

STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY

GUIDELINE AND INTERPRETATION OF THE ASBESTOS NESHAP REGARDING:

CATEGORY I & II NON-FRIABLE ASBESTOS CONTAINING MATERIALS IN REGARD TO CUTTING, SAWING, OR OTHERWISE ABRADING OF SUCH MATERIAL

Roofing felt, asbestos tile, and other normally non-friable asbestos containing materials ("ACM") must be inspected by an EPA accredited inspector prior to any demolition or renovation (D/R) to determine the materials' friability. If the material is determined to be friable, it must be removed prior to D/R in accordance with the provisions of the asbestos NESHAP. If the material is determined to be non-friable, and it will remain so during the D/R, then the material does not require removal.

Category I materials (resilient floor covering, asphalt roofing products, packings and gaskets) are considered regulated asbestos containing material ("RACM") (only when they are in "poor condition" and/or "friable", or the structure in which they are located will be demolished by burning).

Floor tile removal techniques which cause extensive breakage of tile and cause the tile to become RACM, are required to be removed prior to demolition. However, ordinary demolition activities which do not include sanding, grinding, cutting, abrading or extensive breakage, and do not cause the tile to become RACM does not require removal prior to demolition.

Sawing or cutting of normally non-friable materials causes abrasion and the material previously occupied by the saw blade or cutting instrument will now be either crumbled, pulverized, or reduced to powder by the sawing or cutting operation. Therefore, the cutting or sawing operation and the now friable material produced by that operation will be subject to the asbestos NESHAP if the amount of friable ACM exceeds the applicability amounts as specified in 40 CFR Part 61.145. In such cases the cutting operation will have to satisfy the work practice standards for the asbestos NESHAP in 61.147 (e.g., adequate wetting and no visible emissions).

EPA has determined that when a rotating blade (RB) roof cutter or similar tool is used which damages the roofing material, the following criteria should be used to determine the regulatory status of the material.

Because the linear measurement to determine NESHAP applicability can only be used for pipes, the 160 square feet criterion of 61.145 must be used to determine the size of a sawing project that is subject to the NESHAP. Using standard industry practices, EPA has determined that removing a roof containing asbestos felt (or any other Category I or II ACM product) by sawing 5580 square feet will produce 160 square feet of friable ACM. Therefore, when sawing or cutting is used to remove these products, any project that is 5580 square feet or greater is subject to the asbestos NESHAP regulations.

For purposes of interpretation, an RB roof cutter means an engine powered roof cutting machine with one or more rotating cutting blades, the edges of which are blunt. If equipment with sharp blades or tapered edges is used (or it does not use a rotating blade), for "slicing" rather than "cutting" the roofing material, the material will not be considered to be regulated.

During the sawing or cutting operation, if the material is not adequately wetted, the entire area will become contaminated with friable asbestos. Consequently, for this type of operation the contaminated area as well as the cut material is considered friable. This will give rise to three general situations related to the size of the project. First, if the roofing felt (or tile, etc.) being removed by sawing is less than 160 square feet, the project is not subject to the NESHAP and there are no restrictions. Second, if the sawing project is greater than 5580 square feet, as discussed above, it is subject to the NESHAP and must meet all requirements. Third, if the sawing project is 160 square feet or greater, but less than 5580 square feet, the entire area is considered to be friable, and thus, subject to the NESHAP if the friable material made by the sawing is not adequately wetted. However, if the cut material is adequately wetted, the area will not become contaminated and will therefore not be subject to the NESHAP.

Asbestos cement products (such as transite) used for duct insulation, pipes, roofing, or siding, need to be removed prior to demolition of structures if they have a high probability of becoming crumbled, crushed, pulverized, or abraded. EPA believes that most demolition practices commonly used (bulldozers, wrecking balls, clamshells, buckets, hydraulic

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excavators, implosions/explosions, etc.) will cause these Category II materials (all ACM materials not listed under Category I) to become RACM.

Contractors should carefully remove asbestos-cement materials using tools that do not cause significant damage to the material. Material so removed may then be disposed of as common construction waste.

Contractors should also be aware of the new OSHA standards (29 CFR 1910, 1915, and 1926 - Industry & Construction Standards).

ROOFING OPERATION REQUIREMENTS – OSHA

Under OSHA, removal of asbestos containing roof materials must include the following work practices: the continual misting of cutting machines during use, keeping roof materials intact during removal, using wet methods, immediately lowering unwrapped or unbagged roofing materials to a covered receptacle using a dust-tight chute, or immediately wrapping roofing material in plastic sheeting, and lowering it to the ground by the end of the work shift.

In addition, the OSHA states: "unless the employer can demonstrate that it is not feasible, the roof level heating and ventilation air intake and discharge sources must be isolated, HEPA filtered, or extended beyond the regulated area, or mechanical systems must be shut down and vents sealed with 6-mil plastic".

"TRANSITE" REMOVAL REQUIREMENTS - OSHA

Removal of transite panels and/or CACS (cementitious asbestos-containing siding) is considered a Class II activity under the revised OSHA standard. As such, these materials are required to be removed using the following procedure:

1. must be removed intact,
2. must be removed wet through continual misting with amended water,
3. must be wrapped in heavy plastic (6-mil poly), and
4. must be lowered to the ground manually and without breakage.

If you should have any questions or comments in regard to the above, please call the Oklahoma Department of Environmental Quality, Tulsa Regional Office at (918) 293-1600, or the Oklahoma City Office at (405) 702-4100,

For more details concerning the OSHA regulations please call your local OSHA office in Oklahoma City, or the Oklahoma Department of Labor.