



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

**Control Number: C107**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 01/08/1992  
**Title:** Disposal Requirements for Small Projects  
**Recipient:** Glass, William C.  
**Author:** Rasnic, John B.

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

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**References:** 61.150

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**Abstract:**

Vehicles used to transport asbestos-containing waste materials must be marked during the loading and unloading of the waste each time the waste is loaded and unloaded. When the facility consists of telephone lines encompassing a multi-state area and only a small amount of material is generated at each work site which is then accumulated at a material disposition center owned and operated by the same facility, a waste shipment record (WSR) is not required when the small amount of waste is transported from the work site to the central collection point. The WSR is required when the waste is shipped from the central collection point, off the facility site, to the waste disposal site.

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**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
AIR AND RADIATION

JAN 8 1992

Mr. William C. Glass  
Bell South Services  
4FI  
3700 Colonnade Parkway  
Birmingham, Alabama 35243

Dear Mr. Glass:

I regret the delay in this response to your August 20, 1991 letter. However, your request required substantial coordination with other offices within EPA. You requested a clarification on the applicability of the asbestos NESHAP waste disposal requirements to small removal projects. As you described in your letter, your operations involve the removal of small amounts (approximately 5 cu.ft.) of transite duct from a roadside site where telephone repair work is being performed. The transite duct is transported from the work site to a disposition center for aggregation for disposal. The individual projects may not exceed the applicability amounts for the asbestos NESHAP (at least 80 linear meters on pipes, or at least 15 square meters on other facility components, or at least 1 cubic meter off facility components where the length or area could not be measured previously). However, if over the course of a calendar year it is predicted that the applicability amount will be triggered then the notification, emission control and waste disposal requirements do apply. Your specific questions are addressed below.

1. "Is the OSHA prescribed sign for loading/unloading required each time the drum is loaded/unloaded in our process or only when the 'shipment for disposal' is being loaded/unloaded at our aggregation point and the disposal facility?"

Response: The requirement in Section 61.150(c) to mark vehicles used to transport asbestos-containing waste material (ACWM) during the loading and unloading of the waste applies each time the ACWM is loaded and unloaded. This includes the time when the drum is loaded at the work site and unloaded at the aggregation point. The purpose of this requirement is to inform both the workers and others who are on the site of the potential hazards to which they are exposed.

2. "Is the WSR [waste shipment record] required for each removal site or only when the 'shipment for disposal' is shipped from our aggregation point to the disposal facility?"

Response: Section 61.150(d) requires that a WSR be maintained for all ACWM transported off the facility site. Section 61.150(b) requires that all ACWM be deposited as soon as practical by the waste generator at a waste disposal site operated in accordance with Section 61.154, or at an EPA-approved site that converts ACWM into nonasbestos material in accordance with Section 61.155. In cases where relatively small amounts of material are being generated from individual work sites, it may be practical to accumulate the asbestos containing waste material at a central collection point and then ship the material to a waste disposal site. In a prior determination (John B. Rasnic, Stationary Source Compliance Division to C.R. Sledge Jr., June 25, 1991, see enclosure), EPA stated that a WSR is required when ACWM is transported to a central collection point off the facility.

In the case of Bell South, the facility is constituted of telephone lines, and encompasses a multi-state region. A small amount of material is generated at each work site and is accumulated at a material disposition center owned and operated by Bell South. Due to the size of this "facility", the small amount of material that is being generated at any one work site, and the fact that the ACWM is always maintained by Bell South, we believe a WSR is not required when Bell South transports the ACWM from the work sites to the central collection point. Bell South must ensure that the waste being accumulated at the central collection point is maintained in compliance with the waste disposal requirements in 40 CFR Section 60.150. The WSR is required when the ACWM is shipped from the central collection point, off the facility site, to the waste disposal site.

This determination has been coordinated with EPA's Office of Enforcement, and the Emission Standards Division of the Office of Air Quality Planning and Standards. If you have any questions, please contact Scott Throwe of my staff at (703) 308-8699.

Sincerely,

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

Enclosure

cc: Sims Roy, ESD (MD-13)  
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