



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C65

Category: Asbestos
EPA Office: Region 5
Date: 11/09/1989
Title: Determining 1 Percent Level in Joint Compound
Recipient: Podraza, Daniel M.
Author: Varner, Bruce A.
Comments: EPA now allows joint compound to be averaged into analyses of wallboard (11/08/92 response to law engineering).

Subparts: Part 61, M, Asbestos

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

Abstract:

Paint, joint compound, tape, and wallboard may not be combined for analysis of its asbestos content. Paint, joint compound and tape are considered a homogeneous material. If one valid analysis of one sample of a homogeneous material shows that more than 1 percent asbestos is present, then all the material is considered to be friable asbestos material regardless of the number of analyses which show less than 1 percent asbestos.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

Nov 09 1989

Daniel M. Podraza
Environmental Consultant
Boelter Environmental Consultants
8700 West Bryn Mawr Avenue
South Tower, Suite 401
Chicago, Illinois 60631

Re: Drywall Renovation

Dear Mr. Podraza:

Thank you for your October 23, 1989, letter to Valdas Adamkus which asks whether the removal of drywall partitions with asbestos-containing joint compound is subject to the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M. Your letter states that 32 bulk samples of drywall, drywall tape and drywall joint compound were obtained from a commercial high-rise building in the Chicago Metropolitan area, that only some of the joint compound samples contained asbestos, and that one such sample contained 3 percent asbestos. You propose to composite and treat the drywall, drywall tape and drywall joint compound as one homogeneous material because they are inseparable, and to consider the composite material to not be subject to the asbestos NESHAP since the "average" concentration of asbestos in the composite material is less than 1 percent.

The United States Environmental Protection Agency (U.S. EPA) considers a homogeneous material to be one that is uniform in texture and appearance, was installed at one time, and is unlikely to consist of more than one type, or formulation, of asbestos. Since the wall surfaces are finished with paint or wall's drywall, drywall tape and drywall joint compound should be considered one homogeneous material.

It is U.S. EPA policy that if one valid analysis of one sample of a homogeneous material shows that more than 1 percent asbestos is present, then all the material is considered to be friable asbestos material, regardless of the number of analyses which show less than 1 percent asbestos. It is not acceptable to "average" the concentration of asbestos in the material.

The asbestos NESHAP applies to, among other things, all commercial renovation operations that involve the stripping or removal of at least 160 square feet of friable asbestos material on structural members. Unless less than 160 square feet of the building drywall partitions have any drywall joint compound containing more than 1 percent asbestos, the renovation is subject to the asbestos NESHAP, and any partition with any drywall joint compound containing more than 1 percent asbestos must be removed, handled and disposed of in accordance with the asbestos NESHAP.

It strikes me that 32 bulk samples is not an unusually large number for a building that is over 30 stories high with an average of 18,000 square feet of drywall surface per floor. Further sampling and analysis might better define the extent and location of the asbestos contamination.

If you have any questions on this letter, you may contact me at (312) 886-6793.

Sincerely yours,

Bruce A. Varner
NESHAP Coordinator (5AC-26)

cc: Otto J. Klein
Asbestos Coordinator
Division of Air Pollution Control
Illinois Environmental Protection Agency