

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner



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EHS Circular Letter 2013-66

To: All Connecticut Certified Asbestos Laboratories

From: Dermot Jones, MS, MPH, CPH
Environmental Laboratory Consultant/Certification Officer
Environmental Laboratory Certification Program (ELCP)

Date: December 6, 2013

Re: Laboratory Analysts Analyzing in the Field for Asbestos by PCM

There have been issues with the ELCP policy of allowing laboratory analysts to test air samples for asbestos by PCM at on-site locations. The policy was established in 2005 as outlined in the enclosed circular letter.

The ELCP office allowed laboratories certified for asbestos analysis the flexibility of having their analysts read samples on-site so that post abatement /reoccupancy projects could be done in a timelier manner. It seems that there have been instances where individuals have been taking advantage of this policy. This letter is intended to prevent any other misunderstandings or further abuses regarding this policy by registered environmental laboratories certified to test asbestos samples by PCM.

The ELCP office registers and approves environmental laboratories and grants certification for testing. Laboratory asbestos analysts are not given any special licensure or certification from the Connecticut Department of Public Health.

As a requirement to maintain laboratory certification laboratories must successfully analyze proficiency test samples. There are two options for laboratories to take in order to meet the proficiency test sample requirement. Laboratories can either have their analysts participate in a proficiency analytical testing (PAT) or an asbestos analysts testing (AAT) program from AIHA. If laboratories choose the PAT option their analysts can only read samples at the laboratory location. If laboratories choose the AAT option then the ELCP policy stated in the circular letter dated May 6, 2004 applies.



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The analysts that are listed on the AIHA asbestos analyst registry (AAR) for a given environmental laboratory, which would also be listed with AIHA as an approved organization, are employees of said laboratory. The AAR registration number is assigned to a laboratory analyst and is associated to one environmental laboratory and is not transferable unless the analyst changes his/her employment to another laboratory. When the ELCP office schedules an on-site inspection with an asbestos certified laboratory, the list of laboratory analysts provided to the auditor must match the list of analysts on the AAR if the laboratory has been maintaining its certification by participating in the AAT program. It is only those analysts listed on the AAR and employed by the laboratory that can read air samples at on-site locations for that laboratory.

As stated above, the ELCP office does not certify or license asbestos analysts. Laboratory analysts listed on the AAR are not independent asbestos analyzers and can't freelance to do PCM analysis work that is not directly being performed as a result of their employment with a registered and approved environmental laboratory.

Asbestos certified laboratories choosing to maintain their certification by having their analysts listed on the AAR shall adhere to the on-site testing policy established in 2005, otherwise the ELCP office may take action by eliminating this practice. If it is determined that abuses to the policy are continuing, the ELCP office would then only offer asbestos certified laboratories the PAT option in maintaining their certification.

Hopefully this notice clarifies the policy established by the ELCP office in 2005 and it is understood that the policy is not permanent and can be changed as circumstances dictate.

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