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To: DEQ Asbestos Online Submission Notice
Subject: Asbestos Course Length Training Requirements

ASBESTOS CONTROL PROGRAM

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Asbestos Course Length Training Requirements

Several instances have occurred when training providers have submitted notifications, to the Department of Environmental Quality Asbestos Control Program (DEQ), requesting classes (primarily Contractor/Supervisor) be held in a shorter time frame than specified within the Model Accreditation Program (MAP). DEQ has denied these requests.

Within 40 CFR Part 763, Subpart E, Appendix C, the U.S. Environmental Protection Agency (EPA) has established criteria regarding the MAP that states:

“Training requirements for the purposes of accreditation are specified both in terms of required subjects of instruction and in terms of length of training. Each initial training course has a prescribed curriculum and number of days of training. One day of training equals 8 hours, including breaks and lunch.”

DEQ finds that the intent behind this eight-hour limit of class duration is to foster an atmosphere suitable for the retention of information. It is DEQ's policy to ensure that classes with a defined duration listed in “days” will not exceed the EPA definition of eight hours per day. Similarly, the refresher classes are defined by “day” or “one half-day” in their length.

While DEQ recognizes the geographic challenges within Montana, it does not have the authority, regardless of previous practices, to allow for a reduction in the number of “days” by increasing the hours of a class.

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