



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960002

Category: Asbestos
EPA Office: METD
Date: 06/06/1996
Title: Categorizes Galbestos
Recipient: Bucheleres, Stephen
Author: Rasnic, John

Subparts: Part 61, M, Asbestos

Abstract:

Q. Is Galbestos a category I nonfriable asbestos-containing material (ACM) as defined under the asbestos NESHAP?

A. Most, if not all, Galbestos products would be considered to be category I nonfriable ACM as manufactured. Galbestos may still be considered such even if it were impregnated with something other than an asphaltic or bituminous binder if it exhibits the characteristics of a category I nonfriable ACM. However, through aging, chemical attacks or other processes, it may no longer be considered a category I nonfriable ACM. This determination must be made on a case-by-case basis when an inspection is done prior to demolition or renovation.

Letter:

Mr. Stephen J. Bucheleres
Brandenburg Industrial Service Company
1905 East 4th St.
Bethlehem, PA 18015

Dear Mr. Bucheleres:

This is in response to your May 13, 1996, letter requesting the U.S. Environmental Protection Agency's (EPA) concurrence with Pennsylvania Department of Environmental Protection's determination that Galbestos is a category I nonfriable asbestos-containing material (ACM) as defined under the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP).

Galbestos is a generic name for a line of products previously manufactured by H.H. Robertson Company and other related companies. Most, if not all, Galbestos products would be considered to be category I nonfriable ACM as manufactured. Even if the Galbestos were impregnated with something other than an asphaltic or bituminous binder, it may still be considered to be a category I nonfriable ACM if it exhibits the characteristics of a category I nonfriable ACM material (see enclosed letter). However, through aging, chemical attacks or other processes, the Galbestos may no longer be considered to be a category I nonfriable ACM. This determination must be made on a case-by-case basis when an inspection of the facility is done prior to the demolition or renovation activity.

This determination has been coordinated with EPA's Office of Regulatory Enforcement and the Emission Standards Division of the Office of Air Quality Planning and Standards. If you have any questions, please call Tom Ripp of my staff at (202) 564-7003.

Sincerely,

John B. Rasnic, Director
Manufacturing, Energy and Transportation Division Office of Compliance Enclosure

cc: Asbestos NESHAP Coordinators
Regions I - X