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Asbestos 101

This newsletter is on the MDE web site: <http://www.mde.state.md.us>.

EDITOR'S NOTES...



Wye Oak, 1921, Photo by
W.R. Mattoon (Special
Collections of the National
Agricultural Library)

The Wye Oak, shown to the left, was destroyed by high winds on June 6, 2002. Why, you ask is this a note for an asbestos newsletter? Asbestos always seems to pop up in unusual places. Several years ago a mixture of Portland cement and plaster that contained asbestos was placed in the trunk of the tree. The mixture known as parget is an old method of preventing further deterioration of a tree trunk that has rot caused by moisture, fungi, and/or insects. The asbestos was bound in the mixture and was not loose. A licensed contractor removed the material last weekend. Another strange, but true story from the "Asbestos Files"!

The Air & Radiation Management Administration is scheduled to move to Montgomery Park on August 2, 2002. At least this is the current schedule. It may change, so stay tuned. Our new address for the Asbestos & Industrial Hygiene Program is: Maryland Department of the Environment, 1800 Washington Boulevard, STE 725, Baltimore MD 21230-1720. Our new phone numbers are 410-537-3200 or 410-537-3801. The toll free number is the same: 800-633-6101.

Because of the move, it will be necessary to suspend issuing the Photo Ids that are normally issued on the 1st and 3rd Tuesday of each month. This suspension will only be for August 6 & 20, 2002. I would suggest that you call and check to make sure that we are issuing the cards in September. IF the move schedule should change, then dates in September may also be suspended.

For those contractors that hand deliver notifications, call first to make sure that we have moved our operations to Montgomery Park and can accept the notifications at that site. It may be necessary to switch to an overnight service temporarily so that you have the necessary documentation for the time and date of delivery. This is critical for those jobs that are less than the NESHAP size and for those with a 10 day notification requirement.

SCHOOLS...

It is time again to remind schools of the Asbestos Hazard Emergency Response Act (AHERA) requirements for inspections, developing and revising management plans, reinspections, and periodic surveillance.

A. Inspections—An inspection is required for all nonprofit nonpublic schools and public schools that provide preschool through 12th grade education. Home schools and for profit schools are not required to comply with the AHERA requirements to obtain an inspection and prepare a management plan. This inspection must be done by an accredited inspector who has a Maryland Photo Id card.

If the school was completed after October 12, 1988, the school is eligible for an exclusion. There are forms on the MDE website that you can use for the exclusion. It is not necessary for an accredited inspector to prepare this package for you. However, you will need a letter from the architect or construction engineer for your project stating that there were no asbestos-containing materials (ACM) specified for the project and that none were installed in the building. The school will still need a designated person and must issue the annual notification to parents, teachers, and staff.

B. Management Plan—The management plan must be prepared by an accredited management planner (MP) who has a Maryland Photo Id card. The MP uses the information from the inspection to develop a plan that will *manage the asbestos*. The MP will recommend response actions based on several factors including the physical condition of the material, the potential occupant exposure, etc. These response actions or control methods *do not always mean removal*. However, removal of the ACM may be an appropriate response to control the asbestos hazard. AHERA requires only that the school

choose the method that will best protect human health and the environment. The most expensive or extreme methods are not required.

Many schools have forgotten that the response actions and time frame for completing these response actions are the schools' compliance plans! EPA considers it as such and when performing an inspection will check to see that the response actions are on schedule. Many schools due to funding problems, etc. have had to postpone their response action or have chosen to use another response action that may cost less. This is not a problem as long as these changes are documented in the management plan. During the reinspection is a good time to make sure these changes have been documented in the management plan.

C. Reinspections—A reinspection must be done by an accredited inspector and MP. All known or assumed ACM must be inspected for changes in friability, physical condition, etc. These findings will be reviewed by the MP who will recommend any necessary revisions to the management plan. Even though AHERA refers to only the known and assumed, the inspector will frequently find previously unidentified ACM. This material must be handled appropriately. The school is left in jeopardy if the ACM is ignored and this would not be the "standard of care" that a professional would wish to exhibit.

During the reinspection process, we would urge management planners to make sure that there is a designated person with appropriate training for the school, that the annual notification process is active, that any abatement records are in the management plan, etc. This again is part of the standard of care for the MP.

D. Periodic Surveillance—This must be done every 6 months for all schools that have ACM. This can be done by an employee with no special training. This person is to check all the ACM and is looking for any changes to the ACM since

the last periodic surveillance.

ALL custodial and maintenance personnel must receive the 2-hr awareness training within 60 days of being hired. OSHA requires an annual refresher for these folks. Make sure that the training is documented by using a sign-in sheet, etc. The topics that need to be covered are listed in the regulations. This training does not require the use of a training provider either approved by the state or the EPA. The training works best if done by someone familiar with the facility. The twin goals of this training are: (1) provide information on the hazards and health effects of asbestos and (2) make sure these folks know *where* the asbestos is located. These persons are frequently the only ones who see the plumbers, electricians, etc. when they come into the facility to do work.

Failure to notify the facility occupants that asbestos work is occurring, is a recurring problem in the schools. When you fail to notify the occupants about asbestos projects, they become suspicious. They think that something wrong is going on, that you cannot do asbestos projects when school is open and on and on. Suspicious people call us, the EPA, MOSH, the newspapers, and the TV stations.

Notification that an asbestos project will occur does not make all persons happy, *BUT* all persons will be unhappy if they do not find out about the project. Some school systems have left the job of notification to principals and that does not always work because the principals don't "want to scare anyone". It would be prudent to explain to people that you may conduct projects while school is in session and describe the precautions that are being taken while the abatement is going on. Most calls that we receive are from people who think that the schools are doing something illegal by doing it when school is in session. Make sure that these people have adequate warning other than the MDE 3-day notification sign. You cannot hide the projects

from people. It is the schools' responsibility to explain to your parents and staff that what you are doing is legal, is necessary, and what sort of precautions you are taking to do it right. This happens in all size school systems.

NOTE—Please tell staff and parents about renovation jobs that are going on. These are invariably dusty and if it is dusty, it must be asbestos! We received a complaint last week from an employee at a school that described all the dust, men in protective clothing walking down the hall, etc. We sent an inspector out, but it was just dust from a renovation project!!

CONTRACTORS' CORNER...

This time of the year we receive many questions about roof removals. Tim O'Hare put together the following information as a reminder to those of you considering a *Category I Roofing Removal*.

Category I roofing includes primarily asphalt-based materials, including ASPHALT shingles; built-up roofing; asphalt containing single ply membrane systems; asphalt containing underlayment felts; asphalt containing roof coatings and mastics; and asphalt containing base flashings. The removal of the above is not regulated by EPA or MD as long as you do not use a rotating blade saw or other device that would sand, grind, cut, or abrade the asphalt matrix. Acceptable methods include manual means, such as axes, hatchets, knives, spud or pry bars, and shovels; and certain mechanical devices such as power slicers or power plows that slice, shear or punch the roofing material. Dust control by misting is still a good idea. The debris can be taken to any C&D landfill.

If you use a rotating blade saw, and if the total roof area is 5580 sq ft or greater, the project is

subject to NESHAP and applicable notifications are required. Emissions control and adequately wet requirements can be satisfied by using a (1) blade guard that completely encloses the blade and extends close to the roof surface; and a device for spraying a fine mist of water inside the blade guard while the machine is operating. Only the dust generated by the saw is regulated; it must be bagged and disposed of at a regulated landfill. The resultant sections are not regulated, and may be taken to any C&D landfill.

NET NIBBLES...

Check the MDE website at <http://www.mde.state.md.us/arma/Programs/Asbestos/asbestos.html>. The Powerpoint@2000 presentations for the Asbestos Conference are posted on the website under "2002 National Asbestos Conference". The presentations by Mike Beard and Bruce Harvey on lab accreditation and sample analysis are very interesting.

Surprise, surprise...the EPA in conjunction with many other agencies has decided to allow residents in certain areas around the World Trade Center to apply for cleanup and air testing of their residences. See www.epa.gov/wtc for details. On May 9, EPA announced that it would remove insulation from homes in Libby, MT. See http://seattlepi.nwsource.com/local/69934_libby10.shtml for more information on this topic. There is also a series of articles about the risks to mechanics from asbestos exposure while working on brakes and clutches. See <http://seattlepi.nwsource.com/uncivilaction/vcts16.shtml>. Very pertinent for anyone with auto or truck repair facilities.

TRAINING PROVIDERS...

The next meeting for training providers will be at MDE on Thursday, September 12, 2002.

I will provide directions to the facility, parking locations, the room number, etc. in August. The 9/12/02 date is a firm date.

I would remind you again that Janice Lafon has been directed to check the Form 265 submittals carefully and to send these back if there are problems. She will not call you and ask about the problem(s). All initial courses except the worker course require at least 2 instructors. These must be listed on the Form 265!! Some of the errors may appear as though we are nit-picking, but we are tired of fixing your errors!!

The Photo Id Card inventory on the application still causes problems. The period for the inventory is **ONE YEAR PRIOR** to the date of the application. List only the cards received from MDE for that year and list only the cards issued by you for that same year. The cards that you have on hand are the blank ones in your office on the day of the application, excluding voids, lost cards, and cards issued by you to trainees.

STATESIDE...

Management plans for the facilities on due by the September 30, 2002. The information in these plans covers the FY'02 time frame.

(These classes are only for state employees.)

<p>July 2002</p> <p>NO CLASSES!!</p>	<p>August 2002</p> <p>NO CLASSES!!</p>
<p>September 2002</p> <p>5 Worker R 19 Supervisor R 24 Asbestos S & H Specialist</p>	<p>If you must cancel, call Janice Lafon at (410) 631-3801 or (800) 633-6101,-3801 e-mail: jlafon@mde.state.md.us</p>