



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUL 13 1990
4APT-AE

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

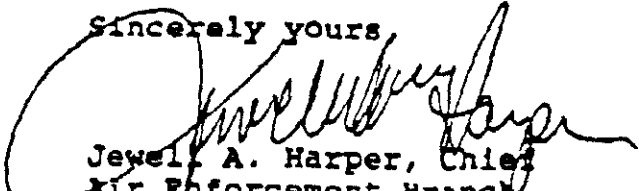
Dear Mr. Fancy:

We are in receipt of your letter dated June 8, 1990, requesting clarification of the National EPA policy regarding removal of non-friable asbestos containing material. Specifically, you requested guidance concerning the use of the Hot Shot steel shot surface preparation system. We have consulted with EPA Headquarters concerning this matter and offer the following comments.

Non-friable material (including floor tile mastic) which is removed using abrasive forces such as grinding, sanding, sawing, shot blasting or other abrasive methods is subject to the asbestos NESHAP regulation. The shot blasting operation which you described causes non-friable asbestos material (mastic) to be crumbled, pulverized, or reduced to powder, and therefore asbestos NESHAP work practices must be followed. This means adequately wetting the non-friable material (mastic) before and during the shot blasting operation, keeping the shot blasted material adequately wet before collection, and disposing of the waste according to the requirements of the asbestos NESHAP regulation.

In brief, the shot blasting technique which you described is subject to the wetting requirements of the asbestos NESHAP regulation, and failure to wet during the blasting operation is considered a violation. If you have any questions concerning this matter please contact Alan Powell at 404/347-5014.

Sincerely yours,



Jewel A. Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division