



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960018

Category: Asbestos
EPA Office: SSCD
Date: 11/17/1993
Title: Paper; Cloth
Recipient: Kessler, James
Author: Rasnic, John

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

Abstract:

Q. Are asbestos containing paper products or woven cloth considered friable asbestos containing materials even if they are in good, undamaged condition and there is no intent to remove them?

A. The determination of whether these materials are regulated is made on a case-by-case basis because they are made out of various materials exhibiting many different characteristics under different activities. The age of the material and its exposure to weathering many also have an effect on the condition of the material.

Letter:

Mr. James R. Kessler
Microprobe Inc.
4337 E 5th Street
Tucson, AZ 85711

Dear Mr. Kessler:

This is in response to your letter dated May 5, 1993 to Region IX office of the U. S. Environmental Protection Agency (EPA) requesting a clarification of the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP). Your letter has been forward to the Stationary Source Compliance Division (SSCD) for response. In your letter, you ask whether or not asbestos containing paper products or woven cloth are consider to be friable asbestos containing materials even if the materials are in good, undamaged condition and there is no intent to remove them.

The paper products and tapes in question are made out of various materials, and therefore exhibit many different characteristics under different activities. Due to high variability in the characteristics of the products, the question of whether the material is regulated or not is determined on a case by case basis. For example, a paper tape made out of asbestos might not exhibit same characteristics as a woven asbestos cloth under "ripping/tearing activity. Many paper products can not be removed without the material becoming regulated, however, they may be nonfriable if left in place. Additionally, the age of the material and exposure to weathering may also have an effect on the condition of the material. I have attached a copy of the determination addressed to Law associates, Inc. dated July 31, 1992 which addresses similar issues for sealant/mastics.

If you have any questions, please contact me at (703) 308-8727 or Chris Oh at (703) 308-8732.

Sincerely,

Thomas W. Ripp
Asbestos NESHAP Coordinator
Stationary Source Compliance Division

Enclosure

cc: Bob Trotter, Region IX