



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

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**Control Number: C18**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 04/08/1985  
**Title:** Vacuum Truck Asb. Removal  
**Recipient:** Gino, Robert  
**Author:** Reich, Edward E.

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

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**References:** 61.145(c)  
61.150(b)

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**Abstract:**

If a truck-mounted vacuum method does not result in any visible emissions, it is an acceptable method for removal of asbestos waste. If visible emissions result, however, this would be a violation of the standard, and subject to enforcement action, because the truck-mounted vacuum is not one of the specific alternatives provided. Additionally, the operation would be subject to the requirements of .61.152(a), regardless of the disposal method selected.

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**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APRIL 8, 1985

Mr. Robert Gino  
Manager, Toxic Waste  
Department of Facilities  
Chicago Public Schools  
1819 West Pershing Road  
Chicago, Illinois 60609

Dear Mr. Gino:

I wish to respond to your February 20, 1985 letter. In that letter you mentioned that the Chicago Public School system was planning to use a new method of asbestos abatement, one involving a truck-mounted vacuum to remove wet asbestos-containing material from a building. You stated you had received verbal permission to use this method from EPA's North Carolina office, but wanted written confirmation that use of this method would be allowed under EPA's Clean Air Act asbestos regulations.

There are certain work practice procedures which must be followed during an asbestos renovation or demolition, if such operation is covered under the EPA Clean Air Act asbestos regulations at 40 CFR 61.145-.147. However, there is flexibility provided in terms of how the waste generated by the renovation or demolition must be removed. The regulations at .61.152(b) require that the owner or operator of a covered operation discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, transporting, or deposition of any asbestos-containing waste material, or use one of the alternatives specified in .61.152(b).

If the truck-mounted vacuum method you wish to use does not result in any visible emissions, it is an acceptable method for removal of asbestos waste. If visible emissions result, however, this would be a violation of the standard, and subject to enforcement action, because the truck-mounted vacuum is not one of the specific alternatives provided. Additionally, the operation would be subject to the requirements of .61.152(a), regardless of the disposal method selected.

A copy of the asbestos regulations is enclosed for your information. Please contact Robert Myers at (202) 382-2875 if you have any questions.

Sincerely yours,

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

Enclosure

cc: John Copeland  
Bruce Varner

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