



U.S. Environmental Protection Agency Applicability Determination Index

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Title: Asbestos Roofing Material
Recipient: Martino, Thomas
Author: Rasnic, John B.

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References: 61.141
61.145(a)
61.145(c)

Abstract:

The removal of regulated asbestos roofing material that is subject to the NESHAP must be supervised by an individual trained in the provisions of the NESHAP. Asbestos roofing material must be removed before demolition only if it is friable; if nonfriable roofing material is sanded, ground, abraded, or burned, then it must be handled according to the NESHAP. Neither air monitoring nor inspection by an accredited inspector is required by the NESHAP.

Letter:

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

OFFICE OF AIR AND RADIATION

Thomas A. Martino, President
American Interply Corporation
West Road Industrial Park
BOX 1500
Pleasant Valley, New Jersey 12569

Dear Mr. Martino:

This is in response to your October 30, 1990 letter in which you requested information on asbestos containing roofing materials. Your specific questions are addressed below.

1. Do you have to be EPA certified to remove asbestos containing roofing material?

As stated in the recently promulgated Asbestos NESHAP Revision, effective 1 year after promulgation (November 20, 1991) no regulated asbestos containing material shall be stripped, removed or otherwise handled or disturbed at a facility regulated by this section unless at least one on-site representative, such as a foreman or management-level person or other authorized representative, trained in the provisions of this regulation and the means of complying with them is present. Every two years, the trained on-site individual must receive refresher training on the provisions of this regulation. Evidence of the training must be posted and made available for inspection at the demolition or renovation site. Additionally, many states require that all workers be accredited before they remove asbestos from any facility. A list of training courses approved by the EPA is published quarterly in the Federal Register and is available through the Toxic Substances Control Act (TSCA) Hotline at (202) 554-1404.

2. Is the asbestos "safe" in a sealed roofing condition?

In a February 23, 1990 memorandum, EPA clarified the requirements of the Asbestos NESHAP regarding normally nonfriable asbestos containing material (ACM) including roofing material. In that memorandum EPA stated that normally nonfriable roofing material must be inspected before demolition to determine if the ACM is in poor condition, indicated by peeling, cracking, or crumbling of the material. If the normally nonfriable material is in poor condition, the material must be tested for friability. If the ACM is friable, that is it can be crumbled, pulverized or reduced to powder by hand pressure, it must be handled in accordance with the NESHAP. Normally nonfriable ACM, including roofing material, should be removed before demolition only if it is in poor condition and can be crumbled pulverized or reduced to powder by hand pressure.

In addition, if the nonfriable ACM is subjected to sanding, grinding, abrading or burning as part of the demolition or renovation, then the nonfriable ACM must be handled in accordance with the Asbestos NESHAP.

3 & 4. What instrument is used to monitor the air during removal and where can it be purchased?

The Asbestos NESHAP does not require air monitoring during the removal of ACM. However, OSHA regulations do require air monitoring during the removal of ACM (see 29 CFR Parts 1910 and 1926).

5 & 6. Is there such a thing as an EPA certified inspector and/or monitor and where is inspector and/or monitor and where is inspector training held?

EPA requires that a facility be inspected for asbestos prior to demolition or renovation and report to EPA information on the asbestos material present, the nature of the demolition or renovation, and measures that will be taken to control emissions of asbestos. EPA presently does not require an "accredited" or "certified" inspector to conduct the inspection, however, using an accredited inspector and following the Asbestos Hazard Emergency Response Act (AHERA) requirements for asbestos inspections of buildings would help ensure a thorough inspection as required by the asbestos NESHAP. A schedule of AHERA courses can be obtained by calling the TSCA Hotline.

As discussed above in the response to questions 3 & 4, EPA does not require the use of an air monitor during the removal of ACM.

7. There are presently millions of square feet of roof area still in place composed of asbestos felts, and most all roofing materials of the 1960's were of asbestos contents, including the cements/coatings and

flashings. What is EPA's stand on this situation?

As discussed above in the response to question 2, EPA does not require roofing material (including the cements, coating and flashings) to be removed prior to demolition or renovation if they are in good condition and are not sanded, ground, burned or abraded during the demolition or renovation process. EPA believes that when these materials are in good condition they will not be damaged by conventional demolition operations such that they will be crumbled, pulverized or reduced to powder by hand pressure.

This response has been coordinated with EPA's Emission Standards Division. If you have any further questions, please contact Scott Throwe of my staff at (703) 308-8699.

Sincerely,

John B. Rasnic, Acting Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards