



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960014

Category: Asbestos
EPA Office: SSCD
Date: 01/13/1994
Title: Treatment of Layers of Wall
Recipient: Green, Dewey
Author: Lay, Linda

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

Abstract:

Q. Is a wall system consisting of 1/2" to 5/8" sheetrock, one layer of sheetrock mud and tape, followed by an additional thin layer of asbestos containing sheetrock mud that is either troweled or stripped onto the surface, subject to the asbestos NESHAP?

A. The above wall system should be considered as several individual layers with the asbestos containing sheetrock mud being a separate layer. Generally, when a sample consists of one or more distinct layers or materials, each layer should be treated separately and the results reported by layer (discrete stratum).

Q. What classification would "joint compound" fall under?

A. It would be covered under "add-on" materials.

Letter:

Dewey C. Green
President
Chem S.I. Inc.
180 Commerce Drive
Pelham, AL 35124

Dear Mr. Green:

This is in response to your letter dated November 22, 1993 requesting a written clarification on the applicability of asbestos containing "sheetrock mud" or other added-on material as it applies to the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP). Specifically you asked whether a wall system consisting of 1/2" to 5/8" sheetrock, one layer of sheetrock mud and tape, followed by an additional thin layer of asbestos containing sheetrock mud that is either troweled or stippled onto the surface, is subject to the asbestos NESHAP. Additionally, you asked if the stated wall system can be considered a complete wall system for testing purposes.

You stated that it was your understanding, based on a prior determination (Law Engineering, September 4, 1992), that the sheetrock mud, tape, and an additional thin layer of asbestos containing sheetrock mud that is troweled over the surface would be an integral part of the wallboard. We do not agree with your interpretation of the referenced letter. The Law Engineering letter did not address situations with a layer/layers of added-on materials. The letter specifically dealt with a situation where a joint compound was used for mending purposes. For example: the letter addressed situations where joint compounds were used to cover nail holes, cracks, small gaps and wall corners. The wallboard system you described above should be considered as several individual layers with the asbestos containing sheetrock mud being a separate and distinct layer.

In general, when a sample consists of one or more distinct layers or materials, each layer should be treated separately and the results reported by layer (discrete stratum). 2

I have enclosed a copy of the multi-layer clarification that has been published in the Federal Register. "Joint compound" that is used as a texturing material would be covered under "add-on" materials. Please review this section for a more detailed explanation. If you have any questions, please contact Jeffery KenKnight of my staff at (703) 308-8728.

Sincerely,

Linda J. Lay, Chief
Inorganic Chemicals Section
Stationary Source Compliance Division

Attachment

cc: Tom Ripp, SSCD (6306W)
Chris Oh, SSCD (6306W)
Jeffery KenKnight, SSCD (6306W)
Regional Asbestos NESHAP Coordinators