



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 23 1990

OFFICE OF NEP...
AND...
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MEMORANDUM

SUBJECT: Clarification of EPA NESHAP Policy - Nonfriable
Asbestos

FROM: Michael S. Alushin *M. S. Alushin*
Associate Enforcement Counsel
for Air

John S. Seitz, Director *John Seitz*
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

TO: Addressees

Attached please find a discussion of our current interpretation of how nonfriable asbestos containing materials should be handled pursuant to the asbestos NESHAP, 40 C.F.R. Part 61, Subpart M (Section 61.140 et. seq. Please file the attached document in Part D (Section 112) of your Policy Compendium as Document 11.

Addressees: Gerald Emison
Office of Air Quality Planning and Standards

James Strock
Assistant Administrator
for Enforcement

Alan W. Eckert
Associate General Counsel
Air and Radiation Division

Air and Waste Management Division Director
Region II

Air Management Division Directors
Regions III and IX

Air and Radiation Division Director
Region V

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Air, Pesticides and Toxics Management Division
Directors
Regions I, IV, and VI

Air and Toxics Division Directors
Regions VII, VIII, and X

Regional Counsels
Regions I - X

Air Branch Chiefs/Team Leaders
Office of Regional Counsel
Regions I - X

Air Division Branch Chiefs
Regions I - X

David Buente, Chief
Environmental Enforcement Section
U.S. Department of Justice

Attachment

Although no research has been conducted on the conditions which will cause nonfriable materials to become friable, it is considered probable that some conditions (e.g. severe weathering, prolonged exposure to harsh chemicals) will cause this effect. Furthermore, certain practices such as burning, sanding, or grinding could crumble, pulverize, or reduce to powder nonfriable ACM.

POLICY

Therefore, we recommend the following approach:

Floor tile, roofing material, packing, and gaskets (normally nonfriable ACM) must be inspected before demolition to determine if the ACM is in poor condition, indicated by peeling, cracking, or crumbling of the material. If normally nonfriable ACM is in poor condition, then the material must be tested for friability. If the ACM is friable, it must be handled in accordance with the NESHAP. The above four nonfriable ACM should be removed before demolition only if they are in poor condition and are friable.

If the nonfriable ACM is subjected to sanding, grinding, or abrading as part of demolition or renovation, then the nonfriable ACM must be handled in accordance with the NESHAP. If a building is demolished by burning, all ACM must be removed prior to the demolition.

We believe that this approach is consistent with the original rule and the 1985 interpretation.

PLANNED FUTURE ACTION

After passage of Title III of the new Clean Air Act amendments we intend to review the asbestos NESHAP. This will allow us to further consider appropriate changes to this NESHAP.

ADDRESSEES:

Kent Anderson, OSW (WH-565E)
 Mike Beard, ORD (MD-77)
 Jim Crowder, ESD (MD-13)
 Fred Dimmick, ESD (MD-13)
 Stan Durkee, ORD (EN-340F)
 Pat Embry OGC, (LE-132A)
 Robert Fegley, OPPE (PM-221)
 Charlie Garlow, OEMC (LE-134A)
 Charles Gregg, OW (WH-556)
 Bob Jordan OTS (TS-788A)
 Asbestos NESHAP Coordinator, Regions I-X

Kathy Kaufman, OPAR (ANR-443)
 Bob Kellam, ESD (MD-13)
 Dennis Kotchmar, ECAO (MD-52)
 Gary McAlister, ESD (MD-19)
 Bruce Moore, ESD (MD-13)
 Brenda Riddle, ESD (MD-13)
 Sims Roy, ESD (MD-13)
 Ron Shafer, SSCD (EN-341)
 Al Vervaert, ESD (MD-13)
 Dave Wagner, OTS (TS-794)
 Roger Wilmoth, AEERL, Cincinnati
 Gil Wood, EMB (MD-14)

cc: Bob Ajax (MD-13)
 Robert Bronstrup, EPA-OIG - Chicago
 Regional Counsels, Regions I - X

Ron Campbell (MD-10)
 Regional Counsel Air Branch Chiefs