



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 28 1988

REPLY TO THE ATTENTION OF:

Tom Hadden, NESHAP Coordinator
Division of Air Pollution Control
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216

Dear Mr. Hadden:

You requested that the U.S. Environmental Protection Agency (U.S. EPA) provide you with an interpretation of the definition of "facility" under the asbestos regulations found at 40 C.F.R. 61.141, as they would be applied to the Capitol University demolition project at Bexley, Ohio.

U.S. EPA Headquarters has recently issued an asbestos demolition determination which states that the interpretation of "installation" is "a building/structure or a group of buildings/structures at a single demolition or renovation site that are under the control of a single entity (i.e. one owner and one operator)."

Since the Capitol University is the sole owner, any group of buildings/structures that are under the control of one demolition contractor or one asbestos removal contractor would be considered an installation. This would include any building or structure that individually would not be subject based on the amount of asbestos it contains, or on its status as a private dwelling. The demolition of this installation would be subject to the work practice and waste disposal standards, if the total amount of friable asbestos material in all the buildings/structures exceeds the 260/160 cut-off.

I have included the August 25, 1988 U.S. EPA Headquarters memo; please call me if you need anything else, at (312) 886-6320.

Sincerely yours,

A handwritten signature in cursive script that reads "Ann Pontius".

Ann Pontius
Environmental Engineer
Air Compliance Branch

Enclosure