



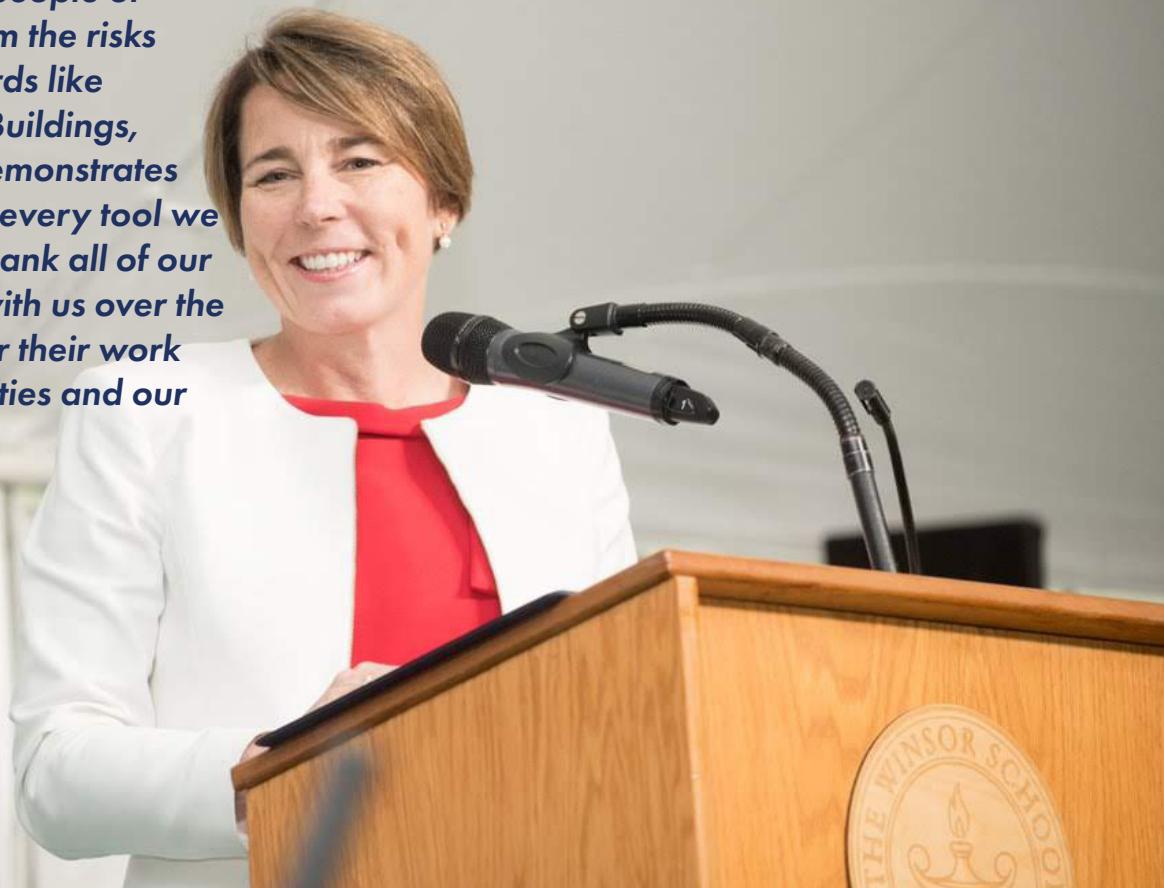
HEALTHY BUILDINGS HEALTHY AIR

2019 ASBESTOS INITIATIVE REPORT



**OFFICE OF MASSACHUSETTS
ATTORNEY GENERAL MAURA HEALEY**

My office and I are working every day to keep the people of Massachusetts safe from the risks of environmental hazards like asbestos. The Healthy Buildings, Healthy Air initiative demonstrates our commitment to use every tool we have to do just that. I thank all of our partners for standing with us over the last three years, and for their work to protect our communities and our residents in the future.



EXECUTIVE SUMMARY

In March 2017, Attorney General Maura Healey announced her [Healthy Buildings, Healthy Air Initiative](#), which focuses the resources of the Attorney General's Office on enhancing protections for the people most at risk from the harms of asbestos exposure. The Initiative includes targeted enforcement efforts, stakeholder communication and education, and national advocacy to achieve these goals.

This report highlights the work of the Attorney General's Office under the Initiative over the past three years and describes the office's ongoing efforts to ensure that Massachusetts remains a national leader in protecting its residents and environment from the harms of asbestos.

Asbestos is a mineral fiber that is used in a wide variety of building materials, from roofing and flooring, to siding and wallboard, to caulking and insulation. And while some uses of asbestos have been limited by legislation or standard practices over the last 50 years, materials containing asbestos can often still be found in many buildings, particularly older ones.

There is broad consensus that the asbestos that remains in many of our homes, schools, and workplaces can be dangerous under certain circumstances. For example, if asbestos is improperly

handled or maintained, fibers can be released into the air and inhaled, potentially resulting in life-threatening illnesses, including asbestosis, lung cancer, and mesothelioma. Asbestosis is a serious, progressive, long-term non-cancer disease of the lungs for which there is no known effective treatment. Mesothelioma is a rare form of cancer that is found in the thin membranes of the lung, chest, abdomen, and heart, that may not show up until many years after exposure, and that has no known cure, although treatment methods are available to address the effects of the disease.

Among the Initiative's accomplishments, the Attorney General's Office has taken action to enforce the Commonwealth's clean air law that governs proper management and disposal of asbestos during building construction and demolition projects. We resolved numerous cases involving violations that affected people in our communities who are the most at-risk for harm—including violations at schools and community centers and in environmental justice neighborhoods. Since the start of the Initiative, the Attorney General's Environmental Protection Division has secured judgments for violations of asbestos laws totaling more than \$3.4 million in penalties in addition to court orders requiring proper asbestos abatement, license forfeiture by unqualified asbestos contractors, additional training requirements for contractors, property audits, and public service announcements. Many of these cases arose from investigations initiated by our enforcement partners at the Massachusetts Department of Environmental Protection (MassDEP).

The Initiative also took on the issue of asbestos safety in schools under the Asbestos Hazard Emergency Response Act (AHERA), the federal law enacted in 1986 requiring schools to identify and address asbestos hazards. After [U.S. Senator Edward Markey issued a report](#) identifying deficiencies in the efforts by schools across the country to gather and make available information about asbestos maintenance in the manner AHERA requires, AG Healey convened a stakeholder group of school organizations and state agencies to inform cooperative solutions to improve monitoring and maintenance of asbestos in Massachusetts schools. This stakeholder meeting resulted in the creation of one of the [first publicly-accessible statewide databases of school-related asbestos information](#). At the same time, the Attorney General's Office also continued its efforts to educate the public about asbestos with the launch of a [targeted website](#) and distribution of accessible information about asbestos at outreach events throughout the state.

AG Healey, working with several other state attorneys general, is leading the way to push for stricter federal protections from the harms caused by asbestos exposures. When the United States Environmental Protection Agency (EPA) announced that it would curtail its evaluation of the risks posed by asbestos under the recently strengthened federal Toxic Substances Control Act (TSCA), [AG Healey led a coalition of 10 states and the District of Columbia in opposing the agency action](#). AG Healey also led 15 states in petitioning EPA to [close loopholes in the reporting required of manufacturers and importers of asbestos products](#) and [sued EPA when it failed to close the loophole](#). Most recently, AG Healey is leading a coalition of 18 states [in support of new national legislation](#) to ban outright asbestos import and use in the United States.

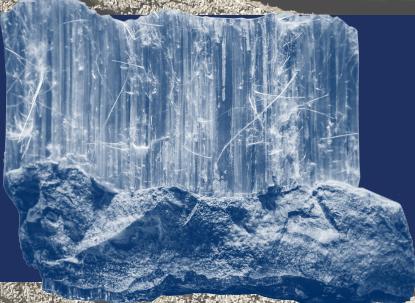


Now, building upon these efforts over the last three years, the Attorney General's Office is continuing its work to protect the public from the risks of asbestos and illegal asbestos work, including:

- Providing public outreach and education about asbestos online and at public events.
- Bringing enforcement actions against those who break the law, endangering our most vulnerable residents.
- Taking action to ensure that the federal government carries out its role in regulating asbestos safely and effectively.

The Attorney General's Healthy Buildings, Healthy Air Initiative is achieving real benefits for workers, residents, school communities and families, and we're continuing to build on the success of our first three years.

ASBESTOS BY THE NUMBERS



Asbestos refers to **6** naturally occurring fibrous minerals—chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite. Because asbestos fibers are strong and can withstand fire, heat, and acid they are often used in building materials, from roofing and flooring, to siding and wallboard, to caulking and insulation.¹

At least **12,000 to 15,000** Americans die from illness related to asbestos exposure each year.³

3 of the most common illnesses are: asbestosis, lung cancer, and mesothelioma. These illnesses typically result from inhaling asbestos fibers, which can be released into the air if asbestos is improperly handled or maintained.²



At least **50** countries worldwide have banned asbestos. The United States is not one of them, although the United States banned new uses of asbestos in 1989.⁴

As of 2015, the United States imported **343** tons of asbestos annually, nearly all from Brazil and Russia.⁵ Brazil banned the production, distribution, and use of asbestos in 2017.⁶



0: the amount of asbestos that has been determined to be safe for inhalation.⁷

PROTECTING THOSE AT-RISK THROUGH ENFORCEMENT ACTIONS

One major goal of AG Healey's Initiative is to better protect the people most at risk for asbestos-related illnesses. The Attorney General's Office prioritizes asbestos enforcement cases that affect people who are least able to avoid exposure. We work with our partners at MassDEP to focus on these cases. Under state and federal law, those performing demolition or renovation work involving asbestos generally must provide notice to MassDEP before starting work, perform the work using licensed abatement companies employing proper work practices, have the work area surveyed and cleared by a certified consultant, and transport and dispose of the all asbestos-contaminated waste material using proper methods in special waste facilities. We pursue enforcement actions when those standards are not met.

Asbestos removal, handling, and disposal violations frequently happen in places where asbestos is still present in older buildings, like low- and moderate-income neighborhoods, schools, publicly-supported housing, and nursing homes. The Initiative focuses on cases where asbestos-related violations and exposure affect seniors, students, school staff, the residents of environmental justice communities,⁸ and renovation and demolition workers.

Over the last three years, the Attorney General's Office has won judgments against 35 defendants imposing a total of up to \$3,413,700 in penalties under the Massachusetts Public Health Law, G.L. c. 111, §§ 142A-O, and requiring violators to clean up contaminated buildings, forfeit their asbestos licenses, perform asbestos audits of their properties, and comply with other court orders to prevent asbestos exposure at work sites.

IN HOMES

Many asbestos enforcement cases handled by the Attorney General's Office involve illegal asbestos work in private homes, including single-family houses, double- and triple-deckers, and larger housing complexes. These cases are often located in environmental justice communities where the cost of legal abatement may have outpaced home values and where non-primary English speakers may not be aware of asbestos warnings and information presented only in English. In these cases, asbestos-related violations and exposure often arise from home renovations, including replacement of exterior siding and roofing, installation of vinyl siding over asbestos-containing siding, removal of or damage to historic flooring materials, and replacement and removal of boilers and heating pipes covered in asbestos insulation. If this work is performed illegally, it can present significant exposure risks.

The Massachusetts Executive Office of Energy and Environmental Affairs

2017 Environmental Justice Policy defines environmental justice as "the principle that all people have a right to be protected from environmental hazards and to live in and enjoy a clean and healthful environment regardless of race, color, national origin, income, or English language proficiency. Environmental justice is the equal protection and meaningful involvement of all people and communities with respect to the development, implementation, and enforcement of energy, climate change, and environmental laws, regulations, and policies and the equitable distribution of energy and environmental benefits and burdens."



AT DEMOLITION SITES

Enforcement under the Initiative often involves illegal demolition work, particularly at larger commercial or industrial facilities. Owners of these sites may not have been present at the site or attentive enough in their oversight, or they may not understand or be aware of the potential for harm. If conducted without required precautions, complete demolition of large buildings can send significant amounts of asbestos fibers into the air and contaminate the soil nearby. This illegal work endangers workers who may not have been properly informed of the risks, as well as the public, especially in busy urban areas.

IN SCHOOLS

Asbestos unfortunately remains prevalent in many private and public schools, in large part because of the cost of abatement and the limits of school budgets. Special federal rules apply to the maintenance and monitoring of asbestos in schools under AHERA. The Attorney General's Office is especially concerned about illegal work that takes place at schools, where children and caregivers may be present, and has worked to help provide schools and parents with the tools to ensure that asbestos is maintained safely and to enforce the law against companies that perform work in violation of these safeguards.



If asbestos is not handled properly, it can pose serious health risks. We hold accountable those who put the health of workers and residents at risk by allowing illegal mishandling of asbestos – especially those in environmental justice neighborhoods. My office prioritizes work in low-income communities where shoddy and dangerous work is far too prevalent.



NOTABLE CASES

COMM. V. RONALD OLIVEIRA

New Bedford

Following a referral from MassDEP, the Attorney General's Office filed a civil lawsuit against Ronald Oliveira of Acushnet and his real estate trust. We alleged that he was responsible for asbestos violations at four different residential properties he or his trust owned in New Bedford. These violations included illegal exterior siding renovation at occupied homes that left asbestos-containing waste on the ground around the houses in densely-populated environmental justice neighborhoods. We also alleged that Mr. Oliveira was responsible for breaking asbestos ceiling tiles, which were left exposed while workers worked in and around the building, and that Mr. Oliveira allowed painters to powerwash an asbestos-sided house, covering themselves, the yard, and nearby toys and vehicles with asbestos.

In 2016, the Suffolk Superior Court entered a consent judgment settling the case and imposing a \$100,000 civil penalty for violations of state asbestos laws. The consent judgment suspended \$35,000 of that penalty for two years if Mr. Oliveira complied with the consent judgment and avoided future violations. The consent judgment also required Mr. Oliveira to provide an independent audit of 20 or more of his residential properties for potential asbestos violations and safe and legal asbestos abatement at those properties if violations were found. And when those audits identified asbestos issues at several other homes Mr. Oliveira owned, he was required to abate those problems and remove the risks to his tenants and the public.

COMM. V. R.M. TECHNOLOGIES, INC., ET AL.

Tyngsborough

In early 2015, the Attorney General's Office began receiving complaints of violations of asbestos laws during extensive renovations at the Greater Lowell Technical High School in Tyngsborough. These complaints described broken asbestos-containing waste and dust left in classrooms and hallways at the school from after-hours demolition and asbestos abatement work. Witnesses also complained about other improper abatement work and abatement workers' attempts to evade supervision by the consultants hired to monitor the asbestos work. After conducting a full investigation of complaints by numerous school employees, the Attorney General's Office filed a complaint against four companies working on the renovation project, including the asbestos abatement company, R.M. Technologies, Inc., the general contractor, Consigli Construction, Co., Inc., and the two asbestos monitoring companies, Universal Environmental Consultants, Inc., and Hub Testing Laboratory, Inc.

In November 2017, the companies agreed to consent judgments with the Attorney General's Office. R.M. Technologies, Inc., forfeited its corporate license to perform asbestos work, and its president agreed not to perform asbestos work or work in a company that performs asbestos work for five years. The other three companies agreed to pay civil penalties, including: a \$195,000 penalty for Consigli Construction, Co., Inc., a \$80,000 penalty for Universal Environmental Consultants, Inc., and a \$25,000 penalty for Hub Testing Laboratory, Inc., \$10,000 of which was suspended for 3 years pending compliance with the judgment.



COMM. V. J. KERRISSEY, LLC, ET AL.

Quincy

The Attorney General's Office filed a civil lawsuit against three companies that conducted the 2014 demolition of the former South Shore YMCA building in downtown Quincy, following an investigation by MassDEP. The demolition site was adjacent to Quincy High School and the new YMCA. The lawsuit alleged that J. Kerrissey, LLC illegally demolished approximately 45,000 square feet of asbestos-containing ceiling plaster, which generated visible asbestos-containing dust that put the surrounding area at risk of exposure. The company also swept and dropped piles of dusty asbestos-contaminated waste down an exterior waste chute to an unlined dumpster by the sidewalk and performed other illegal demolition work. The Attorney General's Office sued the general contractor, Callahan, Inc., for causing or allowing some of J. Kerrissey's violations, and the asbestos monitoring company, Axiom Partners, Inc., for failing to properly identify asbestos in its survey and to properly monitor J. Kerrissey.

In July 2017, the Suffolk Superior Court entered consent judgments between the Attorney General's Office and Callahan and Axiom Partners for civil penalties of \$120,000 and \$60,000, respectively. The Court entered a default judgment against J. Kerrissey in May 2018, after the company failed to respond to the Attorney General's lawsuit, imposing a civil penalty of \$357,000.



COMM. V. DELLBROOK CONSTRUCTION, LLC AND A-BEST ABATEMENT, INC.

Lowell and Haverhill

The Attorney General's Office filed a civil lawsuit against a Quincy general contractor, Dellbrook Construction, LLC, and a Salem, New Hampshire asbestos abatement company, A-Best Abatement, Inc., alleging that they failed to safely and legally perform asbestos abatement work in a building in Lowell. This illegal work included failing to seal the area where asbestos work was occurring, using faulty equipment, and leaving asbestos-contaminated rubble dry and exposed to the air. The companies also stored dry, ripped, and unmarked bags of asbestos waste in a trailer in the parking lot near occupied apartment buildings onsite and failed to have monitors inspect their work as required by law. Additionally, Dellbrook Construction illegally damaged and removed suspected and identified asbestos-containing material at another building and in a courtyard at the Lowell property, and damaged asbestos pipe at a building redevelopment project in downtown Haverhill, which is also an environmental justice community.

On December 20, 2017, the Suffolk Superior Court entered consent judgments with Dellbrook Construction and A-Best Abatement, ordering them to pay \$140,000 and \$75,000 in civil penalties, respectively, for their violations of asbestos regulations.

COMM. V. E & F ENVIRONMENTAL SERVICES, LLC, ET AL.

Salem and Medford

After an investigation by MassDEP, the Attorney General's Office filed a civil lawsuit against four companies responsible for illegal asbestos abatement work at Pioneer Terrace in Salem, Massachusetts. Pioneer Terrace is a Salem Housing Authority apartment complex that included over one hundred apartments for elderly and disabled residents. According to the lawsuit, E & F Environmental Services, a Massachusetts asbestos abatement company, removed door frames, window frames, and exterior staircases that contained asbestos from multiple buildings without containing the area or obeying many of the rules designed to protect workers and residents from asbestos exposure. E & F also left asbestos debris inside and outside of the occupied buildings without securing it, where it presented a risk of harm to the public.

The Attorney General's Office alleged that E & F's owner, Frank Balogh, and three other companies should have been aware of E & F's illegal work and prevented it: the company hired to monitor E & F's asbestos work, TRC Environmental Corp., the general contractor, New England Builders and Contractors, Inc., and the architectural firm that oversaw the project, Blackstone Block Architects, Inc. The lawsuit also alleged that New England Builders and Blackstone for violated the Massachusetts False Claims Act by falsely certifying they complied with applicable asbestos regulations when they requested payment from the Salem Housing. The AG's Office also brought additional claims against E & F and Balogh for illegally removing asbestos-containing siding at a Medford home.

The Suffolk Superior Court entered consent judgments against all of the defendants on March 23, 2018, ordering them to pay a total of up to \$340,000 in civil penalties. The judgments also required New England Builders' owner and construction supervisor, the TRC project monitor, and all E & F employees involved in the Pioneer Terrace project, including Balogh, to take asbestos training classes.

ENSURING ASBESTOS SAFETY IN SCHOOLS

In December 2015, U.S. Senator Edward J. Markey released [Failing the Grade: Asbestos in America's Schools](#). That report raised questions about the extent to which states, agencies, and schools across the country were monitoring and safely maintaining asbestos in schools, as required by federal law. The report concluded that the scope of asbestos hazards in school buildings in the U.S. is likely widespread but remains difficult to ascertain. These problems are difficult to assess because states do not appear to be systematically monitoring, investigating, or addressing those hazards as required under AHERA. In short, little information was available, not just about whether asbestos was being maintained safely in schools, but about which schools had asbestos present at all. This information gap on a critical safety issue for the Commonwealth's children has been a major concern for the Attorney General's Office, which has taken a leading role in resolving the problem under the Initiative.



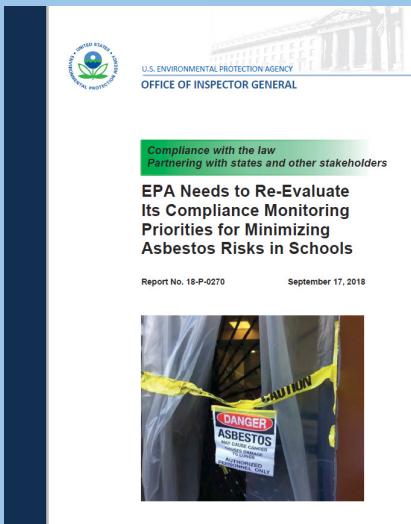
In order to begin addressing the issue, in the summer of 2016, the Attorney General's Office convened a group of stakeholder organizations to discuss the problem, including the Massachusetts Association of School Business Officials, the Massachusetts Association of School Superintendents, the Massachusetts Facilities Administrators Association, the Massachusetts School Building Authority, and the Massachusetts Department of Labor Standards (DLS). After discussing practical ways to solve the problem, the stakeholder group issued a joint letter on March 1, 2017 to all schools in the Commonwealth, asking for their help in determining where asbestos was located and whether schools were safely managing asbestos in their buildings. The letter included a few brief questions to gather that information. Over the next year, the stakeholders spoke with school systems across the Commonwealth and received responses from over 63% of Massachusetts schools.

At the same time, DLS launched a new website, called the AHERA GIS, mapping all schools in the Commonwealth. DLS uploaded the information from school responses to the March 2017 letter into the AHERA GIS. On June 7, 2018, the stakeholder group issued a second letter announcing the website and asking all schools that had not yet responded to input their information directly into the website. The AHERA GIS allows the public to view asbestos information about any school in the Commonwealth online at any time, including whether the school has asbestos in its buildings, when its most recent AHERA reporting occurred, and the contact information for the person at the school responsible for asbestos monitoring. The AHERA GIS effort is among the first in the nation to make this critical information publicly available online through a statewide resource.

Completing the inventory in the AHERA GIS will address the first major problem raised by Senator Markey's report: identifying where asbestos is located. That information can then be used to set priorities and to determine how best to help schools across the Commonwealth ensure that their asbestos is managed safely.

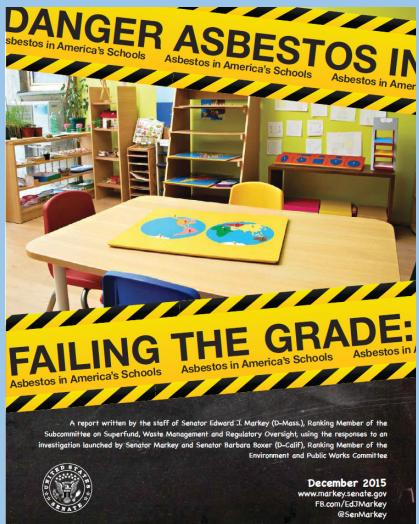
The Initiative is achieving this goal at a critical time: in September 2018, EPA's Inspector General issued a report, the second in five years, raising concerns about the agency's lax monitoring of asbestos in U.S. schools. Given this national backdrop, the progress made over the last three years through the Initiative demonstrates how much can be accomplished on critical issues through cooperative work with Massachusetts stakeholders who care about protecting students, staff, and the public from the hazards of asbestos.

ASBESTOS IN SCHOOLS



ACCORDING TO THE EPA INSPECTOR GENERAL'S 2018 REPORT

- The risk of exposure for mesothelioma is higher for children because they are more active, breathe at higher rates and through the mouth, and spend more time closer to the floor where fibers can accumulate.
- EPA does only 13% of all AHERA compliance inspections, even though EPA is the primary AHERA enforcement agency in 38 states.
- Inspections of 2 of the 10 EPA Regions found that most schools that have asbestos have some AHERA violations, but penalties are rare to avoid taxing schools short on funding.
- No EPA Region commits a single full time employee equivalent to AHERA implementation.
- 7 of 10 EPA Regions report that funding for AHERA work is insufficient.
- 5 EPA Regions inspect only when they receive tips or complaints. 8 of 10 EPA Regions see a need to perform more such inspections.

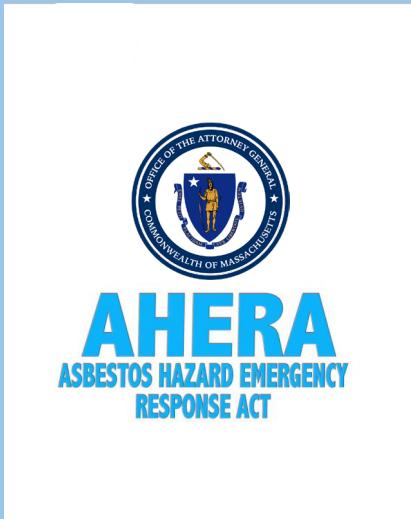


ACCORDING TO U.S. SEN. MARKEY'S 2015 REPORT

- Only 20 states responded at all to the Senator's request for information on AHERA compliance. 5 of those 20 did not respond to the specific questions asked.
- Only 12 states have a waiver to enforce AHERA themselves, and only 8 of those 12 (including Massachusetts) responded.
- Of the 15 responding states, only 3 regularly audit or inspect each school. 8 were unable to articulate a clear schedule to inspect or audit.
- 5 of 16 responding states reported that no information about AHERA compliance is reported to EPA.
- More than 53 million American children and 6 million American adults spend large portions of their days in school buildings.
- About two-thirds of school districts and other local education agencies in the 15 responding states have asbestos.

ACCORDING TO OUR MASSACHUSETTS AHERA GIS

- 63% of all local education agencies responded to the March 2017 information request with some asbestos information, including 67% of all public and charter school districts.
- Of the 2,624 schools listed on the AHERA GIS:
 - 823, or nearly one-third, report the presence of asbestos in school buildings.
 - 484 report that no asbestos is present in school buildings.
 - 1,317 either have not provided information or did not identify which of their buildings contain asbestos.



NATIONAL REFORM

Attorney General Healey is leading national efforts to compel the EPA to effectively regulate asbestos and to challenge the Trump Administration's attempts to avoid its statutory duty to protect the public from the risks of asbestos exposure.

STRENGTHENING TSCA

Beginning in 2015, AG Healey led a coalition of 12 state Attorneys General in supporting needed reform of our nation's law governing the use and management of dangerous chemicals, TSCA. This effort was designed to provide the EPA with better tools to meaningfully regulate risky chemicals like asbestos. Since its passage in 1976, TSCA has proven ineffective for regulating toxic chemicals, resulting in bans of only five toxic substances, and the notable failure to ban asbestos despite the overwhelming data supporting the need for such a ban. The Attorney General's efforts culminated with President Obama's signing the Frank R. Lautenberg Chemical Safety for the 21st Century Act into law on June 2016. These reforms strengthened TSCA in several ways, including by mandating the review of chemicals on the market and requiring decisionmaking based on health and environmental impacts, not cost.

ASBESTOS REVIEW UNDER TSCA

Currently, AG Healey is leading a coalition of 11 states to ensure that the EPA properly evaluates asbestos and other chemicals under TSCA's new rules. Under the 2016 amendment to TSCA, Congress required the EPA to assess a list of ten priority chemicals, including asbestos, and to establish requirements that ensure that the chemicals do not present an unreasonable risk of injury to health or the environment. To determine what requirements will keep people safe, Congress ordered the EPA to assess all identifiable conditions of use.

However, the EPA's current administration recently declared that its review of asbestos will ignore many of the pathways that put people at risk of harm from asbestos, including so-called "legacy uses." Practically, this means that the EPA will not consider the effects of the asbestos that is historically present in building materials in thousands of homes, schools, and other buildings across the country when it decides how asbestos should be regulated. Attorney General Healey's coalition has called out this critical defect in EPA's analysis as well as other problems in detailed formal comments on the EPA's proposed "problem formulations" filed under TSCA. As the EPA moves forward, Attorney General Healey will continue to advocate to ensure that EPA performs the full and fair safety analysis Congress mandated under the TSCA revisions.

In a related effort, working closely with California Attorney General Xavier Becerra, AG Healey also led a coalition of 15 states that petitioned EPA in January 2019 to issue new reporting rules to give the agency the information it needs to manage the significant risks to human health from asbestos. At present, the EPA does not possess, and is not collecting, the comprehensive data regarding importing, processing, and use of asbestos and asbestos-containing articles in the country that are needed both for EPA to carry out its responsibilities to protect the public health and the environment under

TSCA and for the states and the public to have access to this important information. The petition seeks to close these loopholes and require industry to report this much needed data. In April 2019, EPA denied the petition, and the coalition filed suit in the U.S. District Court for the Northern District of California on June 28, 2019 challenging EPA's denial and asking the court to compel EPA to require reporting of this critical information for avoiding potentially dangerous exposures to asbestos-containing products.

BANNING ASBESTOS

In addition to these efforts to enhance asbestos regulation nationally, AG Healey is also leading efforts to ban asbestos nationally. Thirty years ago, EPA banned asbestos, but that ban was vacated by the Fifth Circuit Court of Appeals in 1991. Now, the ["Alan Reinstein Ban Asbestos Now Act of 2019,"](#) which restores that ban on the manufacture, processing, and distribution of asbestos, is pending in Congress. A coalition of state attorneys general has weighed in strongly supporting the bill and will continue to engage with Congress as the bill progresses.

ONGOING EFFORTS

Attorney General Maura Healey will continue tackling asbestos-related problems on many fronts:

OUTREACH AND EDUCATION

The AG's Office has launched a page dedicated to educating the public about asbestos on its website, which may be found [here](#), and also provides information about asbestos requirements and risk at public events.

CONTINUING ENFORCEMENT

The AG's Office is continuing its long-standing asbestos enforcement work in collaboration with the MassDEP, handling a full docket of cases addressing asbestos violations. We are focusing on violations that put the health of workers, residents, seniors, students, and teachers at risk from asbestos hazards, particularly in environmental justice communities.

AHERA GIS

The AG's Office will continue to work with DLS to review the data collected in the AHERA GIS in order to provide assistance to school systems and their leaders as they come into full compliance with AHERA. AG Healey will continue to work to ensure that all our students, teachers, and staff are working and learning in a healthy, safe environment.

NATIONAL REFORM

AG Healey is also continuing her national leadership in fighting back against efforts by the federal government to abdicate its responsibilities to regulate asbestos and protect the public. We are working with multistate coalitions to ensure that EPA meets its legal obligations to address the hazards of asbestos and other dangerous chemicals.

ADDITIONAL ASBESTOS RESOURCES

[MA AGO Healthy Buildings, Healthy Air Initiative](#)

[MassDEP's Asbestos Program](#)

[DLS's Asbestos Program](#)

[EPA's AHERA Program](#)

MassDEP Asbestos Regulations: 310 C.M.R. 7.15

DLS Asbestos Worker Safety Regulations: 453 C.M.R. 6.00

AHERA: 15 U.S.C. §§ 2641-56

AHERA Regulations: 40 C.F.R. 763.80-99

ENDNOTES

1. Collegium Ramazzini, Asbestos Is Still With Us: Repeat Call for a Universal Ban 2 (2010); Agency for Toxic Substances & Disease Registry, U.S. Dep’t of Health & Human Servs., Toxicological Profile for Asbestos 1-2 (2001).
3. Sonya Lunder, Environmental Working Group Action Fund, Asbestos Kills 12,000-15,000 People Per Year in the U.S. (2015) <<http://www.asbestosnation.org/facts/asbestos-kills-12000-15000-people-per-year-in-the-u-s/>>.
2. National Cancer Institute, Asbestos Exposure and Cancer Risk Fact Sheet (visited Apr. 23, 2019) <<https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet>>.
4. Collegium Ramazzini, Asbestos Is Still With Us: Repeat Call for a Universal Ban 4-5 (2010); Richard A. Lemen & Philip J. Landrigan, Toward an Asbestos Ban in the United States, 2017 Int’l Journal of Envtl. Research & Pub. Health 14, 10-11 (Oct. 26, 2017).
5. Richard A. Lemen & Philip J. Landrigan, Toward an Asbestos Ban in the United States, 2017 Int’l Journal of Envtl. Research & Pub. Health 14, 2 (Oct. 26, 2017).
6. Eli Rosenberg, ‘Approved by Donald Trump’: Asbestos sold by Russian company is branded with the president’s face,’ Washington Post, Jul. 11, 2018.
7. See, e.g., Office of the Inspector General, U.S. Envtl. Prot. Agency, EPA Needs to Re-Evaluate Its Compliance Monitoring Priorities for Minimizing Asbestos Risks in Schools 2 Sept. 17, 2018.