



U.S. Environmental Protection Agency Applicability Determination Index

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Category: Asbestos
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Title: Multilayered Systems
Recipient: Gates, William
Author: Rasnic, John

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

Abstract:

Q. Is roofing material an add-on material, in the context of the Asbestos NESHAP Clarification Regarding Analysis of Multi-Layer Systems, published in the January 5, 1994, Federal Register?

A. The Clarification was intended to cover all multilayered systems, including roofing materials.

Q. Should the asbestos content of a multi-layered system be reported as a percent of the total sample?

A. No, the percent asbestos in each individual layer should be reported separately.

Letter:

William R. Gates, CIH
Laboratory Director
Environmental Testing, Inc.
100 South Cass Street
P.O. Box 138
Middletown, DE 19709-0138

Dear Mr. Gates:

This is in response to your letter dated February 25, 1994, requesting further clarification of the "Asbestos NESHAP Clarification Regarding Analysis of Multi-layer Systems" which was published in the January 5, 1994, Federal Register. You specifically ask that we clarify whether your laboratory is reporting the results correctly and whether roofing material should be considered an add-on material?

The intent of the clarification was to cover all multilayered systems. Multi-layered systems are not limited to only wall and ceiling systems. Roofing materials, or any other grouping of materials with multiple layers would also be considered to be a multi-layered system.

In both laboratory reports (sample 94003.0 and 940099.0) the materials were correctly analyzed by layers but you were incorrect in reporting the asbestos content as a percent of the total sample. It is clear from the laboratory analysis that the samples consist of three separate and distinct (heterogeneous) layers. The percent asbestos in each individual layer should be reported separately. For samples 94003.0 and 940099.0 the correct asbestos content for layer 1 should be 15 and 25 percent respectively. Layers 2 and 3 for both samples should report that no detectable amount of asbestos was found.

If you have any questions, please contact Jeffery KenKnight of my staff at (703) 308-8728.