



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C24

Category: Asbestos
EPA Office: Region 10
Date: 08/30/1985
Title: Applicability to Roofing Shingles
Recipient: Hall, Bradley H.
Author: Macfarlane, Ross A.
Comments: see section 61.141 (definitions), section 61.150 (waste disposal), & section 61.145(c) (asb.emiss.cntrl) 1990 NESHAP

Subparts: Part 61, M, Asbestos

References: 61.141
61.145(c)
61.150

Abstract:

Nonfriable roofing shingles that become friable during removal should be handled in a manner consistent with the asbestos NESHAP. For instance, material which becomes fractured should be wetted and carefully lowered to the ground so as to minimize the potential for emissions. Any material that becomes friable should be disposed of appropriately.

Letter:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

Reply To: M/S 613

Attn of

Bradley H. Hall
Lojek, Penland & Munther
711 1/2 W. Bannock
P.O. Box 199
Boise, Idaho 83701

Dear Mr. Hall:

This letter responds to your August 9, 1985, letter to Lynn McKee, requesting an interpretation of the term "friable asbestos material" as it applies to asbestos-containing roofing shingles. The question of friability appears to require a case-by-case determination based on the particular material involved. See 39 Fed. Reg. 38065 (1974) (preamble to amendments to asbestos NESHAP). He would be happy to help you in that determination. Please contact Mark Masarik at the Idaho Operations Office, 334-1459, to arrange a mutually convenient time for an inspection.

Please note, however, that even if the asbestos material is not friable in its normal state, precautions must be taken to ensure that it does not become friable during removal. It is quite possible, for instance, that the asbestos shingles are not friable when whole but may become friable if broken or shattered. In this case, care should be taken to conduct the removal in a manner that minimizes shingles breakage. Any material that becomes friable during removal should be handled in a manner consistent with the National Emission Standard for Asbestos, 40 CFR Part 61, Subpart M. For instance material which becomes fractured should be wetted, 40 CFR .61.147(c) & (e)(1), and should be carefully lowered to the ground so as to minimize the potential for emissions, 40 CFR .61.147(e)(2). Any material that becomes friable should be disposed in accordance with 40 CFR .61.152. If ragged edges result from removal, these edges are often prone to becoming friable. In order to avoid having to put large pieces into plastic bags for disposal, you may choose to use an alternative method, such as painting the edges to minimize the friability. You should obtain prior approval from EPA for any alternative method. All asbestos material should be disposed in a facility consistent with 40 CFR .61.156, since there is a potential that the material will become friable.

Thank you for your attention. Should you have any further questions, please call at (206) 442-1146

Sincerely,

Ross A. Macfarlane
Assistant Regional Counsel

cc: Mark Masarik, IOO
Rich Biondi, OCEM