



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C104

Category: Asbestos
EPA Office: SSCD
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Title: Large Facility Components
Recipient: Jones, Kurt
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Subjects: Part 61, M, Asbestos

References: 61.141
61.145(c)

Abstract:

Small-diameter piping can be removed, contained in leak-tight wrapping, and disposed of without stripping off the ACM. However, for purposes of reuse, small-diameter piping, falls under the "beam" designation of Section 61.145(c)(5) and must be stripped before being reused. Large diameter piping that is to be disposed of can be removed without first stripping the asbestos if wrapped in leak-tight wrapping according to Section 61.145(c)(4). EPA or its delegated agency would determine if a facility component would be a "large facility component" as described in Section 61.145(c)(5).

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

SEP 18 1991

Mr. Kurt Jones
ANCO Industries, Inc.
P.O. Box 83730
Baton Rouge, LA 70884-3730

Dear Mr. Jones:

This is in response to your August 5, 1991 request for a clarification of Section 61.145(c)(5) of the asbestos NESHAP.

Section 61.145(c)(5) states that "large facility components such as reactor vessels, large tanks and steam generators, but not beams" are not required to have the asbestos material stripped if the component "is removed, transported, stored, disposed of or reused without disturbing or damaging the RACM [regulated asbestos containing material]." The components must also be contained in leak-tight wrapping and labeled. Section 61.145(c)(5) excludes beams; however, the exclusion only applies to the "reuse" of beams if the RACM has not been removed. Section 61.145(c)(4) allows that any facility component taken out of a facility as a unit or in sections can either be stripped of the RACM or contained in leak tight wrapping and be disposed of with the RACM intact.

Your specific questions are addressed below.

1. "Do sections of small-diameter piping fall under the 'beams' designation, thus requiring removal of the RACM before disposal?"

Response: As stated above, Section 61.145(c)(4) allows the option of stripping off the RACM or containing it in leak-tight wrapping for any facility component. Therefore, small diameter piping can be disposed of with the RACM intact if it has been contained in leak-tight wrapping. Section 61.145(c)(5) reiterates this option for large facility components and, in addition, allows these components to be "reused" if the asbestos material on the components is not disturbed. The exclusion of "beams" in Section 61.145(c)(5) only applies to the reuse of these components when the RACM covering or coating these components has not been removed. Small diameter piping which has not been stripped of the regulated asbestos containing material would also fall under the "beam" designation and should not be reused without stripping off the RACM.

2. "Could sections of large diameter piping fall under the 'large facility component' designation, thus allowing the piping sections to be properly wrapped, labeled, etc. and disposed of with the RACM intact?"

Response: As stated above, Section 61.145(c)(4) allows any facility component which has been taken out of a facility as a unit or in sections to either be stripped of the RACM or be contained in leak-tight wrapping. Therefore, piping sections can be properly wrapped, labeled, and disposed of with the RACM intact.

3. "Regardless of the answers to one and two above, who can determine if a facility component is 'large' or 'small', and does EPA have any square footage guidelines or 'cutoff' criteria that can be used to aid in that determination?"

Response: EPA or its delegated agency would determine if a facility component should be considered a "large facility component" as described in Section 61.145(c)(5). EPA does not have any square footage guidelines that are used to determine whether a facility component is "large". This provision was intended to provide a narrow allowance for the reuse of large, typically expensive components, such as reactor vessels, large tanks, and steam generators, if these components could be removed from the facility without damaging the asbestos material which they are covered or coated with. Beams and similar components, such as pipes, are excluded from this provision and can not be reused with the RACM intact. However, these components may be reused if the RACM has been removed.

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 Scott Throwe of my staff at (703) 308-8699.

Sincerely,

John B. Rasnic, Director
Stationary Source Compliance Division Office of Air Quality Planning and Standards

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