



# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL HEALTH SECTION

### Circular Letter EHS #2010-48

**TO:** Licensed Asbestos Contractors, Licensed Project Monitors,  
Asbestos Training Providers and Other Interested Parties

**FROM:** Ronald Stromro, Supervising Environmental Analyst  
Department of Public Health  
Asbestos Program

**DATE:** August 16, 2010

**SUBJECT:** Regulatory Interpretations Regarding Post Abatement Reoccupancy Criteria

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This correspondence serves to clarify regulatory interpretations of the Department of Public Health (DPH) Asbestos Program regarding the post abatement reoccupancy criteria detailed in Section 19a-332a-12 of the Regulations of Connecticut State Agencies (RCSA – *Standards for Asbestos Abatement*). These reoccupancy criteria include requirements for both visual inspection and air sampling within the work area.

#### **Post Abatement Visual Inspection – Facility Reoccupancy**

Subsection 19a-332a-12(b) requires, in part, that an asbestos abatement project be determined complete when there is no visible residue in the work area. It is the interpretation of the DPH that a licensed asbestos consultant, who is certified as a project monitor, must perform the visual inspection to determine that no visible residue is present within the work area.

This interpretation is based upon the provisions of Section 20-440-3 of the RCSA (*Licensing and Training Requirements for Persons Engaged in Asbestos Abatement and Consultation Services*). As provided under Section 20-440-3, no individual shall provide services as an asbestos consultant within Connecticut without first obtaining a license as an asbestos consultant issued by the DPH.

Further, Subsection 20-440-3 (b)(4)(A) establishes the scope of certification for a project monitor. In accordance with this Subsection, certification as a project monitor authorizes a licensed consultant to ensure that abatement projects are properly conducted and completed.

#### **Post Abatement Visual Inspection – No Reoccupancy of the Facility**

In the event that a building is not reoccupied following an abatement project, the asbestos contractor must still ensure that no visible residue is present within the work area. In accordance with Subsection 19a-332a-5(g), the sequence of wet cleaning and HEPA-filtered vacuuming shall be repeated until no visible residue is observed in the work area. Further, as required under Subsection 19a-332a-7(c), a coating of encapsulant shall be applied to all surfaces that have been stripped of asbestos-containing material to securely seal any residual fibers that may be present after the surfaces have been visually inspected and found to be free of all visible residue.

As stated previously, it is the interpretation of the DPH that a licensed asbestos consultant, who is certified as a project monitor, must conduct the visual inspection to determine that no visible residue is present in the work area.

The project monitor must make the determination that no visible residue is present within the work area prior to the application of the encapsulant. The project monitor must make this determination in determining the completion of all abatement projects, regardless of whether the facility is to be reoccupied.



410 CAPITOL AVENUE, MS#51A1R  
PO BOX 340308, HARTFORD, CT 06134  
Bus: 860.509.7367 Fax: 860.509.7378

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**Post Abatement Air Sampling – Facility Reoccupancy**

In accordance with Subsection 19a-332a-12(b), except as provided for under Section 19a-333-7 of the RCSA (*Asbestos Management in Schools*), an asbestos abatement project shall be considered complete when there is no visible residue in the work area and when the ambient interior airborne concentration of asbestos after the abatement project, does not exceed the levels specified in Subsection 19a-332a-12(e). It is the interpretation of the DPH that a licensed asbestos consultant, who is certified as a project monitor, must conduct the air sampling specified under Section 19a-332a-12 and under Section 19a-333-7, as applicable.

**Post Abatement Air Sampling – No Reoccupancy of the Facility**

The DPH strongly recommends that post abatement reoccupancy air sampling be conducted following the completion of all asbestos abatement projects, including abatement projects conducted in advance of the demolition of the facility. However, if a facility is not to be reoccupied following an abatement project, post abatement air sampling is not required.

In determining whether post abatement air sampling should be performed consideration should be given regarding various reasons that a facility scheduled for demolition would be reoccupied. Such reasons may include, but not be limited to, the requirement to shut off utilities, the desire to salvage building materials, and the need to ensure that a facility is vacant for safety reasons before commencing demolition. Given that there are limited circumstances under which a facility will not be reoccupied following an abatement project, it is advisable to have a licensed asbestos consultant, who is certified as a project monitor, collect post abatement reoccupancy air samples after all abatement projects.

In the event that no post abatement air samples are collected following the visual inspection determining that no visible residue is present, the asbestos contractor remains responsible for ensuring that all barriers as defined in Subsection 19a-332a-5(c) remain in place until the facility is demolished. All other polyethylene sheeting as required by Subsection 19a-332a-5(e) shall be removed from the work area. This polyethylene sheeting shall be disposed as asbestos-containing waste. Warning signs, as required by Subsection 19a-332a-5(a) shall remain in place until the facility is demolished.

**Demolition of a Structurally Unsound Facility – Visual Inspection**

A licensed asbestos consultant, who is certified as a project designer, must submit an alternative work practice application to the DPH when a structurally unsound facility is to be demolished that is known or assumed to contain asbestos. As a condition of approval of such an application, the DPH requires that a licensed asbestos consultant, who is certified as a project monitor, shall conduct a final visual inspection of the established work area to ensure that no visible debris is present in the work area.

Please contact the DPH Asbestos Program at (860) 509-7367 should you wish to discuss this matter further.

cc: Suzanne Blancaflor, M.S., M.P.H., Chief, Environmental Health Section, DPH  
Ellen Blaschinski, Chief, R.S., M.B.A., Regulatory Services Branch, DPH