

# Asbestos 2018 Rulemaking Advisory Committee

## Asbestos Advisory Committee Meeting



State of Oregon  
Department of  
Environmental  
Quality

### Asbestos

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*DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.*

**March 20, 2018**

9:00 am – 3:30 pm

### Location

OR OSHA Training Center  
16760 SW Upper Boones Ferry Rd., Ste. 200  
Tigard, OR 97224

### List of handouts and presentation notes

- Draft rules for OAR 340 division 248
- Draft rules crosswalk for OAR 340 division 248
- Draft Fiscal Impact Statement
- Stakeholder written input from Nov. 29, 2017 meeting

### List of attendees

- Tim Leniham
- Matt Tracy
- Dave Bartz
- Gerry Strawn
- Ed Joyce
- Nancy Torington
- Rosa Martinez
- Willie Tiffany
- Alex Hutton-Tine
- BJ Hutchins
- Marilyn Bull
- Kristin Leichner
- John Sandie
- Bob Gordon
- Dave McAll
- Greg Olson
- Kim Kaminski – Phone
- Michele Martin - DEQ
- Chris Marko - DEQ
- Jaclyn Palermo - DEQ
- Kieran O'Donnell - DEQ
- Audrey O'Brien - DEQ
- Zeb Bates - DEQ
- Tim Wollerman - DEQ

### Agenda

Time	Topic
9:14 a.m.	<b>Welcome, logistics, agenda review and introductions</b> – Jaclyn Palermo/Chris Marko
9:23 a.m.	<b>Recap of Nov. 29, 2017 meeting</b> – Michele Martin Committee members had no comments.
9:24 a.m.	<b>Charter</b> – Chris Marko
9:25 a.m.	<b>Timeline for rulemaking</b> – Michele Martin Public comment for draft will open in May. There will be time for committee members to submit written comment on draft rules until April 5 <sup>th</sup> . The proposed rules are scheduled to go to the EQC in September.
9:27 a.m.	<b>Review of draft rule changes for OAR 340 division 248; crosswalk</b> - Michele Martin

The crosswalk includes rule items that had significant changes since the previous advisory committee meeting.

**340-248-0010(26) "Friable asbestos material" means any asbestos-containing material that when dry can be crumbled, pulverized, or reduced to powder by hand pressure or by the forces expected to act upon the material in the course of demolition, renovation, transportation, or disposal.**

A committee member suggested adding “reasonably” to the definition. Thinks that adding the word would add clarity to the definition. DEQ discussed this with the DOJ and was advised that the addition of the word would not change the rule in any way.

**340-248-0010(33) "Nonfriable asbestos material" means any asbestos-containing material that when dry can be crumbled, pulverized, or reduced to powder by hand pressure or by the forces expected to act upon the material in the course of demolition, renovation, transportation, or disposal.**

**340-248-0205(4) The content of asbestos in any asbestos-containing material must be determined using the method specified by the Environmental Protection Agency as listed in EPA/600/R-93/116, July 1993, "Method for the Determination of Asbestos in Bulk Building Materials" or another substantially similar method approved by the Department. Bulk samples shall not be composited for analysis.**

Question: When you talk about compositing will you not be allowing joint and tape mud with wallboard for ... This is different than the current practice. If you change the rule to the R98... method, this is not allowed under that method. Answer: When you have layers that are not separable, you will treat them as one system. It will be treated as one sample. If you can separate the layers, then those would be treated as separate samples. This language is common. Zeb: This isn't the current practice. It's not intended to change the current practice.

Question: Whose responsibility is it to make the call on the percentage in interpreting the wallboard system (2%)? Is it the lab's responsibility? Answer: For clarity we can check in with other states to see how they are handling this. There will be follow up conversations.

The question is really how do you proportionally recombine the material in the report?

Question: Would it work to add an exception to the rule? Answer: DEQ is still working with stakeholders on the clarity of this language. Section 250-6 – Exceptions (how this falls in place with the solid waste rules)

**340-248-0250(6) Disposal sites permitted by OAR 340 division 93 through OAR 340 division 96 are exempt from managing nonfriable asbestos-containing material in accordance with 340- 248-0280 if the nonfriable asbestos containing material is first discovered by the permitted disposal site on its tipping floor or within the permitted facility's transfer container, comingled with putrescible waste, and the management of the nonfriable asbestos containing material in accordance with 340-248-0280 would present an immediate risk to health and safety. A disposal site that manages**

**its waste under this subpart must immediately notify the final permitted disposal site, as applicable, and notify DEQ within 24 hours of discovering nonfriable asbestos containing material on its tipping floor or in its transfer container.**

\*\*change includes new language related to disposal of asbestos-containing materials.

There is concern that unintended nonfriable materials are being collected and then tipped at the facility. There are 4 words in the middle that are limiting for smaller facilities. If DEQ removes those 4 words it will go a long way to meeting the concerns. The addition of the language on reporting within 24 hours to DEQ is welcomed.

Suggestion: Delete “comingled with putrescible waste”. DEQ: We wanted to make sure we were talking about all types of landfills. We are looking for a change to the definition as suggested.

**340-248-0260(8) Notification fee refunds. DEQ will consider a refund of a notification fee only as provided in this section. A request for a refund of fees must be made in writing to DEQ, and must be submitted prior to the original start date of the project. DEQ will not consider a refund request that does not include all required information described in this section. If DEQ receives a complete request for refund under this section, then DEQ may refund the notification fee paid by the requester if it determines that a refund is warranted based on the reason the refund is requested. Requests for refunds must include the following written information and documentation: (a) A description of the reason that a refund is requested; (b) A copy of the original notification and the most recent revision; (c) Proof that the requester was awarded the contract for the project prior to submitting the notification to DEQ; (d) Verification of payment to DEQ; and (e) Proof that asbestos-containing material or asbestos-containing waste material was present at the project site, such as lab results, or when material was assumed to be asbestos containing and treated as such in order to avoid survey and lab costs, a depiction of the material.**

\*\*change includes the clarification of the requirements necessary for the refund of notification fees.

Suggestion: The definition still includes language “will consider”, suggest you delete the phrase, unless you are changing the policy of giving refunds. With the exception of sub (e) – consider dropping this one altogether. If you are keeping e, change depiction to description. DEQ: The agency wants to be notified within 10 days, not as early as possible.

Suggestion: Sometimes a client (or contractor) will say a material has asbestos and it is sent to the lab and the results are negative. Requesting DEQ consider this for a refund.

**340-248-0270(3)(c) The testing of each sample collected under subsections (a) and (b) by a laboratory with proficiency demonstrated by participation in a nationally recognized testing program, or a bulk asbestos proficiency analysis testing program, or an equivalent testing program to determine whether it is asbestos-containing material;**

The intent is that the lab is either accredited or that the lab is participating in a proficiency.

	<p><b>340-248-0270(3)(d)(E) Description of the facility or area surveyed, including its past, current, and future use, area square footage, approximate construction date, and number of floors; **removed future use from the rule – Need to remove it from notifications as well, this will be done administratively after rule adoption.</b></p> <p><b>Discussion:</b> The future use in terms of residential demo is the only time the future use is necessary. Originally, DEQ wanted to know this information because demos did not have a survey. Going forward, residential demolitions and renovations.</p> <p><b>340-248-0270(8)(h) Visible emissions are not allowed during any asbestos abatement activities, except within a negative air pressure enclosure.</b> **air deleted.</p> <p><b>340-248-0280(8)(C)(ii) 29 CFR 1926.1101(k)(8) (2013)</b> Friable Asbestos disposal requirements – OSHA has been added. Friable has been removed.</p> <p><b>340-248-0280(8)(a)(A) ...three years to match 340-248-0280(9)(c).</b></p>
	<p><b>Review of draft rules for OAR 340 division 248</b></p>
<p>10:18 a.m.</p>	<p><b>Opened for additional committee member comments on draft rules and public comment</b></p> <p>Dave McAll – In general when I heard some feedback, there are several places where it requires clear signage be placed at a site and some of the feedback I got was, depending on where it is, it may be appropriate, I don't know if you can require it, but to have that signage in multiple languages. We're thinking primarily construction sites where there may not be all 100% proficient English language speaking people working there, make sure all those people are able to be aware of the dangers. I know that may be difficult because different areas of the state will have different languages that are more common, but if that could be somehow worked in. I think that's something that's primarily around the abatement construction site, not so much on the disposal end.</p> <p>Willie Tiffany – Page 2, definition 9, asbestos containing material, that's a new definition. We had a discussion at the last rule meeting and we had some comments during the comment period that we believe the definition is a little bit too broad. It would help with some tightening and our specific suggestion would be "asbestos containing waste material or any waste that contains" and strike "or potentially contaminated with" asbestos containing material and at the end delete "but is not limited to" and the issue there it's, as written, any material qualifies under this definition with those two, the potential language and not limited to language. That's a very difficult standard for our spotters and folks to meet we train them on very specific types of looking material and what those look like and try to be as proficient as possible, but anything can potentially be contaminated. Our suggestion is that we make sure we get the list correct, of materials, that we do create a list here and I think most folks are pretty comfortable with the list in the federal standard under NESHAPs and their list and what they consider asbestos containing material. We'd be open to opening that discussion and make sure the list is correct and would exclude any material but don't want to include all materials because that's a just impossible standard to meet.</p>

Stephanie Baird – I’m Stephanie with Bliss Roofing and I’m here representing the Associated Roofing Contractors of Oregon and Southwest Washington and our concern is with the black felt. It’s a common felt in most residential type roofing. We have prepared our official statement, which I sent to you last week. As members of the Associated Roofing Contractors of Oregon and Southwest Washington we urge you to reconsider listing roofing felt as a required (unintelligible) material prior to disposal. We feel that roofing felt should be excluded from the list of suspect items. From our experience as professional roofing contractors we agree that some roofing materials do contain asbestos and should require screening such as low slope products. Roofing felt, however, very rarely contains asbestos to our knowledge the only roofing felt that ever contained asbestos was a Nicolite product which was very obvious when that is in a load. As a rule Nicolite is rarely found and is generally very recognizable. From February 1, 2016 through February of last year NW Shingle Recyclers tested 257 individual felt paper samples with zero positive test results. In addition to the felt paper samples NW Shingle Recyclers had the air quality tested every 6 months and had no positive test results. The members of our association have collected several hundred samples since the rule was implemented in April of last year with zero positive test results. As instructed by Zeb and Killian from DEQ we compiled it on a spreadsheet and I sent you that information yesterday as well with our most updated version, 312 samples, zero positive test results. We believe that testing roofing felt submits home building owners and contractors to unnecessary expense and use of resources. In addition, requiring every re-roof that occurs in the state to test needlessly clogs up every testing facilities for those contractors that truly need to test materials with a high risk of asbestos. Thank you. And I have one other thing on a personal note, I wanted to talk to Matt about this. I know that Clark County has just lifted the ban on requiring asbestos screenings for roofing felt and I spoke to Central Transfer and they were very knowledgeable and yes they are still requiring screenings for the Nicolite felt paper, they’re still requiring screenings for the silver and white roofing paints, not for the common black felt paper. Thank you.

Alex Hutton-Tine – I would like to follow up on, Willie, your comment about the definition of the asbestos containing waste material and the words “potentially contaminated with”. Willie spoke to, that’s a pretty broad definition in that. Many situations where we get (unintelligible) where we can identify suspect material we’ll isolate and get abatement, but, it’s also touching, depending on the type of load that’s delivered that’s touching other material. So, with that, with the words potentially contaminated with, you might be talking about, now, a small material that was thrown in there, came back positive, now we’re looking at a 40 yard drop box that is potentially contaminated with asbestos. So you’re opening up the amount of material that could be classified under this definition. So, would recommend the removal of potentially contaminated with.

Gerry Strawn – You mentioned Clark County removed felt from the list, you’re speaking of Waste Connections not Clark County. We as the regulatory agency still consider black felt as a suspect material and therefore we would require sampling. That’s maybe outside the scope of what’s going on here but let’s address it. The anecdotal evidence that I’ve received from inspectors and labs is (unintelligible) still be considered suspect materials. I’d be happy to take it off the list but I don’t have the data to support that. The facility that Stephanie mentioned (and others) are not necessarily well versed in Asbestos and may be making assumptions they shouldn’t. Requested that Stephanie share the data.

Matt Tracy – I would like to follow up on both Boyd and Alex’s concerns about the language in here. I think potentially contaminated is a term that is going to create hand wringing for us as well. We need to coordinate a little bit better I think, too, across the river. We’ve been talking to folks, as you already know, we’re trying to make sure we’re accepting standards or have the same sets of standards that Dave was trying to express to us. So, this is interesting, we have two different viewpoints about what’s going on over there and the viewpoints one’s driven from one of the (unintelligible) hauling companies and one of the operators. But, we really do need the clarity especially at the inspection points. Because once this material is entering our facilities we’re responsible for it. We’ve got (unintelligible) waste until it’s in a sealed container and heading up the gorge. I don’t think the clarity is going to come to us by adding additional, basically, ambiguity and I think I’m going to agree with Alex on this. It becomes ambiguous when you start to talk about potential because as material comes on to the floor it’s going to have the potential to not only contaminate a lot of things around it but then all of a sudden we’ve got these zones that we are starting to construct around the material. If the quality’s not great (unintelligible) we have more room to be able to isolate, abate, (unintelligible) not so much. So we’re really trying to catch these things prior to coming in and that starts with the outreach side. So, our recycling information hotline, we get the call in about asbestos questions, we really start the process at that point and in our outreach when we go to meetings that, like the Oregon Roofers association and folks like that, or homebuilders associations, this is where we’re starting. We need to have really clear language about what we want coming into our facilities, what the homeowners want in their materials and how their handling it. Any ambiguity right out of the gate is going to throw a wrench into the works. So, as clear as we can be on these rules is best. I don’t know if you agree Alex.

Alex Hutton-Tine – I do agree because it’s difficult identifying potentially suspect material and then trying to identify what is potentially contaminated you are opening up, potentially, more work and a harder determination as well as having to pass that information on to the customers and ensure they are going to have set standards of what’s going to be required when they come to a receiver.

DEQ clarification question: This is taking out “or is potentially contaminated with” in the definition of ACWM and taking out the “but is not limited to” those are the only two pieces of the ACWM definition were talking about? I think that makes it more clear to everyone so that’s good input.

Kevin Wheatcroft, AGC – Thanks for (unintelligible) dealing with these are the symptoms but the problem is really upstream. Stuff is ending up at the landfill untested so why isn’t there a survey or why does that require (unintelligible) in a box. That’s where the exposure is, workers, that sort of thing, it’s in the box and we’re trying to deal with that sort of thing at the landfill and I think it should be dealt with upstream.

Bob Strong, Envirotest – I don’t think a week goes by that we don’t receive calls, sometimes from contractors, which I still have trouble understanding why, but always from the general public “I just learned” and then the conversation goes on. And I learned from the company I call to get my dropbox I have to have this tested. I don’t know, being a communications professional, I don’t know how you do a better job of communicating to the public. These rules are not new, these rules are 20 plus years old but they are there

and they are in place and they need to be followed how we get that out, unfortunately, is a matter of communications and we do need to do a better job of communicating that.

DEQ: It's DEQ's intention to provide communication and education outreach for these rules once they're adopted by the EQC.

Ed Joyce – Just to comment on that, I did talk about that a little while ago. Really there was a lot of misconception as to what was required and not. I see homes being traded every day and I never see any language or discussion about asbestos. I see it with oil tanks, I see it with sewer lines but asbestos is just kind of missing from that conversation. I think the Realtors Association should play a huge role in this where it's either a disclosure or some sort of informational pamphlet that goes with a home being traded. Right there you've got a crossroads of a willing buyer and a willing seller and if there's money on the line that maybe is a \$10,000 cleanup that's the time to talk about it instead of hey its dropbox is on site and I didn't know anything about this. And they might not have the money to abate it, that's not part of the budget.

Willie Tiffany – So, unfortunately Gary is sick today, of Rogue Waste Systems, he has consistently brought up a request, either in 260 or 270 I'm not quite sure where it would fit but, to address the length of time that a survey is valid or needs to be reviewed. And his suggestion is 3 years, I think some other folks think that that's too short, others think it's too long. I don't know what the appropriate number of years is but I know he's reported seeing surveys that are well over 20 years old and it's kind of difficult to understand what's happening at that site to currently rely on that information. In some cases that might be valid some of these big, big projects that could be valid but for the homeowner project coming in 20, over 20 years of survey we're going to question that at the transfer station disposal site. But there's nothing concrete in the rules on that, so I just wanted to bring that up on behalf of Gary because I know he would have brought that up.

Rosa Martinez – Yes, I just want to, once again ask if there has been any consideration of bringing any of the notifications online for contractors? I know that we battle a lot in our office (unintelligible) what filing notifications or revisions and it's just ridiculous. When trying to fill out a notification and having to get all the information that is required and staying in compliance with that and you guys have certain times of day. There's a lot of changes on projects on a daily basis that are not controlled by the abatement contractor but is controlled by the general contractor, sometimes the homeowners. So I think that having an online system for notifications would have a lot of information out there for everybody but if there's a project that I'm questioning about or anything I want to know if there's a properly notified project or notification. We get a lot of contractors that call in about projects after the (unintelligible) that says we're doing proper things but we don't have all the information to report those contractors not doing the right thing. So, it would help in compliance, having an online system where you have public notices on projects, proper notification of what's going on out there in the community.

DEQ: DEQ agrees that this would be optimal. This would have to happen on an agency wide scale and we're in the process of trying to move toward an electronic system for all of our data. We're trying to figure out if we can squeeze in for advanced notification ahead of that schedule or not. We've also heard, on a regular basis, that we should be able to take credit cards and PayPal payments and that's another thing we're trying to explore. DEQ has to comply with the state system in terms of putting new databases into

place. We're following the state's system so that we don't run into issues that have occurred in the past at other agencies.

Nancy Torington – The City of Portland, what we do, what we're going to be doing when we start pulling in the asbestos surveys is just simply PDF-ing them and putting them on our website. So I don't know if that would require much technology that isn't already in existence.

DEQ: That is something DEQ can do right now for the surveys. The real question is can the asbestos abatement contractors or building owner file it electronically? And that's the system we don't have the ability to do independent of where the whole agency is going. But we can certainly look at (unintelligible) use of surveys. When we do receive some of the surveys, especially in response to complaints we'll follow up and make sure the building owner has a survey and we've made that available when people have asked us for it and we can do it electronically now.

Matt Tracy– With regard to Willie's earlier comment, I think, in lieu of Gary being here we at Metro would agree that we want to know that were putting some type of a shelf life on some of these survey results. What we've been doing too is working with some of the larger building owners, for instance downtown developers, to go floor by floor with their surveys and their abatements and so they've got a historical data base that they bring to us and we're accepting those standards and we've worked with Clackamas County Housing Authority, numerous houses that have been abated over the years, we have documentation of the survey results that go back 15-20 years. That's different than a resident bringing in a survey result that might be 15-20 years old on a DIY. So I think we need to have some established, we need to establish some ground rules here about somebody that's actually in the business of managing the building and managing the abatement over a timespan as they do development on the building, or redevelopment, or renovation on the building versus a (home)tractor or somebody that's rolling in with 10 years of survey results because they took a survey 10 years ago for no apparent reason, because we really weren't following these rules that somebody, I think (unintelligible) said were 20 years old, 10 years (unintelligible). So if DEQ could help us with that because it's hard for us to turn around and have that conversation about why the results don't really mean much to us. Because sometimes those survey results will actually bring in a new remodeling project with old results, and I've seen that myself, it doesn't really work 'cause the materials on the pickup bed don't really match the survey results. So this may be something we should talk about more.

Suggestion: If you're going to include something on the expiration date for surveys you might want to clarify if the laboratory analysis expires or just the survey report or if a validation needs to happen.

Response: If you're proposing a rule change that the laboratories be accredited you're going to get rid of a lot of your older survey results anyway because they won't be valid surveys any longer.

Question: Notification requirements 260-8(1). Does this align with NESHAPs notification of "10 business days"? Answer: This is existing language. Michele will check federal language to ensure it aligns.

Question: Removal of suspect materials, is there a standard review process for what is being required for removal of each type of material? Is the burden of proof the same?  
 Answer: DEQ has no formal rule that identifies suspect materials. We keep a list of know materials based on common knowledge from our inspector group and others. The only material that we don't require testing is 3 tab shingles. The shingles only, not the paper or any other materials. We take a very conservative approach when it comes to Asbestos containing materials.

Question: Are surveys considered public information? Can anyone walk up to a project and ask to see the survey report? Answer: Once DEQ receives the survey they are public record and a person can do a public records request. A contractor is not legally required to provide it, but DEQ is.

**Review of Fiscal and Economic Impact Statement**

The 4 questions we are considering today:  
 Will the rules have a fiscal impact?  
 What is the extent of the impact?  
 Impact on small businesses?  
 Extent of the impact on small businesses?

Dave McAll – Under state and federal agencies, it may be an insignificant fiscal impact. Would like to stress the fact that DEQ expend resources for a lot of education and outreach. Not all counties have a demolition permit process. Under local government, significant indirect costs for counties, the local government or operators.

Willie Tiffany – Avoided health impacts. It seems odd that this be included. Agrees with Dave on local governments. Page 5 talks about the benefit to facilities. Actually losing monies on this material. ACL containing material, could be costly to train employees to specific standards. Would suggest there is an impact on the small business industry, especially in terms of cost, there is also an increased cost for the contractor and home renovators.

11:17 a.m.

Question: In terms of training are you going to have to do extra training or have extra requirements based on this rulemaking that you didn't have before? Answer: No definitive answer on this, there will be changes they just don't know what they are yet. The language in the rule hasn't changed at this time so it is unclear.

Question: Is \$450 - \$650 an accurate amount for the residential renovation asbestos survey? Is the dollar range quote (p 4) accurate on a 2300 sf, 2 bedroom, 2 bath home in Southeast Portland? Answer: They may be low. \$1,000 might be more accurate. Includes travel up to a 40 mile radius, lab, a certain number of samples. Suggestion: The cost to the renovator can be closer to \$3,000 - \$11,000 in this area.

Question: Is there anything that prevents the survey done (for a bathroom) from being used later for an additional renovation (kitchen) when that room is not included in the survey? Answer: DEQ can't control bad actors that is why we include these requirements in rule. Suggestion: There needs to be a provision for the possibility that a remodel can become demolition if drywall is removed from a load bearing wall. There is a cost to contractors when the cost of abatement turns into a loss of business for contractors.

	<p>Nancy Torington – Include the cost of abatement.</p> <p>Bob Gordon – Would like to caution that some renovations have gone over \$10,000 so it would be difficult to respond to customers that approach and say “well, DEQ says”.</p> <p>Audrey: This is an estimate of what the change in rules will cost (the addition of the survey requirement).</p> <p>Tim Leniham – It would be hard to identify the additional cost (loss of business) to contractors when homeowners use unlicensed contractors.</p> <p>There is a distinct difference the perceived definition of demolition and the definition in the guidelines that DEQ’s rules are based upon. This is also true of different jurisdictions. There is going to be confusion based on these differences.</p> <p>Nancy Torington – Permits aren’t required for some renovations, there will be a disconnect with this. If the work to be done wouldn’t require a building permit how would you check to see if they complied with the renovation requirements? This will make it more difficult. The definition is so broad that it will capture projects that won’t require any building permits.</p> <p>Tim Leniham – There is a distinct difference between the definitions of demolition between jurisdictions. There will be confusion as a result of those differences. Nancy: There is some renovation work that wouldn’t require a building permit. Who will be ensuring these requirements are met? The definition of renovation is so broad that it will capture projects that don’t require permits.</p> <p>Alex Hutchins – There will be a negative impact of disposal facilities. Especially with the inclusion of the language “potentially contaminated”, you’ve created a larger abatement project with this language as stated now.</p> <p>DEQ Question: Would changing the definition of ACWM make the fiscal impact more accurate? Answer: I believe so.</p>
<p>11:54 a.m.</p>	<p><b>Next steps</b> Send written comments by 5pm on April 5<sup>th</sup>.</p> <p>Please answer the 3 questions: Does this rules have a fiscal impact? DEQ believes that this rules does have a fiscal impact, do we agree? A majority of the committee agrees.</p> <p>DEQ believes there will be an impact to small businesses, do we agree? Yes</p> <p>Do you agree with how DEQ proposes to mitigate the impact to small businesses? Mostly yes with a few additional suggestions:</p> <ul style="list-style-type: none"> <li>• Changing the cost of survey to \$1,000 as suggested earlier in the conversation.</li> <li>• Acknowledging that people will be finding more Asbestos than currently. There will be an impact because the cost of renovations will be going up. This will cause people to not do projects and will impact the contractors.</li> <li>• Cost of survey and renovations could be higher.</li> </ul>

Noon	Adjourn
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**Alternative formats**

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