



## U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: C79**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 01/09/1991  
**Title:** Clarification-Presence of Asb. & Bulk  
**Recipient:** Spooner, Charles  
**Author:** Rasnic, John B.  
**Comments:** See section 61.145(a) (applicability) 1990 NESHAP

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**Subparts:** Part 61, M, Asbestos

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**References:** 61.141  
61.145(a)

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### **Abstract:**

The Asbestos NESHAP specifies neither the volume of bulk samples to be taken nor a sampling method which must be used to determine the presence of ACM in a facility. However, a well-designed sampling method, such as the method required in the Asbestos-Containing Materials in Schools Rule (40 CFR Part 763), should be used. If one or more samples from a sampling area has more than 1 percent asbestos, then the sampling area is considered to be asbestos-containing. Bulk samples should not be composited.

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### **Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20046

Jan 9, 1991

Dr. Charles Spooner  
HYGEIA Inc.  
303 Bear Hill Road  
Waltham, Mass. 02154

Dear Dr. Spooner:

This is in response to your November 1, 1990 letter requesting clarification of the method used to determine the presence of asbestos-containing materials (ACM) in buildings. In addition, you requested a clarification of the bulk sample volume necessary to determine asbestos content. In your letter you described the sampling method which you used to determine the asbestos content of sprayed on fireproofing material applied to structural steel vertical columns. You collected 336 samples, 17 of which were greater than 1 percent asbestos.

The Asbestos NESHAP does not specify a sampling method which must be used to determine the presence of ACM in a facility. However, we would expect that a well designed sampling method be used, such as the method required in the Asbestos-Containing Materials in Schools Rule (40 CFR Part 763). Using this method, the friable ACM is grouped into homogeneous sampling areas and a recommended number of samples (9) is taken from each area. If one or more samples from a sampling area has more than 1 percent asbestos, then the sampling area is considered to be asbestos containing. Bulk samples should not be composited. I have enclosed a document titled "Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials" for further information.

The Asbestos NESHAP also does not specify a bulk sample volume of material which is required to determine asbestos content. Friable asbestos material is defined as "any material containing more than 1 percent asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR 763 Section 1, Polarized Light Microscopy ...." Therefore, the volume of material collected for a sample must be sufficient to conduct the above cited method. Large samples should not be taken to purposely include material which will dilute the asbestos content of the sample.

Although the majority of the samples which you collected from the sprayed on fireproofing contained no asbestos, 17 samples contained more than 1 percent asbestos with one sample as high as 20 percent. You have also stated that it is impossible to isolate those areas which are asbestos-containing from those which are not. The asbestos content of the fireproofing, although very low in some areas, appears to be widespread. Therefore, for the purpose of the Asbestos NESHAP, we would consider this material to be asbestos-containing, and if at least 160 square feet of this material is removed during a demolition or renovation, the owner or operator would be subject to the requirements therein.

This response was coordinated with EPA's Emission Standards Division, Office of Research and Development and Office of Toxic Substances. If you have any further 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

Enclosure