

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/renovation activities at a facility that contains suspect asbestos-containing materials (ACM), as discussed below, you must hire an asbestos inspector who has been certified by the Massachusetts Department of Labor Standards (MADLS) 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 MADLS 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.
- The results of the inspection must be memorialized in a written asbestos survey report.

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. Additional suspect ACM frequently encountered during demolition/renovation include joint compound, ceiling texture and vinyl sheet flooring
- While there is a commonly held misperception that buildings constructed after 1980 do not contain asbestos, this is not true.
- While asbestos ores are no longer mined or processed in the United States, many 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.

Are there any situations where a survey of suspect 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 MADLS-certified asbestos inspector before conducting any demolition or renovation activities.

Must all Suspect ACM be identified through sampling and analysis?

- All suspect ACM affected by a demolition/renovation project should be sampled and analyzed for the presence of asbestos.
- Note that any suspect ACM affected by a demolition/renovation project that is not sampled and analyzed for the presence of asbestos must be handled and disposed of as if it were ACM and must be identified as ACM in the asbestos survey report. Demolition/renovation would need to be conducted in accordance with the asbestos removal requirements set forth in 310 CMR 7.15.

Asbestos Regulations and Resources

- [310 CMR 7.15: MassDEP Asbestos Regulation, July 2019](#)
- [MassDEP Guide: Asbestos, Construction & Demolition Notifications](#)
- [Frequently Asked Questions About the MassDEP Asbestos Regulation](#)
- [MADLS Asbestos Safety Program](#)
- [453 CMR 6.00: MADLS Regulation, The Removal Containment or Encapsulation of Asbestos](#)