



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

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INFORMATION

APR 11 1990

OFFICE OF
AIR AND RADIATION

Mr. James Wagner
Vice President - Marketing & Sales
Childers Products Company, Inc.
35555 Curtis Blvd.
Eastlake, Ohio 44094

Re: Asbestos NESHAP Applicability Determination for Paint

Dear Mr. Wagner:

This letter is in response to a January 30, 1990, request (enclosed) from Region VI for an applicability determination on the above referenced subject. Per Region VI's request, we are responding directly to you.

In response to the first question, it is not necessary that paint containing greater than one percent asbestos be removed if it is in good condition before demolition or renovation. We do not believe that paint which is not friable prior to demolition or renovation will become friable during demolition or renovation. However, if non-friable paint is subject to burning, sanding, grinding or abrading as part of demolition or renovation, then the non-friable paint must be handled in accordance with the Asbestos NESHAP.

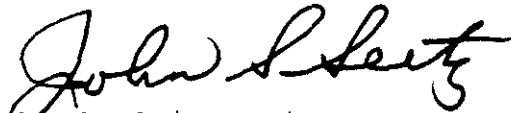
If paint containing greater than one percent asbestos is friable before demolition or renovation, it must be removed in accordance with the asbestos NESHAP. Paint which is friable can be crumbled into powder, pulverized into powder, or reduced to powder by hand pressure. Paint that contains asbestos should be inspected before demolition or renovation to determine if it is friable, indicated by the above conditions.

In response to the second question, EPA recognizes that the recommended polarized light microscopy (PLM) method for determining asbestos content is sometimes inconclusive when the asbestos content is below five percent. The Office of Research and Development (ORD) within EPA is currently working on developing analytical methods for various types of bulk asbestos containing material (ACM). For friable paint material, such as was apparently encountered in the Houston Texas case, ORD's current recommendation is to use the PCM "point counting" quantitation protocol, if the percentage is less than ten percent. Therefore, until additional procedures are developed by EPA, we recommend the continued use of the "point counting" protocol when the concentration is less than ten percent.

In response to the third question, the application of an encapsulant to friable ACM would not cause the ACM to then be excluded from coverage under the asbestos NESHAP regulation. If the ACM is friable, it must be treated in accordance with the asbestos NESHAP.

Thank you for the opportunity to address your questions. If we can be of any further assistance, please contact Scott Throwe of my staff at FTS 475-7002.

Sincerely,



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

Enclosures

cc: Martin Brittain, Region VI
Sims Roy, (MD-13)
Omayra Salgado, (EN-341)
Charlie Garlow, (LE-134A)