



# U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: ZB046**

**Category:** Asbestos  
**EPA Office:**  
**Date:** 03/18/1982  
**Title:** Recycled Asb./Railcar Unloading/Wetting  
**Recipient:**  
**Author:**

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

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**References:** 61.20  
61.21  
61.22(c)  
61.22(d)(4)  
61.22(j)  
61.22(j)(3)

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**Abstract:**

See below. Determination available in abstract form only. Included under "Letter" field to facilitate database word searching.

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**Letter:**

1. Is a manufacturing source's recycled asbestos waste subject to the waste handling regulations or the manufacturing regulations?
  2. Is rail car unloading of asbestos at a subject source covered by the regulations?
  3. Does the wetting of asbestos waste materials from a demolition or renovation automatically make the source subject to section 61.22(j)(3)(i)?
1. If a manufacturing source recycles its asbestos waste by conveying it from a baghouse to a mixing area for re-use, the recycling operation is considered manufacturing. Therefore, the operation is subject to Section 61.22(c). Waste handling procedures in Section 61.22(j) are inappropriate for this operation.
2. At the manufacturing site are subject to the regulations. The operation of unloading bags of commercial asbestos received by rail to be used in the manufacturing process is subject to Section 61.22(c).
3. Since the source in question is voluntarily complying with the work practice of wetting friable asbestos materials (Section 61.22(d)(4)), the source should be encouraged to complete the process by disposing of the waste as outlined in Section 61.22(j)(3)(i).