



## **ENERGY EFFICIENCY PROGRAMS**

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**For Residential Offerings with Building Envelope Measures**

Suspect Asbestos Containing Material Guidance

1-1-20

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## Goal

The intent of this publication is to provide direct guidance surrounding suspect Asbestos Containing Materials (ACM) as they relate to Ameren Illinois Energy Efficiency Program's Residential Offerings as well as, associated documentation and operation in a safe manner. This guidance applies to projects in all Initiatives (also referred to as Offerings or Programs) that provide building envelope measures (whether or not building envelope measures are specified for a particular project) and will direct participants (Program Ally and Program Staff) working on a project as to how to handle situations as they arise in the field. The intent is to provide safety while still being able to deliver energy efficiency. Common sense is required with all judgements. Please contact your program point of contact if necessary.

This guidance takes effect on January 1, 2020.

## Definition

Asbestos is a mineral fiber that occurs in rock and soil. Because of its fiber strength and heat resistance, asbestos has been used in a variety of building construction materials for insulation and as a fire retardant (roofing shingles, ceiling and floor tiles, paper products, and asbestos cement products).

Asbestos fibers may be released into the air by the damage of asbestos containing material during product use, demolition work, building or home maintenance, repair, and remodeling. In general, exposure may occur only when the asbestos-containing material is disturbed or damaged in some way to release particles and fibers into the air.

For more information on asbestos, refer to <https://www.epa.gov/asbestos>.

## Reference

This publication is referencing the *Energy Audit Inspection Disclaimers* form located on the Ameren Illinois Energy Efficiency Program website as its foundation, as pictured below:

| ASBESTOS <input type="checkbox"/> Applicable <input type="checkbox"/> Not Applicable   |           |
|--|-----------|
| The following suspected Asbestos Containing Materials (ACMs) were identified in your home. It is important to understand that it is not possible to determine if a material has asbestos without professional testing and for this reason all possible ACMs must be treated as if it contains asbestos. This may disqualify your home from participation in the Ameren Illinois Energy Efficiency Program; however, proper precautions must be taken to ensure the suspect ACMs will not be disturbed. As a result, any measure that would result in work taking place in an area with suspect ACMs or that could disturb the asbestos is not allowed. For more information regarding asbestos, please visit <a href="http://www.epa.gov/asbestos">www.epa.gov/asbestos</a> . If friable suspect ACMs are found during a site visit, your home must be cleared as safe by a certified abatement company. |           |
| <input type="checkbox"/> Vermiculite   | Location: |
| <input type="checkbox"/> Suspect Asbestos Siding   | Location: |
| <input type="checkbox"/> Suspect Asbestos Duct Wrap and/or Flue Pipe   | Location: |
| <input type="checkbox"/> Other:  | Location: |

## Form Guidance - Disclosure

This section will provide a breakdown of the *Energy Audit Inspection Disclaimers* detail. The detail has been broken into three “items” as indicated by the rectangular boxes surrounding them above. Completion of this form is how you disclose this information to the customer and the Program.

### Item 1 “Heading”

The heading for this detail shall be marked as “Applicable” if any of the boxes are checked in the item below it (Item 3). It is a best practice to mark this section “Not Applicable” if no evidence of suspect ACMs was identified. This demonstrates the item was discussed and reviewed by the customer.

### Item 2 “Disclaimer”

Provides guidance on how this may affect a particular project and where to reference for more information.

### Item 3 “Location Details”

This section allows for the entry of information regarding the particular suspect ACM identified at the project location. The appropriate box or boxes should be marked on the form and details entered in the “Location” field. If more information is required that can be entered in the field, please summarize the findings and provide further detail by attaching a separate document to this form.

## Project Guidance

This section provides a listing of situations that may be encountered at a residence during a project. This section also instructs how to handle the situation while maintaining a safe environment for the customer, your employees, and Program staff. State and local codes supersede the below guidance if the codes are more stringent. If there are more stringent requirements, we require a copy of said requirements to be provided to the program.

### Term: “Suspect”

We refer to these as **suspect** ACMs because the energy auditor is not trained, certified, or licensed to identify with complete certainty if the suspected item does contain asbestos. Only a testing company can do so. The auditor is simply working from previous experience to determine if the chances are high for the material to be a potential health concern and operate in an accordingly safe fashion.

### Reporting

All instances of the identification of suspect ACMs require notification to be provided to the customer and to the Program through the use of a signed form (currently the *Energy Audit Inspection Disclaimers*) and inform both as to how it effects the project disposition.

## Staff Disclosure

When work is to be performed in an area with suspect ACM, workers should be notified as to its presence to ensure caution against damage of the suspect ACM. Workers should wear the appropriate respirator/mask (usually P100), protective bodysuit (disposal after use), and must minimize travel through other areas of the home (reduction of any possible cross contamination). Please consult <https://www.epa.gov/asbestos> for exact personal protective equipment and procedures, as the above are provided as an example only.

## Specific Suspect ACMs

Depending upon the suspect ACM identified at the project site, work may be able to progress as indicated for each item below. If you are in doubt as to how to proceed in a particular situation, contact your Program point of contact for guidance in writing prior to any work commencement.

### **Vermiculite**

- At this time, the Program does not allow the testing, encapsulation, removal, or any other method of handling vermiculite other than to leave it alone
- No infiltration (Blower Door) testing is permitted
- No building envelope affecting measures are able to be performed
- To reduce potential project liability, an auditor should try to enter the attic (when possible) and check at least 10 foot away from the opening to ensure there has been no partial removal attempted in homes where this is suspected.

### **Forced Air Ductwork “Tape/Wrap”**

- Do not disturb or damage; building envelope measures and HVAC measures may be possible
- Infiltration (Blower Door) test can proceed as normal
- Abatement is required if it must be disturbed or became damaged during energy efficiency work (see *Abatement Guidance* below for photographic documentation of site conditions)
- HVAC equipment installation is permitted if this suspect ACM will not be disturbed in the act of installation

### **Steam/Boiler Pipes “Hardcast”**

- Do not disturb or damage; building envelope measures may be possible but no Program incentivized work is permitted on that HVAC system
- Infiltration (Blower Door) testing allowed if the material is undamaged (and will not be disturbed) and no suspect asbestos containing dust is present

## Exterior Siding

- Building envelope measures and HVAC measures may proceed as normal
- Infiltration (Blower Door) testing can proceed as normal
- Do not drill through the siding; remove the nails and shingles in a safe, non-damaging process
- Wear proper PPE (masks, suits, etc.) following EPA recommendations

## Abatement Guidance

In instances where there may be a suspect ACM that was damaged prior to any energy efficiency Program work being performed, photos must document **all** of the existing damage and be submitted along with the disclaimer during their reservation of the project (at the latest) for review by Program staff. If the project is approved to proceed, any damage to suspect ACMs detected by a post-work inspection site visit will be determined by the Ameren Illinois Energy Efficiency Programs to have been caused by energy efficiency work and abatement will be required of the Program Ally.

Regardless of state and local codes, laws, or ordinances; the Ameren Illinois Energy Efficiency Programs requires the use of a State of Illinois licensed asbestos abatement company to handle all instances of testing, removal, and/or encapsulation of asbestos containing materials. This is to protect the health and safety of all parties involved.

Any other discovered suspect ACMs that may be found at a residence and are believed to have a potential health risk to the customer, Program staff, or your company employees should be brought to the attention of Program staff prior to any Program related work proceeding.

## Form Guidance - Abatement

This section covers the details on how to provide proof of abatement if the project requires such and documenting this with **Section 4** of the *Energy Audit Inspection Disclaimers* document. The detail is described in the heading following the image.

The documentation for proof of abatement can be found on page 3 and page 4 of the *Energy Audit Inspection Disclaimers* form. Page 4 has been created as a stand-alone document to leave with a customer as necessary.

| ASBESTOS ABATEMENT   |            |    |       |
|--|------------|----|-------|
| Certified Remediation Company:   | License #: |    |       |
| Inspecting Agent Printed Name:   |            |    |       |
| I have performed an inspection of the home located at the below address and upon completion of my inspection, I have found that all of the asbestos containing material has been successfully removed. |            |    |       |
| Address:   | City:      | IL | Zip:  |
| Signature of Inspecting Agent:   |            |    | Date: |

### Fields 1 and 2 “Certified Remediation Company, License #”

The company name for the abatement company is entered here along with their State of Illinois valid license number is entered in the following field.

### Field 3 “Inspecting Agent Printed Name”

Print the name of the abatement company representative that is signed the state of asbestos abatement, encapsulation, or testing here.

### Field 4 “Statement of Abatement”

This details what has been resolved at the residence.

### Fields 5, 6, and 7 “Address, City, Zip”

These fields list the address at which the abatement, testing, or encapsulation has occurred.

### Fields 8 and 9 “Signature of Inspecting Agent, Date”

These fields are where the signature of the inspecting agent (see above) and the date of their signature are placed.