



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

SEP 4 1992

OFFICE OF
AIR AND RADIATION

Mr. Lawrence Carroll
Assistant Vice President
Law Engineering Inc.
2150 North 107th Street
Suite 570
Seattle, Washington 98133

Dear Mr. Carroll:

This is in response to your February 13, 1991 letter requesting a determination on the applicability of asbestos containing joint compound to the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP). I regret the extended delay of our response to your request. However, resolution of this issue required substantial coordination with other EPA offices.

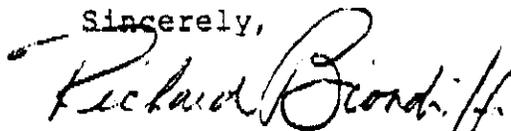
You specifically inquired whether asbestos containing joint compound, which is applied to wallboard, should be considered a separate material or whether the combination of joint compound and wallboard become one material.

We believe that when joint compound and/or tape is applied to wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system. Therefore, where a demolition or renovation impacts a wall system, a composite analysis of the wall system (percent of asbestos in the joint compound, tape and wallboard) should be conducted. If the composite analysis shows an asbestos content of greater than one percent and at least 160 square feet of the wall system is involved in the demolition or renovation, then the project would be subject to the asbestos NESHAP.

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This determination has been coordinated with EPA's Office of Enforcement, the Office of Prevention, Pesticides and Toxic Substances, and the Emission Standards Division of the Office of Air Quality Planning and Standards. If you have any questions, please contact Scott Throwe of my staff at (703) 308-8699.

Sincerely,



John B. Rasnic, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

cc: Sims Roy, ESD (MD-13)
Charles Garlow, OE (LE-134A)
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Regional Asbestos NESHAP Coordinators