UTAH DEPARTMENT *of*
ENVIRONMENTAL QUALITY
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How many samples are required of loose-fill vermiculite type insulation to prove it is not ACM?

When sampling loose-fill vermiculite type insulation (define as Libby Amphibole in UAC R307-801), you must follow the 3, 5, 7 rule or collect more samples that are sufficient to determine that the material is not ACM (asbestos-containing material). This means that you must estimate the square footage of the vermiculite insulation material and collect at least 3 samples if the material is 1,000 square feet or less, at least 5 samples if it is greater than 1,000 square feet but less than or equal to 5,000 square feet, and at least 7 samples if it is greater than 5,000 square feet.

Depending on the amount of suspect material present, you may need to collect more samples that are sufficient to determine that the vermiculite insulation does not contain regulated amounts of asbestos. For example, if the square footage of the vermiculite is grossly over 5,000 square feet, ensure that you are collecting a representative number of samples, this may be more than 7 samples.

The inspector documenting conditions at the site should bear in mind that they are responsible to collect a sufficient number of samples to properly characterize the quantity of miscellaneous ACM. The quantity of samples collected should be proportionally representative to the amount of suspect miscellaneous ACM observed and statistically significant, to support the inspector's conclusion.

Alternatively, you can follow EPA's preferred method and assume that all loose-fill vermiculite type insulation contains regulated amounts of asbestos.

Lastly, please ensure that the laboratory you send the samples to is NVLAP accredited and is using the EPA/600/R93/116 method to identify all asbestiform varieties including Libby Amphibole.

Thank you from the DAQ ATLAS team!

This document is meant to help facilitate compliance. This document and the opinions within are subject to change and may be amended in the future. Regulatory compliance is determined on a case-by-case basis.

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