



Protecting, maintaining and improving the health of all Minnesotans

When Nonfriable Materials Become Friable

The Minnesota Department of Health (MDH) is reminding licensed asbestos-abatement contractors and the public about conditions that affect removal of nonfriable asbestos-containing materials (ACM) during renovation or demolition projects. The purpose of this memorandum is to ensure that individuals and organizations handling nonfriable ACM understand that nonfriable ACM can change during renovation and demolition projects, requiring MDH to regulate the material under current regulations. This memorandum does not change current enforcement of the regulations.

The second sentence of the MDH definition of friable ACM (Minnesota Rules, part 4620.3100, subpart 21) states: "... Friable ACM includes previously nonfriable ACM which becomes damaged to the extent that, when dry, all or a portion of the material may be crumbled, pulverized, or reduced to powder by hand pressure."

If the nonfriable ACM is in good condition at the start of a project, MDH would not regulate the material. Keep in mind, however, that the condition of the nonfriable ACM may change over time due to environmental factors or to forces acting on it during a project.

To determine if the nonfriable ACM has become friable, and would be subject to MDH regulation, MDH inspectors look at three qualifications. Here is a quick overview of the process:

1. Has the nonfriable asbestos material been damaged? Damage may occur from the impact of a hand tool or from impact of a wrecking ball. Yes or No? If Yes, go to step 2.
2. Can the damaged asbestos material be made friable by hand pressure? Yes or No? If Yes, go to step 3.
3. Does the amount of friable material to be removed meet or exceed the regulatory standards of greater than 160 square feet or greater than 260 linear feet or greater than 35 cubic feet? Yes or No? If Yes, the removal of that material is asbestos-related work and the project is regulated by MDH. (See Minnesota Statutes, section 326.71, subdivision 4.)

If you have answered no to any of the above questions, MDH would not regulate the material.

If you have any additional questions, please contact the Asbestos/Lead Compliance Unit at 651-201-4620 or health.asbestos-lead@state.mn.us.

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