From: Asbestos Control Program
To: DEQ Asbestos Online Submission Notice;
Subject: AHERA and Asbestos Sampling in Schools
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The question of the use of AHERA inspections and "thoroughly inspected" has been brought to the Department of Environmental Quality Asbestos Control Program (DEQ). The regulated community and DEQ have wrestled with a clearer picture of the term "thoroughly inspected," especially when applied to preexisting sampling done in schools.

While done in good faith at the time, most AHERA inspections, and many re-inspections are not suitable for use because under the 1982 sampling methods, fibers under .25 microns were without any clear guidance on how they should be read. In January of 1994 the EPA clarified the sampling methodology and specifically encouraged using the new improved method for any sampling that had been done using the 1982 method to avoid the "potential violation of the NESHAP." (See: *Improved Asbestos Bulk Sample Analysis Test Method, http://yosemite.epa.gov/r10/owcm.nsf/d14dabb756dc1fb3882565000062f164/878a5d97c3853a2e882566dd0056fee7!OpenDocument*)

A school's AHERA Inspection is for the purposes of satisfying AHERA protocol; not for the purposes of satisfying Montana inspection requirements. The AHERA inspection was designed to be used as an inventory of asbestos material and the condition of the material for input into the school's management plan, and does not contain the same criteria, such as sampling and reporting requirements, as ARM 17.74.354.

Montana regulatory requirements, the need for Montana accreditation, the sample quantities, and the inspection report information requirements all have changed over the years. The message now is the same as it was then: thoroughly inspect to the standards of today.