



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94108-3901

April 14, 1993

Mr. Elvin Burnside
AHERA Compliance Monitor
Facilities and Transportation Services
Clark County School District
1700 Galleria Dr., bldg. C
Henderson, Nevada 89014

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C.C.S.D.
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Dear Mr. Burnside:

This is an additional response to your request for guidance as specified in your letter of March 11, 1993 to the EPA Regional Administrator.

In your letter, you stated that Clark County School District ("CCSD") proposed that at the conclusion of any AHERA asbestos response action that a minimum of five (5) TEM air samples be collected from inside the abatement area, and no samples be collected outside the abatement area.

During a discussion on the technical interpretation of this issue with EPA Headquarter's staff, it became apparent that the various EPA documents, which were quoted to you, failed to be specific regarding the number of samples to be collected for the second analytical method, as specified in Section 763.90(4). We have been advised that this optional alternative to Section 763.90(3) does allows only five samples to be collected and analyzed. At the same time, the first collection method, found in paragraph (3), is preferred, as the inside abatement area cannot be cleaned better than the outside abatement area level of fibers.

The Headquarters staff pointed out the following consequences in using the second analytical method:

- 1) If the analysis of the first five samples fails the analytical method, the contractor must re-clean the site.
- 2) The analysis of the second set must be independent of the first, and at no point can any five samples be compared, using the Z-test calculation, to any other five samples not taken at the same time. I think we are in agreement on this.

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

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From: W.C.S.D.	To: ANDREW SATO / GJC
Dept./Agency: JOHN NOLAN	Phone: 324-4044
Fax: (702) 851-5683	Fax: (702) 323-1598

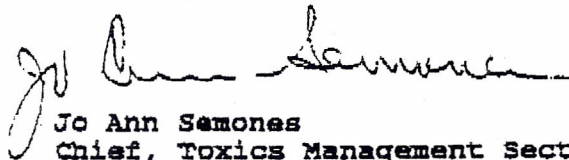
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Reviewing your "Minimum Requirements for Clearance Samples" distribution, it is apparent that you are specifying the analytical method to be used. Do your reports from laboratories also specify that this is the method of analysis they have used? Requesting laboratories to clarify this on each Lab report would provide documentation that they are following your requirements.

EPA hopes this has not caused you or Clark County School District any inconvenience by not correctly interpreting this in our first letter.

If you have any further questions or comments on this issue generally, you may address them to Gladys Hansen, Case Development Officer, Toxics Management Section, at (415) 744-1123.

Sincerely,



Jo Ann Semones
Chief, Toxics Management Section

cc: Jan Villaire
Don Lanier