



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C72

Category: Asbestos
EPA Office: SSCD
Date: 04/25/1990
Title: Nonfriable Asbestos
Recipient: Chmielorski, John
Author: Seitz, John S.

Subparts: Part 61, M, Asbestos

References: 61.141
61.145(a)
61.145(c)

Abstract:

EPA responded that in reference to a request for an applicability determination regarding the removal of tar paper, nonfriable ACM is not required to be removed unless it is or will be rendered friable during the renovation or demolition operation. All friable ACM and nonfriable ACM which is rendered friable must be handled in accordance with the asbestos NESHAP.

Letter:

Control Number: C72

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Apr 25 1990

John Chmielorski
General Supervisor
Industrial Hygiene
Weirton Steel Corporation
400 Three Springs Drive
Weirton, West Virginia 26062-4989

Dear Mr. Chmielorski:

This is in response to your March 26, 1990 letter requesting written verification of an Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) applicability determination made by Scott Throwe of my staff in a March 16, 1990 conversation with you.

In your letter you state that during the renovation of a coke production facility, thousands of feet of both friable and nonfriable asbestos containing material (ACM) will have to be removed. You specifically inquired if nonfriable ACM in the form of tar paper covering nonasbestos containing material must be removed and disposed of as friable ACM.

The Asbestos NESHAP at 40 CFR Part 61, Subpart M, applies to friable ACM and applies to nonfriable ACM that will be crumbled, pulverized or reduced to powder during the demolition or renovation process. The regulations define friable ACM as any material containing more than one percent asbestos by weight that hand pressure can crumble, pulverize or reduce to powder when dry. Friable ACM includes material which is friable at the time of notification, as well as ACM which is rendered friable during the renovation or demolition process.

Nonfriable ACM is not required to be removed unless it is rendered friable, as discussed above, during the renovation or demolition operation. All friable ACM and nonfriable ACM which is rendered friable must be handled in accordance with the Asbestos NESHAP.

I have enclosed copies of two memoranda dated December 5, 1985 and February 23, 1990, which discuss the requirements of the asbestos NESHAP regarding nonfriable ACM. If you have any further questions, please contact Scott Throwe of my staff at (202) 475-7002.

Sincerely

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

Enclosure