



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

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MEMORANDUM

SUBJECT: EPA Guidelines for States Regarding Online Asbestos Model Accreditation Plan (MAP) Annual Refresher Training

FROM: Lynn Vendinello, Chief *Lynn Vendinello*  
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TO: EPA Regional Asbestos Coordinators, State Regulatory Stakeholders

On April 17, 2007, we provided via e-mail a summary of comments received from State regulatory stakeholders on our draft guidelines for online Asbestos Model Accreditation Plan (MAP) (40 CFR Part 763, Appendix C to Subpart E) annual refresher training. After considering and, where appropriate, incorporating these comments into the guidelines, today EPA is issuing the final guidelines, also available at the EPA asbestos website at <http://www.epa.gov/asbestos>. The major comments received included, among others:

- Online systems should authenticate the identity of the students taking the course.
- Appropriate protections should be implemented to prevent fraud.
- Training providers should not be able to get approval from one state and then offer the course nationwide based on that specific state's approval.
- The course instructor should be available to answer student questions while the course is being taken.
- Personal interaction between course attendees during traditional (i.e., classroom-based) annual refresher training is important and should be facilitated via online training as well.
- There should be a statement on the training certificate that the MAP annual refresher training was taken online.
- If a test is given in connection with the online annual refresher training, it should be proctored or, alternatively, taken at a testing center.

EPA has revised the guidelines to address these key comments, as well as some others not specifically highlighted above. We wish to recognize the assistance and support of both the EPA Regions and the States in developing this new guidance. The guidelines are now comprised of two distinct sections: (1) a summary of relevant asbestos MAP requirements, and (2) recommendations for states with a MAP at least as stringent as the EPA MAP to consider when evaluating proposed online annual refresher training courses. EPA believes that these guidelines will enable states to properly evaluate a proposed online annual refresher training course. EPA may update this document in the future based on input from the states as further experience is gained in this area.

Attached, please find EPA's *Guidelines for States Regarding Online Asbestos MAP Annual Refresher Training*. Any state wishing to implement this new guidance may at their discretion proceed by directly notifying its accredited training organizations of any specific procedures, requirements or restrictions that it will apply. For further information, or for questions regarding these guidelines, please contact Robert Courtnage of my staff at (202) 566-1081.

Attachment