



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C9

Category: Asbestos
EPA Office: SSCD
Date: 04/01/1982
Title: "Structural Member" Definition
Recipient: Voltaggio, Thomas C.
Author: Reich, Edward E.
Comments: If the asbestos roofing material is not RACM it is not subj.
to the requirements of the Asbestos NESHAP.

Subparts: Part 61, B-Asb, Asbestos Demolition/Renovation (Now Sub. M)

References: 61.141
61.145(a)

Abstract:

The removal of friable asbestos roofing material should be subject to the requirements for renovation in 61.22(d) since roofs are considered structural members.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APRIL 1, 1982

SUBJECT: NESHAP Applicability Determination - Asbestos

FROM: Director
Division of Stationary Source Enforcement

TO: Thomas C. Voltaggio, Chief
Compliance Branch (3AW20)

This memo is in response to your request on March 19, 1982 for a NESHAP applicability determination. Specifically, you ask whether an operation to remove friable asbestos roofing material from an industrial complex is subject to the regulations for demolition and renovation in 40 CFR 61.22(d).

For the renovation operation to remove roofing material to be subject to Section 61.22(d), the roofing must be considered a "structural member." The definition of "structural member" is given in Section 61.21 and as amended on March 2, 1977:

"Structural member" means any load-supporting member, such as beams and load-supporting walls; or any non-load-supporting member, such as ceilings and non-load-supporting walls.

Based upon this definition, the intent is to cover any, non-load-supporting member, such as a roof. Therefore, the removal of friable asbestos roofing material should be subject to the requirements for renovation in Section 61.22(d).

I have consulted with the Emission Standards and Engineering Division and they concur with this determination. If you have further questions concerning this matter, please contact Ann Eastham at 382-2876.

Edward F. Reich

cc: Linda Chaput - OAQPS