



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

MAR 10 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Andra Liberty and Thomas J. Broido  
ATC Associates Inc.  
171 Commerce Street  
P.O. Box 1486  
Williston, Vermont 05495

Dear Ms. Liberty and Mr. Broido:

This is in response to your question, received on December 3, 2008 by James Bryson of US EPA Region 1, regarding vermiculite insulation in the concrete masonry unit walls in several of your clients' school buildings.

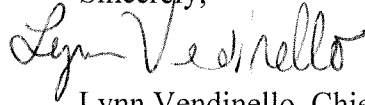
You asked the following question in your letter: if vermiculite insulation bulk samples analyzed by standard PLM analysis (the AHERA-recognized method of analysis for schools found in Appendix E to 40 CFR Part 763, Subpart E) is found to be negative for asbestos, can schools treat the vermiculite as a non-asbestos containing material under AHERA? In the event that the answer to this question is no, you also asked whether a school could use the standard PLM analysis plus additional analysis by the "CARB B" or "Cincinnati Method" to determine vermiculite to be negative for asbestos.

While there are a number of issues at play in determining whether vermiculite insulation qualifies as asbestos-containing material under AHERA and the AHERA regulations, it certainly is the case that vermiculite insulation containing less than 1 percent asbestos would not qualify as asbestos-containing material. In your particular situation, the PLM testing and analysis that you have described would appear to suffice to make this determination as long as the bulk samples taken comply with the sampling requirements set forth in 40 CFR Part 763.86, and the subsequent analysis of those samples complies with the analysis requirements set forth in 40 CFR Part 763.87.

Finally, you should be aware that in our May 2003 guidance to homeowners concerning vermiculite insulation in the home, EPA advised that it is best to assume that the vermiculite insulation in the home may contain asbestos due to uncertainties with existing testing techniques. As such, EPA recommended that homeowners hire professionals trained and certified to handle asbestos if they plan to remove vermiculite insulation.

If you have any further questions or comments, please contact Tom Simons of my staff at (202) 566-0517 or by e-mail at [Simons.Tom@epa.gov](mailto:Simons.Tom@epa.gov)

Sincerely,

A handwritten signature in cursive script that reads "Lynn Vendinello". The signature is written in black ink and is positioned above the printed name.

Lynn Vendinello, Chief  
Fibers and Organics Branch  
National Program Chemicals Division