



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

**Control Number: A960005**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 12/22/1993  
**Title:** Wall Texturing Material  
**Recipient:** Cotter, Paul  
**Author:** Rasnic, John

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

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**Abstract:**

Q. Is wall texturing material an integral part of the wall system? In its current undisturbed state, would it be classified a category II nonfriable ACM?

A. The texturing material is not considered to be an integral part of the wall system. It is a separate and independent layer in the wall system. The material in its undisturbed state may or may not be classified as a category II nonfriable ACM, depending on the condition of the material.

Q. Is granular texturing material part of the sheetrock wall/ceiling system?

A. A texturing material, whether granular or smooth, is not a part of the wall system. The applicability of the material does not change with the thickness of the texturing material.

Q. If these wall and ceiling materials are part of the wall/ceiling system, can the same sampling protocol that is used in determining the asbestos content of the tape and bed on the sheetrock be used to determine the asbestos content of these materials?

A. These materials are not part of the wall/ceiling system, and therefore each layer of the material must be analyzed separately.

Q. Are materials which have an asbestos content of greater than 1% considered ACM?

A. Yes. If any material or separate layer contains greater than 1% asbestos, then the materials are considered ACM.

Q. If materials considered to be ACM are disturbed during a renovation or demolition, would they be covered by NESHAP?

A. Yes. The owner or operator is subject to the NESHAP standards if the materials are disturbed.

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**Letter:**

Mr. Paul Cotter  
Texas Tech University  
Environmental Health and Safety  
Box 4369  
Lubbock, TX 79409-1090

Dear Mr. Cotter:

This is in response to your letter dated November 12, 1993 requesting a clarification of the National Emission Standards for Hazardous Air Pollutant (NESHAP) regulations regarding asbestos containing materials (ACM). The following are responses to your questions:

Question 1: Would not the wall texturing material be an integral part of the wall system in the same manner that the tape and bed material? In its current undisturbed state, would the wall texturing be classified as a Category II nonfriable asbestos containing material (ACM)?

Response: No. The texturing material is not considered to be an integral part of the wall system. It is a separate and independent layer in the wall system. The texturing material in its undisturbed state may or may not be classified as a Category II nonfriable ACM. The material's applicability status would have to be determined on a case by case basis based on the condition of the material.

Question 2: Would the granular ceiling texturing material also be part of the sheetrock wall/ceiling system?

Response: A texturing material, whether granular or smooth, is not a part of the wall system. Also the applicability of the material does not change with the thickness of the texturing material.

Question 3: "If these wall and ceiling materials are part of the wall/ceiling system, can the same sampling protocol that is used in determining the asbestos content of the tape and bed on the sheetrock be used to determine the asbestos content of these other materials?"

Response: Since these wall/ceiling materials are not part of the wall/ceiling system, a sampling protocol described in the letter to Law Engineering, dated September 4, 1992, may not be used. Each layer of the material must be analyzed separately.

Question 4: "If the materials are not considered part of the wall/ceiling system, and can not be composite sampled, then would these materials be considered ACM if the percentage of asbestos is greater than one percent?"

Response: Yes. If any material or separate layer contains greater than one percent asbestos, then the materials are considered ACM.

Question 5: "If these materials are considered to be ACM and are disturbed during a renovation or demolition activity, would these materials be covered by the NESHAP standards?"

Response: Yes. The owner/operator of the renovation or demolition activity is subject to the NESHAP standards if the materials in question are disturbed.

Question 6: If the material is found to be less than one percent by normal polarized light microscopy (visual estimation) must the sample then be point counted to insure that it is less than one percent?

Response: Yes. If the sample is found to be less than one percent by the visual estimation and you want to show that the material is not an asbestos containing material (less than 1 per cent asbestos), then the sample must be point counted to insure that the material is non-ACM. However, in cases where no asbestos is detected by normal polarized light microscopy, the sample does not have to be point counted. I have attached a memo dated May 5, 1991, which addresses the issue of point counting.

In addition to the "Point Counting" memo, I have attached a copy of the multi-layer clarification letter for more detailed explanation. If you have any questions, please contact Chris Oh of my staff at (703) 308-8732.

Sincerely,

John B. Rasnic, Director  
Stationary Source Compliance Division Office of Air Quality Planning and Standards

**Attachments**

cc: Sims Roy, ESD (MD-13)  
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