U.S. Environmental Protection Agency
Applicability Determination Index

Control Number: A960011

Category:	Asbestos
EPA Office:	METD
Date:	01/17/1995
Title:	Joint Compound
Recipient:	Garrett, Gerald
Author:	Rasnic, John

Subparts: Part 61, B-Asb, Asbestos Demolition/Renovation (Now Sub. M)

Abstract:

Q. What is the scientific basis for differentiating the analysis of joint compounds from all other building materials?

A. Joint compound when used as a skin coat on the entire wallboard system is treated as an add-on material. Only when it is used to cover the joints and nail holes in a wallboard system that the materials may be averaged for a composite result. This is done for practical enforcement reasons as it would be difficult to find all the joints and nail holes covered, and measure and add the surface areas together to determine if the threshold has been exceeded.

Q. Does the January 5, 1994 Federal Register nullify the practice of compositing layered bulk samples to determine the asbestos content?

A. The asbestos NESHAP program has always required that each layer of a multi-layered system be analyzed for asbestos content when determining compliance with NESHAP. Compositing layered bulk samples was only allowed with the Asbestos Hazard Emergency Act.

Letter:

Mr. Gerald Garrett
Garrett Laboratories, Inc.
8500 Stemmons Freeway, Suite 2020
Dallas, TX 75247-3804

Dear Mr. Garrett:

This is in response to your October 12, 1994 letter requesting an explanation of the scientific basis for differentiating the analysis of joint compounds from all other building materials. Additionally you state that the January 5, 1994 Federal Register appears to nullify the practice of compositing layered bulk

samples to determine the asbestos content.

It has always been the policy of the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) program to have each layer of a multi-layered system analyzed for asbestos content when determining compliance with the asbestos NESHAP rules. Compositing layered bulk samples was only allowed for compliance with the Asbestos Hazard Emergency Act (AHERA) rule.

Joint compound when used as a skim coat on the entire wallboard system is treated as an add-on material. It is only when joint compound and/or tape is used specifically to cover the joints and nail holes in a wallboard system (not to cover the entire wallboard) that the materials may be averaged for a "composite" result. The decision to exempt joint compound and/or tape in this circumstance is based on practical enforcement issues and not epidemiological data. It would be difficult at best to find all the joints and nail holes in a wall system that are covered with asbestos-containing material, measure and add the surface areas together to determine if the 160 ft2 threshold has been exceeded, and then abate only the regulated material. Essentially the whole wallboard system would have to be treated as regulated asbestos-containing material which would greatly increase the amount of material going to asbestos landfills unnecessarily.

This response was coordinated with the Office of Regulatory Enforcement and the Emissions Standards Division of the Office of Air Quality Planning and Standards. If you have any questions, please contact Tom Ripp of my staff at (202) 564-7003.

Sincerely,

John B. Rasnic
Manufacturing, Energy, and Transportation Division Office of Compliance

cc: Regional Asbestos NESHAP Coordinators
Tom Ripp, METD (2223A)
Charlie Garlow, AED (2242A)
Sims Roy, ESD (MD-13)