



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C16

Category: Asbestos
EPA Office: Region 9
Date: 03/14/1985
Title: Removal of Breakable Roof Tiles
Recipient: Smith, Creighton
Author: Seeley, Charles M.
Comments: The asbestos NESHAP does not specify that removed materials be placed in "double bags".

Subparts: Part 61, M, Asbestos

References: 61.141
61.145(c)

Abstract:

Any asbestos-containing materials, such as rigid roof tiles, which could reasonably be expected to release asbestos fibers during normal renovation or demolition operations should be treated as friable. Tiles should be wetted and kept wet during removal and care should be exercised to minimize breakage. Materials removed should be placed in labeled double bags.

Letter:

Mr. Creighton Smith
Chief, Enforcement Branch
Kern County Air Pollution Control District
1601 "H" Street, Suite 250
Bakersfield, CA 93301

Dear Mr. Smith:

Under normal conditions, the asbestos in undamaged asbestos-containing rigid roof tiles is not considered friable. However, when these tiles are cut, fractured, broken, or otherwise damaged, asbestos fibers can be released to the atmosphere.

As you know, 40 CFR 61 does not clearly address the matter of whether or not the removal or handling of damaged asbestos tiles from structures is subject to the work-practice standards. Consequently, we raised the issue to our Washington headquarters and requested information on any determinations of relevancy made elsewhere so that we could properly advise you in the matter of the fire-damaged school in the Richmond School District. We recently received a response to our request.

Any asbestos-containing materials, such as rigid roof tiles, which could reasonably be expected to release asbestos fibers during normal renovation or demolition operations should be treated as friable. Tiles should be wetted and kept wet during removal and care should be exercised to minimize breakage. Materials removed should be placed in labeled double bags.

In addition to following the NESHAP work practice standards, we would suggest that, to minimize hazards to workers involved in the project, CAL-OSHA be consulted to assure any worker safety or health protection requirements are addressed.

If you have any further questions concerning this matter, please contact Mark Sims of my staff at (415) 974-7648 or me (415) 974-8053.

Sincerely,

(Original Signed by)
Charles M. Seeley, Chief
Compliance Section
Air Management Division

cc: Robert Meyers (SSCD)
Robert Johnson (KCAPCD)
Greg Kendrick (Architect, AIA)