



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: ZB051

Category: Asbestos
EPA Office: DSSE
Date: 10/26/1982
Title: Fabrication/Worn Asbestos Pad Replacement
Recipient: Davis
Author: Reich, Edward E.

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

References: 61.20
61.21(s)
61.22(h)

Abstract:

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

Letter:

Worn asbestos pads are replaced with new ones. The worn pads are stripped and the new ones riveted into place. Attaching the new pads involves no grinding, cutting or other altering; they are precut and consist of 20% encased asbestos. Since stripping the old pads results in asbestos emissions, is this operation considered fabrication subject to Section 61.22(b)?

Yes, fabricating is defined at Section 61.21(s) as "any processing of a manufactured product containing commercial asbestos, with the exception of processing at temporary sites for the construction or restoration of buildings, structures, facilities or installations." The stripping or debonding of the old pads and the bonding of new ones is considered the processing of a manufactured product containing commercial asbestos. The Control Techniques Document for Asbestos Air Pollutants (AP-117, February 1973, pp. 3-29 to 3-36) makes clear that debonding or stripping is considered part of friction product processing and as such, its emissions are covered under Section 61.22(h). Although the bonding of asbestos friction material on motor vehicles is exempted at Section 61.22(h)(2) from the fabrication provisions, no exemption is allowed for the debonding or stripping of such materials.