



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

APR 4 2006

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Vincent Ardito  
OCCU-TEC, Inc.  
6501 E. Commerce, Suite 230  
Kansas City, MO 64120

Dear Mr. Ardito:

In your letter dated, February 22<sup>nd</sup>, 2006, you asked whether providing online refresher training is prohibited under the EPA Asbestos Model Accreditation Plan (MAP) pursuant to the Asbestos Hazard Emergency Response Act (AHERA). After a review of the applicable MAP regulations (Appendix C to 40 CFR Part 763, Subpart E) it is our determination that the MAP does not prohibit EPA approved state accreditation programs from allowing training providers to conduct annual refresher training online. However, the MAP does not allow initial training to be conducted online. Section I.B.2 of 40 CFR Part 763, Subpart E, Appendix C, states that the initial contractor/supervisor course under the MAP must include at least 14 hours of hands-on training.

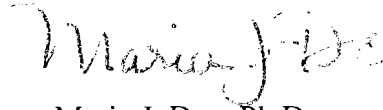
In 1986, the United States Congress passed AHERA (15 U.S.C. §§ 2641-2656), which required the U.S. Environmental Protection Agency (EPA) to establish Federal regulations that safeguard our nation's school children from asbestos exposure in school buildings. AHERA also required that EPA establish an asbestos MAP for states to use to develop their own accreditation programs that are at least as stringent as the EPA asbestos MAP (15 U.S.C. § 2646).

EPA accredited training providers during an interim period after the promulgation of the MAP in 1987 while states were in the process of adopting their own accreditation programs. Today, most states have EPA approved asbestos worker accreditation programs. EPA, therefore, no longer accredits training providers.

Based on our determination that our Asbestos Model Accreditation Plan does not prohibit the use of online annual refresher training, approved MAP states may provide online refresher training or allow a third party (state-approved training provider) to provide such online refresher training.

If you have any further questions, please contact Robert Courtnage of my staff at (202) 566-1081 or e-mail him at [courtnage.robert@epa.gov](mailto:courtnage.robert@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Maria J. Doa". The signature is written in a cursive style with a large initial "M".

Maria J. Doa, Ph.D.  
Director  
National Program Chemicals Division

cc: Regional Asbestos Coordinators  
Chris Kaczmarek, OGC  
Everett Bishop, OECA  
Carl Eichenwald, OECA