

From: Justin Wood
Sent: Sunday, September 17, 2017
Subject: DRAC Comments for Members

DRAC members, I am sorry that I cannot make the meeting this upcoming Thursday but I wanted to share a couple of thoughts with you that I am hoping you will ask staff and the Commissioners office regarding the draft policy dealing with SB 871 (lead and asbestos).

I wanted to share a couple of points from a builders perspective. First while I will admit the rules surrounding lead and asbestos are not uniform and there are different rules for different agencies. Much is also made about the fact that there are no state regulations currently regarding lead removal on demolitions. This is only partly true. OSHA will and has fined contractors heavy fines who subject their employees to working on houses that have levels of lead that exceed “acceptable amounts”.

Because of this most builders (including myself) already have the home tested for lead and asbestos before we demolish the home. If lead and or asbestos is found in the home, then we hire licensed contractors who specialize in hand remediation and removal of these items. The homes are not demolished until the hazardous materials are removed.

SOO.... The big question I am trying to understand is why are they proposing for us to a) remove all windows and doors b) remove all siding c) cover the house in plastic and d) spray a mist over the materials if the home is tested and shown to not show these materials.

If we have the home tested and if the home does not have any of the hazardous materials, then why do we have to follow the steps outlined above. These steps seem to be what should be done if we were not hiring a licensed contractor to remediate or abate these materials. This almost seems like a “best practices for someone who is not a licensed specialist”.

I am not trying to minimize the concerns of lead and or asbestos at all. I worry about exposure of these materials as well and as such that is why we hire people to remove and remediate it before we demolish the home.

I hope this makes sense to you.

Thanks and sorry I cant make it.

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