



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

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**Control Number: C26**

**Category:** Asbestos  
**EPA Office:** Region 5  
**Date:** 04/17/1986  
**Title:** Dry Stripping of Friable Asb.  
**Recipient:** Griffing, Aileen Y.  
**Author:** Kertcher, Larry F.  
**Comments:** section 61.145(c)(3)(i)(a) of the 1990 NESHAP

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

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**References:** 61.145(c)

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### Abstract:

The asbestos NESHAP requires, among other things, that friable asbestos materials be adequately wetted when they are being stripped from facility components and that they remain wet until they are collected for disposal. The only exceptions are when wetting would unavoidably damage equipment, and when the temperature at the point of wetting is below 32 feet and it is not possible to remove the facility components as units or in sections before stripping.

Permission for a glove-bag dry removal (requested for safety purposes) was not granted.

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### Letter:

April 17, 1986

Aileen Y. Griffing  
Industrial Hygienist  
Commonwealth Edison  
Post Office Box 767  
Room 1937 E  
Chicago, Illinois 60690-0767

Dear Ms. Griffing:

The U.S. Environmental Protection Agency (U.S. EPA), Region V, has reviewed your March 3, 1986 letter to Bruce Varner of my staff, requesting approval to do dry stripping of friable asbestos material inside glove bags and to then wet the material prior to disposal, when the presence of electrical hazards makes wet removal unsafe.

The asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) (40 CFR 61.140, et seq.) applies to, among other things, renovations involving the stripping or removal of at least 260 linear feet of friable asbestos material on pipes or at least 160 square feet on other facility components. This includes planned renovations involving individual nonscheduled operations where the additive amount of friable asbestos materials to be removed or stripped at a facility over the maximum period of time a prediction can be made (not to exceed one year), exceeds the above quantities.

The asbestos NESHAP requires, among other things, that friable asbestos materials be adequately wetted when they are being stripped from facility components and that they remain wet until they are collected for disposal. The only exceptions are when wetting would unavoidably damage equipment, and when the temperature at the point of wetting is below 32 F and it is not possible to remove the facility components as units or in sections before stripping.

Region V has brought this matter to the attention of the U.S. EPA Office of Air Quality Planning and Standards (OAQPS) that promulgates NESHAPS. OAQPS confirmed Region V's understanding that the asbestos NESHAP contains no provisions for approving any other alternatives to the emission control procedures specified in 40 CFR 61.147 under any other conditions.

The need for possible revisions to this standard for safety considerations should be communicated to Jack R. Farmer, Director, Emission Standards and Engineering Division, OAQPS, U.S. EPA, Research Triangle Park, North Carolina 27711, as the Regional Office does not have authority to grant the requested exception to this standard. Obviously, however, the Regional Office would consider the specific details of any particular situation before deciding whether to exercise its enforcement discretion where a violation of the letter of the standard is involved.

If you have any questions on this matter, please contact Mr. Varner at (312) 886-6793 or myself at (312) 353-2081.

Sincerely yours,

Larry F. Kertcher, Chief  
Air Compliance Branch (5AC-26)

cc: Michael J. Hayes, Manager  
Division of Air Pollution Control  
Illinois Environmental Protection Agency

Sy Levine  
Division of Air Pollution Control  
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Ronald L. Novak, Chief  
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Jack R. Farmer, Director  
Emission Standards and Engineering Division (MD-13)