

State of Vermont  
Department of Environmental Conservation  
Solid Waste Management Program  
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POLICY ON THE MANAGEMENT OF  
ASBESTOS-CONTAINING WASTE AND VERMICULITE INSULATION  
IN VERMONT

April 2024

**Applicable Rules and Guidance:**

*[Solid Waste Management Rules § 6-1005 \(d\) \(2\), effective October 31, 2020, Vermont Department of Environmental Conservation \(VTDEC\), Solid Waste Management Program.](#) Waste asbestos-containing materials are classified as a solid waste. These rules include standards for solid waste management facilities, and special waste management.*

*[Vermont Regulations for Asbestos Control, 18 V.S.A. Chapter 26, effective February 1987, amended November 1995, Vermont Department of Health \(VTDOH\).](#) These regulations include requirements for asbestos abatement, including asbestos waste containment prior to transport and disposal.*

*US-EPA, [“Protect Your Family from Asbestos-Contaminated Vermiculite Insulation”](#)*

**Terms:**

***Asbestos Containing Material (ACM)*** is defined as material that contains greater than 1% by weight of asbestos.

***Asbestos waste*** is any asbestos-containing material removed during abatement, and any materials that may have been contaminated with asbestos during abatement.

***Vermiculite insulation*** is a lightweight, poured-in building insulation that may contain less than 1% asbestos.

***Friable asbestos-containing material*** is any material that can be crumbled, pulverized, or reduced to powder by hand pressure. Examples of friable asbestos containing materials are pipe insulation, boiler insulation, and ceiling tiles.

***Non-friable asbestos containing material*** is any material that cannot be crumbled, pulverized, or reduced to powder by hand pressure. Examples of non-friable asbestos materials are vinyl flooring, exterior roofing and mastic, exterior siding, concrete piping, and transite board, and any other



asbestos-containing material determined by the Vermont Department of Health to be exempt from Sections 2 and 4 and included in Section 6 of the Vermont Regulations for Asbestos Control. Non-friable material that is subjected to dust-producing activities (e.g., sanding, chipping, grinding, abrasion, drilling, etc.) or processes that result in the material becoming crumbled, pulverized, or reduced to powder is reclassified as friable asbestos containing material.

### **Disposal Policy:**

Any amount of friable or non-friable ACM must be disposed of in a landfill specifically certified to accept asbestos waste. Alternatively, friable asbestos material may be disposed of in out-of-state facilities approved for asbestos. Certified, approved disposal facilities are listed at the end of this document. No VTDEC permits or approvals are needed by the generator; however, the disposal facility generally requires pre-notification of incoming loads of asbestos containing waste or vermiculite insulation.

Prior to disposal, properly packaged friable and non-friable ACM may be stored by a certified asbestos contractor at the contractor's place of business. Storage requirements are detailed in the VTDEC policy "Storage of Asbestos Waste Prior to Disposal," dated April 2024.

Packaging of asbestos is to be performed at the abatement project site, and before transport. Except for homeowners performing abatement in their own residences, and abatement of those materials listed in Section 6 of the Vermont Regulations for Asbestos Control, all asbestos abatement must be performed by a certified asbestos contractor. Sampling and analysis for the presence of asbestos in vermiculite insulation by certified asbestos consultants and laboratories is permissible, but not recommended due to the uncertainties and limitations arising from current methodologies. It is recommended that vermiculite insulation be assumed to contain asbestos, and a certified asbestos contractor performs any necessary removal of this material. The VTDOH Lead and Asbestos Regulatory Program should be contacted for information regarding asbestos contractor certification and acceptable abatement work practices at 800-439-8550 or [alrp@vermont.gov](mailto:alrp@vermont.gov).

### **Asbestos-containing material shall be packaged for transport to an approved storage or disposal facility in one of the following methods:**

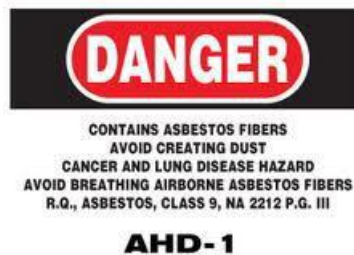
- a. 6 mil. thick polyethylene bags, two layers or more (12 mil. total thickness), which is acceptable for most types of asbestos-containing waste and vermiculite insulation. The bag openings must be closed, and the integrity of the bags maintained at all times. This method is not recommended for materials with sharp edges, e.g., vinyl floor tiles or exterior siding.
- b. 6 mil. thick polyethylene sheeting, two layers or more (12 mil. total thickness). Waste must be double wrapped in sheeting and secured with tape to maintain package integrity during transport.
- c. 6 mil. thick polyethylene bag or sheeting, one layer, closed and placed in a secure fiber or steel drum.
- d. Waste transport container (dumpster, roll-off, etc.) or truck body lined with a minimum of two layers or more 6 mil. thick polyethylene sheeting (12 mil. total thickness). Waste must be double wrapped in sheeting and secured with tape to maintain package integrity during transport.

The securely bagged or wrapped ACM must be transported directly to the approved storage or disposal facility, and not mixed with other types of waste, compacted, or shredded.

All packaged ACM must be clearly labeled as below:



Friable ACM must be labeled in accordance with US DOT requirements, including: “Asbestos, 9, NA2212, PG III,” and “RQ” if the package contains more than one pound of asbestos. Note that, USEPA requires that a Waste Shipment Record (WSR) for friable ACM waste be maintained in accordance with [40CFR § 61.150](#).



As of the date of this policy, the following Vermont landfill will accept asbestos containing material:

**New England Waste Services of Vermont “NEWSVT” Landfill, Coventry, (802) 334-8300.** *For both friable and non-friable ACM, pre-approval is required by calling the 24-hour phone number above to pre-schedule delivery and to complete the necessary forms.*

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