



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

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**Control Number: C110**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 03/29/1991  
**Title:** Wet Shot Blasting  
**Recipient:** Sander, Jim  
**Author:** Rasnic, John B.

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

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**References:** 61.141  
61.145(c)

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**Abstract:**

A shot-blasting method for mastic removal, which incorporates wetting into the shot-blasting and waste collection stages, appears to meet the NESHAP work practice provisions for adequately wetting regulated material.

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**Letter:**

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

Office of  
Air and Radiation

MAR 29 1991

Mr. Jim Sander  
Manager  
OCRIC, Inc.  
P.O. Box 99381  
San Diego, California 92169

Dear Mr. Sander:

This letter is in response to your January 24, 1991 letter in which you discussed a wet method of the shot-blasting removal technique for asbestos-containing mastic. Included with your letter was a videotape of the process which members of my staff and I viewed.

In a September 21, 1990 applicability determination, we stated that nonfriable material (including floor tile mastic) which is removed using abrasive forces such as grinding, sanding or other abrasive methods is subject to the Asbestos NESHAP regulation. The shot-blasting operation would cause nonfriable asbestos material (mastic) to be crumbled, pulverized, or reduced to powder, and therefore, Asbestos NESHAP work practices must be followed. This means adequately wetting the nonfriable material (mastic) before and during the shot-blasting operation, keeping the shot-blasted material adequately wet before collection, and disposing of the waste according to the requirements of the Asbestos NESHAP.

You have incorporated a wetting process in the shot-blasting and waste collection stages of your system which appears to meet the above requirements. To the extent that those requirements are being met, this wet shot-blasting system would be an acceptable method of mastic removal. Please be aware that EPA does not formally approve or endorse specific removal techniques. This letter should not be interpreted as an approval from EPA regarding OCRIC's process.

This response 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 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

cc: Sims Roy, ESD (MD-13)  
Elise Hoerath, OE (LE-134A)  
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