



MEMO TO : North Dakota Licensed Asbestos Contractors

FROM : Terry L. O'Clair, P.E.
Director
Division of Air Quality *TLO*

RE : ND Department of Health Vermiculite Policy

DATE : June 11, 2018

Vermiculite is a naturally-occurring mineral composed of shiny flakes. A mine near Libby, Montana, was the source of over 70 percent of all vermiculite sold in the United States from 1919 to 1990. There was also a deposit of asbestos at that mine, so the vermiculite from Libby was contaminated with asbestos. Vermiculite from Libby was used in the majority of vermiculite insulation in the United States and was often sold under the brand name Zonolite.

The ND Department of Health is in agreement with the current EPA stance that there are currently no validated and approved analytical methodologies to accurately analyze and quantify asbestos concentrations in vermiculite.

EPA has also determined that vermiculite is not a Category I or Category II asbestos-containing material (ACM). Rather, it is a friable ACM. Therefore, vermiculite that will be disturbed during demolition or renovation activities, such as vermiculite attic insulation, block fill, packing material, etc., must be treated as a Regulated Asbestos-Containing Material (RACM). The vermiculite must be assumed as RACM, identified as RACM in the written survey report, and managed as RACM in accordance with all the requirements of the ND Air Pollution Control Rules, 33-15-13-02, Emission Standards for Asbestos. The Department will not accept current testing methods that may classify vermiculite as non-ACM.

TLO/JKK:saj