



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C31

Category: Asbestos
EPA Office: Region 5
Date: 06/11/1987
Title: Floor Tile Removal Prior to Building Demolition
Recipient: Griffith, Richard A.
Author: Varner, Bruce A.
Comments: See s.61.141 (def.) 1990 NESHAP "cat I nonfria. asb-cont.mat & reg. asb-cont.mat. & s.61.145(c)(10)"intent. burning"

Subparts: Part 61, M, Asbestos

References: 61.141
61.145(a)
61.150
61.154

Abstract:

If vinyl asbestos floor tile becomes friable during demolition or associated waste disposal, then the asbestos NESHAP applies from the point where the tile becomes friable. Tile that may become friable should be removed prior to demolition to preclude the possibility of release of asbestos fibers.

Letter:

JUNE 11, 1987

Richard A. Griffith, Manager
Industrial Hygiene Department
Environmental Services Division
ATEC Associates, Incorporated
5150 East 65th Street
Indianapolis, Indiana 46220-4781

Re: Vinyl Asbestos Floor Tile Removal
Prior to building Demolition

Dear Mr. Griffith:

Thank you for your May 1, 1987, letter to Charles Loomis of this office asking if vinyl asbestos floor tile should be removed prior to building demolition. Asbestos removal during building demolition is regulated by the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). 40 CFR Part 61, Subpart M. I have discussed your inquiry with the Stationary Source Compliance Division of the United States Environmental Protection Agency (U.S. EPA) in Washington, DC. The answer that follows is a coordinated U.S. EPA response.

The demolition and renovation standards in the asbestos NESHAP apply only to friable asbestos materials, and the waste disposal standards for demolition and renovation operations apply only to friable asbestos waste and asbestos waste from control devices. Friable asbestos includes material containing more than one percent asbestos by weight that can be crumbled, pulverized or reduced to powder when dry by hand pressure.

However, the scope of the regulation is not limited just to asbestos containing material that is friable prior to demolition. If vinyl asbestos floor tile becomes friable during demolition or associated waste disposal, then the asbestos NESHAP applies from the point where the tile becomes friable.

Vinyl asbestos floor tile that may become friable during demolition or waste disposal should be removed prior to demolition to preclude the possibility of releasing asbestos fibers and of violating the asbestos NESHAP. Again, the asbestos NESHAP would apply to the removed tile if it becomes friable, from the onset of friability through deposition at an acceptable waste disposal site. Since the liability extends through proper deposition, it would be advisable to deposit all vinyl asbestos floor tile that can become friable at an acceptable site.

Region V has delegated its authority to implement and enforce the asbestos NESHAP to all six states in the region. By copy of this letter, I am distributing this response to the State asbestos NESHAP coordinators in Region V.

If you have any questions on this matter, you may contact me at (312) 886-6793.

Sincerely yours,

Bruce A. Varner
NESHAP Coordinator
Air Compliance Branch (5AC-26)

cc: Otto Klein
Illinois Environmental Protection Agency

Andy Knott
Indiana Department of Environmental Management

Lonnie Lee
Michigan Department of Natural Resources

Anita Twaroski
Minnesota Pollution Control Agency

Tom Tucker
Ohio Environmental Protection Agency

Joe Brehm
Wisconsin Department of Natural Resources