



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

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**Control Number: C21**

**Category:** Asbestos  
**EPA Office:** Region 7  
**Date:** 06/21/1985  
**Title:** Friability of Asb. Shingles  
**Recipient:** Expert Environmental Control  
**Author:** Whitmore, Charles W.  
**Comments:** see section 61.141 (definitions) 1990 NESHAP - asbestos shingles

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

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**References:** 61.141  
61.145(c)

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**Abstract:**

An asbestos shingle is usually non-friable and, therefore, not subject to the NESHAP regulations. However, once the shingle is damaged, in any way, the asbestos material becomes friable and is subject to all NESHAP requirements.

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**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 68101

Expert Environmental Control  
3016 Miller Drive  
Independence, Missouri 64050

Dear Sir:

The Environmental Protection Agency (EPA) was requested, by an anonymous employee of your company, to provide a written policy statement regarding the removal of asbestos shingles.

The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for asbestos, 40 C.F.R. Part 61, Subpart M (49 FR 13661) defines friable asbestos as follows:

Friable asbestos material means any material containing more than 1 percent asbestos by weight that hand pressure can crumble, pulverize or reduce to powder when dry.

An asbestos shingle is usually non-friable and, therefore, not subject to the NESHAP regulations. However, once the shingle is damaged, in any way, the asbestos material becomes friable and is subject to all NESHAP requirements.

These requirements are stated in .61.147 Standard for demolition and renovation: Procedures for asbestos emission control. A portion of the requirements are:

Each owner or operator to whom this section applies shall comply with the following procedures to prevent emissions of particulate asbestos material to the outside air.

(a) Remove friable asbestos materials from a facility being demolished or renovated before any wrecking or dismantling that would break up the materials or preclude access to the materials for subsequent removal. However, friable asbestos materials need not be removed before demolition if:

(1) They are on a facility component that is encased in concrete or other similar material; and

(2) These materials are adequately wetted whenever exposed during demolition.

(b) When & facility component covered or coated with friable asbestos materials is being taken out of the facility as units or in sections:

(1) Adequately wet any friable asbestos materials exposed during cutting or disjoints operations; and

(2) Carefully lower the units or sections to ground level, not dropping them or throwing them.

(c) Adequately wet friable asbestos materials when they are being stripped from facility components before the members are removed from the facility.

A copy of the regulation is enclosed for your information.

If you have any questions, please contact Ms. Jan Lambert, 816/374-2576, the member of my staff most familiar with the NESHAP regulations.

Sincerely yours,

Charles W. Whitmore  
Chief, Air Compliance Section

Enclosure