



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

MAR 15 1989

OFFICE OF
AIR AND RADIATION

Thomas S. Hadden, Supervisor
Division of Air Pollution Control
Ohio EPA
P.O. Box 1049
1800 Watermark Drive
Columbus, OH 43266-0149

Dear Mr. Hadden:

This is in response to your letter to EPA Region V of October 21, 1988, requesting an interpretation of the "facility" definition in 40 CFR Section 61.141. Your specific request was for a determination regarding "groups of residential and commercial structures which are scheduled for demolition in order to allow for the construction of a roadway."

It is our determination that one demolition or renovation operation involving a group of residential and/or commercial structures under the control or supervision of a single entity (i.e. one owner and/or one operator) is one "facility." Therefore, demolition of a group of residential or commercial buildings or structures on a highway right-of-way is subject to the NESHAP requirements as one facility if, as I presume, the operation is under the ownership control, or supervision of a single entity. The amount of asbestos in each building or structure included in the operation must be added together in calculating the total quantity of asbestos at that facility for purposes of determining whether the threshold amount is present and thus whether the work practice and disposal requirements of the NESHAP apply. The aggregate amount of friable asbestos must be included in any notification to the State or EPA.

I have also enclosed a determination made by this office which discusses correct work practices whenever multiple structures, regardless of size or relative location, are to be demolished.

Thank you for the opportunity to address your question. Please contact Kenneth Malmberg (202) 382-2870 of my staff if you have any further questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "John S. Seitz".

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

Enclosure

Ms. Susan N. Mastin
Assistant Attorney General
209 St. Clair Street
Frankfort, Kentucky 40601

Dear Ms. Mastin:

This letter is in response to your letter of September 10, 1986 to Doreen Cantor of this office. You requested information on appropriate removal procedures for a demolition project where asbestos material is applied on the outside walls of approximately 30 buildings. The asbestos material is about 1/8" thick, contains up to 40% asbestos, and could become friable during demolition.

The asbestos regulations contained in 40 CFR Part 61 Subpart M (National Emission Standards for Hazardous Air Pollutants - Asbestos) require that all friable asbestos material be removed from a facility before it is demolished, and that this material be adequately wetted as it is being stripped and kept wet until it is placed in a leak-tight container for disposal (other requirements also apply - see enclosed regulations). Therefore, the asbestos material would have to be stripped from the walls of each of the buildings while wetted, and then placed into leak-tight containers and deposited in a properly-operated waste disposal site.

If the material is not friable at this time, it is recommended that the removal be done in this manner. However, in this case, the owner or operator would have the option of demolishing the building without first removing the asbestos, but would then have to wet all of the demolition debris which contains asbestos from the point the material becomes friable. Also, all of this material would have to be handled as asbestos waste through final disposal. In most cases, this option is not economically feasible.

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Depending on the removal and collection methods, the ground surrounding the buildings may become contaminated with asbestos. If this happens, the dirt must also be collected, containerized, and placed in an acceptable waste disposal site.

If you have further questions, please contact Doreen Cantor at 202-382-2874.

Sincerely,

John B. Rasnic, Chief
Compliance Monitoring Branch
Division of Stationary Source Compliance

Enclosure

cc: Brian Beals, Region 4

EN-341:DCANTOR:amd:Draft:9-16-86:Rm.3202:382-2874
Disk:Doreen #16:Final#1:mrd:9-16-86.