified and/or managed by demolition and renovation contractors, or where dust suppression was inadequate. These are discussed in more detail below.

We also want to say thank you, as the success of our pre demolition inspection program can be attributed, in large part, to the support received from your staff in notifying our office when demolition permits are issued or major fires occur. When we receive a notice of a demolition permit issuance, we contact the demolition contractor on the same day to inform them of their responsibilities to properly identify and remove asbestos and other hazardous wastes from buildings prior to demolition. We then schedule a walk-through inspection with the contractor and require that documentation be submitted to our office upon project completion demonstrating that asbestos, other hazardous wastes, appliances, electronics and demolition debris are managed properly in a manner that protects human health and the environment.

Since our Pre-Demolition Inspection Program began in 2008, our staff have performed over 1,000 pre-demolition inspections in communities throughout Ramsey County. Demolition projects range from single family homes and mobile homes to commercial and industrial buildings. Pre-demolition inspection staff have found asbestos in *over 80%* of the structures, including mobile homes! One challenge with asbestos is it is still being mined in the world and imported *into* the United States in building materials that are available for sale locally. Furthermore, unlike the 1978 ban on using lead in residential paint, there has been no comprehensive ban on the continued use of asbestos.

In addition, over 68% of the structures inspected contain other hazardous wastes that require identification, removal and proper management. These wastes include chemicals, paints, solvents, pesticides, mercury thermostats, fluorescent, compact fluorescent and other mercury containing lamps, electronics and appliances. While our staff has a high degree of confidence that asbestos and hazardous wastes are being identified, removed and managed properly following our pre-demolition inspections, there are concerning compliance gaps that exist in mobile home demolitions where demolition permits are not issued, and in renovations/remodeling projects which involve aspects of demolition but only building permits (vs. demolition permits) are required. Finally, effectively managing fugitive dust emissions by applying water during demolition is a requirement not consistently adhered to by some demolition contractors.

In our continued efforts to proactively address asbestos, hazardous waste and dust concerns related to demolition and renovation activities, we ask you to consider the following:

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1. Pre-demolition inspection staff have found several renovation/remodeling projects where contractors failed to have a required asbestos survey performed, which resulted in their unknowingly disturbing asbestos-containing building materials. Examples include:
 - House renovations where the contractors received a building permit then removed the roof and a top floor, leaving the basement and first floor intact but not first performing a required asbestos inspection.
 - Improper removal of textured ceilings in an apartment complex following water and smoke damage without first performing a required asbestos inspection. The ceiling was later confirmed to contain asbestos, and residents were being invited to move back in when it was discovered that their newly repaired apartment units were contaminated with asbestos. Workers were also unnecessarily exposed.
 - Improper removal of pipe wrap (later confirmed to contain asbestos) in the basement of a commercial building (with subsequent contamination of the parking lot) near the Fair Grounds one week before the State Fair commenced.

We need your assistance to raise awareness of asbestos—which Pre-demolition staff have found in **over 80%** of buildings—for property owners and contractors performing demolition, renovation or remodeling activities. Ramsey County requests that you consider duplicating a pamphlet available from the Minnesota Department of Health (MDH) entitled “***Before you renovate or demolish...STOP***”, and make it available to contractors and homeowners applying for building (non--demolition) permits. If questions about asbestos arise, your staff may direct them to MDH staff and their contact information already included in the brochure.

2. If your community has a mobile home park but does *NOT* require a demolition permit for on-site **mobile home** demolitions, our office will likely not receive a pre-demolition notification. This would mean our office would not be aware that a demolition is occurring unless or until we receive a complaint. We have received a concerning number of VALID complaints alleging that a mobile home was in the process of being demolished WITHOUT asbestos being identified and properly abated. In addition, mobile homes may contain asbestos and all the same hazardous wastes found in a typical house. This situation where asbestos and hazardous wastes are not properly identified, removed and managed presents an avoidable yet significant health hazard to the community and requires costly cleanup when encountered. One possible solution is for municipal permit staff to differentiate between a mobile home being *removed* from a mobile home park vs. *demolished* on-site. (Our office does not regulate the removal of a mobile home provided it is saleable/usable and roadworthy.)
3. There are special requirements for **structures used for firefighter training burns**: an asbestos survey must be conducted by a state-certified inspector, with **all** asbestos materials properly abated prior to the fire. In addition, the agency conducting the fire training burn must follow the techniques described in “***Live Fire Burn Training Procedures for Minnesota State Colleges and Universities and Minnesota Fire Service***”.

This document spells out the required permits and permissions for fire training burns:

- a. Written permission and documentation from the owner to burn in the structure, to include authorization, clear title, cancellation of insurance, and disconnection of utilities;
- b. Minnesota Department of Natural Resources, Division of Forestry (DNR) Live Fire Training Burn of Residential Structures Permit Form;
- c. Minnesota Pollution Control Agency (MPCA) authorized asbestos abatement statement; and
- d. Other forms as may be required by a local jurisdiction.

For more information about fire training burns, please contact Tim Oland, Rural Fire Department Program Coordinator, MN DNR, at 218-327-4373.

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4. It is a full expectation under State, County and local Ordinances that dust emissions are minimized from demolition activities. Ramsey County expects demolition contractors to take all reasonable steps, including the application of water during demolition, to control dust emissions from the project. If active demolition projects are underway and the contractor is not applying water to keep dust down, they are subject to cease and desist orders from this office until dust suppression practices are in use. Our office is asking for your field staff support in requiring active dust suppression on all demolition projects in your community.
5. As a reminder, Ramsey County's Solid Waste Ordinance, Section 15.02 requires municipalities to provide the County with a copy of issued demolition permits by fax or electronically within one (1) day of issuance. This is an essential step that provides Ramsey County the information necessary to contact the demolition contractor and to schedule a site pre-demolition inspection prior to any demolition activity. A timely inspection ensures that asbestos assessments and abatements are completed and that other hazardous building materials and wastes are identified and properly managed prior to demolition. A timely notification also ensures that the project will not be delayed awaiting asbestos testing results during the demolition or having all demolition waste being managed as asbestos containing material, which escalates the cost of the project significantly. The County considers the following projects subject to this notification:
 - Full *residential demolition* projects only.
 - Any *commercial demolition and/or renovation* project, as well as any renovation/remodeling project in residential multi-unit housing in which some wall, ceiling, floor or structural component will be altered or repaired.
 - Any structure burned for firefighter training.

These permits can be forwarded by fax to 651/266-1177; or by e-mail to: ehpredemo@co.ramsey.mn.us

In closing, please remember to notify us of any demolition or commercial renovation permits issued in your community, and share this information with others. We also ask that your building permit-issuing staff provide demolition contractors with copies of the **Ramsey County Pre-Demo Requirements Information** page, and the MDH "**Before you renovate or demolish...STOP**" asbestos requirements brochure at the time a permit is applied for or issued. Lastly, feel free to contact any of our Pre-demolition Inspection staff if you have any questions about our program: **Greg LaMere**, 651/266-1184; **Michael Reed**, 651/266-1181; **Joe Wozniak**, 651/266-1187; or **Aaron Chavez** at 651/266-1182.

We look forward to continuing to work with all of you toward the common goal of protecting human health and the environment.