



STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH AND ADDICTION SERVICES

MEMORANDUM

TO: Asbestos Contractors, Asbestos Consultants and Other Interested Parties

FROM: Ronald Skomro, Supervising Environmental Sanitarian
Asbestos Program

DATE: June 30, 1995

SUBJECT: Asbestos Related Issues

The following information is provided concerning Department of Public Health and Addiction Services regulatory requirements and policies concerning several asbestos related issues. This information is provided to help ensure regulatory compliance.

Alternative Work Practice Applications

Alternative work practice applications submitted pursuant to the requirements of Section 19a-332a-11 of the regulations of Connecticut State Agencies must be made by a licensed Project Designer. The development of an alternative work practice requires a determination as to how asbestos abatement should be conducted. As such, this task falls within the scope of certification for a Project Designer detailed in Section 19a-332a-19(c)(1) of the regulations of Connecticut State Agencies.

Enclosed is a revised Alternative Work Practice Application form to be submitted when making application to this Department. This form must be used to make such application to the Department. You will note that this form requires that the name and license number of the Project Designer be provided. Failure to submit this form with all pertinent information will result in the denial of the application.

A revised Alternative Work Practice Guidance Document is being prepared and will be provided once available.

Post Abatement Sampling/Project Monitoring

The collection of samples to determine compliance with the post abatement reoccupancy criteria of Section 19a-332a-12 of the regulations of Connecticut State Agencies is considered a function of a Project Monitor. An individual providing this service must be licensed as a Project Monitor pursuant to Section 19a-332a-19 of the regulations of Connecticut State Agencies.



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A licensed Asbestos Contractor who wishes to provide this service must be separately licensed as a Project Monitor. Please note that Section 19a-333-2(i) of the regulations of Connecticut State Agencies requires local education agencies to avoid any conflict of interest in the selection of personnel to perform activities under Sections 19a-333a-1 through Section 19a-333a-13 of the regulations of Connecticut State Agencies (Asbestos-Containing Materials in Schools regulations). Further in accordance with the provisions of Appendix A of 40 CFR Part 763, Subpart E requires that sampling operations be performed by qualified individuals completely independent of the abatement contractor to avoid possible conflict of interest.

Asbestos Abatement By Homeowners

In accordance with the provisions of Section 19a-332a-18 of the regulations of Connecticut State Agencies, no person shall provide the services as an asbestos contractor without a license issued by the Commissioner of the Department of Public Health and Addiction Services. Asbestos abatement, except for a spot repair as defined in subsection 19a-332a-17(cc) must be performed by a trained asbestos abatement site supervisor or a trained asbestos abatement worker. These provisions prohibit a homeowner from performing asbestos abatement, except a spot repair, unless the homeowner is licensed as an Asbestos Contractor.

Asbestos Abatement Notifications

The provisions of Section 19a-332a-3 of the regulations of Connecticut State Agencies require that asbestos abatement notifications be postmarked or hand delivered at least ten (10) days before the start of asbestos abatement, or in the case of emergency asbestos abatement, within one (1) working day after the start of asbestos abatement. Asbestos abatement contractors or facility owners who provide notification of asbestos abatement must comply with these requirements. Failure to comply with these requirements will result in the initiation of enforcement action by the Department which may result in a delay in the performance of the asbestos abatement.

It is intended that similar correspondence will be issued periodically to provide clarification concerning regulatory requirements or policy issues. Please contact the Asbestos Program at (203) 566-1260 should you have any questions concerning these issues.