



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: ZB009

Category: Asbestos
EPA Office:
Date: 05/25/1973
Title: Asbestos Board Cutting
Recipient:
Author:
Comments: revised 07/06/73

Subparts: Part 61, B-Asb, Asbestos Demolition/Renovation (Now Sub. M)

References: 61.20
61.22(c)(3)

Abstract:

See below. Determination available in abstract form only. Included under "Letter" field to facilitate database word searching.

Letter:

If one purchases an asbestos board, which is an insulating or fireproofing product, and then cuts it, is this source subject to the asbestos standard for manufacturing of fireproofing and insulating materials?

This is considered a fabrication operation. The regulation applies to manufacturing operations (i.e., the mixing of commercial asbestos with other materials and the processing of this mixture into a marketable product which is sold to a distributor or at retail if no distributor or at retail if no distribution is involved). Any processing after initial marketing is considered fabrication. However, there is one exception to the rule. This includes manufacturing of woven friction products which can involve the processing of asbestos textiles purchased from another source.