

subpart M, section 61.145, the full notification and emission control requirements apply to demolition and renovation activities if the combined amount of RACM is "[a]t least 80 linear meters (260 linear feet) on pipes or at least 15 square meters (160 square feet) on other facility components." [40 CFR 61.145(a)(1)(i) and (a)(4)(i)]. Therefore, the linear measurement applies only to RACM on pipes. For caulking and roof flashing, the square footage threshold of 160 square feet applies.

I appreciate your concern about the measurement of asbestos-containing materials. This determination has been reviewed by the Office of Civil Enforcement, the Office of Air Quality Planning and Standards, and the Office of General Counsel.

Very truly yours,

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