



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

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**Control Number: C74**

**Category:** Asbestos  
**EPA Office:** Region 1  
**Date:** 07/26/1990  
**Title:** LTC 1060pn Vac. Sand Blaster to Remove ACM  
**Recipient:** Wiggin, Douglas  
**Author:** Houlihan, Damien F.  
**Comments:** See section 61.145(c)(3)(i) (exemptions from wetting) 1990  
NESHAP

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

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**References:** 61.145(c)

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**Abstract:**

EPA responded to an applicability determination request regarding use of a dry method sand-blasting machine to remove skim coat. If wet methods could be used, such a technique may be in conformance with the asbestos NESHAP. Section 61.145(c) of the Asbestos NESHAP explicitly requires one to "Adequately wet friable asbestos materials when they are being stripped or removed from facility components before the members are removed from the facility." Adequately wetted means sufficiently mixed or coated with water or an aqueous solution to prevent dust emissions. The regulation does not present an alternative to wet methods except in very limited circumstances.

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**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
J.F.KENNEDY FEDERAL BUILDING,  
BOSTON, MASSACHUSETTS 02203-2211

July 26, 1990

Mr. Douglas Wiggin  
AR Construction Inc.  
2220 Plainfield Pike  
Cranston, RI 02920

Re: Use of LTC 1060Pn Vacuum Sand Blaster to Remove ACM Asbestos Containing Materials (ACM) under the Asbestos NESHAP Standard, 40 CFR Part 61, Subpart M.

Dear Mr. Wiggin:

I appreciate the opportunity to review your proposal to use the LTC 1060Pn Vacuum Sand Blaster System to remove the skimcoat ACM from the walls at the Hartford Park Project, 10 Whelan Ave, Providence, RI. Please be advised that this letter is neither a formal approval of your proposal nor a guarantee of compliance with the Asbestos NESHAP Standard ('Standard') by employing such methods.

Page 3 of your proposal states, "The process by design requires the contained vacuumed material remain dry until removed from the equipments collection point." Section 61.147(c) of the Asbestos NESHAP Standard explicitly requires that you "Adequately wet friable asbestos materials when they are being stripped or removed from facility components before the members are removed from the facility." Adequately wetted means sufficiently mixed or coated with water or an aqueous solution to prevent dust emissions.

While I assume the intent of your proposal is comply with the Standard, the regulation does not present an alternative to wet methods except in very limited circumstances. This office has no authority to waive any of the requirements set forth under the Standard. Therefore, the removal of the ACM must be completed in an adequately wetted manner. If, in addition to misting the air in the contained area, the entire surface is also misted (e.g., coated with water) to a sufficient degree to prevent dust emissions, use of the equipment and methods described in your proposal presumably should result in compliance with the Standard.

You should be aware, however, that any debris found on the wall, floor or anywhere in the area which is not adequately wet would be evidence of dust emissions and may result in an enforcement action by EPA against the owners or operators involved in the project. You should also be aware that the abrasive used would most likely be contaminated and should be disposed of accordance with the Asbestos NESHAP.

I hope this letter has addressed your concerns and is of some assistance. Please feel free to contact me at (617) 565-3265 if I can be of any further aid or you have any questions regarding this correspondence. If you feel it is warranted, I would be happy to be present for a demonstration of the equipment and techniques.

Sincerely,

Damien F. Houlihan  
Asbestos NESHAP Coordinator  
EPA Region I

cc: Stephen O'Rourke, Providence Housing Authority Henry Collins, H.V. Collins Co., Inc.  
Mike Becker, Certified Engineering and Testing Co., Inc.