



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

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**Control Number: A930008**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 07/31/1992  
**Title:** Sealants/mastics  
**Recipient:** Mueller, Kevin A.  
**Author:** Rasnic, John B.

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

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### **Abstract:**

Pliable asbestos-containing sealants and mastics that are in good condition and not friable would be considered Category I nonfriable ACM. As Category I nonfriable ACM, sealants and mastics will become regulated ACM if they have become friable or are subjected to sanding, grinding, cutting or abrading.

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### **Letter:**

Mr. Kevin A. Mueller, P.E.  
Mr. Robert S. Walters, P.E.  
Law Associates, Inc.  
932 Lee Street, Suite 201  
Des Plaines, Illinois 60016

Dear Messrs. Mueller and Walters:

This is in response to your April 16, 1992 letter requesting a determination of the applicability of the asbestos National Emission Standard for Hazardous Air Pollutant (NESHAP) to sealants/mastics commonly used at seams of fiberglass, pipe and duct insulation and at joints of uninsulated, sheet metal ducts. Specifically, you requested a determination on whether or not the asbestos NESHAP applies to the removal and disposal of asbestos-containing sealants/mastics (used as described above) during renovation.

Pliable asbestos-containing sealants and mastics that are in good condition and not friable exhibit many of the same characteristics of Category I nonfriable asbestos-containing materials (ACM), and therefore would be considered to be Category I nonfriable ACM. As Category I nonfriable ACM, sealants and mastics will become regulated ACM if they have become friable or are subjected to sanding, grinding, cutting or abrading.

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  
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