TIMELY ASBESTOS NOTIFICATION

TxDOT Bridge Demolition Projects
Questions & Answers
Timely Asbestos Notification

When is asbestos notification required for TxDOT projects?

- **Demolition of Bridges:** Notification is required for all demolition projects *even when asbestos is not present*. Demolition projects are those that involve the wrecking or taking out of any load-supporting structural member.

- **Asbestos Abatement/Renovation:** Notification is required when the work will disturb regulated asbestos materials in excess of EPA Threshold Quantities: **260 linear feet** for pipes; **160 square feet** for other components; **35 cubic feet** for stripped material that could not be previously measured.
Who completes the Notification Form?

- **For abatement projects or other work with asbestos involvement:** The Abatement Contractor or Project Consultant should assist with preparation and submittal of the Notification Form.

- **For demolition projects with no asbestos:** Usually the form will be completed and submitted Texas Department of State Health Services (DSHS) Notifications Group by the TxDOT project manager.
How can I make sure the notification for my demolition project is submitted on time?

- **Review** the Notification Form prior to mailing. Be sure the form will be postmarked at least 10 working days prior to the demolition start date given in the Work Schedule. (demolition can start on the 11th day)
- Mail the form **earlier** than 10 working days prior if you have a reasonable idea of the start date.
How can I make sure the notification for my demolition project is submitted on time? (continued)

- Use a calendar to count back 10 working days (weekdays) from the demolition start date to find the last day that the notification can be postmarked.

- Note: **Holidays** are currently counted as working days if they fall on weekdays (however it is recommended that extra days be allowed in case this DSHS policy changes).

- See the **calendar examples** on the following three slides.
**Timely Asbestos Notification**

- **Example**
  - Key: $P = \text{Postmark Date}$
  - $D = \text{Earliest start date for demolition}$

In New Brunswick, the San Antonio River replaced Luna Park, while similarly evolving into a new landmark and shoreline park. George Orwell believed in supporting the new structure as designed to look like the original 1920s bridge.

**July**

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**Note:**
- National Recreation and Parks Month
Timely Asbestos Notification

- Example
  Key: P = Postmark Date
  D = Earliest start date for demolition

In New Braunfels, the San Antonio District replaced a dangerously creased bridge over the Guadalupe and historic Landa Park while carefully mitigating impacts to Ti embattled and threatened species. Using a Context-Sensitive approach, the new structure was designed to look like the original 1886 bridge.
Example

Key: P = Postmark Date
D = Earliest start date for demolition

July

National Recreation and Parks Month

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When do I need to send an amended notification for a demolition project?

- The EPA rule requires amendment of the notification when the **demolition start date** changes.

- If demolition will begin **earlier** than scheduled, an amended notification must be postmarked at least 10 working days prior to the new start date.

- Failure to amend for **minor delays** generally should not result in a notice of non-compliance provided at least preparatory activities are occurring at the bridge site on the given start date.
When do I need to send an amended notification for a demolition project? (continued)

- When the demolition start date is delayed enough that preparatory activities are not occurring at the bridge site on the given start date, provide the DSHS with a written notice of the new start date at least 24 hours prior to the previous start date. The amended notification should be faxed or e-mailed to the local asbestos inspector, with the original mailed to the DSHS Notifications Group.

- Change to the work schedule end date alone should not require an amended notification form for bridge demolition projects with no asbestos.
My project includes more than one bridge. Can I file a single notification for multiple bridges?

- DSHS has indicated that a single notification for multiple bridges on the same project would be acceptable in certain circumstances. Note that:
  - The demolition start date is the date demolition begins on the 1\textsuperscript{st} bridge.
  - The demolition end date is the estimated completion of demolition on the last bridge.
  - This method is recommended only when the bridges are contiguous/adjacent and the work is continuous (i.e., delays between bridge demolitions are not long).
Where can I find more information?

- Additional information on asbestos notification (including example form and instructions), amendments, inspections, fees, abatement, and acquisition of services can be found in the “Guidance for Handling Asbestos During Construction Projects” link from the BRG Field Operations intranet pages: http://crossroads/org/brg/FO/index.htm

- The latest notification form (and instructions) may be downloaded from the DSHS Asbestos Application/Forms internet page at http://www.dshs.state.tx.us/asbestos/forms.shtm#notification
Who can I contact with questions?

- Contact ENV – Hazardous Materials Management Branch if you have questions:
  - Rodney Concienne (Manager) – (512) 416-3012
  - Terry Dempsey – (512) 416-3010
  - Douglass Mack – (512) 416-2634