



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

---

**Control Number: C89**

**Category:** Asbestos  
**EPA Office:** Region 5  
**Date:** 02/25/1991  
**Title:** Labels on Containers of Asbestos Waste  
**Recipient:** Wood, Marlene T.  
**Author:** Varner, Bruce A.  
**Comments:** In ref. to generator i.d. labels, the letter cites s.61.150 (a)(5);the correct citation is s.61.150(a)(i)(v),1990 NESHAP

---

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

---

**References:** 61.150(a)

---

**Abstract:**

Containers of asbestos waste must be labeled with the name of the waste generator, who may be either the facility owner or operator, or the contractor. The Agency prefers that the name on the label be that of the contractor when asbestos is removed by a contractor, especially when there is more than one contractor at the facility site.

---

**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN STREET  
CHICAGO, ILLINOIS 60604

Feb. 25, 1991

Reply to Attention of:

Marlene T. Wood  
Executive Secretary  
National Environmental Services, Inc.  
4016 Terminal Drive, Suite D  
P.O. Box 76  
McFarland, Wisconsin 53558

Dear Ms. Wood:

Thank you for your February 1, 1991, letter asking whose name should appear on the labels that are required to be attached to asbestos waste disposal bags when asbestos is removed by a contractor. I have discussed this issue with Agency Headquarters, so that the following answer is a coordinated Agency response.

The requirement to label containers or wrapped materials transported off the facility site is part of the November 20, 1990 revisions to the National Emission Standard for Asbestos, and is found in Section 61.150(a)(5). Since the regulation does not definitively answer your question, I examined the comments and the response on labeling in the background information document that is referenced in the preamble to the November 20, 1990 revisions. I have enclosed these comments and response for your reference. In answer to your question, the response states: "The name on the label should be that of the generator who may be either the facility owner (or operator) or the contractor." However, while any of these names is acceptable, the Agency prefers that the name be that of the contractor when asbestos is removed by a contractor, especially when there is more than one contractor at the facility site.

If you have any further questions on this matter, you may contact me or Ingrid Enriquez at (312) 886-6793 or 866,6315, respectively.

Sincerely yours,

Bruce A. Varner  
Air Toxics Coordinator  
Air Toxics and Radiation Branch

Enclosure