



Asbestos: Inspection Report Requirements

The statements in this document are intended solely as guidance. This document is not intended, nor can it be relied on, to create any rights enforceable by any party in litigation. This guidance may be revised without public notice to reflect changes in law, regulation or policy.

This document is one in a series of fact sheets designed to assist you in becoming aware of the Missouri Department of Natural Resources' asbestos requirements. This particular document contains general information about asbestos surveys or inspections.

Asbestos Inspection Requirements

Any project subject to the National Emission Standard for Hazardous Air Pollutants, or NESHAP, for Asbestos, 40 CFR Part 61, Subpart M will require an asbestos inspection. The year of construction or renovation of a regulated facility does not affect the inspection requirements. NESHAP requirements are discussed in the Department's fact sheet, *Asbestos Requirements for Demolition and Renovation Projects (PUB2157)* available on the Web at dnr.mo.gov/pubs/pub2157.pdf. Additional asbestos information is available at dnr.mo.gov/env/apcp/Asbestos.htm.

An asbestos inspection occurs when an individual inspects a building or facility for the presence of asbestos-containing material, or ACM. Suspect ACM, is also looked for during the inspection. This is any material potentially containing asbestos but has not been sampled and analyzed for asbestos content. An asbestos inspection also includes re-examining a building or facility to identify the presence or location of additional or existing ACM, suspected ACM or to determine the current condition of previously identified ACM following an event such as a fire or flood.

The following inspections or assessments do not normally qualify as thorough NESHAP asbestos inspections:

- Periodic surveillance in schools as required by the U.S. Environmental Protection Agency by the Asbestos Hazard Emergency Response Act, or AHERA.
- Full AHERA inspections or reinspections in school buildings to be demolished.
- Visual inspections to determine if asbestos related work is complete.
- Compliance inspections performed by an agent of a government agency and Phase I environmental assessments.

Asbestos Inspection Personnel

A person certified as an asbestos inspector by the department must conduct all inspections and assessments. A list of certified inspectors is available at dnr.mo.gov/env/apcp/Asbestos.htm.

The NESHAP requires thorough inspections be conducted. For renovation projects, inspections need only include those areas of a building impacted by the renovation work. For demolition work, thorough inspections should include destructive sampling and access to all areas of the building.

Total Number of Samples Required

No sampling is required if the inspector presumes that ACM is present and the owner or operator responsible for the project decides to treat it as ACM. However, for a suspect material to be considered as non-ACM, a minimum number of samples must be collected and analyzed. The department recommends inspectors follow, at a minimum, the 3-5-7 rule suggested in the Asbestos Hazard Emergency Response Act.

Inspectors should also note both the condition of the materials and their quantities in the report. If known, inspectors should comment on the potential work practice impacts on Category I and II nonfriable or stable ACM that have the potential to be left in-place during demolition or renovation projects.

Asbestos Sample Analysis Requirements

The department strongly recommends all asbestos analysis be conducted by either:

- A laboratory credited by the National Institute of Science and Technology through the National Voluntary Laboratory Accreditation Program.
- A laboratory with successful participation in the asbestos bulk analysis program of the American Industrial Hygiene Association.

Asbestos Inspection Report Requirements

The written report should be provided to the person requesting the inspection. The asbestos inspection and assessment report should contain the following information:

- A general description of the structure, the areas inspected (including any areas that were not accessible) and the date of the inspection.
- The location of each homogeneous material known or assumed to contain asbestos.
- If an assessment of homogeneous material is performed, the condition of each homogeneous material known or assumed to contain asbestos and is it a regulated material.
- The quantities of known or assumed ACM in square, linear or cubic feet.
- The laboratory data including the name of the lab, the results and analyst's signature.
- The inspector's signature and a signed and dated copy of their asbestos inspector certificate as provided by the department.

Completed copies of asbestos inspection reports should accompany all NESHAP renovation and demolition notifications submitted to the department or local agencies.

Asbestos Contact Information

For more information about the department's asbestos requirements, contact the department's Air Pollution Control Program or one of the other offices listed below that have additional asbestos requirements for their area:

Kansas City Health Department, Air Quality Section	816-513-6314
St. Louis Division of Air Pollution Control	314-657-1517
St. Louis County Health Department	314-615-8924
Springfield-Greene County Health Department	417-864-1662

For More Information

Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102
Phone 573-751-4817
Fax 573-751-2706

dnr.mo.gov/env/apcp/Asbestos.htm