



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C40

Category: Asbestos
EPA Office: SSCD
Date: 03/08/1988
Title: Creation of Friable Tile In Demolition Process
Recipient: Vorhees, J. Ross
Author: Seitz, John S.
Comments: EPA believes that ordinary demolition operations do not render vinyl asbestos floor tile friable.

Subparts: Part 61, M, Asbestos

References: 61.141
61.145(b)
61.150
61.154

Abstract:

EPA is not in a position to determine whether friable asbestos will be created from the vinyl floor tile during the demolition process. However, if friable asbestos materials are created in the demolition process, the owner and operator of the demolition operation would be responsible for complying with the notification, wetting, and disposal requirements of 40 CFR Part 61, Subpart M.

Letter:

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

MAR 8 1988

Mr. J. Ross Voorhees
Industrial Hygienist
Briggs Associates, Inc.
8300 Guilford Road, Suite E
Columbia, Maryland 21046

Dear Mr. Voorhees:

Thank you for giving me this opportunity to respond to your February 1, 1988, inquiry regarding asbestos NESHAP applicability to vinyl asbestos floor tile in facilities to be demolished. Depending on demolition procedure and asbestos floor tile characteristics, the creation of friable asbestos from the floor tile could result from demolition. EPA is not in a position to determine whether friable asbestos will be created from the vinyl floor tile during the demolition process you plan to utilize. However, should friable asbestos materials be created in the demolition process, the owner and operator of the demolition operation would be responsible for complying with the notification, wetting, and disposal requirements of 40 C.F.R. Part 61, Subpart M.

The enclosed applicability determination discusses further the applicability of the asbestos NESHAP to materials such as vinyl asbestos floor tiles.

Any questions concerning this matter should be addressed to Jim Engel at 382-2877.

Sincerely,

John S. Seitz, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

Enclosure