

**FINAL STATEMENT OF REASONS  
PROPOSED CHANGES TO REGULATIONS OF THE  
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH**

**Title 8, California Code of Regulations, Chapter 3.2, Subchapter 2 Regulations of the  
Division of Occupational Safety and Health  
Article 2.5 Registration – Asbestos-Related Work  
Article 2.6 Asbestos Consultants and Site Surveillance Technicians  
Article 2.7 Approval of Courses and Course Providers**

Adopt and incorporate amendments to **Sections 341.13 Denial of Registration; 341.14 Revocation and Suspension of Registration; 341.15 Certification of Asbestos Consultants and Site Surveillance Technicians; 341.16 Approval of Courses and Course Providers; and 341.17 Asbestos Cement Pipe Training.**

There are no modifications to the information contained in the Initial Statement of Reasons.

**Summary and response to Written and Oral Comments**

List of Written Commenters:

1. Email from Katherine Taylor, USEPA 2/22/2011

List of Oral Commenters from from the February 28, 2011 Public Hearing:

1. Jennifer Caraway, CAL INC
2. Dan Napier, DNA Industrial Hygiene

**Summary and Response to Comments**

Comment 1 (Katherine Taylor)

Ms. Taylor wrote to correct two technical errors in the Informative Digest/Policy Statement Overview included in the public notice of hearing. Stating that USEPA does not oversee state programs and does not provide interim approval of State programs.

Response 1

The Division concurs with these corrections and incorporates them into this final statement of reason.

Comment 2 (Jennifer Caraway, Dan Napier)

Proposed rulemaking clarifies the requirements in the effected regulations.

Response 2

Thank you for participating in the rulemaking process.

**OTHER REQUIRED SHOWINGS - GOVERNMENT CODE 11346.2(b)(2)-(4)**

**Studies, Reports, or Documents Relied Upon**

None.

**Reasonable Alternatives Considered**

The Division has determined that no alternative considered would be more effective in carrying out the purpose that underlies the proposed action, or would be as effective as and less burdensome to affected small businesses than the proposed action.

**Reasonable Alternatives That Would Lessen the Impact on Small Businesses**

None.

**Evidence Relied Upon to Support the Initial Determination That the Proposed Regulations Will Not Have a Significant Adverse Economic Impact on Business**

The Proposed Rulemaking will not result in significant additional costs to private persons or businesses.

**COST ESTIMATES**

- (1) Costs or Savings to State Agencies: The Division anticipates no significant cost impact.
- (2) Impact on Housing Costs: The Division anticipates no significant cost impact.
- (3) Impact on Businesses: The Division anticipates no significant adverse impact on businesses, including the ability of California businesses to compete with businesses in other states.

- (4) Cost Impact on Private Persons or Entities: the Division anticipates no significant cost impact.
- (5) Costs or Savings in Federal Funding to the State: No federal funding is impacted.
- (6) Savings or Costs to Local Agencies or School Districts Required to be Reimbursed: The Division anticipates no savings or reimbursable costs to local agencies or school districts.
- (7) Other Nondiscretionary Costs or Savings Imposed on Local Agencies: These proposed regulations do not impose nondiscretionary costs or saving on local agencies.

#### Text of Final Statement of Reasons

Copies of the Final Statement of Reasons may be obtained upon request from the Division of Occupational Safety and Health, 2211 Park Towne Circle, Suite 1, Sacramento, CA 95825-0414. These documents may also be viewed and downloaded by going to “DIR Rulemaking—Proposed Regulations” under the category “Division of Occupational Safety and Health” at [www.dir.ca.gov/DIRRulemaking.html](http://www.dir.ca.gov/DIRRulemaking.html) .