



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: ZB052

Category: Asbestos
EPA Office: DSSE
Date: 10/27/1982
Title: Hedmanite Manufacturing/Dry Resin Forming
Recipient: Kee
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Subparts: Part 61, B-Asb, Asbestos Demolition/Renovation (Now Sub. M)

References: 61.20
61.21(h)
61.21(i)
61.22(c)
61.22(c)(7)
61.22(h)

Abstract:

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

Letter:

1. Adhesives are manufactured using a raw material known as Hedmanite, which is a short-fiber form of asbestos mined from a naturally-occurring formation. Is this operation subject to Subpart B?

2. Two sources receive dry resin mixtures containing commercial asbestos. The mixtures are placed in heated presses to form the cores for grinding wheels and abrasive discs. Are the sources subject to the asbestos standard?

1. Hedmanite meets the definition of commercial asbestos. Manufacturing is defined at Section 61.21(i) as the combining of commercial asbestos with any other materials and the processing of this combination into specified products. Section 61.22(c)(7) specifies one such product as adhesives. Since Hedmanite is commercial asbestos combined with other materials and processed into adhesives, it is subject to asbestos regulations of 40 CFR 61, Subpart B.

2. Grinding wheels and abrasive discs are not considered friction products, as that term is intended. EPA's "Background Information on NESHAPs-Asbestos and Mercury," October 1974, indicates that the term "friction products" refers to those products designed to create friction in order to stop movement-brake linings and clutch plates. Products such as abrasive discs and grinding wheels do not fall under this category. These sources are not subject to the manufacturing or fabricating provisions because the products they process do not fit into any of the manufacturing or fabrication categories listed at Section 61.22(c) and (h).