



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

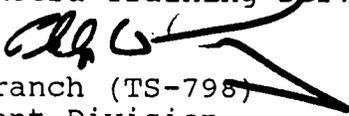
WASHINGTON, D.C. 20460

JUN 8 1993

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Approval of Retra Training Services, Inc.

FROM: Philip W. King 
Field Programs Branch (TS-798)
Chemical Management Division
Office of Pollution Prevention & Toxics

TO: Alfreda Freeman, Chief
Asbestos Unit
Source Evaluation & Asbestos Section
Region IV

Thank you for your memo of June 2, 1993, explaining the background circumstances surrounding Mr. John V. Savio's request to use EPA's AHERA training course approval given to "Retra Services, Inc." for his new training firm which is operating under the name "Retra Training Services, Inc."

It is clear from both the information you provided, and from what Mr. Savio stated to you directly in his attached letter, that Retra Training Services, Inc. is now a separate company distinct from Retra Services, Inc. You have also established that the earlier course approval which had been given by EPA had been given to Retra Services, Inc. Because EPA has never given direct approval to Retra Training Services, Inc., and because Retra Services, Inc. has retained its original EPA approval and is continuing to offer accredited training, Retra Training Services, Inc., does not therefore have EPA approval of its worker and contractor/supervisor training courses. Furthermore, because of EPA's longstanding policy of not accepting new training courses for review and contingent approval (see 54 FR 38802), Retra Training Services, Inc. is not in a position to obtain direct EPA approval.

Although we are sympathetic to Mr. Savio, we are not in a position to grant his request. It would be contrary to EPA policy to have the approval given to Retra Services, Inc., divided in two. It would also be contrary to policy to grant a new training entity, Retra Training Services, Inc., what would amount to a new EPA approval.



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

Retra Training Services, Inc., may obtain approval for any of its training courses from any of the thirty-eight States which are now EPA-approved. They already have approval from the State of Maryland for their worker and contractor/supervisor courses. Training courses approved by an EPA-approved State are recognized by EPA and meet the requirements for accreditation under TSCA Title II.

cc: Esther Tepper
Carole Dougherty



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365



MEMORANDUM

DATE: JUN 02 1993

SUBJECT: EPA AHERA COURSE ACCREDITATION:

RETRA TRAINING, INC.

VS

RETRA TRAINING SERVICES, INC.

FROM: Alfreda Freeman, Chief
Asbestos Unit
Source Evaluation and Asbestos Section

TO: Phil King (TS-798)
Technical Assistance Section
Office of Toxic Substances

As a follow-up to your request made during the teleconference which included you, Carol Dougherty of EPA Region III, Lee Furse of my staff, and myself on April 29, 1993, the following narrative sets forth the salient facts relating to the subject matter of this memo as we understand it:

On April 20, 1993, after some preliminary telephone inquiries, we received a letter from Mr. John V. Savio (see copy attached) requesting that his company, Retra Training Services, Inc., of Tarpon Springs, Florida, be authorized to operate under the aegis of EPA course approvals (cited on page two of this memo) originally issued to a previous organization, Retra Services, Inc., at the same address. Mr. Savio stated that the courses which he is presently conducting are being presented using the original course materials, three of the original instructors, and the original facility, all of which were those in use by Retra Services, Inc., at the time the courses were audited and recommended for approval by Region IV inspectors.

Further, it is our understanding that Mr. Phil Parroff, another of the original instructors of RETRA Services, Inc., in Tarpon Springs, Florida, has since relocated to Pittsburgh, Pennsylvania, where he is still affiliated with RETRA Services, Inc., which has also been relocated to Pittsburgh. Presently, RETRA Services, Inc., in the Pittsburgh area is continuing to conduct AHERA courses under the auspices of the EPA approvals granted to them in their previous Florida location as well as under course approvals granted to them later in Pennsylvania by the states of Maryland, New York, Pennsylvania, and Virginia.

Mr. Savio, of Retra Training Services, Inc., in Tarpon Springs, Florida, informs us that in the meantime, his company has also obtained approvals from the states of Maryland and Florida for their AHERA courses but that they are desirous of advertising that their courses have also been approved directly by the EPA itself.

According to a copy of a letter in our files, Mr. Phil Parroff of RETRA Services, Inc., Watergate Executive Suites C-700, 1730 S. Alt. 19, Tarpon Springs, Florida 34869 was notified as follows by Region IV:

January 11, 1989: EPA contingent approval granted for Asbestos Abatement Worker Refresher course (No effective date specified).

According to a copy of another letter in our files, Mr. Phil Parroff of RETRA - TREEO of 1730 US Alt. 19 South, Tarpon Springs, Florida 34689, was notified as follows by Region IV:

April 6, 1989: EPA final approval granted for Asbestos Abatement Worker and Worker Refresher courses effective January 24, 1989.

Based on the circumstances described above, we would appreciate very much a determination and ruling on whether or not Retra Training Services, Inc., in Tarpon Springs, Florida, should be authorized to make statements to the effect that the asbestos abatement courses which they are conducting are "EPA-approved".

Attachments

cc: Carole Dougherty (3AT33)
USEPA Region 3
841 Chestnut Building
Philadelphia, PA 19107

Retra Training Services Inc.

1730 S. Alt 19 Suite B
Tarpon Springs, Fl 34689
1-800-548-5848

RECITIAN
~~Frederic Ogden~~
P.L.S. ~~keep~~
w/ final on
a response.
(Apr. 16, 1991)

Dear MS. Freeman,

I am writing regarding our listing in the Federal Register of approved Asbestos training centers. We recieved our initial E.P.A. approvals in 1989 and are currently approved by the states of Florida and Maryland for our worker and supervisor training courses. Last year the owner of our company, my uncle, passed away and I started a new corporation (Retra Training Services Inc.). The former company, Retra Services Inc. has remained in Pittsburgh, PA and has retained the original E.P. A. approvals even though it has recently been sold to another individual. One of the original instructors is Mr. Phil Paroff and he is still with the Pittsburgh office. We feel that our location has as legitimate a claim to the original approval since we presented the original course with our instructors at our location. We are still in the same location with three of the original instructors listed in our initial correspondence with your office and the course material has remained unchanged except for updates of newer regulations. Our course was initially observed by Mr. Ogden in 1989 and in 1991 by Mr. Woods. We have consistently tried to provide the best training possible and have built a good working relationship with our State and Local officials. I realise that our approvals in the above mentioned states will allow us to continue training. However, we also feel that the original E.P.A. approvals add credibility to our training. We would like to retain those approvals if at all possible. Thank you for considering this matter.

Sincerely,



John V. Savio
President