

Guidance for Consultants: Top 5 Inspector Violations

Schools are required to use a certified Asbestos Inspector to identify asbestos-containing material (ACM). A summary of common violations is provided to assist consultants comply with AHERA requirements.

1. Inaccurate Identification

- Inspector combines two different types of asbestos-containing material (ACM), such as floor tile and mastic, into one homogenous area.
- Inspector combines material that is not similar in color, texture, size or vintage into one homogeneous area, such as multiple colors of floor tiles or multiple styles of ceiling tiles.
- Inspector fails to identify specific locations of ACM, simply stating “throughout school.”
- Inspector fails to differentiate assumed-ACM from materials that were sampled and identified as ACM.
- Suspect ACM that has been tested and determined not to contain asbestos is not clearly indicated.

2. Quantities not Provided

- Inspector fails to include the quantities of ACM and assumed-ACM.

3. Inadequate Sampling

- Inspector fails to collect an adequate number of samples, often collecting only one sample.
- Inspector collects samples using a sampling scheme that is not representative of the homogeneous area. i.e. collects multiple samples from the same room and uses that data to represent a large homogeneous area, such as all ceiling tiles throughout the school.
- Inspector relies on previous bulk sample analysis that cannot be matched to a sample location. i.e. information on original reports cannot be matched to a current location in the school.
- Inspector fails to properly apply patch material in areas where samples were collected.

4. Inadequate Assessment

- Inspector fails to properly classify the ACM into one of the 7 AHERA categories. i.e. Inspectors issue a rating of “High” for any disturbance factor but classify it as potential for damage rather than potential for significant damage.

5. Inspection Report

- Inspector fails to provide the inspection report to the school within 30 days.