



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

JUL 26 1990

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

Ms. Clarrissa Roddy
Training Director
Ashley Environmental Services
5959 Centralcrest
Houston, Texas 77092

Dear Ms. Roddy:

Thank you for your recent inquiry about our policies regarding non-English asbestos training courses. Although we are sympathetic to the concerns you have raised, we feel that our current policy of requiring all non-Worker training courses to be given in the English language is both necessary and appropriate.

Our existing policy is based primarily upon consideration for public safety. As you know, a Contractor/Supervisor has fundamentally different on-the-job responsibilities from an Abatement Worker. The Contractor/Supervisor must be able to read, comprehend, interpret and apply a wide variety of federal, state and local regulations, policy memoranda and manuals dealing with asbestos abatement in all of its technical and legal aspects. The Contractor/Supervisor must also be able to direct the activities of the Workers so as to ensure full compliance with these regulatory standards. Without exception, these regulations and standard manuals are not only written in English, but are also periodically revised and updated in English.

A Contractor/Supervisor must also be able to read and write the English language in order to effectively discharge his/her responsibilities with respect to contracting and reporting, dealing with insurance issues and providing adequate supervision to English-speaking Workers or non-workers that may be present at or near the job site. In general, the Contractor/Supervisor must be able to effectively communicate with a wide variety of people both on and off the job site. The same is true for the other non-Worker disciplines of Inspector, Management Planner and Project Designer. If understanding or communications cannot occur because of language barriers, personal and public safety can be seriously compromised in conjunction with an asbestos abatement project.

This is the reason why we have taken the position that all non-Worker accredited courses under the Asbestos Hazard Emergency Response Act (AHERA) must be given in the English language. If you might have further questions about this or any other accreditation issue, please call Mr. Phil King, of my staff, at (202) 382-7849. Thank you again for sharing your thoughts and concerns with us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joseph Schechter, for".

Joseph Schechter, Chief
Technical Assistance Section
Office of Toxic Substances

cc: Accreditation File
Michael Stahl
David Kling
Regina Bushong
Robert McNally
Philip King