

From: Asbestos Control Program <deqacponline@mt.gov>
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To: DEQ Asbestos Online Submission Notice
Subject: PLM Point Counting

ASBESTOS CONTROL PROGRAM

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Wet concrete cutting in Anaconda (Left), dry cutting in Billings (Right).

PLM Less Than Ten Percent Must Be Point Counted:

There has been much discussion within the industry over the years dealing with the topic of point counting asbestos sample results. The Administrative Rules of Montana (ARM) incorporate the EPA Method for the determination of Asbestos in Bulk Building Materials, EPA/600/R-93/116, which is the industry standard for the analysis of bulk samples. The EPA itself also forwarded a determination in 1991 that clarified the issue (Control Number C112).

In cases where the asbestos content is “non-detect,” the bulk sampling protocol is complete as long as three samples have been used to confirm this finding. Where the analysis is anything greater than non-detect but less than ten percent, the EPA method and the EPA determination on the subject find that either point counting must be performed, or the material must be assumed greater than one percent ACM.

This additional action provides that the material being sampled has been treated in a manner that affords the lowest probability that it will be categorized incorrectly. Point counting utilizing both the 400 count and the 1000 count methods result in a 95 percent accuracy rating. Where the use of point counting provides a quantification of the findings, these results will always supersede the visual estimation made by the polarized light microscopy method.

Over the course of reviewing paperwork from permitted projects and random inspection reports, we have found a lack of compliance with this protocol. We have drafted this article in an attempt to clarify the issue and supply the regulated community with this educational opportunity. The Program would like to remind everyone that the use of point counting as described above is required under ARM and the EPA. Failure to thoroughly inspect is considered by ACP, DEQ Enforcement, and the EPA as a High Priority Violation and



may be pursued as such.

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