



Virginia Board for Asbestos, Lead, and Home Inspectors

**Guidance Document: Clarification of Requirements for  
Individuals who Analyze PCM Air Samples Onsite**

**Adopted May 14, 2015**

**I. Background**

Regulation 18 VAC 15-20-33 E.2.b (2) describes the entry requirements for the licensure of an asbestos analytical laboratory to perform onsite PCM analysis, and the qualifications of the onsite analyst who is analyzing the PCM air samples.

Regulation 18 VAC 15-20-456 outlines the responsibilities of an Asbestos Project Monitor. Subsection D describes the accreditations the Asbestos Project Monitor must have to analyze PCM air samples on site, and indicates that they shall be employed by a licensed analytical laboratory.

**II. Issue**

Regulation 18 VAC 15-20-456.D requires project monitors who analyze PCM air samples onsite to “be listed or have applied for listing in the AAR and rated ‘acceptable’ or is accredited by AIHA or has been rated ‘proficient’ in the PAT Program’s most recent round of asbestos evaluations” in addition to being employed by a licensed analytical laboratory. Further, 18 VAC 15-33.E.2.b(2) requires on-site analysts to have the same accreditation/designation as well as the NIOSH 582 training program or equivalent. Other than the AAR listing, the other options for accreditation/designation apply to analytical laboratories and not individuals. The Board is requested to identify how a project monitor or on-site analyst can meet the accreditations/designations applicable to analytical laboratories.

### III. Clarification

The Board clarified that a project monitor or on-site analyst can satisfy the requirement for AIHA accreditation or PAT Program proficiency through completion of the NIOSH 582 or equivalent, **and** the following:

- **For PAT Program proficiency**, the project monitor or on-site analyst is employed by a licensed analytical laboratory that is rated as “proficient” in the PAT Program and the analytical laboratory maintains, and provides upon request, the training and quality control documentation such as is necessary to demonstrate competency in performing onsite analysis.
- **For AIHA (AIHA-LAP, LLC) accreditation**, the project monitor is employed by a licensed analytical laboratory that is AIHA accredited and the analytical laboratory maintains, and provides upon request, the training and quality control documentation such as is necessary to demonstrate competency in performing onsite analysis.