



# U.S. Environmental Protection Agency Applicability Determination Index

---

**Control Number: C105**

**Category:** Asbestos  
**EPA Office:** Region 9  
**Date:** 12/05/1991  
**Title:** Disposal of Contaminated Critical Barriers  
**Recipient:** Olson, Steven P.  
**Author:** Trotter, Robert S.

---

**Subparts:** Part 61, M, Asbestos

---

**References:** 61.141  
61.150

---

## **Abstract:**

Material that has become contaminated due to renovation or demolition must be disposed of as asbestos-contaminated waste material according to 61.150. This includes contaminated poly used in the abatement process. OSHA requirements may apply.

---

## **Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

December 5, 1991

## MEMORANDUM

**SUBJECT:** Disposal of Contaminated Critical Barriers

**FROM:** Robert S. Trotter  
Asbestos NESHAP Coordinator

**TO:** Steven P. Olson  
Maricopa County Department of Health Services

This letter is to respond to your question of the NESHAP applicability of material used to construct critical barriers for asbestos removal. Material that has become contaminated due to renovation or demolition activities must be disposed of as asbestos-containing waste according to the provisions of 40 CFR Section 61.150. This would include contaminated poly used in the abatement process.

I have enclosed two former EPA determinations which dictate that asbestos-contaminated material and asbestos-contaminated clothing be disposed of according to NESHAP waste disposal requirements.

You should also be aware of the Occupational Safety and Health Administration's requirements in 29 CFR Section 1926.58 which state "Any asbestos-contaminated supplies and equipment that cannot be decontaminated should be disposed of in pre-labeled bags; items in this category include plastic sheeting, disposable work clothing, respirator cartridges, and contaminated wash water."

If you have any questions on these determinations please feel free to call me.