



## U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: A930003**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 09/16/1992  
**Title:** Landfills Requiring Registered Land Surveyor  
**Recipient:** Curran, John J.  
**Author:** Rasnic, John B.

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**Subparts:** Part 61, M, Asbestos

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**References:** 61.151(e)  
61.154(f)  
61.154(j)

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### **Abstract:**

Summarizes the requirements of the asbestos NESHAP for a land survey at landfills accepting asbestos-containing waste materials. Specifically discusses, whether or not a Registered Land Surveyor is required to be on-site anytime regulated asbestos-containing material (RACM) is being disposed of in a sanitary landfill. To meet the recordkeeping requirements of the NESHAP it is not necessary for the land surveyor to be registered (although it would be advisable to use a registered land surveyor), nor is it necessary for a surveyor to be on site every time RACM is being disposed of in a landfill. If any locations (trenches) that were not identified in the initial survey are to be used for RACM disposal, another survey must be done.

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### **Letter:**

Mr. John J. Curran, CIH  
State of North Carolina  
Department of Environment, Health, and Natural Resources Division of Epidemiology  
Asbestos Hazard Management Branch P. O. Box 27687 Raleigh, N. C. 27611-7687

Dear Mr. Curran:

This is in response to your letter dated July 10, 1992 requesting a clarification of the requirements of the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) for a land survey at landfills accepting asbestos-containing waste materials. Specifically you ask whether or not a Registered Land Surveyor is required to be on-site anytime regulated asbestos-containing material (RACM) is being disposed of in a sanitary landfill.

The purpose of the landfill recordkeeping requirements listed in 61.151(e)(2) and 61.154(f) is to inform any potential purchaser, owner, or operator of the property that (1) RACM was disposed of at the property, (2) its location within the property, and (3) the quantity disposed of at the property. This record is also used as a basis for notifying the responsible agency (EPA, State or local) when any excavating or other disturbance of any asbestos-containing waste will be done at the site (61,154(j)).

To meet the recordkeeping requirements of the NESHAP, it is not necessary for the land surveyor to be registered (although it would be advisable to use a registered land surveyor), nor is it necessary for a surveyor to be on site every time RACM is being disposed of in a landfill. If the land surveys prior to opening and closing identify all locations (trenches) where asbestos-containing waste is buried, then those surveys meet the requirements of the NESHAP. A survey need not be done each time RACM is disposed of in a marked trench, or at the end of each operating day when the RACM is covered to prevent visible emissions. If any locations (trenches) that were not identified in the initial survey are to be used for RACM disposal, then another survey must be done.

This determination has been coordinated with EPA's Office of Enforcement and the Emission Standards Division of the Office of Air Quality Planning and Standards. If you have any questions, please contact Tom Ripp of my staff at (703) 308-8727.

Sincerely,

John B. Rasnic, Director  
Stationary Source Compliance Division Office of Air Quality Planning and Standards

cc: Sims Roy, ESD (MD-13)  
Charlie Garlow, OE (LE-134A)  
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Regional Asbestos NESHAP Coordinators