



## U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: C47**

**Category:** Asbestos  
**EPA Office:** Region 5  
**Date:** 07/26/1988  
**Title:** Wetting and Disposal of Thermal Insulation  
**Recipient:** Killian, Richard A.  
**Author:** Kee, David  
**Comments:** The term "deposition" is no longer included in the "no visible emissions" restrictions of s.61.150(a).

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

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**References:** 61.141  
61.145(c)  
61.150

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### Abstract:

The waste disposal standards of the asbestos NESHAP require, among other things, that there be no visible emissions to the outside air during the collection, processing, packaging, transporting or deposition of asbestos-containing waste material generated by a subject removal operation. This is a performance standard, so the method of containerizing the waste (e.g., bagging, double bagging, etc.) is at the discretion of the removal contractor.

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### Letter:

Richard A. Killian  
Operations Manager, Engineering  
Rubloff Inc.  
111 West Washington Street  
Chicago, Illinois 60602

Dear Mr. Killian:

Thank you for your July 7, 1988, letter to Valdas V. Adamkus concerning proper wetting and disposal of asbestos-containing thermal insulation when removing it by the glove bag method. Your concern stems from inspections by the United States Environmental Protection Agency (U.S. EPA) Region V, of asbestos removal occurring in a commercial building at 500 North Michigan, Chicago, Illinois, on June 7 and 8, 1988. Region V has discussed your inquiry with U.S. EPA Headquarters, and the following interpretation represents a coordinated U.S. EPA response.

U.S. EPA regulates asbestos removals from institutional, commercial and industrial structures, installations and buildings under the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M, a copy of which is enclosed. The asbestos NESHAP requires, among other things, that friable asbestos materials be adequately wetted when they are being stripped from facility components. 40 CFR 61.147(c). Adequately wetted means sufficiently mixed or coated with water or an aqueous solution to prevent dust emissions. 40 CFR 61.141. Thus friable asbestos materials must be wetted before they are stripped, and such wetting must be sufficient to prevent dust emissions. These requirements apply whether or not the materials are being stripped by the glove bag method. If a glove bag is used, wetting must be sufficient to prevent dust emissions inside, as well as outside, the bag.

Your letter refers to the regulations for asbestos-containing materials in schools that U.S. EPA promulgated on October 30, 1987. These regulations implement the Asbestos Hazard Emergency Response Act (AHERA), and are to be codified at 40 CFR Part 763, Subpart E. Appendix B to Subpart E suggests works practices and engineering controls for small-scale short-duration operations and maintenance activities. The glove bag work practices in Appendix B state that asbestos material must be thoroughly wetted before it is removed from the pipe, beam or other surface. This specification does not conflict with the aforementioned NESHAP wetting requirement.

The waste disposal standards of the asbestos NESHAP require, among other things, that there be no visible emissions to the outside air during the collection, processing, packaging, transporting or deposition of asbestos-containing waste material generated by a subject removal operation. This is a performance standard, so the method of containerizing the waste (e.g., bagging, double bagging, etc.) is at the discretion of the removal contractor. The standard simply requires that the method chosen be adequate to prevent visible emissions to the outside air during all stages of waste handling.

If you have any further questions on the asbestos NESHAP, you may contact Bruce Varner of my staff at (312) 886-6793. Questions on AHERA should be directed to Tony Restaino of the Region V Environmental Sciences Division (5SPT), who may be reached at (312) 886-6003.

Sincerely yours,

David Kee, Director  
Air and Radiation Division (5AC-26)

Enclosure