

# Asbestos Survey Requirement for Commercial Buildings

## What is the survey requirement?

Lane Regional Air Protection Agency (LRAPA) asbestos survey rule requires a thorough inspection of a building or facility before any demolition or renovation activities to determine the presence of friable and non-friable asbestos-containing materials, commonly known as ACM.

## Who must conduct a survey?

All facility owners, including but not limited to manufacturing and industrial facilities, public and private building owners and operators, commercial facilities, and apartment complexes undertaking demolition or renovation requires an asbestos survey.

## What is a demolition or renovation project?

Demolition is defined as wrecking that involves the removal of any load-supporting member or intentional burning.

Renovation is defined as altering in any way one or more facility components that does not involve removing a load-supporting member.

## Who can perform the survey?

Only an accredited inspector may perform the asbestos survey. An accredited inspector must complete training and receive accreditation under the Model Accreditation Program training rules in 40 CFR Part 763.

For training courses, contact LRAPA's office for the most current list of training providers.

## What does LRAPA mean by survey?

Generally, LRAPA requires a sample of each type of material suspected to contain asbestos to be collected and analyzed before any demolition or renovation activity. A list of laboratories that perform asbestos analysis is available on [LRAPA's asbestos website](#).

When complete demolition or extensive renovation is to occur, a thorough asbestos survey is required. When partial renovation activity is to occur, such as a kitchen remodel, a survey is required for that area of the structure only.

When the suspected material involves either blown or troweled on surfacing material, such as popcorn ceiling texture, LRAPA recommends collecting several samples from different locations in the project area and having all of the samples analyzed. LRAPA recommends that accredited inspectors follow the EPA "Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials" guidance.

A copy of the survey report must be kept onsite during the demolition or renovation project and LRAPA can request a copy of the survey report. A survey includes the sampling of materials suspected to contain asbestos, laboratory analysis results to determine asbestos content and an evaluation of the materials to assess their condition.

A survey is not an absolute guarantee that all ACM has been identified. Other suspect materials can be found in areas which were not accessible during the survey such as materials behind walls, under carpet, etc. During the demolition and renovation activities, an appropriately trained person must be on site.

## When is a survey not required?

One may presume that a single material contains asbestos and therefore have it properly abated without conducting a survey.

Materials that commonly contain asbestos, such as popcorn ceiling texture, cement siding, and vinyl floor tile, are candidates for material that may be presumed to contain asbestos and properly abated in accordance with the rules.

**However, you cannot assume that a material does not contain asbestos.** Laboratory analysis is the only method to verify a material does not contain asbestos.

**When will a survey always be required?** An asbestos survey will always be required before the intentional burning of any public and private buildings, including residential buildings.

## Asbestos Program

[www.lrapa.org](http://www.lrapa.org)

## Contact Information:

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LRAPA's asbestos rules can be found in [Title 43](#). If you have questions or need additional technical assistance, contact asbestos program staff. Additional information is available on [LRAPA's asbestos webpage](#).

For information about asbestos surveys for residential buildings, please refer to the Residential Building Asbestos Survey Requirement fact sheet available on the [LRAPA's asbestos webpage](#).

### **Alternative Formats**

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call LRAPA at 541-736-1056.