



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C90

Category: Asbestos
EPA Office: Region 5
Date: 03/07/1991
Title: Labels on Containers of Asbestos Waste
Recipient: Wood, Marlene T.
Author: Varner, Bruce A.

Subparts: Part 61, M, Asbestos

References: 61.150(a)

Abstract:

In addition to the name of the waste generator, containers of asbestos waste transported off the facility site must be labeled with the location at which the waste was generated. Waste containers must also be labeled using OSHA warnings whether transported off-site or not.

Letter:

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

Reply to Attention of:

Marlene T. Wood
Executive Secretary
National Environmental Services, Inc.
4016 Terminal Drive, Suite D
P.O. Box 76
McFarland, Wisconsin 53558

Dear Ms. Wood:

On February 25, 1991, I wrote to you in response to your inquiry on whose name should appear on the labels that are required to be attached to asbestos waste disposal bags when asbestos is removed by a contractor. Since then it has been brought to my attention that three clarifications should be made to my response:

1. The labeling requirement is found in Section 61.150 (a)(1)(v), not in section 61.150(a)(5).
2. Besides the name of the waste generator who may be either the facility owner (or operator) or the contractor, section 61.150(a)(1)(v) also requires that containers or wrapped materials transported off the facility site be labeled with the location at which the waste was generated.
3. In addition, section 61.150(a)(1)(iv) requires that specified warning labels of the Occupational Safety and Health Administration be placed on all containers or wrapped materials, whether transported off the facility site or not.

I hope these clarifications are helpful to you.

Sincerely yours,

Bruce A. Varner
Air Toxics Coordinator
Air Toxics and Radiation Branch