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To: DEQ Asbestos Online Submission Notice
Subject: Clarification of “sample locations” in ARM 17.74.354(6)

ASBESTOS CONTROL PROGRAM

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This is an attempt to clarify the use of the term “sample locations” in the creation of an asbestos inspection report. The DEQ has found that owners, contractors, and regulators have had difficulty in identifying the locations used by inspectors for sampling and this makes confirmation of a “thorough” inspection difficult. The DEQ, in researching the matter, has identified that the E.P.A. Pink book provides guidance and clarity over sample identification that can be adapted to general use. Three main areas can be summarized as follows:

Diagrams are strongly encouraged and should be prepared approximately to scale and include an identification number, brief description, dimensions and scale, building name and address, inspector name and date, and the location of collected samples with their identification number.

Identification numbers for samples should be non-systematic but unique. The use of alphabetic coding for different materials is appropriate but the addition of a numeric date code within the sample identification will eliminate the confusion that stems from the repeated use of similar alphabetic coding on subsequent dates or different sites.

Narrative descriptions should be made in such a manner so that the area can be identified properly. Broad generalizations such as “first floor” or “room 136” are too vague to provide the ability to establish the exact location. Descriptions such as “first floor, room 136, five feet from North wall, four feet from East wall on floor, brown 9x9 FT” prove more descriptive and meet the intent of ARM 17.74.354. The narrative description should be included in the body of the report as chain of custody notes are vague and difficult to read.

Patty’s Industrial Hygiene proves useful in defining the depth of the sampling location narrative as: “Records should be sufficiently detailed to permit another individual to locate the sampling area and duplicate the previous survey without the assistance of the person who originally recorded the data”

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