



State of Oregon Department of Environmental Quality

Comments Received on Nov. 29, 2017

Meeting Topics

Asbestos 2018 Rulemaking

Contact: [Michele Martin](#)

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Commenter	Affiliation	Date Submitted
John Sandie	United Neighborhoods for Reform	Dec. 8, 2017
Lisa Jones-Stohosky	Public	Dec. 19, 2017
BJ Hutchins	IQA Home Inspections, Inc.	Dec. 20, 2017
BJ Hutchins	IQA Home Inspections, Inc	Dec. 20, 2017
Kim Kaminski	Waste Management	Dec. 20, 2017
Marilyn Bull	Bullseye Analytical	Dec. 20, 2017

From: John Sandie
Sent: Friday, December 08, 2017 2:31 PM
To: MARTIN Michele
Subject: DEQ Asbestos Advisory Committee

Michele,

Feedback on rules:

Under 340.248.0250. 2(d) I think it would be helpful to add "as per" sections 270 and 280, to remind contractors that the survey exemption still requires them to follow rules in those sections regarding abatement and disposal.

In general, with the discussion on removing non-friable designation that will require IMD up-dating, I'm pushing for an easy and more consistent method to identify all ACM materials (including their origin) through the entire transporting and disposal process. It seems whenever any asbestos containing material is removed from any structure it should be tied to some sort of traceable ID/project number, so when questions arise there is a complete folder (if reports are requested on an ongoing basis) on all activity from a particular potential generator source. Often this folder may just include a survey showing that no ACM was identified... I'm not sure existing abatement project # system does this already; maybe it does but compliance is biggest problem?

If this assigned number is part of site posting, then concerned neighbors have a clear point of reference when talking with DEQ.

Feedback on fiscal Impacts:

Couple typos.... Avoided Health Impacts para 2 "...materials by forces *expected* to act..."
State and Federal Agencies para 1 "...could be an increase (in) communication...."
Cost of Compliance para 1 " delete "approximately"..

Overall, I think the financial impact document has realistically captured the potential costs and revenue streams to identified parties.

Regards,

John Sandie
Sent from [Mail](#) for Windows 10

From: Lisa Stohosky
Sent: Tuesday, December 19, 2017 10:54 AM
To: MARTIN Michele
Subject: False asbestos lab accreditation claims by a new lab in Tigard

Good Morning Michele,

I'm writing to follow up about the need for lab accreditation due to another lab that has cropped up, claiming to be "fully accredited", and mis-analyzing samples, yielding **false negatives**. We know because we've researched this claim and have tested them out.

This is clearly a case of "**Buyer Beware**". They are **false advertising and not accredited**. They only have taken a one-week of course - **highly insufficient training**. Just ask any lab. A training program is critical as being able to ID asbestos in perfect, textbook samples is very different than being able to extract and prep it from building materials. Again, verify with Marilyn or John over at LabCor.

Our industry is dangerous enough. Even the best labs make errors. But, at least good labs that adhere to ISO requirements will make far fewer errors so that there is less risk to human health and **the environment - DEQ's mission**.

I have reports that demonstrate they reported negative results for positive samples which I will gladly send over upon request.

I strongly urge DEQ to set some laboratory testing standards that require proficiency testing, evidence of exhaustive sample prep training, equipment maintenance, record keeping, etc.

Respectfully,
Lisa

--

Elizabeth "Lisa" Jones-Stohosky
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From: BJ Hutchins
Sent: Tuesday, December 19, 2017 11:29 PM
To: 'MARTIN Michele'
Subject: Asbestos Comments

Hi Michele,

In regards to surveys expiring. I think that expiration dates are a reasonable consideration and because it sounds like the primary purpose of applying a validation period to surveys is to help the waste management group I could be in favor of a validation period as short as one year.

I would like to suggest however that a *validation inspection* be an option in lieu of requiring an entirely new survey. With properly formatted reports, that included photos, a walk-thru of a property could be performed by an inspector to verify that the condition/materials have not changed and the report could be validated for another one year duration...however...the validation inspector needs to have the right to retest materials or to request that additional materials be tested if he or she observes suspect ACMs not previously evaluated.

This leads me to another comment in regards to report formatting. What I heard at our last meeting was that members of the DEQ Staff had or were developing a reporting outline and not necessarily a template. I interpret an outline as a list of things required within the body of the asbestos survey report. If this is the case I suggest that a validation inspection sheet or log be included in that outline, something preformatted that can be completed by inspectors should this validation strategy be put to use.

Personally I would like to see a standardized template and format and it sounds like the waste management group would greatly appreciate that as well and help them to efficiently review surveys.

Something that bothered me the most was the report of contractors using survey reports for multiple project locations and the blatant disregard for worker and public health in doing so. I'm wondering if we can't couple the completion of an abatement to the applicable survey report somehow. Perhaps the abatement process has to be completed and signed off by an abatement contractor prior to other construction debris being transported.

This assumes that abatement is required prior to other activities being performed, but in doing so a survey report is essentially finalized by the abatement contractor (dated and signed), which should greatly reduce the instances of contractors reusing reports. If special provisions exist where a contractor seeks to demo an area where ACMs were not found and prior to abatement efforts that process would have to be addressed. Should contractors, including abatement contractors, get caught cheating I vote that they are required to have an accredited inspector onsite full time for any projects completed in the next X number of months and at the contractor's expense.

One other item I have is a question about the asbestos report documents themselves. A copy of a survey for a property must be kept on site - is the asbestos survey report considered public information? Can any member of the public request to see an asbestos survey for a renovation or demolition project that is underway? If so I suggest that it be clarified within the rule.

Is the next meeting scheduled?

Thank you,

BJ Hutchins

President



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Home Inspection Group

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From: BJ Hutchins
Sent: Wednesday, December 20, 2017 12:59 PM
To: 'MARTIN Michele'
Subject: RE: Asbestos Comments

Hi Michele,

I forgot to mention something that I think is critical. I would like to suggest that within the rule we include a list of suspect materials that are to be tested. With all of the professionals involved with this rulemaking we could develop a very comprehensive list that would not only establish some continuity within the surveys, but that would also mitigate inconsistencies between new inspectors and seasoned inspectors. I imagine that at the waste facilities they have to wonder why some materials were sampled and analyzed and why some weren't; this would provide a baseline expectation.

Let's take Vinyl Wall Coverings for example, I've seen them listed on a couple of lists of suspect materials, but two different inspectors I know rarely if ever test this type of material today because they've never seen it test positive for asbestos in the past. Some are obvious; floor tiles and mastic, sheet vinyl flooring, wallboard systems...but what roofing felt and shingles? That is one I've heard come up in one of our meetings – should it be on the list?

I'd like to know what DEQs position is on this and the committees opinion, in the proposed rule change we have outlined the number of samples to be taken, but what types of materials are we to be sampling and testing at a minimum?

Thank you,

BJ Hutchins
President



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From: Kaminski, Kim
Sent: Wednesday, December 20, 2017 3:23 PM
To: michele.martin@state.or.us
Subject: Comments to DEQ's Asbestos Rule Draft Proposal

Good afternoon Michele,

As promised, I am providing comments on the draft *Chapter 340, Division 248, Asbestos Requirements* that DEQ presented at our second Advisory Committee meeting on November 29, 2017. The following comments reflect issues discussed during the Advisory Committee meeting and the meeting held between DEQ and ORRA. The rule proposal is a good start but does not yet go far enough to alleviate the issues that solid waste facilities face concerning the receipt and disposal of asbestos-containing waste materials. We hope that you would give full consideration to our concerns and comments as we are all ultimately aiming to protect human health (our employees, homeowners, transporters and contractors) and the environment.

340-248-0010 - Definitions

Asbestos-Containing Waste Material: DEQ indicated during the Advisory Committee meeting that the NESHAPS definition of asbestos-containing waste materials (ACWM) was utilized in this draft rule. However, DEQ's definition expands the NESHAPS definition and adds confusing and ambiguous language such as "potentially contaminated." We would recommend deleting "potentially contaminating" and instead create a new definition for suspect ACWM. Thus, loads of ACWM actually contain ACWM and if disposed of improperly would be a violation of the asbestos standards, and DEQ could enforce those ACWM requirements. However, loads of suspect ACWM or projects which contain suspect ACWM may or may not contain ACWM. If a project or load does have suspect ACWM or is "potentially contaminated" with ACWM, then DEQ can regulate those materials as such, and conduct enforcement if necessary, before those suspect ACWM arrives at a disposal facility.

Additionally, the language for the definition of ACWM is too inclusive and broad with the phrase "includes, but is not limited to." Instead, DEQ could provide examples of ACWM, within the definition, as the NESHAPS definition does.

Survey: DEQ in its proposed rule deleted the definition of survey and instead describes survey requirements in Section 340-248-0270 (3). We recommend that DEQ cross reference this subsection within the definition of survey for clarity purposes.

340-248-0250 - Asbestos Abatement Project Exemptions

As previously stated and shared during Advisory Committee meetings, we would support the elimination of all exemptions to the asbestos survey requirement. However, realizing that some exemption removals would require legislation and understanding that DEQ prefers some exemptions, we would suggest another solution. The rule should be **explicit** that proper packaging, handling, transportation and disposal is required of all ACWM, regardless if a survey exemption applies to a residential renovation or demolition project. The rule should also provide for penalties applied to homeowners and contractors who do not package, transport, and dispose of ACWM in accordance with the rule. Penalties for improperly packaged ACWM that arrives at a solid waste facility should not be laid at the feet of that transfer or disposal facility.

Although, DEQ stated at the Advisory Committee that proper packaging and handling of any discovered ACWM is required, notwithstanding an exemption, communication with contractors and homeowners performing demolition or renovation work has not been consistent about how exemptions apply to asbestos surveys and that exemptions do not relieve the contractor or homeowner of properly packaging detected ACWM. Therefore, the asbestos rule, any DEQ asbestos informational sheets, website information, and telephonic communications should be clear and unambiguous that ACWM be appropriately packaged and managed.

Finally, if an exemption applies and an asbestos survey is not required for a particular project per the rule, then analytical testing for that project ACWM should also not be required. DEQ has communicated to solid waste facilities that, in fact, all construction and demolition debris projects and loads need analytical testing to assess if a load contains ACWM; this does not comport with the current asbestos rule.

340-248-0260 - Asbestos Abatement Notification Requirements

We support the supplementary requirement that asbestos abatement notification projects have a one-year expiration date, beyond the original start date. Several committee members also discussed requiring an expiration date for asbestos surveys. We would also support that proposal and suggest a one-year expiration date apply to asbestos surveys. Disposal facilities, at times, see photocopies of old asbestos surveys that can be questionable and problematic for our scalehouse staff to review and accept as corresponding to the incoming waste material load. By requiring an expiration date, we can perhaps be more assured that the asbestos survey indeed matches the receiving waste load. If there is concern by contractors that a renovation/demolition project will last beyond the one-year time period or that a new survey will be prohibitively expensive (one committee member identified this as a possible issue), then they can use DEQ's variance process to seek a longer term for those surveys.

340-248-0280 - Asbestos Disposal Requirements

We recommend that there be a newly created term in the rule for "inadvertently received ACWM" or "improperly disposed of ACWM," as ORRA suggested in its proposed language to DEQ. We support some version of the language that ORRA provided to DEQ, understanding that the language may need to be worked through by DEQ:

Definition: "Improperly disposed of asbestos-contained waste material" is asbestos containing waste material that is delivered to a permitted disposal site as defined and permitted in ORS Chapter 459, and such material has not been properly surveyed, abated or packaged as required under statute and rule.

New Section in 340-248-0280: Improperly disposed of material is exempt from the provisions of OAR 340-280-0280. DEQ shall review procedures for the proper handling and disposal of these materials at permitted disposal sites and those procedures will be amended into the site's operating plan, with the goal of providing for public health and worker safety.

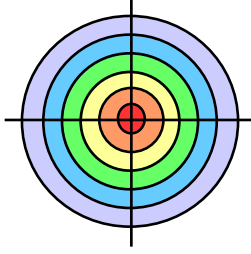
By allowing sites to address this inadvertently received ACWM in a site's operating plan or special waste management plan, it affords the site flexibility in managing ACWM that arrives improperly surveyed, abated, and packaged. DEQ would still maintain oversight over a solid waste facility's management of this type of ACWM since DEQ would review the plan procedures.

Please let me know if you would like to further discuss any of the above comments or if you have any questions. We look forward to the second draft of the asbestos rule requirements and hope the rule proposal addresses and assuages our concerns.

Warm Regards,
Kim Kaminski
Sr Government Affairs Mgr, Pacific NW/British Columbia

Waste Management
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BULLSEYE

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Michele Martin
Department of Environmental Quality
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Dear Ms. Martin,

Thank you for the opportunity to address some important proposed rule changes to Oregon Administrative Rule 340 Division 248. In my opinion, the addition of the requirement for residential renovation survey be conducted by an AHERA accredited building inspector prior to renovation activities is a logical extension of the Senate Bill 705.

It has been my observation that neither the average homeowner or contractor is knowledgeable enough about asbestos containing materials to know what to sample in a demolition or renovation situation. For example, a person might know enough to sample a floor tile because they are replacing the floor, but might not know to sample the associated cove base adhesive or the orange peel wall texture or joint compound under the cove base. All of these will be disturbed during the process. I also frequently encounter misconceptions that asbestos was banned in late 1970s and therefore materials installed after that age do not require testing.

It astonishes me that it has taken 30 years to target waste haulers for proper disposal of asbestos containing materials. Logically, building materials from demolitions and renovations end up at the waste disposal facilities and it should not be the waste haulers or disposal facilities problem to separate out asbestos from nonasbestos materials. The argument that the safety of the waste disposal worker requires these rule changes should also have been just as valid 30 years ago.

The economic impact of having to test all materials that go to the landfills versus worker safety on the landfill side is small compared to potential human suffering that could result from asbestos exposure. However, added costs of even a few hundreds of dollars will cause some people to illegally dump these materials. It is therefore critical we find the most cost effective ways to keep everybody safe.

I struggle a bit with the need to test building materials newer than mid-1990s. However, by sitting on this committee I have learned to appreciate the problems that waste disposal people

have in distinguishing what is actually suspect asbestos containing materials and how could you be expected to date these materials. Testing them all is just way less complicated and will reduce asbestos exposure.

As a bulk asbestos analyst with over 30 years of experience, I do have an opinion that some materials such as fiberglass, blown in paper or glass fiber insulations, glass fiber based roofing shingles, and other materials should be able to be excluded from actual testing as they are visually recognizable to the naked eye with a minimal amount of training. This kind of training could reduce somewhat the economic impact of this rule change. More education and training on how to recognize a suspect material should be offered by the DEQ or Construction Contractors Board. This would benefit homeowner's as well.

Waste disposal representatives on this committee have described the difficulties matching survey reports to dump loads and suggested that reports expire after one year to help solve this dilemma. I am opposed to putting age dates on survey reports because some of my own reports are often used several years later. However, it would not be unreasonable to require visual field verification after 3 years to see if any new materials have been uncovered or to document addition of new materials. There is precedence, as this would be similar to a 3-year re-inspection for schools under AHERA.

Standardization of the survey reports and a DEQ generated standardized table report format should help the waste haulers match loads to reports. I would also advocate for more description of homogeneous sampling areas and actual sampled materials, photos of both material and location, and standardization of wording for various suspect building materials. If everyone was better at providing adequate samples, adequate descriptions, including verbal and photographic, the sharing of this data/knowledge regarding what is actually suspect asbestos material would be a benefit to all.

It is common sense that a laboratory should be accredited in some fashion. Asbestos work in schools requires that a NVLAP lab be used. Many states have adopted this requirement for laboratory work and most EPA approved training providers for asbestos classes will advocate for it as well. As a person who used to run a NVLAP accredited lab I have to advocated for it too, but would also point out that the cost is prohibitive to a small company. Thirty years ago, at the industrial hygiene company I worked for, we calculated that it took enough work coming in to keep 2.5 lab people busy just for the lab just to break even. The cost of the accreditation includes annual fees, inspection fees, and fees for lab standards and quarterly testing that are geared for sets of 4 employees not just one. No price breaks are given to the small laboratory. There is also added cost in supplying documentation of all the required quality control procedures such as equipment calibrations, quality control sample conflicts and many other not so obvious things. At my very first NIST inspection, we could not get a pass on the inspection until the laboratory installed a handicap entrance and we procured off-site data storage. These things had nothing to do with our analytical proficiency.

Perhaps an argument could be made that a single person or very small company should not be in the laboratory game. Large labs have more employees and higher turnover rates which equates to a certain percentage of analysts with less experience. In my opinion, there is risk for biased or incorrect laboratory work to become entrenched in both small and larger laboratories without regular quality control comparisons. Round Robin exchanges and participation in PAT or AAR testing could substitute for NVLAP accreditation. There must be an accreditation or professional licensing or registration at stake to ensure quality results from a laboratory. Without something to lose, there is no repercussion if a lab produces bad data either by fraud or through ignorance. While my own economic impact is at stake, I would also point out that if the Oregon DEQ decides a laboratory must be NVLAP accredited then the DEQ laboratory should also become NVLAP accredited in order for their analysis to be considered valid. This is an additional expense to the state as well.

While I had expected to be challenged regarding laboratory accreditation as part of the proposed rule changes, I did not expect the DEQ to suggest adopting a different laboratory method for the analysis other than EPA 600/R-93-116 Method for the Determination of Asbestos in Bulk Building Materials (July 1993). This analytical method became required for school work because it was considered state of the art at the time. It includes modifications to improve accuracy and reproducibility of analytical results, one of which is the requirement of point counting for samples that test at 10% or less asbestos unless the building owner chooses to accept that the sample is legally asbestos containing without this added procedure.

The suggestion by Eric Feely of the DEQ lab that point counting should be regulated away as a valid analytical method was very surprising to me. The OSHA bulk PLM reference analytical method does not require point because it is "tedious." I do not find this a valid reason to eliminate a useful tool that gets reproducible results in low percentage ranges. One of the reasons it is important to adopt the EPA 600/R-93-116 method is that it requires the analyst to apply the appropriate analytical method for the given sample. We should add alternative better analytical methods not take them away as an option. There are many different compositions of various building materials, many kinds of interferences and binders that are difficult to clear from the fibers, and there needs to be many different ways to analyze them.

The DEQ decided years ago that TEM analysis should only be used to find more asbestos not less and would not take the TEM result over the PLM result when applied to joint compound. Mr. Feely referred to studies where TEM is being used in to show whopping high percentages of asbestos in joint mud therefore questioning the validity of bulk PLM point counts. The contention is that point counting is being used to turn regulated material into nonregulated material. One of the main reasons the Research Triangle Institute requires point counting is that studies showed that analysts typically overestimate the asbestos concentration in low percentage ranges. This was validated by years and years of NIST reference samples sent to accredited labs for their NVLAP accreditation. If there is actually more chrysotile in joint mud now being reported as 1% or less then this does need to be addressed, however, the problem of quantification of relatively large asbestos fiber bundles in the very small split of a sample used in TEM or SEM has already been recognized not only by the DEQ but also by NIST. The

validity of the studies would need independent peer review before we could justify tossing out a federally required analytical method. I think this goes way beyond the purpose of this committee and current set of proposed rule changes.

My reaction at the meeting to the elimination of the point count method was to joke that we should eliminate the 1% definition and call all materials containing any amount of asbestos to be asbestos containing. I want to be very clear that I do not advocate for that. NIOSH has established there is no safe level of asbestos exposure. This does not translate there is no safe level of asbestos fibers in a material. The amount or concentration of asbestos fiber in a material is not what makes it hazardous. It is the amount of respirable fiber in a very specific size range that becomes airborne depending on the forces or work practices applied to that material that is the hazard. As a geologist looking at asbestos samples for over 30 years I can confirm there are trace amounts of asbestos that show up in mineral fillers that are naturally occurring and this happens more frequently than you would suppose. There are thousands of potential minerals one might find in these fillers but commercially common ones from limestone, talc, and gypsum deposits are the ones seen every day by the bulk PLM analyst. Natural asbestos contamination in talc is particularly common. Mineral fillers are present in almost all construction materials. Trace amounts are logical due to the durability and persistence of asbestos to weathering. Trace amounts are very common in joint compound when talc is a major component. It is my opinion that to do away with the regulatory limit of 1% or less that defines nonregulated asbestos would create enormous economic impact. Trace amounts are not necessarily reproducible which is why we do not regulate trace amounts. California uses 0.5% as their regulatory limit but at this level the lab would need to do 1000 point counts versus the standard 400 to achieve reproducible results, so if we want to fight against tedium this would not be the way to go!

I have joked many times over the years that you can train a monkey to analyze asbestos by the bulk PLM method and get it right 95% of the time. The other 5% however takes quite a bit of skill and training and you cannot rely on your accredited lab who is only required to be right 95% of the time. It is unfortunate if your sample is one of the 5% and you are not allowed to bring to bear the most skilled analysts or the best analytical methods when the result is going to impact your pocketbook. The distinction between naturally occurring asbestos in trace amounts and the determination of weathered asbestos versus conversion to morphologically similar minerals such as fibrous clays really does require an expert who knows which tools (analytical methods) need to be used to make the proper identification.

It is important to point out that unless analyzing a known reference standard, there is no right answer for asbestos analysis. The calibrated analyst is actually attempting to provide the most average reproducible result if compared with all other analysts. By quality control standards using Round Robin samples, PAT or AAR samples, that is the 'right' answer. For NIST samples sent for NVLAP accreditation your results are also compared to all the other analysts but actual breakdown of the sample into weight or area percentages are also provided to help you calibrate your analysts. Calibration standards are an absolute necessity to produce a good analyst. It seems to me that state labs who do asbestos analysis should also generate round

robin exchanges with other labs in their state using known reference standards available from NIST in order to bring the quality up for the people of their state. This would also give state regulatory people some feedback on whose lab results could be trusted.

The argument was made at the meeting that the 600/R-93-116 method cannot be adopted because it was not referenced in the federal NESHAP rule. I understand the DEQ's desire to conform to all aspects of the NESHAP rule but the logic of this argument is flawed. This method was not referenced because it was not completed and published until after the NESHAP was published. However, it was referenced in clarification documents that came out after NESHAP was published and these documents informed laboratories that this would be the expected method once completed and that other changes, specifically in reference to gravimetric reduction analysis were being researched and may be coming in the future.

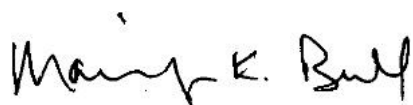
There should always be ongoing research into the best analytical methods for asbestos analysis. Technology has changed dramatically since the original rules were written. There have been advances in microscope technology in particular as well as available hand held devices that can detect serpentines and amphiboles (but unfortunately not the fibrous versus nonfibrous forms of the same mineral) in a manner similar to portable x-ray diffraction guns. We should be re-evaluating analytical methods but it is my understanding this is the purpose of such entities as NIST and ASTM. I see serious problems with adopting an analytical method in state regulations that is different than the one required for schools unless it can be proven the method is actually more rigorous. States are only allowed to adopt their own rules when they are more rigorous than the federal guidelines.

It was suggested that OSHA or NIOSH bulk analytical methods be adopted to replace the 1982 Interim bulk method currently in the DEQ regulations. Lisa Stohsky at JSE Labs and I both agree this is the wrong direction to go. It was called the Interim method because the intent was always to replace it with what became the 600/93-R-116 method. It adds an unnecessary level of confusion for the state required analytical method to be out of sync with mandatory rules required for schools. There may need to be additional discussion and research done on this topic as I think other laboratories will want to express their opinions on this as well, but neither Lisa or I find either of those proposed methods more rigorous than the 600/R-93-116 method. The OSHA method uses too small of a sample to start with and does not require enough mounts made of the material which leads to bias and provides no alternative quantification method after eliminating point counting. The method also states that commercial samples can be presumed to contain asbestos in more than a few percent which is likely true from a material science perspective, but this is a good example of introduced bias. If you are going to assume that instead of doing the quantification method recommended by the people who have studied the problem, then you are reducing the accuracy and precision of the analytical method from which you are trying to eliminate bias. I have observed the real world to be notoriously inhomogeneous but the only real solution there is to take more samples, not take ridiculously small samples, or make assumptions that materials must contain more than 1% because it is a commercial product.

I am a lab person so I feel compelled to discuss the proposed lab changes being discussed by this committee. I will let others discuss changes such as removing the nonfriable category for disposal purposes, which sounds logical as it is common knowledge that these materials cannot help but be broken during the waste disposal process. Since the landfills have made packaging a requirement beyond that required by DEQ anyway, this distinction does seem to have become irrelevant, at least for the people generating the waste. The special problems for the waste facilities of having to deal with all improperly dumped and/or packaged asbestos waste as friable ACM instead of nonfriable does seem to be a complicated situation as they have to satisfy both DEQ and OSHA regulations. I can understand their hesitation to embrace this change given the slight disconnect between DEQ and OSHA regulations. Historically there are examples of materials not regulated under DEQ regulations that are still regulated under OSHA (joint compound in a wall system for example). Even if DEQ comes up with specific methodology for dealing with friable ACM that shows up unpackaged at the landfill, will there still be OSHA regulations they are out of compliance with that could generate violations? I would be concerned about this too if I was a waste hauler and understand with their need for an additional meeting to cover these concerns.

Thank you for your considerations. I would appreciate further discussion with Eric Feely regarding the joint compound analysis by TEM studies he has seen and would also like to know if he has objections to the 600/93-R-116 analytical method based on his own personal experience as an analyst. However, these kinds of technical details may not be of interest to other committee members and maybe best saved for a different venue.

Sincerely,
BULLSEYE
Precision Analytical & Environmental Services

A handwritten signature in black ink that reads "Marilyn K. Bull". The signature is written in a cursive, flowing style.

Marilyn Bull, RPG
AHERA Accredited Building Inspector and Management Planner