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Department of Environmental Quality

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September 13, 2016

Honorable Debe Hollingsworth
Mayor, City of Pine Bluff
200 East 8th Avenue, Suite 201
Pine Bluff, AR 71601

Re: Requirements for Demolition and Disposal of Debris from Residential Buildings in City of Pine Bluff

Dear Mayor Hollingsworth:

On May 9, 2016 through May 11, 2016, US EPA, Region 6 (EPA) accompanied by Arkansas Department of Environmental Quality (ADEQ) personnel, conducted an asbestos investigation on several structures in the City of Pine Bluff (City). The impacted structures were located at:

1. 217 Laurel Street
2. 1216 West 13th Street
3. 1400 South Linden
4. 712 West Fifth Street

The EPA investigation was to determine compliance with the Toxic Substance Control Act (TSCA), 40 CFR Part 763, Subpart G, Worker Protection Rule. The ADEQ investigation was to determine compliance of demolition activities with the National Emission Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR Part 61, Subpart M. The ADEQ would like to take this opportunity to follow up with the Mayor's Office concerning the remaining debris and disposal practices from those specified structure(s) demolished by the City.

Disposal for the remaining construction debris, Regulated Asbestos Containing Material (RACM) and Asbestos Containing Material (ACM) or any associated debris from the above structures shall comply with Regulation No. 21, particularly Chapter 10 and Chapter 11, as well as 40 CFR Parts 61.145 and 61.150.

City, Department of Corrections (DOC), and Arkansas Community Corrections (ACC) personnel or any other persons conducting an asbestos inspection, renovation and/or demolition activity in which asbestos may be dislodged or disturbed must be trained as defined by Regulation No. 21, Chapter 15.

Furthermore, all persons conducting an asbestos inspection, renovation and/or demolition activity shall be certified by the ADEQ, Asbestos Section. For government entities and subdivisions thereof, licensing requirements found in Regulation No. 21, Chapter 12 specifically §21.1205(A), §21.1205(B), §21.1206(A), and §21.1206(B) shall apply.

If the City, ACC or DOC would like to pursue training, please feel free to submit an application for an Asbestos Training Provider to the ADEQ, Asbestos Section as provided by Regulation No. 21, Chapter 14. Please review Regulation 21 to ensure that all relevant requirements are met prior to initiating any activities involving the asbestos debris. Copies of the specific chapters referenced in this letter are enclosed.

Another option the City may prefer to pursue is contacting a currently Arkansas-Licensed Training Provider to satisfy any asbestos training criteria for DOC, ACC and City personnel to conduct asbestos inspections and/or renovation and/or demolition activities for residential buildings. The training would also certify personnel to inspect, abate and/or demolish commercial buildings the City may want to renovate or demolish.

Finally, EPA's inspection addressed compliance with the TSCA Worker Protection Rule. The City, ACC, and/or DOC should be aware that those requirements also govern activities subject to Regulation 21 and the asbestos NESHAP regulations including the transportation and disposal of the remaining debris.

If you have any questions, concerns or would like to further discuss the requirements, please feel free to contact me at spencer@adeq.state.ar.us or via phone at 501-682-0873.

Sincerely,

for Stuart Spencer, Associate Director
Office of Air Quality
Arkansas Department of Environmental Quality

Enclosures

cc: Mr. Kevin Murphy, Deputy Director
Arkansas Community Correction

Mark Potts, Branch Chief- US EPA (6)
Hazardous Waste Enforcement Branch (w/o enclosures)

Becky Keogh, Director
Arkansas Department of Environmental Quality (w/o enclosures)

Demetria Kimbrough, Asbestos and Enforcement Supervisor
Arkansas Department of Environmental Quality (w/o enclosures)

Torrence L. Thrower, Environmental Program Coordinator- Asbestos Section
Arkansas Department of Environmental Quality (w/o enclosures)