



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C32

Category: Asbestos
EPA Office: SSCD
Date: 09/04/1987
Title: Dry Removal If Explosion Potential
Recipient: Delisle, Mark A.
Author: Seitz, John S.

Subparts: Part 61, M, Asbestos

References: 61.145(c)

Abstract:

The asbestos NESHAP allows dry removal of ACM under certain conditions, e.g., whenever wetting would unavoidably damage equipment. Equipment explosion potential would be covered by this provision whenever the equipment cannot be shut down or bypassed.

(Note: the letter incorrectly quotes the regulation.)

Letter:

Mr. Mark A. DeLisle, CSM
President
DeLisle Consulting and Laboratories, Inc.
2401 E. Milham Avenue
Kalamazoo, Michigan 49002

Dear Mr. DeLisle:

I am writing in response to your May 11, 1987 letter to Bruce Varner requesting a determination on acceptable techniques for removing asbestos containing material (ACM) from steam or hot water systems which cannot be shut down or bypassed. You are concerned that the use of wetting techniques on this "hot equipment" might increase asbestos exposure, risk worker heat exhaustion, and sometimes cause equipment to explode upon contact with cold water.

The asbestos NESHAP allows dry removal of ACM under the conditions of .61.147(c)(1) and (c)(2) "whenever wetting would unavoidably damage equipment (.61.147(c)(1))." Certainly equipment explosion potential would be covered by this provision whenever the equipment cannot be shut down or bypassed.

EPA never intended to promote unsafe practices. However, it is expected that in nearly all cases ACM removal can be scheduled to occur during an equipment shutdown or be done while the equipment is bypassed. If you are faced with a specific situation where ACM cannot be removed for over a year because of the inability to shut down or bypass "hot equipment" during that time period, approval for an alternative removal procedure may be considered by the Administrator upon request.

Any questions concerning this matter may be addressed to Jim Engel at (202) 382-2877.

Sincerely,

John S. Seitz, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

cc: Larry F. Kertcher, Region 5
Asbestos NESHAP Contacts

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