



# Asbestos Inspection and Report Requirements

It has come to the attention of the Division that there has been a great deal of “interpretation” as to what constitutes an asbestos building inspection and the resulting asbestos inspection report. Colorado Regulation No. 8, Part B, requires that the inspection of a building - including the identification, sampling and assessment of suspect materials - and the components of the final report summarizing the findings must be done in accordance with the appropriate portions of Section IV. Many inspections and inspection reports reviewed by the Division are deficient and do not constitute a complete and accurate inspection of the building, structure, facility or component(s) and many do not include required information in the final report.

The inspection requirements in the Asbestos Hazard Emergency Response Act (AHERA) were designed to identify suspect materials that students or staff might encounter so as to have those materials sampled by a certified asbestos building inspector (or materials could be assumed to be asbestos-containing) in order to develop a meaningful management plan whose ultimate purpose is to prevent unintended disturbance of ACM in order to protect building occupants from being exposed to asbestos. Section III.A.1.b. of Regulation No. 8, Part B, requires suspect materials that will be impacted by renovation or demolition activities to be sampled by a certified asbestos building inspector (or assumed to be asbestos containing) and assessed as required by Section IV., prior to the start of those activities.

While the building type may be different – a school building vs. a public and commercial building or single-family residential dwelling – the basic inspection procedures and components of the inspection report are the same. All asbestos inspections and reports, whether it is an inspection of one component or of the entire building, must comply with the requirements of Section IV. of Regulation No. 8, Part B. An inspection prior to renovation or demolition activities may be more inclusive. Unlike AHERA, all suspect materials - inside and out - must be identified and assessed.

Inspections conducted prior to renovation or partial demolition activities might focus only on areas or materials that would be disturbed by that activity. Inspections conducted prior to full demolition must comprehensively identify all suspect materials and homogeneous areas in and on the building, structure or facility.

The following are required elements of an asbestos building inspection and report. If any of these are missing from the report it will be deemed as not complying with the minimum requirements of Colorado Regulation No. 8, Part B. The exact report format may be determined by each inspector or firm.

For each building, structure, facility or component(s) inspected to determine the presence of asbestos – containing materials, the Colorado certified asbestos building inspector shall:

- First and foremost, identify, quantify and categorize all homogeneous areas of suspect ACM. This information is required for all materials, not just those that are confirmed as ACM.
- Touch all suspect ACM to determine whether the material is friable or non-friable.
- Either assume suspect material to be ACM or collect, in a statistically random manner representative of the homogeneous area, bulk samples of suspect ACM as follows:

- Surfacing Material – Additional information on sampling surfacing material can be found in the EPA “Pink Book”, Asbestos In Buildings: Simplified Sampling Scheme For Friable Surfacing Materials (1985).
  - At least three bulk samples shall be collected from each homogeneous area that is 1,000 square feet or less. This is based on the quantity of the surfacing material, not footprint of the homogeneous area. Note that homogeneous areas must be determined prior to any sampling/analysis being done, *not* after.
  - At least five bulk samples shall be collected from each homogeneous area that is greater than 1,000 square feet but less than or equal to 5,000 square feet. This is based on the quantity of the surfacing material, not footprint of the homogeneous area.
  - At least seven bulk samples shall be collected from each homogeneous area that is greater than 5,000 square feet. This is based on the quantity of the surfacing material, not footprint of the homogeneous area.
  - It is recommended, though not required, that nine bulk samples be collected from each homogeneous area of friable surfacing material.
- Thermal System Insulation – Additional information on sampling thermal system insulation can be found in the EPA “Purple Book”, Guidance For Controlling Asbestos-Containing Materials in Buildings (1985)
  - At least three bulk samples shall be collected from each homogeneous area of thermal system insulation.
  - At least one bulk sample shall be collected from each homogeneous area of patched thermal system insulation that is less than six square or linear feet.
  - In a manner sufficient to determine whether the material is ACM, collect bulk samples from mechanical system fittings such as “Ts”, elbows, and valves.
  - Bulk samples are not required where the Colorado certified asbestos building inspector has determined the thermal system insulation is fiberglass, foam glass, rubber, or other non-suspect ACM insulation. The inspector is still responsible to look under the non-suspect ACM insulation to determine that another suspect material is not present.
- Miscellaneous Material
  - In a manner sufficient to determine whether the material is asbestos-containing, collect bulk samples from each homogeneous area.
- Provide a written report of the asbestos inspection findings and assessment. The report shall include:
  - The name (if applicable) and address of the building, structure or facility that was inspected. If there is no street address, GPS coordinates are required. If less than the

entire building, structure or facility is inspected, the exact location of the area or component(s) inspected shall be listed.

- The clients' name and contact information.
- The Colorado certified asbestos building inspector's name, signature, contact information, individual certification number, and Asbestos Consulting Firm name and registration number.
- The date(s) the inspection was performed.
- A description of the purpose and scope of the inspection. For example: complete or partial renovation, complete or partial demolition or spill identification.
- A physical description of the building, structure, facility or component(s) inspected.
- Date(s) of construction and any known renovations.
- A description of the manner used to determine homogeneous areas and sampling locations. See the requirements for surfacing materials in the "Pink Book" and thermal system insulation in the "Purple Book".
- The location and quantity or volume of each homogeneous area of all suspect ACM. All spaces represented by each homogeneous area shall be listed.
- A blueprint, diagram or drawing of the building, structure, facility or component(s) with each homogeneous area delineated, exact sample locations identified, and each homogeneous area determined or assumed to be ACM clearly illustrated. It is recommended that photographs and detailed descriptions of each suspect and/or known ACM and assumed material are included in the report.
- A copy of the analytical report, which must contain the name and address of the laboratory performing the analysis, the laboratory's CDPHE registration number and NVLAP accreditation number, the chain-of-custody paperwork, the date of analysis, the name and signature of the microscopist performing the analysis, the method of analysis and the results of the analysis. Point count or composite analysis analytical data must also be included if performed.
- Current condition of the known or assumed ACM, whether the material is in good condition, it is damaged or significantly damaged.
- An assessment of all known or assumed ACM as to whether, in its current condition, it is friable or non-friable. If the ACM is non-friable in its current condition, the inspector's opinion as to whether the ACM will remain non-friable if disturbed by renovation or demolition.
- For ACM that will remain after renovation, the following information shall be provided:
  - Whether the ACM is accessible

- The potential for damage
- Known or suspected causes of damage
- The Colorado certified asbestos building inspector's conclusions and recommendations. This shall include a list of all known or assumed ACM based on the scope of the inspection along with a physical description.
- If ACM has been disturbed, the inspector must quantify the amount of ACM disturbed and determine if there is a major or minor asbestos spill present.

Demolition Notice Application Forms will not be approved if the asbestos inspection report is labeled "limited" or states that it was "limited in scope" unless the demolition is specific to an area or component(s). Demolition inspections may require destructive sampling to locate and sample all suspect materials that may be under or behind other building components, or otherwise hidden from view or at least to rule out their existence. Therefore, it is advised that the building be empty or at least unoccupied (with repairs made prior to re-occupancy) during the inspection. Inspection reports for demolition containing sentences such as *"The attic/basement/boiler, etc. was not accessible during this inspection"* or *"There may be materials under the ones tested"* will result in the denial of the Demolition Notification Application Form. The inspector is required to and is responsible for inspecting **all reasonably accessible** areas where suspect material may be present. An asbestos inspection report for demolition must contain the above statement because the inspector's signature on the Demolition Notification Application Form certifies that they have thoroughly inspected the facility and sampled all suspect materials. Failure to make all reasonable effort to identify homogeneous areas and to sample or assume suspect materials may lead to enforcement.

The Division does not expect that an inspector will perform demolition (which is defined as the wrecking or removal of load-bearing members) in order to locate and sample materials. However, if there is concern that there may be suspect materials in areas that actually require demolition in order to access them such as the removal of the slab or foundation, the inspector should clearly state this in their report so that the building owner knows that an inspector should be on site to identify suspect materials when uncovered.

For questions or clarification, please contact the CDPHE Indoor Environment Program at 303-692-3100 or [cdphe.asbestos@state.co.us](mailto:cdphe.asbestos@state.co.us).