



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

**Control Number: C30**

**Category:** Asbestos  
**EPA Office:** Region 5  
**Date:** 03/18/1987  
**Title:** Removal of Contaminated Ceiling Tile  
**Recipient:** Boelter, Fred W.  
**Author:** Adamkus, Valdas V.  
**Comments:** Removal of tiles covered with RACM during a reno. const. a regulated act. see s.61.141 (def.) "remove" & "renovation".

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

**References:** 61.141  
61.145(a)

**Abstract:**

A renovation operation includes removal of ceiling tile contaminated by asbestos on facility components above the tile. If the renovation operation does not include the stripping or removal of friable asbestos material from the facility components above the tiles, and if the tiles themselves contain 1 percent asbestos or less by weight, then the removal of the tiles is not subject to the asbestos NESHAP.

**Letter:**

(6RA-14)

March 18, 1987

Fred W. Boelter, CIH, PE  
Senior Consultant  
Boelter Associates, Inc.  
6405 North Avondale  
Chicago, Illinois 60631

Dear Mr. Boelter:

Thank you for your March 2, 1987, letter which asks for an interpretation of the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 61.140, et seq. For cellulose ceiling tiles whose top surface is contaminated with asbestos powder, you ask if it is necessary to notify under NESHAP if over 160 square feet of contaminated tiles are scheduled for removal, and if it is necessary to dispose of these tiles as asbestos-containing waste.

The asbestos NESHAP applies to, among other things, renovation operations involving the stripping or removal of at least 260 linear feet of friable asbestos material on pipes or at least 160 square feet of friable asbestos material on other facility components. 40 CFR 61.145(d). 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. Facility component includes any pipe, duct, boiler, tank, reactor, turbine, furnace or structural member. 40 CFR 61.141.

The asbestos powder contamination on the ceiling tiles presumably came from friable asbestos material on facility components above the tiles. If the renovation operation does not include the stripping or removal of friable asbestos material from the facility components above the tiles and if the tiles themselves contain 1 Percent asbestos or less by weight, then the removal of the tiles is not subject to the asbestos NESHAP. In this case, the area of tile removed does not have to be considered in determining if the overall operation is subject and does not have to be included in any required notice, and it is not necessary to follow the work practices of 40 CFR 61.147 in removing the tiles or to dispose of them as asbestos-containing waste.

If the renovation operation does include the stripping or removal of friable asbestos material from any of the facility components above the tiles and if the overall operation includes the stripping or removal of at least 260 linear feet on pipe or 160 square feet on other facility components, then the removal of the contaminated tiles would be considered to be part of the subject operation. Again, for tile containing 1 percent asbestos or less by weight, the area of tile removed does not have to be considered in determining if the overall operation is subject and does not have to be included in the required notice. However, it is necessary to follow the work practices of 40 CFR 61.147 in removing these tiles and to dispose of them as asbestos-containing waste. In addition, the notice should state the removal work practices and the disposal method for the tiles.

Region V has delegated its authority to implement and enforce the asbestos NESHAP to all six States in the region. For your information, I have enclosed a list of the proper notification addresses. Please send a copy of each notice Adamkus.

Valdas V. Adamkus  
Regional Administrator

Enclosure

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

Walter J. Kulakowski, Assistant Commissioner  
Office of Air Management  
Indiana Department of Environmental Management

Robert P. Miller, Chief  
Air Quality Division  
Michigan Department of Natural Resources

J. Michael Valentine, Director  
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Minnesota Pollution Control Agency

Patricia P. Walling, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency

Donald F. Theiler, Director  
Bureau of Air Management  
Wisconsin Department of Natural Resources