

State of Vermont
Department of Environmental Conservation
Solid Waste Management Program
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POLICY ON THE STORAGE OF
ASBESTOS CONTAINING WASTE 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 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.

Policy on the Management of Asbestos-Containing Waste and Vermiculite Insulation in Vermont (“*Asbestos Management Policy*”), Vermont Department of Environmental Conservation (VTDEC), Solid Waste Management Program, April 2024. *This policy explains proper methods of containment, container labeling, transportation, and disposal of asbestos containing material.*

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.

Storage Policy:

According to state regulations, asbestos waste must be properly packaged at the site of the abatement project, and the containment must remain intact until disposal at an authorized Vermont out-of-state disposal facility. A certified asbestos contractor may find it beneficial to temporarily store asbestos waste generated from individual asbestos abatement projects, spot repairs, building maintenance activities, or homeowner-performed asbestos abatement prior to disposal. Temporary storage of properly packaged asbestos waste by a certified asbestos contractor is permitted without the need to obtain Solid Waste Management Program facility certification provided that it follows at minimum of these two storage methods:

1. ACM is contained in a completely enclosed roll-off container or enclosed transport trailer, that:
 - a. The container or trailer is located on property owned or leased by the contractor, and the container or trailer is stored in a location that is a minimum of 25 feet from any property line; and
 - b. The container or trailer is locked and accessed only by the contractor, or contractor's certified personnel; and
 - c. The container or trailer is clearly labeled and displayed with signage as shown below; and
 - d. any and all US DOT requirements for labeling, placarding, and manifesting are adhered to prior to transport for disposal.

2. ACM is contained in a stationary building, provided that:
- a. The building is located on property owned or leased by the contractor; and
 - b. The asbestos storage area is completely contained, locked, and accessed only by the contractor, or contractor's certified personnel; and
 - c. The enclosed storage area has a capacity of less than 150 cubic yards; and
 - d. When in use for asbestos storage, signage as shown below is clearly displayed on the entrance of the building or storage area.
 - e. Asbestos waste shall not be removed from the storage area except to prepare the waste for transport to an authorized disposal facility. Transportation and disposal of the waste shall be performed in accordance with the *Asbestos Management Policy*.

All packaged asbestos containing waste, asbestos waste storage trailers or containers, and asbestos storage buildings must be clearly labeled:



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