



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960026

Category: Asbestos
EPA Office: METD
Date: 02/02/1995
Title: Spray on Application for Equipment
Recipient: Petrakis, Leonidas
Author: Rasnic, John

Subparts: Part 61, M, Asbestos

References: 61.146
61.152

Abstract:

Q. Is the spraying of insulation material containing approximately 10-15% chrysotile asbestos onto test plates of laboratory equipment a prohibited activity under the asbestos NESHAP?

A. No, Section 61.146(b) allows for the spray-on application of friable materials that contain more than 1% asbestos on equipment and machinery. The test plates are considered to be "equipment", and therefore spray application is allowed. The requirements of 61.146(b)(1) and (2) must be followed.

Letter:

95-04
Mr. Leonidas Petrakis
Department of Applied Science
Brookhaven National Laboratory
P.O. Box 5000
Upton, NY 11973-5000

Dear Mr. Petrakis:

This is in response to your January 10, 1994 follow up letter to our meeting of December 16, 1994. You state that it is your understanding that EPA does not consider the spraying of insulation material containing approximately 10-15% chrysotile asbestos onto test plates of laboratory equipment to be a prohibited activity under 40 CFR Part 61 Subpart M, the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP).

Your understanding is correct. Section 61.146(b) allows for the spray-on application of friable materials that contain more than one percent asbestos on equipment and machinery. We consider the test plates to be "equipment," and therefore spray application is allowed. Section 61.146(b) requires that for those spray applications:

(1) Notify the Administrator at least 20 days before beginning the spraying operation. (Notification to the delegated agency/office is acceptable. In this case, notifications should be sent both to the State of New York and EPA Region II.) Include in the notice the name and address of the owner or operator, location of the spraying operation, and the procedures to be followed to meet the requirements of paragraph (2).

(2) Discharge no visible emissions to the outside air from the spray-on application of the asbestos-containing material

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or use methods specified by 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.

This response was coordinated with the Office of Regulatory Enforcement and 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
Charlie Garlow, ORE (2242A)
Sims Roy, OAQPS (MD-13)
Tom Ripp, METD