



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C13

Category: Asbestos
EPA Office: SSCD
Date: 10/04/1984
Title: Required Removal in Privately Owned Building
Recipient: Johnson, Dean R.
Author: Reich, Edward E.

Subparts: Part 61, M, Asbestos

References: 61.140

Abstract:

40 CFR 61 Subpart M has requirements for proper renovation and disposal of asbestos materials if they are being removed, but does not require their removal from privately-owned office buildings.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCTOBER 4, 1984

Mr. Dean R. Johnson
Skidmore, Owings & Merrill
400 One Shell Plaza
Houston, Texas 77002-4906

Dear Mr. Johnson:

This is in response to your September 18, 1984 letter requesting information on your plan to partially renovate an existing privately-owned eleven-story office building. Chrysotile asbestos fireproofing was applied to the underside of each floor slab. You wanted to ensure there are no regulations requiring complete removal of all asbestos in office buildings as is currently being considered for school buildings.

You are correct that at this time there are no requirements for complete removal of asbestos in private office buildings. The air office, under its asbestos National Emission Standard for Hazardous Air Pollutants (NESHAPs) 40 CFR 61 Subpart M, has requirements for proper renovation and disposal of asbestos materials if they are being removed, but does not require their removal. The asbestos NESHAP is currently being reviewed, but no consideration has been given to requiring asbestos removal. The Office of Pesticides and Toxic Substances does not have requirements for privately-owned buildings and has not proposed any requirements. Obviously, we cannot predict what may occur in the future, but there is no indication at this time that future EPA asbestos regulations will require complete removal of asbestos in privately-owned office buildings.

Sincerely yours,

Edward E. Reich, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

cc: Dave Mayer
Bob Ajax
John Copeland
Jim Wilburn