



Division of Air Pollution Control Response to Comments

Rule: Ohio Administrative Code Chapter 3745-22

Agency Contact for this Package

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Ohio EPA held a 23-day public comment period ending September 22, 2017 regarding new draft rules in Ohio Administrative Code (OAC) Chapter 3745-22, "Asbestos Hazard Abatement Contractors, Specialists & Other Professionals." This document summarizes the comments and questions received at during the associated comment period).

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

OAC Ch 3745-22

Comment : After reviewing OAC Chapter 3745-22, I have the following comments:

1. 3745-22-01 (D): Remove "or industrial hygienist in training" from the statement "An industrial hygienist or industrial hygienist in training certified by the American board of industrial hygiene is exempt from certification as an asbestos hazard abatement air-monitoring technician. I understand the IHIT designation no longer exists with the ABIH. Another option would be to replace the IHIT with Certified Associate Industrial Hygienist (CAIH). According to the ABIH, the certification process for the CAIH was similar as that for the CIH except that the qualifications for education, experience and examination were less stringent.
2. 3745-22-02 (E): Remove "or industrial hygienist in training". Only allow CIH's to take air samples without a CAHEVS or CAAMT certification or consider replacing the IHIT with CAIH .
3. 3745-22-11 (C) Same issue as previously mentioned with the IHIT, consider removing or replacing with CAIH

(Doug Schafer, Training Manager Training Services International, Inc.)

Response : Ohio EPA thanks the commenter, however we cannot remove "or industrial hygienist in training" from the rules because it is in the definition of "Asbestos

hazard abatement air-monitoring technician” in the statute, Ohio Revised Code (ORC) 3710.01(S), on which these rules are based. Should the Ohio Legislature ever change the statute, Ohio EPA will remove the term.

End of Response to Comments