Asbestos/NESHAP
Regulated Asbestos Containing Materials
Guidance
ASBESTOS NESHAP
REGULATED ASBESTOS CONTAINING
MATERIALS GUIDANCE

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Quality Planning and Standards
Stationary Source Compliance Division
Washington, DC 20460

December, 1990
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1. INTRODUCTION

Section 112 of the Clean Air Act (CAA) requires EPA to develop emission standards for hazardous air pollutants. In response to this section the Environmental Protection Agency (EPA) published a list of hazardous air pollutants and promulgated the “National Emission Standards for Hazardous Air Pollutants” (NESHAP) regulations. Since asbestos presents a significant risk to human health as a result of air emissions from one or more source categories, it is therefore considered a hazardous air pollutant. The Asbestos NESHAP (40 CFR 61, Subpart M) addresses milling, manufacturing and fabricating operations, demolition and renovation activities, waste disposal issues, active and inactive waste disposal sites and asbestos conversion processes.

In the initial Asbestos NESHAP rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed and those materials that were unlikely to result in significant fiber release. The terms “friable” and “non-friable” were used to make this distinction. EPA has since determined that, if severely damaged, otherwise nonfriable materials can release significant amounts of asbestos fibers.

Friable asbestos-containing material (ACM), is defined by the Asbestos NESHAP, as any material containing more than 1 percent asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. (Sec. 61.141)

Nonfriable ACM is any material containing more than 1 percent asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy
ACKNOWLEDGEMENTS

This document was written by Alliance Technologies, Inc., based on discussions with a work group from EPA. The group consisted of the Regional Asbestos NESHAP Coordinators, Ron Shafer, Scott Thowe, and Omayra Salgado of the Stationary Source Compliance Division, Charles Garlow and Elise Hoerath of the Air Enforcement Division and Sims Roy of the Standards Development Branch. We thank the individuals who reviewed an earlier draft and provided comments, many of which are incorporated in the final version. Their input is gratefully acknowledged.
(PLM), that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. EPA also defines two categories of nonfriable ACM, Category I and Category II nonfriable ACM, which are described later in this guidance.

"Regulated Asbestos-Containing Material" (RACM) is (a) friable asbestos material, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

The purpose of this document is to assist asbestos inspectors and the regulated community in determining whether or not a material is RACM and thus subject to the Asbestos NESHAP.

The recommendations made in this guidance are solely recommendations. They are not the exclusive means of complying with the Asbestos NESHAP requirements. Following these recommendations is not a guarantee against findings of violation. The EPA intends for owners/operators to be reasonably certain whether or not they are subject to the NESHAP. In the end, if a question arises, determinations of whether asbestos containing materials are regulated by the Asbestos NESHAP are made by EPA inspectors on site.
2. **FRIABLE ASBESTOS CONTAINING-MATERIALS**

Due to their high tensile strength, incombustibility, corrosion and friction resistance and other properties, such as acoustical and thermal insulation abilities, asbestos fibers have been incorporated into over 3600 commercial products. Thermal system, fireproofing and acoustical insulation materials have been used extensively in the construction industry.

Thermal system applications include steam or hot water pipe coverings and thermal block insulation found on boilers and hot water tanks. Fireproofing insulation may be found on building structural beams and decking. Acoustical insulation (soundproofing) commonly has been applied as a troweled-on plaster in school and office building stairwells and hallways. Unfortunately, with time and exposure to damaging forces (e.g., severe weather, chemicals, mechanical forces, etc.), many asbestos-containing materials may become crumbled, pulverized or reduced to powder, thereby releasing asbestos fibers, or may deteriorate to the extent that they may release fibers if disturbed. Since inhalation of asbestos fibers has been linked to the development of respiratory and other diseases, any material which is friable, or has a high probability of releasing fibers, must be handled in accordance with the Asbestos NESHAP.

The following work practices should be followed whenever demolition/renovation activities involving RACM occur:

- notify EPA of intention to demolish/renovate,
- remove all RACM from a facility being demolished or renovated before any disruptive activity begins or before access to the material is precluded,
• keep RACM adequately wet before, during, and after removal operation,

• conduct demolition/renovation activities in a manner which produces no visible emissions to the outside air, and

• handle and dispose of all RACM in an approved manner.

3. NONFRIABLE ASBESTOS-CONTAINING MATERIALS

Because of the resilient nature of asbestos, it is used in materials exposed to a wide variety of stressful environments. These environments can cause the deterioration of binding materials and cause nonfriable materials to become friable. For example, asbestos-containing packings and gaskets (Category I nonfriable ACM) used in thermal systems may be found in poor condition as a result of the heat they have encountered. In petrochemical handling facilities, which may have miles of transfer pipes and fittings which contain asbestos gaskets and/or packings, profound degradation of the ACM may occur due to exposure to organic-based liquids and gases or to corrosive agents used to chemically clean these lines.

When nonfriable ACM is subjected to intense mechanical forces, such as those encountered during demolition or renovation, it can be crumbled, pulverized, or reduced to powder, and thereby release asbestos fibers. When nonfriable materials are damaged or are likely to become damaged during such activities, they must be handled in accordance with the Asbestos NESHAP.

There are two categories of nonfriable materials: Category I Nonfriable ACM and Category II Nonfriable ACM.
**CATEGORY I NONFRIABLE ACM**

Category I nonfriable ACM is any asbestos-containing packing, gasket, resilient floor covering or asphalt roofing product which contains more than 1 percent asbestos as determined using polarized light microscopy (PLM) according to the method specified in Appendix A, Subpart F, 40 CFR Part 763. (Sec. 61. 141)

Category I nonfriable ACM must be inspected and tested for friability if it is in poor condition before demolition to determine whether or not it is subject to the Asbestos NESHAP. If the ACM is friable, it must be handled in accordance with the NESHAP. Asbestos-containing packings, gaskets, resilient floor coverings and asphalt roofing materials must be removed before demolition only if they are in poor condition and are friable.

The Asbestos NESHAP further requires that if a facility is demolished by intentional burning, all of the facility’s ACM, including Category I and II nonfriable ACM, be considered RACM and be removed prior to burning (Sec. 61.145 (c)(10)). Additionally, if Category I or Category II nonfriable ACM is to be sanded, ground, cut, or abraded, the material is considered RACM and the owner or operator must abide by the following (Sec. 61.145 (c)(1)):

(i) Adequately wet the material during the sanding, grinding, cutting, or abrading operations.

(ii) Comply with the requirements of 61.145(c)(3)(i) if wetting would unavoidably damage equipment or present a safety hazard.

(iii) Handle asbestos material produced by the sanding, grinding, cutting, or abrading, as asbestos-containing waste material subject to the waste handling and collection provisions of Section 61.150.
CATEGORY II NONFRIABLE ACM

Category II nonfriable ACM is any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using polarized light microscopy according to the methods specified in Appendix A, Subpart F, 40 CFR Part 763 that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. (Sec. 61.141)

Category II nonfriable ACMs (cement siding, transite board shingles, etc.) subjected to intense weather conditions such as thunderstorms, high winds or prolonged exposure to high heat and humidity may become "weathered" to a point where they become friable. The photograph in Figure 1 demonstrates a split asbestos shingle that has become friable along the cracked edge.

The following table lists examples and other relevant information about Category I and Category II nonfriable ACM.

Figure 1. Nonfriable asbestos shingle which has become friable along the broken axis.
### TABLE 1. NONFRIABLE ASBESTOS PRODUCTS

<table>
<thead>
<tr>
<th>Subdivision/Generic name</th>
<th>Asbestos (%)</th>
<th>Binder/sizing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cementitious extrusion panels:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>concrete-like products</td>
<td></td>
<td></td>
</tr>
<tr>
<td>corrugated</td>
<td>8</td>
<td>portland cement</td>
</tr>
<tr>
<td>flat</td>
<td>20-45</td>
<td>portland cement</td>
</tr>
<tr>
<td>flexible</td>
<td>40-50</td>
<td>portland cement</td>
</tr>
<tr>
<td>flexible perforated</td>
<td>30-50</td>
<td>portland cement</td>
</tr>
<tr>
<td>laminated</td>
<td>35-50</td>
<td>portland cement</td>
</tr>
<tr>
<td>(outer surface)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>roof tiles</td>
<td>20-30</td>
<td>portland cement</td>
</tr>
<tr>
<td>clapboard and shingles:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>clapboard</td>
<td>12-15</td>
<td>portland cement</td>
</tr>
<tr>
<td>siding shingles</td>
<td>12-14</td>
<td>portland cement</td>
</tr>
<tr>
<td>roofing shingles</td>
<td>20-32</td>
<td>portland cement</td>
</tr>
<tr>
<td>pipe</td>
<td>20-15</td>
<td>portland cement</td>
</tr>
<tr>
<td>Roofing felts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Category I)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>smooth surface</td>
<td>10-15</td>
<td>asphalt</td>
</tr>
<tr>
<td>mineral surface</td>
<td>10-15</td>
<td>asphalt</td>
</tr>
<tr>
<td>shingles</td>
<td>1</td>
<td>asphalt</td>
</tr>
<tr>
<td>pipeline</td>
<td>10</td>
<td>asphalt</td>
</tr>
<tr>
<td>Asbestos-containing compounds</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(Category I and II)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>caulkig putties</td>
<td>30</td>
<td>linseed oil</td>
</tr>
<tr>
<td>adhesive (cold applied)</td>
<td>5-25</td>
<td>asphalt</td>
</tr>
<tr>
<td>roofing asphalt</td>
<td>5</td>
<td>asphalt</td>
</tr>
<tr>
<td>mastics</td>
<td>5-25</td>
<td>asphalt</td>
</tr>
<tr>
<td>asphalt tile cement</td>
<td>13-25</td>
<td>asphalt</td>
</tr>
<tr>
<td>roof putty</td>
<td>10-25</td>
<td>asphalt</td>
</tr>
<tr>
<td>plaster/stucco</td>
<td>2-10</td>
<td>portland cement</td>
</tr>
<tr>
<td>sealants fire/water</td>
<td>50-55</td>
<td>castor oil or polysobuxylene</td>
</tr>
<tr>
<td>cement, insulation</td>
<td>20-100</td>
<td>clay</td>
</tr>
<tr>
<td>cement, finishing</td>
<td>55</td>
<td>clay</td>
</tr>
<tr>
<td>cement, magnesia</td>
<td>15</td>
<td>magnesium carbonate</td>
</tr>
<tr>
<td>Asbestos ebony products</td>
<td>50</td>
<td>portland cement</td>
</tr>
<tr>
<td>Floor tile and vinyl/asbestos tile</td>
<td>21</td>
<td>poly(vinyl)chloride</td>
</tr>
<tr>
<td>Sheet goods asphalt/asbestos tile</td>
<td>20-33</td>
<td>asphalt</td>
</tr>
<tr>
<td>sheet goods/resilient</td>
<td>30</td>
<td>dry oils</td>
</tr>
</tbody>
</table>

Except for the following, Section 61.145(c) of the Asbestos NESHAP requires that each owner or operator of a demolition or renovation activity involving RACM remove all such material from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.

**ACM need not be removed** before demolition if it:

(i) Is a Category I nonfriable ACM that is not friable.

(ii) Is on a facility component that is encased in concrete or other similarly hard material and is adequately wet whenever exposed during demolition.

(iii) Was not accessible for testing and therefore was not discovered until after demolition began and, as a result of the demolition, cannot be safely removed. If not removed for safety reasons, the exposed RACM and any asbestos-contaminated debris must be treated as asbestos-containing waste material and kept adequately wet at all times until disposed of.

(iv) Is a Category II nonfriable ACM and the probability is low that the material will become crumbled, pulverized, or reduced to powder during demolition.

4. **INSPECTION PROCEDURES TO DETERMINE THE POTENTIAL FOR FIBER RELEASE FROM NONFRIABLE ASBESTOS-CONTAINING MATERIALS**

Members of the regulated community (i.e. abatement contractors, industrial hygienists, building owners & operators, etc.) should become familiar with these procedures as they are designed to enhance compliance with the Asbestos NESHAP.
Asbestos NESHAP RACM Decision Tree
(Pre Demolition/Renovation Activity)

IF SEVERAL AREAS ARE BEING RENOVATED OR
DEMOLISHED AT ONE TIME AS
PART OF ONE ACTIVITY THEN THE TOTALS OF ALL
FACILITIES MUST BE SUMMED
Regulated amounts of suspect RACM discovered after Demo/Reno

Yes

Is it Category II material that has been damaged so that it is crumbled, pulverized, or reduced to powder?

No

Not covered by NESHAP

Yes

Analyze representative sample for asbestos content

No

Does sample contain more than 1% asbestos?

No

Covered by NESHAP

Yes
GENERAL INSPECTION PROCEDURES

1. Identify all nonfriable suspect ACM and determine whether it is Category I or II.

2. If it is Category I nonfriable RACM:
   - Is it in "poor condition?"
     [Is the binding of the ACM losing its integrity? Is the ACM peeling, cracking, or crumbling? (Remember, friable ACM may not appear in poor condition.)]
   - Is it friable?
     - Collect a piece of dry ACM and seal it in a transparent, reclosable sample bag.
     - Apply hand pressure and observe if the ACM falls apart to the extent that it is crumbled, pulverized, or reduced to powder. Does it occur suddenly, all at once?
     - Send representative samples of the RACM to an analytical laboratory which is able to test them for the presence of asbestos according to the methods specified in 40 CFR Part 763 Subpart F, Appendix A.
     - Ask the owner/operator if any ACM or RACM has been sampled and analyzed. If so, determine where the samples were taken and ask if the methods of demolition/renovation were considered when assessing
the fiber release potential of the material.-
Will it or has it been subjected to sanding,
grinding, cutting or abrading?

3. If it is Category II nonfriable ACM:

- Has the material been crumbled, pulverized or
  reduced to powder or is there a high probability that
  it will be crumbled, pulverized or reduced to powder
  during the demolition/renovation operations, thus
  rendering the material friable and subject to the
  Asbestos NESHAP?

- If Category II nonfriable ACM has been or will be
  crumbled, pulverized, or reduced to powder by
  demolition or renovation forces, take representative
  samples and send them to a laboratory to test for the
  presence of asbestos according to the method
  specified in 40 CFR Part 763, Subpart F, Appendix A.

5. SPECIFIC INSPECTION PROCEDURES

Category I Nonfriable ACM

Packings and Gaskets

These materials are often very difficult to find because they are
usually placed inside ovens, doors, pipes, boilers, etc.
Often a packing or gasket is discovered during a stripping or
demolition activity. For example, some boilers have an asbestos-
containing paraffin wax packing between the steam lines that travel
between the mud and fire boxes. The paraffin binding of the
packing may decompose due to the high temperatures, and render the
packing friable. Observe all of the packing and note areas that are in
poor condition. Packings in poor condition appear dry and
discolored, and fibers may be visible.

A representative piece of asbestos-containing packing material (in good or poor condition) should be removed with a utility knife and sealed in a transparent, reclosable bag. Apply hand pressure to the packing in the sample bag to determine if any portion is crumbled, pulverized or reduced to powder. If the material simply deforms, but does not crumble or reduces to a powder, then the material is considered nonfriable.

**Resilient Floor Covering**

There is a wide variety of resilient floor covering applications that contain asbestos. The most common are linoleum flooring and vinyl asbestos tile (VAT). VAT is most commonly found in either a 9"x9" or a 12"x12" square size. The 9"x9" VAT's are normally found in older buildings because they were manufactured earlier than the 12"x12" VAT's; however, floor tile sizes and resilient floor covering applications vary greatly since many buildings have been re-tiled several times.

In order to determine if a resilient floor covering is in poor condition look for sections or tiles which are cracked or peeling to the extent that they are crumbled. Floor coverings in poor condition can often be found near doorways or loading/staging areas where the floor has sustained a lot of stress and traffic. If the floor covering is in poor condition, collect a small representative sample and seal it in a transparent, sample bag. Hand pressure should be applied to determine if the material can be crumbled, pulverized, or reduced to powder. If it can, the material is considered friable. Resilient floor covering that will be or has been sanded, ground or abraded is subject to the Asbestos NESHAP. Figure 2 depicts a VAT which is in poor condition.
Figure 2. VAT in poor condition

Asphalt Roofing Products

Asbestos-containing roofing felts have been widely used in "built-up" roofs. Built-up roofing was used on flat surfaces and consists of alternating layers of roofing felt and asphalt. The roofing felt consists of asbestos paper saturated and coated with asphalt. Asphalt-asbestos roofing products made from roofing felt coated with asphalt were reportedly used on residential structures for only a short time (1971-1974).

To determine if an asphalt roofing product is covered by the Asbestos NESHAP, examine the RACM to spot any areas where the material is in poor condition and friable. Figure 3 illustrates a section of roofing felts which have deteriorated and display fibers.

If possible, sample areas where fibers can be seen protruding from the matrix of the asphalt. The sample should be sealed into a transparent, reclosable sample bag and hand pressure applied to see if the sample can be crumbled, pulverized, or reduced to powder.
Figure 3. Asphalt roofing felts which are in poor condition. Notice the fibers protruding along the edge of this roofing felt.

**Category II Nonfriable ACM**

*Asbestos Cement Pipe and Sheet Products*

Asbestos-cement (A-C) pipe has been widely used for water and sewer mains and occasionally used as electrical conduits, drainage pipe, and vent pipes. A-C sheet, manufactured in flat or corrugated panels and shingles (transite board), has been used primarily for roofing and siding, but also for cooling tower fill sheets, canal bulkheads, laboratory tables, and electrical switching gear panels. If these ACM are crumbled, pulverized or reduced to a powder, they are friable and thus covered by the Asbestos NESHAP. Broken edges of these materials typically are friable. The fractured surface should be rubbed to see if it produces powder.

If Category II nonfriable ACM has not crumbled, been pulverized or reduced to powder and will not become so during the course of demolition/renovation operations, it is considered nonfriable and therefore is not subject to the Asbestos NESHAP. However, if during the demolition or renovation activity it becomes crumbled, pulverized or reduced to powder, it is covered by the Asbestos NESHAP.
APPENDIX A

ASBESTOS NESHAP COORDINATORS (FOR DEMOLITION/RENOVATION ACTIVITIES)

Asbestos NESHAP Coordinator
Air Management Division
U.S. EPA Region I
 JFK Federal Building
Boston, MA  02203
(617) 565-3265
CT, MA, ME, NH, RI, VT

Asbestos NESHAP Coordinator
Air Management Division
U.S. EPA Region V
230 South Dearborn Street
Chicago, IL  60604
(312) 886-6819
IL, IN, MI, MN, OH, WI

Asbestos NESHAP Coordinator
Air & Waste Management Division
U.S. EPA Region II
26 Federal Plaza
New York, NY  10278
(212) 264-6770
NJ, NY, PR, VI

Asbestos NESHAP Coordinator
Air, Pesticides & Toxics Division
U.S. EPA Region VI
1445 Ross Avenue
Dallas, TX  75202-2733
(214) 655-7223
AR, LA, NM, OK, TX

Asbestos NESHAP Coordinator
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U.S. EPA Region III
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Philadelphia, PA  19107
(215) 597-6550
DC, DE, MD, PA, VA, WV

Asbestos NESHAP Coordinator
Air & Toxics Management Division
U.S. EPA Region VII
726 Minnesota Avenue
Kansas City, KS  66101
(913) 551-7618
IA, KS, MO, NE

Asbestos NESHAP Coordinator
Air Management Division
U.S. EPA Region IV
345 Courtland Street, N.E.
Atlanta, GA  30365
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AL, FL, GA, KY, MS, NC, SC, TN

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U.S. EPA Region VIII
999 18th Street
Suite 500
Denver, CO  80202-2405
(303) 293-7685
CO, MT, ND, SD, UT, WY
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Air and Toxics Division
U.S. EPA Region IX
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San Francisco, CA 94105
(415) 774-5569
American Samoa, AZ, CA, Guam, HI
Northern Marianas, Trust Territories

Asbestos NESHAP Coordinator
Air & Toxics Management Division
U.S. EPA Region X
1200 Sixth Avenue
Seattle, WA 98101
(206) 442-1757
AK, ID, OR, WA
APPENDIX B

REGIONAL ASBESTOS COORDINATORS (FOR SCHOOLS)

Regional Asbestos Coordinator
U.S. EPA Region I
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(617) 565-3835
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Regional Asbestos Coordinator
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Regional Asbestos Coordinator
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Edison, NJ 08837
(201) 321-6671
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Regional Asbestos Coordinator
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Regional Asbestos Coordinator
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