



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C66

Category: Asbestos
EPA Office: SSCD
Date: 11/13/1989
Title: Single Family Housing
Recipient: Tedford, Ronald W.
Author: Seitz, John S.

Subparts: Part 61, M, Asbestos

References: 61.141
61.145
61.150

Abstract:

Single family housing units are not subject to the regulations. If a demolition operation involving a group of residential structures is under the control or supervision of a single entity (i.e., the City), then the owner or operator is subject to the asbestos NESHAP.

Letter:

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

NOV 13 1989

Mr. Ronald W. Tedford, AICP
Assistant Director
Regional Planning Commission
Clarksville - Montgomery County
106 Public Square
Clarksville, TN 37040

Dear Mr. Tedford:

This responds to your letter of October 3, 1989, asking if single family housing units are subject to the asbestos NESHAP when demolished. Such units are not subject to the regulations, unless the demolition operation involves a group of structures, for example an entire city block. If such an operation involving a group of residential structures is under the control or supervision of a single entity (i.e., the City), then the owner or operator is subject to the notification, work practices, and waste disposal requirements of the asbestos NESHAP. (Please see the enclosed March 15, 1989 letter for a previous determination on this issue).

The amount of friable asbestos in each building included in the operation must be added together in calculating whether the minimum threshold of asbestos-containing material is exceeded. Section 61.145(a) establishes that threshold at 260 linear feet for pipes or 160 square feet for other facility components. If the amount of friable asbestos material is less than this threshold, the owner or operator need only comply with the notification requirements of Section 61.146.

If these facilities are being demolished under an order of the City because they are structurally unsound and in danger of imminent collapse, the notification requirements of Section 61.146 apply, as do specified work practices in Section 61.147(d),(e),(f), and (g).

I have enclosed a copy of our regulations for your information. This response has been coordinated with the Office of Enforcement and Compliance Monitoring within the Agency. Please call Kenneth Malmberg (202-382-2870) of my staff if you have any questions.

Sincerely,

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

Enclosures

cc: John Hund, Region IV
Charley Garlow, OEMC
Sims Roy, ESD