MassDEP Asbestos Overview

2025 MassDEP-MHOA Annual Seminars

Feb-25: Delaney House, Holyoke

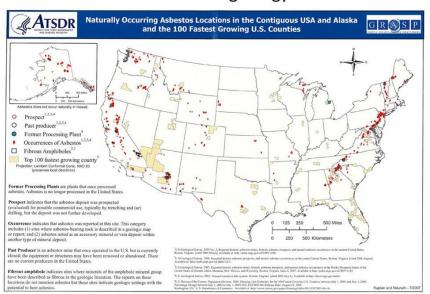
Mar-11: Cyprian Keyes, Boylston

Mar-12: Virtual

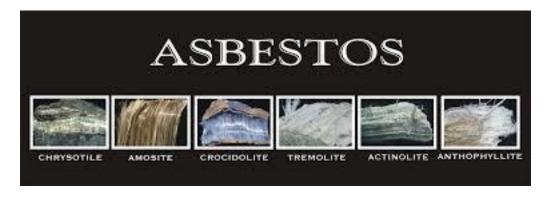


Naturally Occurring Fibrous Mineral Environmentally Stable & Non Biodegradable

Asbestos & geology







- Desirable Physical Properties
 - High Tensile Strength
 - Resistant to Corrosives & Other Chemicals
 - Resistant to Heat & Flame
 - Flexible
- Asbestos Containing Material (ACM)>1% Asbestos (USEPA regulatory definition)
- Laboratory Analysis Required to Determine Type
- >3,000 Building Products
 - Widely used Commercial & Residential Use until 1970s
 - Still Used Today: Automotive, Vinyl Tiles, Roofing Material, Adhesives, Mastics, Some Imported Cement Pipes & Corrugated Sheeting

Asbestos Products still Available in Commerce

The manufacture, importation, processing and distribution in commerce of these building products are **not banned** (partial list):

- Asphaltic roofing shingles, felts, flashing
- Cement shingles/panels
- Cement pipe
- Vinyl floor tile
- Millboard
- Gaskets
- Adhesives/mastics

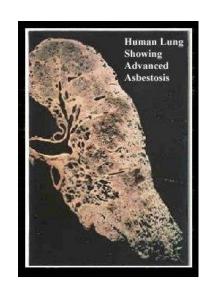


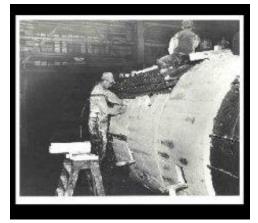
Image Source: Rosenfeld Injury Lawyers

Reference: https://www.epa.gov/asbestos/us-federal-bans-asbestos

HEALTH HAZARDS

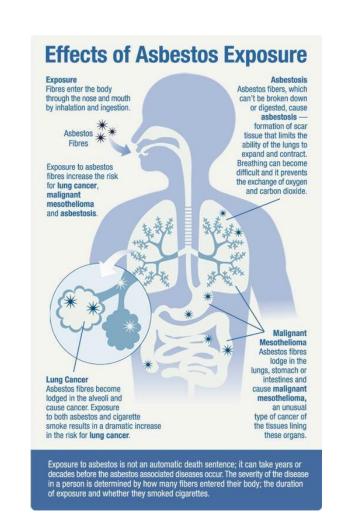
- Primarily Inhalation Hazard;
 Secondarily Ingestion
 Hazard
- Must Be Disturbed, Friable & Airborne
- Friable= Able to be pulverized or reduced to powder by hand pressure when dry.





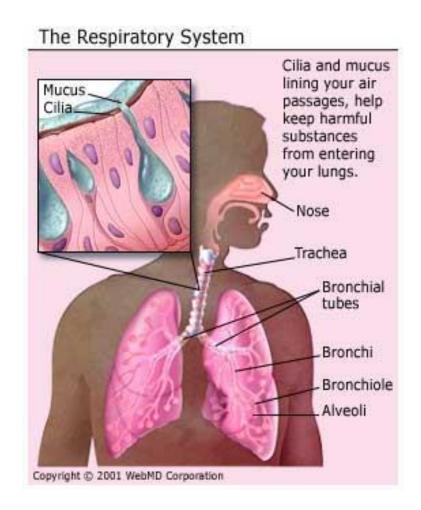
Diseases Associated with Asbestos Exposure

- Asbestosis (fibrosis of the lung)
- Lung Cancer
- Mesothelioma (Pleural & Peritoneal)
- Colon Cancer
- Latency Period (10 to 40 years)
- Risk Level & Duration of Exposure



DEFENSE MECHANISMS

- Nose & Mouth
- Mucous Lined Breathing Passages
- Cilia
- Macrophages



At-risk Population Today

- Population Groups Most Likely to Be Affected and Exposed today?
 - Individuals in the Construction Trades
 - Firefighters
- Development of asbestos-related disease is a function of exposure and individual risk factors.



Potential Risk Factors

- Concentration of asbestos fibers
- Duration of exposure
- Frequency of exposure
- Iron Content
- Type of asbestos fibers involved in exposure & Dimensions, type & durability of asbestos fibers
 - Wide fibers (diameter greater than 2 to 5 microns) entrained URT
 - Long thin asbestos fibers can reach the lower airways & alveoli -can tend to be retained in the lungs
 - Sharp, needle-like amphibole fibers are associated with higher risk of disease

SMOKING

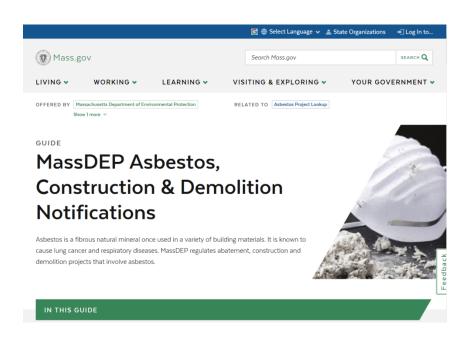
- Impairs Body's Primary Defense Mechanism
- Increased Risk of Lung Cancer
- Multiplicative Effect
 - 90X non-exposed, nonsmoker



MassDEP Asbestos Program focus on Demolition and Renovation Projects

- Performance standards:
 - Prevent air emissions
 - Protect public health, safety and environment
- Essential Elements of Program:
 - Survey/Notification prior to work
 - Asbestos abatement work practice standards
 - Asbestos-containing waste material must be properly managed
- Must also comply with DLS requirements (https://www.mass.gov/asbestos-safety-program):
 - Worker qualifications/training
 - Work practices/worker safety
 - Final clearance monitoring

MassDEP Asbestos Webpage



http://mass.gov/dep/asbestos

MassDEP Survey Requirements

- Required prior to <u>ANY</u> demolition/renovation project
 - ANY structure of ANY age
 - Demo/Reno projects include, but are not limited to:
 - Old boiler/piping repairs/replacement
 - HVAC repairs/upgrades
 - Electrical repairs/upgrades
 - Home/facility improvement projects



https://www.mass.gov/doc/asbestos-surveyrequirements-prior-to-demolition-or-renovationinformation-guide/download

MassDEP Survey Requirements

- Owner/Operator must engage DLS-licensed Asbestos Inspector to conduct "thorough" inspection of the area to be worked on
 - Identify all material containing asbestos in any amount (including <1%)
 - Destructive survey (inspect/sample behind wall cavities, through floor layers, above ceilings)
 - Must use approved analytical methods (e.g., Polarized Light Microscopy (PLM))
 - Any suspect ACM not analyzed must be identified as ACM
- Keep the Survey Report for at least two years (preferably longer; DLS requires retention of records for at least 15 years)

Purpose of Survey

- Comply with State and Federal regulations
- Identify and properly manage materials that contain asbestos
 - Minimize uncertainty/doubt
 - Avoid "surprises" (i.e., unforeseen disturbance of ACM) and added project cost (e.g., decontamination, disposal, possible enforcement & penalties)
 - Protect health and safety of workers, building occupants and members of the public
- Survey report enables determination of:
 - Notification requirements
 - Licensed contractor requirements
 - Work practice requirements
 - Sequence of project tasks
 - Removal requirements prior to demo/reno
 - Minimize volume managed as ACWM
 - Waste packaging, transportation and disposal requirements
- Building Officials can request to see survey report for any questionable materials/facility components

"Suspect Asbestos-Containing Material"

 MassDEP Definition (310 CMR 7.15(1)) Products reasonably likely to contain asbestos based on appearance, composition, and use

• Includes (but is not limited to):

Non-fiberglass insulation (e.g., pipe, boiler, duct work)	Mastic (flooring or cove base adhesive or damp-proofing)	
Spray-on fire proofing	Vinyl floor and wall tiles	
Asphalt roofing and siding (shingles, roofing felts, tars, etc.)	Vinyl sheet flooring (i.e. linoleum)	
Cement/transite shingles	Wallboard Joint Compound	
Cement/transite pipes	Plaster	
Cement sheets (corrugated and decorative)	Ceiling tiles	
Cloth vibration dampers or duct work	Window, door, building seam caulk and/or glazing	
	Vermiculite Attic Insulation	



ASBESTOS BUILDING TYPICAL LOCATIONS FOR THE MOST COMMON ASBESTOS-CONTAINING MATERIALS **ROOF AND EXTERIOR WALLS** Roof sheets and tiles Guttering and drainpipe Wall cladding Soffit/facia boards

Panel beneath window

Roofing felt and coating to metal wall cladding

BOILER, VESSELS AND PIPEWORK

Lagging on boiler, pipework, calorifier etc. Damaged lagging and associated debris

Paper lining under non-asbestos pipe lagging

Gasket in pipe and vessel joints

Rope seal on boiler access hatch and between cast iron boiler sections

Paper lining inside steel boiler casing

Boiler flue

CEILINGS

Spray coating to ceiling, walls, beams/columns

Loose asbestos in ceiling/floor cavity

Tiles, slats, canopies and firebreaks above ceilings

Textured coatings and paints

INTERIOR WALLS/PANELS

Loose asbestos inside partition walls

Partition walls

Panel beneath window

Panel lining to lift shaft

Panelling to vertical and horizontal beams

Panel behind electrical equipment

Panel on access hatch to service riser Panel lining service riser and floor

Heater cupboard around domestic boiler

Panel behind/under heater

Panel on or inside, fire door

Bath panel

FLOORING MATERIALS

30 Floor tiles, linoleum and paper backing, lining to suspended floor

AIR HANDLING SYSTEMS

Lagging

Gaskets

Anti-vibration gaiter

DOMESTIC APPLIANCES

Gaskets, rope seals and panels in domestic boilers

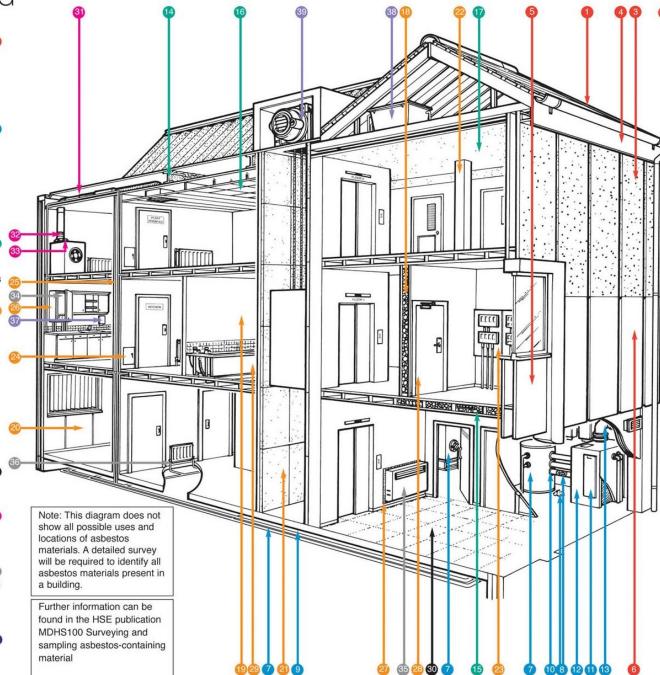
'Caposil' insulating blocks, panels, paper, string etc in domestic heater

String seals on radiators

OTHER

Fire blanket

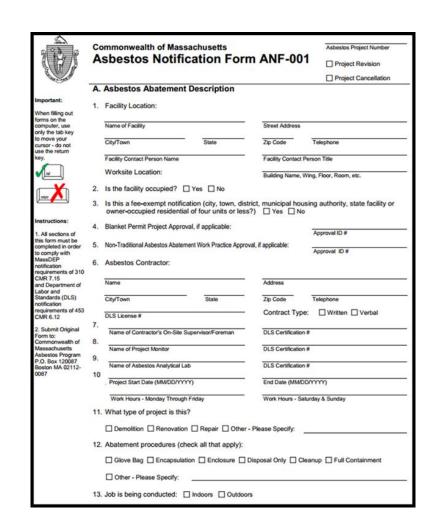
Water tank Brake/clutch lining



Reference: Public Health & Safety, Inc.

AQ04 Notification Requirement

- Submit Asbestos Notification Form (AQ04/ANF-001) 10 working-days prior to start of abatement activity.
- Except for VAT floor tile, gypsum WB/Joint compound systems, and exterior cement shingles, notification is required for any amount removed
- Regardless of notification requirement, reg. work practices apply in all cases.
- Online notification satisfies both MassDEP and DLS requirements https://www.mass.gov/how-to/file-an-aq-04-anf-001-asbestos-removal-notification
- Upon request, emergency waiver may be granted to start work sooner at discretion of MassDEP staff https://www.mass.gov/doc/emergency-waiver-request-procedures-asbestos-abatement-demolition-projects/download



Asbestos Abatement Project Requirements

Managing Asbestos Containing Waste Material (ACWM)

- Packaging
- Transportation
- Storage & Disposal
- Waste Shipment Record

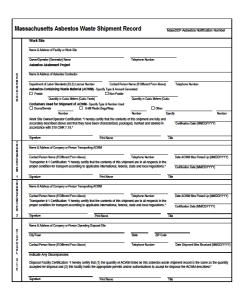




Image Source: ILC Dover

Clarification about Material Containing < 1% Asbestos

- Should be identified in the pre-demo/reno survey
- ACWM includes material contaminated with any amount of asbestos (even <1%)
- If material with any asbestos gets mixed with nonasbestos C&D, all must be handled as ACWM
- Keep segregated, and manage separately from other C&D debris to reduce disposal costs
- Notification required prior to disposal of ACWM
- Never send to C&D Processor



FINAL CLEARANCE MONITORING

- Certified Asbestos Project Monitor (independent of Asbestos Contractor)
- Prior to removal of containment/Neg. Air Unit
- Visual Inspection
- Air Clearance monitoring (for re-occupancy)
- Analytical Methods
 - General project: Phase Contrast Microscopy (PCM): dust particles 0.01 fibers/cc
 - School project: Transmission Electron Microscopy (TEM): asbestos 70 structures/mm²



Image source: www.asbestosspecialist.co.uk

Suggested Checklist for Building Officials Asbestos Survey/Removal Requirements

- 1. Was the structure, or the portion of structure where work will be performed, thoroughly surveyed by a DLS-certified asbestos inspector prior to **ANY** demolition or renovation activity?
 - Ask for copy of asbestos survey report.
- 2. Did survey identify any Asbestos-Containing Material (ACM)?
 - Note: Any suspect ACM not analyzed must be managed as ACM
- 3. If ACM was identified, has it been removed?
 - Ask for copy of Asbestos Notification Form (ANF)
 - Ask for evidence of project completion
 - Final clearance monitoring report, or
 - Waste Shipment Record (WSR), or both documents

AQ06 Construction/Demolition/Renovation Notification Requirement

- Submit 10 working-days prior to start of construction, demolition, or renovation of a building/structure:
 - Industrial/Commercial/Institutional
 - Residential buildings with more than 20 units (EPA requires notification for demo of any residence >4 units)
 - Required by several municipalities
- Use MassDEP form BWP AQ06
 Notification Prior to Construction or Demolition
- Prevent release of dust or other hazardous pollutants (e.g., asbestos)
- Notification form asks about:
 - Asbestos survey
 - Survey results
 - Any asbestos abatement activities

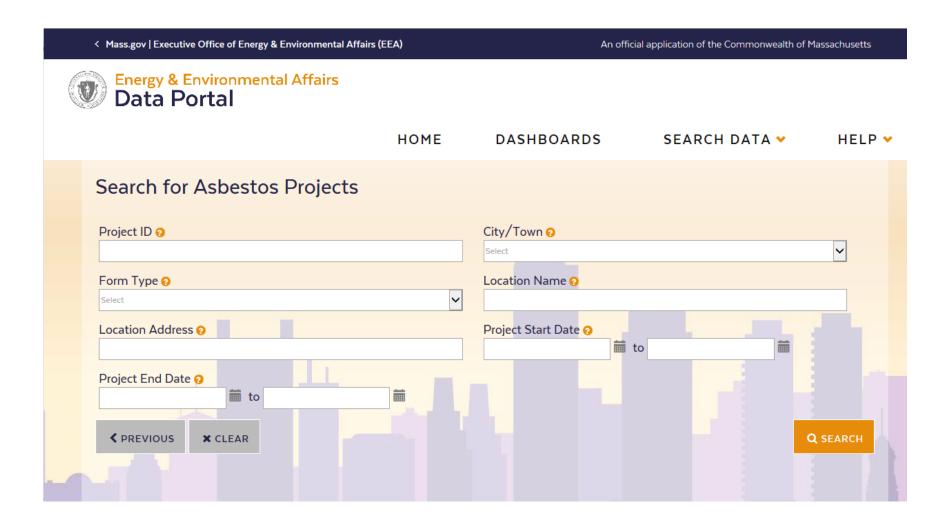
T.	Massachusetts Department of Environmental Protection Bureau of Waste Prevention • Air Quality BWP AQ 06 Notification Prior to Construction or Demolition						
Important: When filling out forms on the computer, use only the tab key to move your	A.	A. Applicability A Construction or Demolition operation of an industrial, commercial, or institutional building, or residential building with 20 or more units is regulated by the Department of Environmental Protection (MassDEP), Bureau of Waste Prevention - Air Quality Division, under Regulations 310 CMR 7.99. Notification of Construction or Demolition operations is required under 310 CMR 7.09 (2) ten (10) days prior to any work being performed. The					
cursor - do not use the return key.		following information is required pursuant to its this a fee-exempt notification (city, town, residential property of four units or less)? Yes No	310 CMR	7.09.			
Instructions:							
1. All sections of this form must be completed in order to comply with the Department of Environmental Protection notification requirements of 310 CMR 7.09		General Project Description Facility Information:					
		Name of Facility City/Town	State	Zip Code T	elephone		
2. Submit Original Form To:		Facility Contact Person		Contact Person Ti			
Commonwealth of Massachusetts Asbestos Program P.O. Box 120087 Boston, MA 02112-0087		Facility Contact Person Telephone Facility Contact Person Email Facility Size:					
		Square Feet Was the facility built prior to 1980? Describe the current or prior use of the	facility:	Number of Floors Yes I			
	2.	Is the facility a residential facility?	Yes [] No If yes, ho	ow many units? Number		
		Facility Owner Name		Address			
		City/Town On-Site Manager/Owner Representative	State	ZIP Code	Telephone		
		City/Town	State	ZIP Code	Telephone		

https://www.mass.gov/how-to/aq-06constructiondemolition-notification

Suggested Checklist for Building Officials Notification Prior to Construction/Demolition/Renovation

- 1. Does the project involve an institutional, commercial or industrial structure, or any portion of such a structure?
- 2. Does the project involve of a residential structure, or any portion of such a structure, with more than 20 dwelling units?
- 3. Does the project involve the demolition of a residential structure with more than 4 dwelling units?
- 4. If yes to any of above, then the owner/operator is required to submit an <u>AQ06 Notification Prior to Construction</u>, <u>Demolition</u>, or <u>Renovation</u>.
 - 10 working-days (ca. two weeks) prior to start of any activity
 - MassDEP can grant emergency waiver upon request

Asbestos Project Look-up Tool



For More Information:

- MassDEP Asbestos Regulation July 2019: https://www.mass.gov/doc/310-cmr-715-massdep-asbestos-regulation/download
 - Questions about Asbestos Regulations and Policy: Mike Elliott, email: michael.elliott@mass.gov, telephone: 617/571-0824
- Regional MassDEP Asbestos Contacts: Technical Questions
 - Central: Christa Cronk, christa.cronk@mass.gov, 508-965-5267
 - Northeast: Grady Dante, grady.dante@mass.gov, 978-921-1152
 - Southeast: Colleen Ferguson, <u>colleen.ferguson@mass.gov</u>, 617-680-6657
 - Western: John Moriarty, john.Moriarty@mass.gov, 857-443-5348
- Find your region: https://www.mass.gov/service-details/massdep-regional-offices-by-community
- Asbestos Project Lookup Tool (via EEA Data Portal): https://eeaonline.eea.state.ma.us/portal#!/search/asbestos
- Asbestos Survey Requirements Guide: https://www.mass.gov/doc/asbestos-survey-requirements-prior-to-demolition-or-renovation-information-guide/download
- MassDEP Asbestos Website: http://mass.gov/dep/asbestos
- Department of Labor Standards (DLS)
 - Information, Licenses, Complaints......617/626-6960
 - DLS web site: https://www.mass.gov/asbestos-safety-program

References:

- USEPA Asbestos Website: https://www.epa.gov/asbestos
- Asbestos Training Requirements: <u>https://www.epa.gov/asbestos/asbestos-training</u>
- OSHA Asbestos Fact Sheet: <u>https://www.osha.gov/sites/default/files/publications/OSHA3507.pdf</u>
- Agency for Toxic Substances and Disease Registry (ATSDR) Asbestos and Your Health: https://www.atsdr.cdc.gov/asbestos/index.html
- Consumer Product Safety Commission Asbestos in the Home: https://www.cpsc.gov/safety-education/safety-guides/home/asbestos-home
- MassDEP Asbestos Website: <u>http://mass.gov/dep/asbestos</u>
- Massachusetts Department of Labor Standards Website: https://www.mass.gov/asbestos-safety-program