RAMSEY COUNTY
Saint Paul – Ramsey County Public Health

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Pre-Demolition Inspection Program Frequently Asked Questions



Notification of Demolition Activity

I applied for or received a demolition permit through the city. Must I notify Ramsey County of my demolition plans?

Yes. Ramsey County Ordinance requires immediate notification upon receipt of a permit from the city for the demolition or deconstruction (disassembly) of any commercial, industrial or any residential structure (including mobile homes).

The property owner or contractor must contact Ramsey County to schedule a pre-demolition inspection **before** beginning any demolition project. Ramsey County requires notification of a minimum of two business day prior to the date of the inspection. Emergency demolitions (i.e., following a fire or flood, etc.), do not require as much notice. However, the county still must be notified before the start of the demolition to determine if the situation meets the emergency exemption.

Do I need to submit a "Demolition/Renovation Notification", also known as the Minnesota Pollution Control Agency (MPCA) 10-Day Notification, to Ramsey County?

Yes. The Ramsey County Solid Waste Ordinance requires the demolition contractor or property owner submit a completed copy of the MPCA's Demolition/Renovation Notification form, also known as the 10-day Notification, to the county, seven business days before beginning **any** commercial or residential demolition or deconstruction. In addition, the Minnesota Department of Health (MDH) may require a "Notification of Asbestos Related Work".

Asbestos

Am I required to have an asbestos survey performed?

Yes. An asbestos survey must be completed by an MDH-licensed asbestos inspector before any demolition or renovation activity begins. Program data continually shows that asbestos is found in about nine out of every ten structures. Asbestos is still used in some building materials today, so you cannot assume a newer building is asbestos free. The only way to know for sure is to test for asbestos. The MPCA and MDH have additional requirements for demolition or renovation of certain structures. For more information, see the MDH brochure: Before You Renovate or Demolish…STOP.

An asbestos survey is not required if the demolition is considered an emergency. Contact the county before beginning the demolition to find out if the demolition would be considered an emergency demolition. All demolition debris from an emergency demolition must be managed as asbestos containing material and transported directly to and disposed of at a landfill permitted by the MPCA to

receive asbestos containing material. An MDH-licensed asbestos abatement contractor must perform emergency demolitions of any structure that is assumed to contain friable asbestos.

What do I do if building material contains more than 1% of asbestos? What type of asbestos can stay in the structure at the time of the demolition?

Category I non-friable asbestos (if fully intact and undisturbed) may stay in the structure if demolition activity will not damage it. If tiles or other Category I material are broken or damaged during demolition, the asbestos will become friable and will contaminate all demolition debris. All other asbestos above 1%, including Category I in poor condition and all of Category II, must be properly abated by an MDH-licensed asbestos abatement contractor and properly disposed of prior to any demolition activity.

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.

What do I do if building material contains 1% or less asbestos?

While Ramsey County does not require abatement of asbestos-containing building materials containing **1% or less** of asbestos, demolition contractors still must protect themselves and other employees at the job site under Federal OSHA rules (CFR 1926.1101). The contractor should notify the disposal facility that the incoming demolition debris does contain asbestos below the regulated limit.

How does asbestos affect disposal of demolition debris?

Demolition debris containing asbestos must be delivered directly to a permitted landfill. It cannot be delivered to a transfer station or Construction and Demolition (C&D) processing facility in order to protect employees working at these locations. Ramsey County requires the contractor to notify the receiving demolition landfill, prior to arrival, if asbestos is present in the load.

Pre-Demolition Inspections

What happens at a pre-demolition inspection?

The property owner or contractor must contact Ramsey County to schedule a pre-demolition inspection **before** beginning any demolition project. Prior to scheduling an inspection, the county inspector will require details on the project, including project scope and a copy of the completed asbestos survey.

At the job site, the county inspector performs a walk-through inspection to identify, document and discuss proper management of hazardous materials. This includes suspect asbestos containing materials, hazardous wastes, electronics, appliances and municipal solid waste (MSW). The inspector provides an inspection report to the contractor to further explain contractor responsibilities. A follow-up inspection is generally not required. Contact the city for any additional requirements.

After all hazardous materials and asbestos are properly removed and managed and an inspection has been conducted, demolition or renovation may begin.

Hazardous Materials

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

No. Household hazardous waste is defined in MN State Statute and MPCA rules as characteristic or listed wastes which come from a household activity. Household hazardous waste does not include waste from commercial activities that is generated, stored or present in a household.

Ramsey County allows HHW from a residential demolition site to be delivered, at no charge, directly to Ramsey County's HHW collection site at Bay West, located at 5 Empire Drive in Saint Paul. HHW must go directly from the demolition site to Bay West. Transporting HHW to your business location or another alternate location in order to accumulate it is prohibited. Your inspector will provide you with a copy of an HHW Pre-Demolition form, required for delivery, along with Bay West's hours of operation. Complete the form before arriving, listing one address per form. Especially for large quantities, Ramsey County encourages contractors to call 651-291-3451 to schedule a drop-off to reduce wait time. Please note hours of operation vary by season. **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 hazardous waste ID number, identifying proper management methods and finding licensed or permitted disposal companies. All commercial hazardous waste regulations apply in this case.

Major Appliances

What is proper management of appliances and electronics?

All appliances and electronics must be removed from the building prior to demolition and re-used or delivered to a licensed recycler or processer. The appliances and electronics must be removed intact and undamaged, even if heavy equipment is required for removal. If recycled, you must obtain a receipt and provide a copy to the county inspector. For items that are re-used, you must provide the county with written documentation explaining who and how it will be reused. For HVAC systems and central air conditioning units, documentation must be provided showing that the unit was decommissioned in the field (i.e., refrigerant removed by an EPA-certified technician) and that PCB capacitors, mercury components and electronics have also been removed and properly managed.

Lead Paint

What if lead paint is found at concentrations greater than or equal to 0.5% or 5,000 ppm?

Demolition contractors are no longer required to remove or stabilize in place loose and flaking lead paint before beginning the demo. If the building is removed by either demolition or deconstruction, not renovated or remodeled, the EPA Renovation, Repair and Painting (RRP) Standard does not apply. Peeling, flaking or intact lead paint present at the time of demolition does not require abatement/stabilization and is considered demolition debris if removed with the structure and delivered

to a MPCA-permitted landfill that is approved to accept this waste. Ramsey County encourages containment of lead-based paint as much as possible.

PCBs

Where can PCBs be found?

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.

Do I need to remove PCBs prior to demolition?

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. If the structure is non-residential, this waste is considered a fully regulated hazardous waste.

Trash/Municipal Solid Waste (MSW)

Can MSW be left in the building during demolition and disposed of with the demolition debris?

No. MSW must be removed before the demolition and managed separately. 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 demolition debris is not allowed unless the entire load is managed as MSW by delivering it to an MPCA MSW permitted facility. The cost for disposal of demolition debris mixed with MSW and managed as MSW is subject to the County Environmental Charge (CEC). The CEC is an add-on service charge assessed by licensed waste haulers, and is 28% for residential MSW and 53% for non-residential MSW. To avoid this charge, contractors should remove MSW and dispose of it separately from demolition debris. Examples of MSW include garbage, trash, furniture and miscellaneous non-hazardous debris.

Site Management

What are Ramsey County's expectations for dust suppression?

Ramsey County Ordinance requires that measures be taken to control nuisance dust during demolition and loading. Municipalities and others (MPCA, MDH) may also impose requirements to control dust.

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

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

Required Documentation

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

Prior to demolition, the contractor, building owner or their designee must provide a copy of the following:

- Completed asbestos survey.
- City issued demolition permit.
- Completed MCPA Demolition/Renovation Notification, also known as the MPCA 10-Day Notification.

After submission of these documents and prior to any demolition activities, Ramsey County must complete a pre-demolition site inspection.

After demolition, the following documentation must be submitted for items identified in the asbestos survey and/or the pre-demolition inspection within 30 calendar days after the completion of demo:

- Asbestos abatement documentation and disposal manifests.
- Ramsey County's HHW form (if applicable).
- Disposal/recycling receipts for all major appliance and electronics.
- Disposal/dump tickets for all related MSW and demolition waste.
- Documentation that refrigerant (central A/C or commercial/built in refrigerant/HVAC units) was properly evacuated onsite by a licensed technician.
- Documentation for all other commercial hazardous waste disposal (i.e., hazardous waste manifests, bill of lading, recycling receipts).

Exceptions may be made to the 30-day deadline if a written extension is submitted to and approved by the county.

If hazardous materials/items (e.g., appliances) are salvaged from the demolition site for reuse, what type of documentation is required?

Written documentation explaining who and how it will be reused is required to be submitted. All documentation may be submitted by email, fax, U.S. Mail or hand delivered.

Pre-Demolition Inspection Staff

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