



Department of Environmental Protection

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Frequently Asked Questions About the Revised MassDEP Asbestos Regulation (310 CMR 7.15) June 19, 2015 (Revised August 1, 2017)

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Asphaltic Roofing and Siding Materials.

1. Do I need to conduct a pre-demolition/renovation asbestos survey prior to the removal of asphalt roofing and siding materials that contain asbestos?

- Yes. Asphalt roofing and siding materials (including shingles, roofing felt and tar) are considered to be “Suspect Asbestos-Containing Material” and must be inspected by a Department of Labor Standards (DLS)-certified asbestos inspector before the project starts. The asbestos inspector will determine whether the material contains any asbestos. The inspector can take samples of the material and have them analyzed by a laboratory certified by DLS. If found to contain 1% or more asbestos, then the roofing or siding materials is, by definition, Asbestos Containing Material (ACM).

- Alternatively, if one chooses to forego sampling, then the asbestos inspector must presume that the asphalt roofing or siding material is ACM and identify it as such in the written survey report.

2. Do I need to file a BWP AQ 04 Asbestos Notification Form (ANF-001) for the removal of asphalt roofing and siding materials that contain asbestos?

- Yes. A BWP AQ 04 Asbestos Notification Form (ANF-001) must be filed for the project 10 working days before the roofing or siding material is removed or otherwise disturbed if the material meets the definition of ACM or is presumed to be ACM. For more information on filing the ANF-001, see: <http://mass.gov/dep/asbestos>
- If after proper sampling and analysis, the analytical report confirms that none of the materials contains 1% or more asbestos, then the materials do not meet the definition of ACM and no notification is required prior to the removal or disturbance of the roofing and siding materials.
- However, if the waste asphalt roofing and siding material is found to contain, or is presumed to contain, any amount of asbestos (even less than 1%), and the owner/operator is unable to obtain permission to dispose of the material as a solid waste in a landfill permitted under the MassDEP Solid Waste regulations 310 CMR 19.000, then the material must be managed as Asbestos Containing Waste Material (ACWM) and disposed of in a landfill permitted to accept ACWM as a “Special Waste”. In this scenario, irrespective of whether notification was required on the front-end of the project prior to removal of the roofing and siding material, then at a minimum, on the back-end of the project, a “disposal-only” notification is required 10 working-days prior to disposal as ACWM.

3. Do I need to hire a DLS-licensed asbestos abatement contractor to remove asphalt roofing and siding materials that contain asbestos?

- A person who removes asphalt roofing or siding does not need to hold an Asbestos Abatement Contractor License from the DLS as long as the work that breaks, shears, or slices the non-friable asphalt roofing and siding materials does not produce asbestos dust or make the material friable [See DLS’s regulation, 453 CMR 6.13(2)(a)5]] and the work is performed in accordance with MassDEP 310 CMR 7.15.
- Workers performing this work need to be trained in accordance with applicable OSHA requirements, but there are no DLS asbestos license or certification requirements for the workers, as long as the material remains non-friable. If the material becomes friable during the project, or asbestos dust is released, then DLS requires the use of a licensed asbestos abatement contractor who employs DLS-certified asbestos supervisors and

workers, and the use of safe work practices.

- Please note that this response only summarizes the requirements as pertains to DLS (453 CMR 6.00). Other federal, state or municipal agencies may have their own requirements that apply to asphalt roofing and siding projects.
- i.* The response to this question was provided by DLS. For more information about the DLS asbestos regulations, please see the DLS website: <http://www.mass.gov/lwd/labor-standards/>

4. What kinds of cutting machines may be used to remove asphalt materials containing asbestos (e.g., roofing/siding shingles and felts)?

- Asphalt roofing/siding shingles and felts containing asbestos should be removed intact to the greatest extent feasible.
- If the material needs to be cut, any cutting machine equipped with a HEPA vacuum (which captures dust produced by the cutting process) may be used. Examples include manual and electric saws and shears. Additionally, where cutting machines are used to remove asphalt roofing/siding shingles and felt materials, the materials shall be adequately wetted throughout the cutting process. A cutting machine that is not equipped with a HEPA vacuum may be used, but only inside containment that is sufficient to prevent the release of visible dust to the outside air. However, containment for a roofing project is not generally considered practical or safe. [See 310 CMR 7.15(10)(e)].
- i.* Note: Dust produced by power roof cutters operating on aggregate surfaces shall be removed by HEPA vacuuming. Dust produced by power roof cutters operating on non-aggregate, smooth surfaces shall be removed by HEPA vacuuming or wet wiping along the cut line.

5. Do asphalt roofing and siding materials that contain asbestos have to be kept wet while they are being removed?

- Wetting is required when:
 - Removing asphalt shingles and felts that are already broken or that get broken during the project; or
 - Cutting machines are being used.

(Note: Broken [non-intact] shingles must be kept wet while they remain on a roof.)

6. How should asphalt shingles and felts that contain asbestos be lowered to the ground?

- They should be carried or passed to the ground by hand, lowered by a crane or hoist, or transferred in dust-tight chutes. Do not throw or drop asbestos-containing shingles and felts to the ground.

7. Where can asbestos-containing asphalt roofing and siding materials be disposed?

- If the work practice requirements specified in 310 CMR 7.15(10) are followed, asbestos-containing asphaltic roofing and siding may be disposed of in any landfill permitted by the Department to accept solid waste pursuant to 310 CMR 19.000. If the asbestos-containing asphaltic roofing and siding are not handled in accordance with this section or if the Department has determined that asbestos fibers may be released during handling, removal or disposal, then the materials shall be disposed of in a landfill that has obtained a special waste permit to accept asbestos wastes or is managing such wastes in accordance with 310 CMR 19.061. By way of example:
 - Asphaltic roofing and shingles that are removed carefully in accordance with the work practices specified at 310 CM 7.15(10) can be disposed at a permitted landfill as “solid waste”
 - By contrast, fire damaged asphaltic roofing and siding, or roofing and siding broken apart by a mechanical excavator are both examples of materials not handled in accordance with the requirements of the work practice standards, and therefore they must be managed as ACWM and disposed at a landfill permitted to accept ACWM Special Waste.
- Fines and dust that are collected in the HEPA filter of the vacuum machine used with the cutting equipment must be removed during the decontamination of the equipment and must be disposed of as ACWM. This material must be kept adequately wet, containerized and sealed in leak-tight containers, and disposed of in a landfill that has obtained a “Special Waste” permit to accept asbestos wastes [See 310 CMR 7.15(17)].

8. Can you bulk load asbestos-containing roofing debris without a Non-Traditional Asbestos Abatement Work Practice Approval?

- A Non-Traditional Asbestos Abatement Work Practice Approval is not required for bulk loading of asbestos-containing asphaltic roofing and siding if the work practice requirements specified in 310 CMR 7.15(10) are followed.

- By contrast, a Non-Traditional Asbestos Abatement Work Practice Approval is required for bulk loading of asbestos-containing roofing and siding material if the work practices required by 310 CMR 7.15 (10) are not followed (for example, during a demolition project, rather than systematically cutting the roof into pieces using HEPA-equipped cutting machines and carefully lowering the pieces to the ground for bulk loading, an excavator is used to break apart the roof and load the roof debris directly into bulk containers).

Floor Tile

1. Is the use of abrasive blasting to remove floor tile and related mastics permitted under the new regulations?

- Abrasive blasting using traditional wet methods is allowed provided it is done in compliance with the “General Asbestos Abatement Work Practice Standards” (310 CMR 7.15(7)), which include but are not limited to wetting, work area isolation, containment and ventilation system requirements to prevent visible emissions at all times. Under certain conditions (namely when it can be shown that use of traditional wet methods would unavoidably damage equipment or present a safety hazard), MassDEP may approve a Non-Traditional Asbestos Abatement Work Plan permit on a facility-specific basis for the use of “dry” abrasive blasting at that specific location provided that the work is done under full containment equipped with work area ventilation systems, and dust generation is minimized inside in the work area through the liberal use of area misters.
- Abrasive blasting may NEVER be used to remove asbestos-containing floor tile and related asbestos-containing mastics if the work area is 100 square feet or less, which is defined as Incidental Maintenance [310 CMR 7.15 (13)]. Please note that in addition to the prohibition on abrasive-blasting, the Incidental Maintenance work practice standard in the regulation also prohibits sanding, dry-sweeping, dry-scraping, drilling, sawing, mechanical chipping or pulverization during removal work. Please see the “Floor Tile” Section Question 2 below for more information on incidental Maintenance.

2. The specific requirements for removal of asbestos floor tile as an Incidental Maintenance Project indicate that floor tiles must be removed in a manner which minimizes breakage. Can you clarify “minimizes breakage”?

- The goal is to remove the floor tiles in an intact state to the maximum extent feasible. [310 CMR 7.15 (13)(b)2.]

- While the regulation does not define “minimal breakage”, the specific work practices prescribed in the “Incidental Maintenance” section are designed to limit breakage as floor tiles are removed:
 - Use hand scrapers or similar hand-held tools to pry up individual floor tiles. The use of tools that are likely to break floor tiles—e.g., spud bars or ice breakers—is prohibited.
 - Where tiles do not readily release from the underlying mastic, you can strike the removal tool with a hammer to facilitate the tile’s release.
 - Surfaces may be heated with a heat gun or other heat source to soften the adhesive and facilitate tile removal.

3. How is a single 9” x 9” vinyl asbestos floor tile that “pops” up and needs to be removed regulated in Massachusetts?

- You do not need to notify the MassDEP of the removal of one 9” x 9” asbestos-containing tile [*Notification Exemption for Incidental Maintenance Projects or Work*, 310 CMR 7.15 (6)(f)2.], as long as you follow the work practices described in the response to the “Floor Tile” Question 2 above.
- Intact and unbroken vinyl asbestos tiles (VAT) can be disposed of at any Massachusetts landfill permitted by MassDEP to accept solid waste, or at any out-of-state landfill permitted to accept solid waste from the environmental permitting authority in the state in which the landfill located.
- Non-intact VAT (i.e. broken, shattered, crumbled, pulverized or otherwise deteriorated) and any other types of asbestos-containing floor tile debris must be managed as Asbestos-Containing Waste Material (ACWM). Requirements for managing ACWM include: packaging [310 CMR 7.15 (15)], transport [310 CMR 7.15 (16)], storage and disposal [310 CMR 7.15 (17)], and waste shipment records and reports [310 CMR 7.15 (18)].

4. How does the quantity of “related asbestos-containing mastics” relate to the notification exemption for projects involving 100 square feet or less of asbestos-containing floor tile and related mastics? Does the exemption cover 100 square feet of floor tile plus the related mastics, or is it limited to 50 square feet of floor tile if the tile is completely underlain with asbestos-containing mastic?

- *Incidental Maintenance* for asbestos-containing floor tile is defined as the “removal or disturbance of...100 square feet or less of asbestos-containing floor tile and related

asbestos-containing mastics.” This exemption is based on the amount of work area disturbed, not the sum of the individual layers (tile and mastic). So, a project that removes a total area of 100 square feet or less of floor tile along with its related mastic compounds is eligible for the incidental maintenance notification exemption [310 CMR 7.15 (6) (f) 2.].

Non-Traditional Asbestos Abatement Work Practice Approvals

1. How do I apply for a Non-Traditional Asbestos Abatement Work Practice Approval?

- Use the MassDEP form BWP AQ36 Application for Non-Traditional Asbestos Abatement Work Approval, which is available on the MassDEP website. For more information on filing the BWP AQ36, see: <http://mass.gov/dep/asbestos>

Survey Requirements

1. What do I need to do to satisfy the asbestos survey requirement before demolishing or renovating a facility or portion of a facility?

- Before starting any demolition or renovation activities at a facility that contains Suspect ACM, you must hire an asbestos inspector who has been certified by DLS to conduct a thorough inspection of the facility, or that portion of the facility where the demolition or renovation will occur, to identify the presence, location and quantity of any ACM or Suspect ACM.
- The inspector will take samples of Suspect ACM and send them to a laboratory that has been certified by DLS for analysis. If you do not want to take samples, you can presume that Suspect ACM contains 1% or more asbestos and handle the material as ACM.
- To the extent that the survey report relies on sampling and analysis to verify the presence, location and quantity of ACM, the analysis should follow protocols established by the U.S. EPA in a report entitled “*Test Method: Method for the Determination of Asbestos in Bulk Building Materials*” (EPA/600/R-93/116, July 1993). Note: DLS establishes certification requirements for laboratories that conduct analysis of air and bulk samples in connection with asbestos-related activities. A list of DLS-certified laboratories is available on the DLS website: <http://www.mass.gov/lwd/labor-standards/>
- The results of the inspection must be memorialized in a written asbestos survey report. The report must include: an inventory of locations, dates and type of materials sampled; analytical results (which usually include the analytical methods used); the name(s) of the

person(s) who provided the analytical services; and a site map, diagram or written description of locations and quantities of identified ACM.

- The owner/operator must maintain a copy of the written asbestos survey report at the facility for at least two years. If the facility is unstaffed or if it is demolished, the owner/operator must maintain a copy at their regular place of business.

2. What materials are “Suspect ACM”?

- Structures built before 1980 are very likely to contain some building materials that contain asbestos, including “snow-man” boilers encased with hand mixed and hand-applied plaster insulation; thermal system insulation on pipes and ductwork; sprayed-on fire-retardant insulation; vinyl-asbestos tile; asphalt roofing; and cement shingles. While there is a commonly held misperception that buildings constructed after 1980 do not contain asbestos, this is not true. After successfully enacting a number of individual product bans for asbestos-containing materials in the 1980s, the U.S. EPA adopted a regulation banning all asbestos-containing materials from use in commerce in 1989; however, this rule was struck down in 1991 by the US Court of Appeals for the 5th Circuit. While asbestos ores are no longer mined or processed in the United States, thousands of products containing asbestos continue to be produced, imported, legally sold in commerce, and commonly used in building construction and industrial applications requiring management of challenging environments (e.g. extreme temperature, electric voltage, friction/wear, exposure to weather, etc.).
- MassDEP’s definition of “Suspect ACM” includes any product reasonably likely to contain asbestos based on appearance, composition and use. A partial list of product categories that might contain asbestos is listed in the regulation. It includes, but is not limited to:
 - non-fiberglass insulation (e.g. pipe, boiler, duct work, etc.),
 - cloth vibration dampers or ductwork,
 - spray-on fireproofing,
 - cement/transite shingles,
 - cement/transite pipes,
 - cement sheets (corrugated and decorative),
 - asphalt roofing or siding materials (shingles, roofing felts, tars, etc.).
 - vinyl floor and wall tiles,

- vinyl sheet flooring,
- mastic (flooring or cove base adhesive or damp proofing),
- wallboard joint compound
- plaster, and
- ceiling tiles.

3. Are there any situations where a survey of Suspect Asbestos Containing Material (ACM) is not required?

- The only time a pre-demolition/pre-renovation survey is not required is when homeowners are doing the work *themselves*, and only on non-friable ACM, at their single-family, owner-occupied homes. All other projects involving a facility or facility component containing Suspect ACM require a survey prepared by a DLS-certified asbestos inspector before conducting any demolition or renovation activities. [310 CMR 7.15 (4)]

4. Must all Suspect ACM be identified through sampling and analysis?

- No. However, Suspect ACM that is not sampled and analyzed for the presence of asbestos must be handled and disposed of as if it were ACM (310 CMR 7.15 (4)(c)). Therefore, you may presume that Suspect ACM affected by a demolition/renovation project is ACM without sampling it, but the material must be identified as ACM in the survey report and managed according to all the applicable requirements of 310 CMR 7.15.

5. If one analytical method indicates that suspect material contains less than 1% asbestos but another analytical method indicates that the material contains more than 1% asbestos, which method is considered definitive?

- Any analytical result that identifies the presence of 1% asbestos or more triggers the requirement that the material be managed as ACM.

6. If a laboratory reports an analytical result of “Non-Detect” for a sample, do you have to follow up with a more definitive analytical protocol?

- If you use a DLS-certified laboratory, and the laboratory properly follows the U.S. EPA approved analytical method (EPA/600/R-93/116 July 1993) to analyze your sample, there is no need to re-sample or re-analyze the sample in question.

Please note: Appendix D of EPA/600/R-93/116 “Special Case Building Materials” suggests that for the dominantly non-friable materials covered by that Appendix,

materials exhibiting characteristics of interfering binder/matrix, low asbestos content, or small fiber size may require additional sample treatment(s) and analysis beyond routine Polarized Light Microscopy (“PLM”). The Appendix provides examples of materials for which additional sample treatment and analysis should be considered: cementitious products (pipe, sheeting, etc.), viscous matrix products (adhesives, cements, coatings, etc.), vinyl materials (vinyl floor tile and sheeting), asphaltic roofing (shingles, roll roofing) and miscellaneous products (paints, coatings, friction plates, gaskets, etc).

7. Can you clarify how MassDEP wants “condition” reported in the asbestos survey report?

- The regulation does not specify how an owner/operator should report the “condition” of Suspect ACM in the asbestos survey report. The owner/operator may use any classification system that adequately describes its condition.

Vermiculite Insulation

1. Can vermiculite insulation contain asbestos?

- Yes. The U.S. Centers for Disease Control has stated that “[h]istorically, much of the world’s supply of vermiculite came from a mine near Libby, Montana. The Libby mine also had a natural deposit of asbestos, and the vermiculite from Libby is contaminated with asbestos.”¹
- The U.S. EPA has stated that “...the Libby mine was estimated to be the source of over 70 percent of all vermiculite sold in the United States from 1919 to 1990, and vermiculite from Libby was contaminated with asbestos...”²

2. Does all vermiculite contain asbestos?

- Most, but not all, of the vermiculite insulation that was used in homes and many other buildings in the United States between 1919 and 1990 came from a mine near Libby, Montana. The ore composition at the Libby mine is known to include a range of asbestiform minerals in the Amphibole family (the so-called Libby Amphibole Asbestos). The Libby Amphibole Asbestos was found to be a primary cause of illness to workers in the mine and nearby residents in the town. Most recently, the vermiculite insulation from the Libby mine was sold under the brand name “Zonolite.” Since the Libby Amphibole Asbestos is well documented in vermiculite that originated at the Libby mine, U.S. EPA advises people with vermiculite attic insulation to “assume that the vermiculite contains asbestos...”

¹ <http://www.atsdr.cdc.gov/asbestos/vermiculite051603.html>

² <http://www2.epa.gov/asbestos/protect-your-family-asbestos-contaminated-vermiculite-insulation>

3. What regulatory requirements apply to vermiculite insulation in Massachusetts?

- The MassDEP asbestos regulation [310 CMR 7.15 (1)] defines “Suspect Asbestos-Containing Material” as “products that have a reasonable likelihood of containing asbestos based upon their appearance, composition and use”, and lists non-fiberglass insulation as an example. Vermiculite insulation is one form of non-fiberglass insulation that is considered to be Suspect ACM due to its likely contamination with Libby Amphibole Asbestos.
- All Suspect ACM (including vermiculite insulation) that could be affected by the demolition or renovation must be identified during the pre-demolition/renovation survey [310 CMR 7.15 (4)].
- If the vermiculite insulation that could be affected by the demolition or renovation is not sampled to determine the presence of asbestos, you must assume it is ACM, identify it as ACM in the written survey report, and manage it as ACM in accordance with all the requirements of 310 CMR 7.15 [310 CMR 7.15 (4)(c)]. This conforms to the USEPA Guidance that discourages sampling and analysis, because it has yet to approve any definitive analytical methods, and recommends that you simply assume vermiculite contains asbestos and manage it as ACM.
- If, as part of a pre-demolition/renovation survey, you choose to sample and analyze vermiculite insulation, and you trust the validity of the results, then there are three possible outcomes that follow. (It is worth noting, however, that the USEPA has not yet identified any definitive test methods to analyze for the presence of Libby Amphibole Asbestos in vermiculite. The USEPA Guidance recommends that you simply assume vermiculite contains asbestos and manage it as ACM.) Assuming that the analytical results are valid, the three possible outcomes that that would apply to any suspect ACM are as follows:
 - a) If any sample is determined by laboratory analysis to contain 1% or more asbestos, the material must be managed as ACM and ACWM in accordance with 310 CMR 7.15.
 - b) If none of the samples is determined by laboratory analysis to contain 1% or more asbestos but at least one sample is found to contain asbestos in concentrations of less than 1%, then the work practice requirements in 310 CMR 7.15 do not need to be followed (although it is advisable to do so), but waste material must be managed as ACWM in accordance with the requirements of packaging [310 CMR 7.15 (15)], transport [310 CMR 7.15 (16)], storage and disposal [310 CMR 7.15 (17)], and waste shipment records and reports [310 CMR 7.15 (18)].

- c) If all the sample results are reported as “non-detect” levels of asbestos in the surveyed materials, then the asbestos regulations do not apply. Please note that, in this circumstance, the solid waste facility to which you send the demolition/renovation debris for disposal may ask for documentation that the suspect ACM was sampled for asbestos and that all sample results were reported to be “non-detect”. This will ensure that the solid waste facility that receives your material will be able to comply with the terms of its MassDEP permit, which does not allow the facility to accept any material containing asbestos.

4. What does MassDEP consider to be “adequate” or “representative” sampling of vermiculite insulation?

- MassDEP’s regulation for the pre-demolition/renovation survey [310 CMR 7.15(4)] does not specify particular sampling methods or protocols. However, the regulation defines an “Asbestos Survey Report” to be “a written report resulting from a **thorough inspection** using EPA approved procedures and methods, or an alternate asbestos inspection method that has received prior written approval from the Department.” (emphasis added)
- When vermiculite insulation is contaminated with asbestos, the asbestos minerals are not distributed evenly throughout the material, making representative sampling extremely challenging. To date, U.S. EPA has not established methods or protocols for analyzing samples (including bulk samples) of vermiculite insulation to definitively determine their asbestos content.³
- Other variations in asbestos content result from aging of the insulation material: as the material ages, it tends to stratify, with fine particles falling to the lowest point in the insulating layer or cavity. Additionally, a building that has been renovated at different times in the past may contain vermiculite insulation that exhibits variations in asbestos content in different parts of the structure. Therefore, if you choose to characterize vermiculite insulation through sampling, your proposed sampling plan must include an adequate number of samples from multiple locations and depths of the insulation to ensure that the sampling will represent the differences that may be present in the material considering the building’s history, and it must include the bottom of the cavity containing the vermiculite insulation or wherever the fine particles are likely to accumulate.

³ See U.S. EPA’s “Office of Superfund Remediation and Technology Innovation – Asbestos Compendium of Technical Resources” at http://www.epa.gov/superfund/asbestos/compendium/samp_anal.html and U.S. EPA’s “Office of Enforcement and Compliance – Applicability Determination Index” at <http://cfpub.epa.gov/adi/>.

5. If my vermiculite insulation contains 1% or more asbestos, do I need to obtain a “Non-Traditional Asbestos Abatement Work Practice Approval” from MassDEP to remove it?

- If the vermiculite insulation at your renovation/demolition project contains 1% or more asbestos, or if you choose to manage it as presumed ACM, and you cannot avoid disturbing it, then you need to follow the MassDEP Asbestos Regulation requirements for notification, work practices, and waste handling/disposal (310 CMR 7.15). If you need to deviate from certain regulatory requirements and your project’s situation meets one or more of the criteria that make it eligible for a Non-Traditional Asbestos Abatement Work Practice Approval (for example, your project is a state or local government agency- ordered demolition of a structurally unsound facility or the project will require bulk loading of ACM and/or ACWM) you will need to obtain a Non-Traditional Asbestos Abatement Work Practice Approval from the appropriate regional MassDEP office. Please note that applications for a Non-Traditional Asbestos Abatement Work Practice Approval need to contain a demonstration that the alternative work practices that you are proposing will not cause any visible emissions to the outside air, and will not pose significant risk to public health, safety, or the environment [310 CMR 7.15(14)(d)(3.)] For more information on filing the BWP AQ36 Non-Traditional Asbestos Abatement Approval Application, see: <http://mass.gov/dep/asbestos>
- If the vermiculite insulation at your project is determined to contain less than 1% asbestos based on a definitive laboratory analysis of representative samples of the vermiculite, then the work practice requirements in 310 CMR 7.15 do not necessarily need to be followed (although it is advisable to do so). However, once the material is removed and becomes a waste, it must be managed as ACWM with respect to packaging, transportation and disposal. And just as with the case above, any bulk loading of ACM or ACWM for disposal, regardless of the asbestos content, requires a Non-Traditional Asbestos Abatement Work Practice Approval.

6. Is any financial assistance available for removal of vermiculite attic insulation?

- As part of a settlement with the U.S. EPA for contamination from the vermiculite mine in Libby, Montana, the W.R. Grace Company has established the “Zonolite Attic Insulation Trust”, which provides some financial assistance for owners of residential and commercial buildings in which this insulation was installed. Please see <http://www.zonoliteatticinsulation.com> for information on what the Trust can provide.

Window Painting and/or Repair Work

1. Does MassDEP require that any disturbance of asbestos-containing window glazing and/or caulking compounds be done under “full” containment?

- MassDEP has established specific requirements for window painting and repair work that will disturb glazing or caulking compounds containing 1% or more asbestos that include alternatives to full containment to prevent the release of asbestos fibers in the building and the exterior area around the jobsite [310 CMR 7.15(11)]. Be sure to check the regulation for the full list, but some important elements include:
 - Close openings on the side of the building where work is being performed;
 - Spread tarpaulins or plastic sheeting on ground below the work area;
 - If an entire sash is to be removed, seal the window with plastic sheeting on the inside;
 - Keep glazing compound and caulk adequately wet with amended water before removing it (Note: amended water means water with soap/surfactant added to prevent generation of visible dust);
 - Keep all waste adequately wet. Collect waste and seal it in a leak-tight container, and dispose of it in accordance with requirements pertaining to packaging [310 CMR 7.15 (15)], transport [310 CMR 7.15 (16)], storage and disposal [310 CMR 7.15 (17)], and waste shipment records and reports [310 CMR 7.15 (18)].

2. How do I handle a window glazing or caulking compound that contains less than 1% asbestos?

- Window glazing or caulking compound containing less than 1% asbestos does not meet the definition of an “Asbestos-Containing Material (ACM)” and therefore its removal from a window is not subject to the work practice requirements for window painting and/or repair work described in the response to the “Window Section” Question 1 above. If you are disturbing window glazing or caulking compound containing less than 1% asbestos, you may still elect to follow these work practice requirements to minimize the risk of asbestos exposure to workers and members of the public.
- Waste that includes removed pieces of window glazing or caulking compound containing any amount of asbestos is classified as “Asbestos-Containing Waste Material (ACWM),” and must be managed in accordance with requirements pertaining to packaging [310 CMR 7.15 (15)], transport [310 CMR 7.15 (16)], storage and disposal [310 CMR 7.15 (17)], and waste shipment records and reports [310 CMR 7.15 (18)].

Revision Tracking

For more information on the topics covered by these FAQs or other asbestos questions, please contact Mike Elliott in MassDEP's Bureau of Air and Waste (michael.elliott@state.ma.us or 617-292-5575).

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