



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Lucinda L. Sullivan
Technical Trainer
Asbestos Hazard Management Branch
Department of Environment, Health & Natural Resources
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Dear Ms. Sullivan:

Thank you for your letter of October 15 requesting clarification of EPA's requirements relating to AHERA training course instructor qualifications. As we discussed in our subsequent telephone conversation, EPA has very little written guidance on this subject other than the language contained in the Model Accreditation Plan (MAP) regulation. As you know, 40 CFR Part 763, Subpart E, Appendix C, III(7), states that instructors must have academic credentials and/or field experience in asbestos abatement.

EPA views the MAP instructor qualification criteria as both strict and flexible. It is strict insofar as it requires instructors to demonstrate an ability to present their assigned material and answer questions knowledgeably. It is also flexible because it allows state programs to go beyond EPA's criteria to adopt more definitive standards as appropriate. Further, the MAP requires that all instructors be approved before they present material in a classroom for accreditation purposes.

In determining the adequacy of an individual instructor's academic credentials and/or field experience, it is important to consider them in the context of the actual classroom material the instructor will be responsible for presenting. Where, for example, the training course is a 4-day contractor/supervisor course, and the instructor will be one of only two instructors presenting the entire curriculum, their training or experience must demonstrate broad knowledge of all of the various topic areas they will be covering (e.g., medical monitoring, contracts, personal protective equipment, air monitoring, etc.). If, on the other hand, they are presenting only on one or a few subjects, they should only be expected to demonstrate knowledge in those relevant areas. An example of the latter would be where a licensed industrial hygienist was a lecturer who presented the material on safety hazards, and then left.



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In pursuing this, you may wish to contact Alfreda Freeman, the EPA Region IV Asbestos Coordinator (RAC) in Atlanta, at 404-347-5014, for further information and assistance in this regard. Our regional offices have historically reviewed and approved training instructors in the AHERA program, and their first-hand experience with this procedure may prove helpful to you in deciding what future course to take. In addition, because all new training courses have been approved by EPA-approved state programs since 1989, we might also suggest that you contact these other state program offices for information regarding their criteria or procedures.

We appreciate and encourage your efforts to develop regional criteria for the approval of training course instructors within the states represented by the Southeastern States Asbestos Conference.

Sincerely,



Philip W. King
Field Programs Branch
Chemical Management Division (7404)

cc: Esther Tepper
Pat Curran
Alfreda Freeman

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Epidemiology

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary



October 15, 1993

Mr. Philip King
United States Environmental Protection Agency Headquarters
401 M. St. S. W./T.S. 798
Washington, D.C. 20460

Dear Mr. King:

The North Carolina Asbestos Hazard Management Branch requests that the EPA provide a clarification in regards to instructors who teach AHERA training courses. In 40 CFR Part 763, Subpart E, Appendix C, III (7), it is stated that instructors must have academic credentials and/or field experience in asbestos abatement. As you are aware, the Southeastern States Asbestos Conference is working diligently to provide criteria for these instructors. A clarification of academic credentials and/or field experience is needed until all the states in EPA Region IV are able to adopt this information in their regulations.

Thank you in advance for your prompt attention to this matter. If you have any questions, please contact me at (919) 733-0820.

Sincerely,

Lucinda L. Sullivan
Technical Trainer
Asbestos Hazard Management Branch

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