



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C93

Category: Asbestos
EPA Office: SSCD
Date: 04/09/1991
Title: Categorization of Mastic
Recipient: Loch, William
Author: Rasnic, John B.

Subparts: Part 61, M, Asbestos

References: 61.141
61.145(c)

Abstract:

Mastic is considered Category I nonfriable ACM and is not subject to the NESHAP unless it is subjected to sanding, grinding, cutting, or abrading. Therefore, where the floor tile is not friable and not being removed prior to demolition, the mastic can remain in the building during the demolition. If the demolition will be done by burning, then all asbestos material, including floor mastic, must be removed in accordance with the NESHAP prior to burning. The use of solvents to remove mastic would not cause the mastic to be crumbled, pulverized, or reduced to powder.

Letter:

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

Office of
Air and Radiation

APR 9 1991

Mr. William Loch
Project Manager
Warren and Panzer Engineers P.C.
10 East 38th Street
New York, New York 10016

Dear Mr. Loch:

This letter is in response to your December 21, 1990 letter in which you requested clarification regarding the categorization of mastic in the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP).

In the recently revised asbestos NESHAP, promulgated on November 20, 1990, EPA established two categories of nonfriable asbestos containing material (ACM): Category I nonfriable ACM and Category II nonfriable ACM. As defined in 40 CFR Section 61.141, "Category I nonfriable ACM" means asbestos-containing packings, gaskets, resilient floor covering and asphalt roofing products containing more than 1 percent asbestos determined using the methods specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy. "Category II nonfriable ACM" means any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the methods [cited above] that, when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure."

Mastic which is in good condition, that is, it is not peeling, cracking, or crumbling, would be considered Category I nonfriable ACM. Therefore, mastic which is in good condition will not be subject to the Asbestos NESHAP unless it is subjected to sanding, grinding, cutting or abrading. In cases where floor tile is not friable and is not being removed from a building prior to demolition, we believe the mastic underneath the floor tile will be in good condition and not friable and therefore, can remain in the building during the demolition process.

However, if the demolition process involves the intentional burning of a building, all of the asbestos-containing material in the building, including the floor tile mastic, must be removed in accordance with the NESHAP before the burning. In addition, it should be noted that the condition of the mastic may be affected by the process used to remove the floor tile. Mastic should be closely inspected after floor tile removal to determine its condition. In reference to your question on the use of solvents to remove mastic, we believe the use of solvents alone would not cause the mastic to be crumbled, pulverized or reduced to powder, and therefore would not be subject to the Asbestos NESHAP.

This determination has been coordinated with EPA's Office of Enforcement and with the Emission Standards Division of the Office of Air Quality Planning and Standards. If you have any 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

CC: Sims Roy, ESD (MD-13)
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