



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A990002

Category: Asbestos
EPA Office: Region 5
Date: 01/14/1999
Title: Dry Removal
Recipient: Barnes, James
Author: Czerniak, George

Subparts: Part 61, M, Asbestos

References: 61.145

Abstract:

Q: May engineers conduct dry removal of asbestos material on pipe where the pipe is hot and the use of water could damage equipment or pose a safety hazard?

A: The structure contains several boilers, and all of them do not need to operate at any given time. Dry removal is allowed only on the main header that can never be shut down or bypassed.

Letter:

January 14, 1999

James D. Barnes, CIH
Manager, Industrial Hygiene Services
Hanson Engineers Incorporated
1525 South Sixth Street
Springfield, Illinois 62703-2886

Dear Mr. Barnes:

This is in response to your December 17, 1998, letter to Dave Fodor of the Illinois Environmental Protection Agency (IEPA), in which you request approval to conduct dry removal on a portion of pipe associated with an asbestos abatement project to be conducted at the Illinois Secretary of State (ISOS) Capital Complex Power House. Mr. Fodor forwarded this letter to the United States Environmental Protection Agency (U.S. EPA) for our review and response.

Your letter requests approval to conduct dry removal of asbestos material on 5,000 linear feet of pipe and 667 joints and elbows. You state that because the Capital Complex Power House cannot be deactivated, the temperature of the pipes will be between 140 and 360 degrees Fahrenheit. The use of water on these pipes could damage equipment or cause a safety hazard.

Ms. Linda Hamsing, of my staff, has reviewed your request and discussed the specifics of the project with your associates, David Watts and Al Raufeisen. Based on Ms. Hamsing's review, U.S. EPA can only partially approve your request.

U.S. EPA agrees that the use of water on hot pipes can present a safety hazard by increasing the risk of worker heat exhaustion or causing the pipes to explode. However, U.S. EPA expects that in nearly all cases, asbestos removal can be scheduled to occur during an equipment shutdown or be done while the equipment is bypassed. In the instant case, although there is a continuous need for steam and heat to be provided to the Capital Complex, the Power House contains several boilers, all which do not need to operate at any given time. Therefore, a significant portion of the asbestos material should be able to be removed at times throughout the year when certain boilers are shutdown. It is only that portion of pipe constituting the main header (where all boilers eventually tie into) that can never be shutdown or bypassed.

Therefore, U.S. EPA will only approve the use of dry removal of asbestos material on the main header of pipe. Although Mr. Watts and Mr. Raufeisen did not indicate the length of the main header, it is U.S. EPA's understanding that it constitutes a relatively small portion of the total 5,000 linear feet of pipe/667 joints and elbows to be removed in the Power House.

Please keep in mind that the asbestos NESHAP requires that certain procedures be followed when dry removal is conducted. These requirements are set forth in 40 C.F.R. 61.145(c)(3)(i)(B), a copy of which is enclosed with this letter.

If you have any questions about this letter, please contact Ms. Hamsing at (312) 886-6810.

Sincerely yours,

George T. Czerniak, Chief
Air Enforcement and Compliance Assurance Branch

Attachment

cc: Dave Fodor
Illinois Environmental Protection Agency

Tom Ripp
U.S. Environmental Protection Agency