

Minutes
Asbestos Roundtable
March 1, 2017
Room 45 Metcalf Building

Do I need to send in a new 10-day notification (or email) to revise my permit if I want to start before the date on my application (even if it originally was submitted more than 10 days before the start date)

40 CFR 61.145(b) was explained. If notifying a new start date, the new start date must allow ten working days before the proposed start.

Project Permit Site Names

Use the current (or former) name of the site, not the address, for the site name on the asbestos permit application.

5-day/10-day Start Dates

HB 434 was discussed. If your project qualifies as a small scale project, according to HB 434, you may enter a start date of 5 days from the time the program receives the completed application.

Will my training materials need to be updated to reflect single sample analyses of wall board systems?

Yes, if your training materials do not reflect that the compositing (averaging) of the results from the individual layers is not in accordance with the Administrative Rules of Montana.

Any wall board sampling and analyses questions?

The question was asked if compositing wallboard was allowed. It was explained that the inspector, for the purposes of sampling, may take a composite sample of the tape, mud, and wallboard by placing all three in a single sample container. The sample must be analyzed according to EPA Method 600/R-93/116 as stated in ARM 17.74.354 and the layers reported individually. The averaging of the 3 layers

(i.e. compositing of the results) is not part of the method and therefore is not recognized allowed by rule.