



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

**Control Number: C62**

**Category:** Asbestos  
**EPA Office:** Region 6  
**Date:** 04/17/1988  
**Title:** Dry Removal to Prevent Damage to Hosp. Equip.  
**Recipient:** Shoemaker, Philip H.  
**Author:** Hathaway, William B.

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

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**References:** 61.145(c)  
61.152

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**Abstract:**

Use of the "dry method" for removal of friable asbestos ceiling tiles (containing 1-5 percent asbestos) during the renovation of a hospital will comply with Section 61.147(c) relating to removal procedures provided that a local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material produced by the removal of tiles is used. EPA found that there could be damage to equipment that could not be shut down because it was critical to operation of life support systems.

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**Letter:**

Apr 17 1988

Colonel Philip H. Shoemaker  
Directorate of Engineering and Housing  
Headquarters, U.S. Army Air Defense  
Artillery Center and Fort Bliss  
ATTN: ATZC - DEH - P (Ms. Maria Montes)  
Fort Bliss, Texas 79916-6107

Re: Planned Renovation of Building 7777 at William Beaumont Army Medical Center (WBAMC) in Fort Bliss, Texas

Dear Colonel Shoemaker:

This is in response to your letter dated April 6, 1989, requesting approval to employ dry removal of friable asbestos materials during the referenced renovation which was described as the Life Safety Code (LSC) construction project and urgently required in order for WBAMC to retain hospital accreditation. Use of the "dry method" was specifically requested for removal of asbestos contaminated ceiling tiles with an asbestos content of 1% to 5%.

Martin Brittain of my staff also obtained the following clarification via telephone discussions with Mr. Tony Deanda of the WBAMC on April 7, 1989, and Ms. Pat Giles of the U.S. Army Corp. of Engineers, Fort Worth on April 17, 1989. Approximately 172,000 square feet of the ceiling tiles, which constitute friable asbestos material (FAM), are to be removed during the LSC project renovation of Building 7777 at WBAMC. All areas within WBAMC Building 7777 undergoing removal of the ceiling tiles would be subjected to unavoidable damage to equipment if the wetting method is used as required.

Based on the information received, the planned LSC upgrade project at WBAMC is considered by this office to be subject to the requirements for asbestos renovation in 40 CFR Part 61, Subparts A and M. After reviewing your request under the provisions of Section 61.147(c) of Subpart M, Region 6 of the Environmental Protection Agency (EPA) has determined that the wetting required to comply with this standard for removal of FAM asbestos ceiling tiles at the WBAMC facility during the LSC project renovation of Building 7777 will unavoidably damage equipment in light of the following information that was submitted.

(1) Medical operations and services would be unduly disrupted because highly sophisticated equipment would have to be relocated or completely turned off to avoid shorting out electrical systems caused by the wetting method.

(2) Use of the wetting method would further require that other electrical circuits be rendered nonoperational for safety reasons and result in shutdown of critical life support systems.

(3) Since shutdown and relocation of equipment is not an acceptable alternative, use of the wetting method for removal of FAM would result in equipment being unavoidably damaged. Region 6 of EPA therefore finds that use of the "dry method" for removal of the asbestos ceiling tiles during the planned LSC renovation of the WBAMC facility will comply with Section 61.147(c), provided that a local exhaust ventilation (LEV) and collection system designed and operated to capture the particulate asbestos material produced by the removal of tiles is used. The LEV collection system must exhibit no visible emissions to the outside air or be designed and operated in accordance with the requirements in Section 61.154, Air-cleaning standard.

This determination and finding does not relieve the WBAMC facility and respective renovation contractor(s) of the legal responsibility to comply with all remaining applicable requirements of the asbestos renovation standard(s) of Subpart M, including the notification, work practices, visible emissions, other wetting and disposal requirements. It also does not relieve the facility and respective contractors of the responsibility for compliance with any other applicable provisions of federal, state, or local law or regulations. Further, it does not limit any action which this agency could take to implement or enforce air pollution requirements, including those required to prevent imminent and substantial endangerment to health.

Mr. Martin E. Brittain P.E. (214-655-7229) of my staff can be contacted concerning any questions about the substance of this letter.

Sincerely yours,

William B. Hathaway, Director  
Air, Pesticides and Toxics Division (6T)

Enclosure cc: See Attached List