



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C42

Category: Asbestos
EPA Office: SSCD
Date: 05/03/1988
Title: Removal Using Forklift Blade
Recipient: Hepola, John
Author: Seitz, John S.

Subparts: Part 61, M, Asbestos

References: 61.145(c)

Abstract:

The use of a forklift blade to remove wetted asbestos siding within an enclosed area appears to satisfy the intent of the regulation, but it may be procedurally inconsistent with Section 61.147(e)(2) (Section 61.145(c), 1990 regulations) depending on whether friable asbestos materials are carefully lowered to the ground by the forklift apparatus.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
MAY 3 1981

MEMORANDUM

SUBJECT: Innovative Asbestos Removal Technique

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

TO: John Hepola, Chief
Air Enforcement Branch (6T-E)

We have reviewed the removal technique studied by the U. S. Army Corps of Engineers which you referenced in your February 11, 1988, memo to this office. That technique involves the use of a forklift blade to remove wetted asbestos siding within an enclosed area. This removal technique appears to satisfy the intent of the regulation, but it may be procedurally inconsistent with Section 61.147(e)(2) depending on whether friable asbestos materials are carefully lowered to the ground by the forklift apparatus. Final resolution of such matters will have to be made at the Regional level. The Emission Standards Division may also review this removal technique in the context of the regulatory review and perhaps revise the asbestos NESHAP accordingly.

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

cc: Bob Ajax
Sims Roy