

clarification to the EPA policy regarding nonfriable ACM. You suggested that other materials could fall into the same category as the four materials mentioned in a February 23, 1990 memorandum (i.e., floor tile, roofing material, packings and gaskets) in which EPA's policy on nonfriable materials was stated. Since the February 23, 1990 memorandum was issued, we reevaluated the terms used in the listed materials in the category and have made the following clarifications: (1) floor tile was replaced by the term resilient floor covering and (2) roofing material was replaced by the term asphalt roofing products. The EPA policy on nonfriable materials was codified in the November 20, 1990 promulgation of the revisions to the asbestos NESHAP. Vinyl floor covering (linoleum) is included in the term resilient floor coverings, and tar paper is included in the term asphalt roofing products. These materials are classified as Category I materials. The other materials that were mentioned, cement asbestos board, raybestos board, floor tile mastic and all other ACM materials, are included in category II, and a determination for those materials must be made on a case-by-case basis taking into account the condition of the material and the methods of demolition or renovation that will be used. Materials such as floor tile mastic, electrical wiring, and caulking compounds might be treated like Category I materials; however, this determination must be made on a case-by-case basis. Asbestos siding shingles and cement asbestos board would usually be covered by the asbestos NESHAP regulation unless they are removed without being damaged.

In your December 10, 1990 letter you had a question regarding what "However, the absence of visible emissions is not sufficient evidence of being adequately wet" means in the definition of adequately wet. This means that there are other factors that will be considered besides visible emissions in determining adequate wetness, e.g., the degree to which the ACM was mixed or penetrated with liquid.

The EPA's Stationary Source Compliance Division (SSCD) is currently preparing guidance documents which will explain EPA's policy on nonfriable ACM and on the definition of adequately wetted. These documents will be available within the next few weeks and we will send you a copy when these documents are published.

I hope that this response answers your questions, and I appreciate the opportunity to be of service to you. If you have any further questions, please call Sims Roy at (919) 541-5263.

Sincerely,

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