



Department of Environmental Protection

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Asbestos Inspection Protocol Revision Statement

Asbestos Inspector Qualifications/Training at C&D Processors and Large C&D Transfer Stations

March 23, 2022

To better align the qualifications and training requirements of a C&D Handling Facility Asbestos Inspector with the job function defined in the “Asbestos Inspection Protocol for C&D Processing Facilities and Large C&D Transfer Stations,”¹ MassDEP revised the “Asbestos Inspector Qualifications” specified in the “Asbestos Inspection Protocol.” Effective May 1, 2017, the protocol no longer requires the individual who performs ongoing inspections on inbound C&D waste loads to possess a valid and legible Massachusetts DLS Asbestos Inspector Certification Card (photo ID) issued by DLS pursuant to 454 CMR 28.00. (Please note that the “Asbestos Inspection Protocol” only applies to in-house staff at C&D Processing Facilities and Large C&D Transfer Stations. This revision does not apply to individuals who conduct “Third-Party Inspections” as specified at 310 CMR 19.018.)

Notwithstanding the relief from the requirement of possessing a valid DLS Asbestos Inspector Certification ID Card, **MassDEP believes that the Classroom Training requirements for the traditional “Asbestos Inspector” (both initial and annual refresher training) are still the best options currently available to train an individual who will inspect inbound C&D waste loads at a C&D Waste Handling Facility to properly recognize and identify ACM and Suspect ACM.** If an alternative training curriculum were to be developed by a DLS-certified Training Provider specific to inbound C&D waste load inspectors at C&D Waste Handling Facilities, the MassDEP BAW Solid Waste Division may, after review, approve such a curriculum as an acceptable alternative to the current Asbestos Inspector Initial and Refresher training.

Given that building materials containing ACM or Suspect ACM in inbound C&D waste loads may often be altered from their original appearance and hard to recognize when the load arrives at the C&D Waste Handling Facility, MassDEP believes that “On-The-Job” (O-T-J) training under an experienced inbound C&D waste load inspector at a C&D Waste Handling Facility is as important as the classroom training.

¹ For a traditional “Asbestos Inspector” engaged prior to a building demolition or renovation project, their job function is “to determine and document the presence and condition of known or suspect ACM [asbestos-containing material] in facilities,” in other words, to generate written inspection reports documenting the presence, quantity and condition of ACM in built structures. For a person inspecting inbound waste loads at a C&D Waste Handling Facility, their job function is “to identify and prevent the acceptance, improper handling, and processing of ACM at the Facility.” So while the respective job functions exhibit some similarities; they are not entirely the same, nor do they serve the same purpose. Therefore, it is appropriate that they would have separate training/qualification requirements.

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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So, in addition to the classroom training requirements specified above, the individual inspecting inbound waste loads at a C&D Waste Handling Facility will need to demonstrate that he/she received a minimum of 40 hours O-T-J Training under an experienced incoming C&D waste load inspector.

In accordance with the protocol revisions outlined above, C&D Waste Handling Facilities shall demonstrate compliance with the revised requirements as follows: **For each individual whose job description includes inspecting inbound C&D waste loads to prevent the acceptance, improper handling, and processing of ACM at the C&D Handling Facility, the following documentation shall be maintained at the facility and be readily available for inspection:**

- a) **A Certificate of Completion issued by a DLS certified Asbestos Training Provider for having successfully completed the Initial Asbestos Inspector training** as specified in 454 CMR 28.05(4)(c); and
- b) **A Certificate of Completion for the current 12-month period issued by a DLS certified Asbestos Training Provider for having successfully completed the Annual Refresher Asbestos Inspector training** as specified in 454 CMR 28.05(5)(c); and
- c) **A record of having completed 40 hours of On-the-Job (OTJ) training under an experienced incoming C&D waste load inspector at said C&D Handling Facility** that covers (1) how to identify ACM and suspect ACM in incoming C&D waste loads, and (2) what actions must be taken under the facility-specific Asbestos Inspection Protocol after a Suspect ACM or ACM is identified.

MassDEP believes that this protocol revision improves both the minimum experience requirements and the training requirements so that they are more relevant for the specific job function performed by in-house staff who perform the inbound C&D waste load inspections at C&D Waste Handling facilities. Plus, they clarify the required training documentation to be maintained and available for inspection at the facility. MassDEP believes this revision helps ensure that properly qualified individuals are serving in the critical function of preventing the acceptance, improper handling, and processing of ACM at C&D Waste Handling Facilities.

If you have any questions about this protocol revision, please do not hesitate to contact the MassDEP statewide C&D program coordinator, Michael Elliott, at 617-292-5575 or by email at michael.elliott@mass.gov.