

**SUMMARY OF COMMENTS AND STAFF RESPONSES  
FOR PROPOSED ADDITION OF SUBCHAPTER 40, CONTROL OF EMISSION OF  
FRIABLE ASBESTOS DURING DEMOLITION AND RENOVATION OPERATIONS**

**COMMENTS RECEIVED PRIOR TO THE  
OCTOBER 18, 2006 AIR QUALITY ADVISORY COUNCIL MEETING**

**Written Comments**

**EPA Region 6** – email received from Carrie Paige, Multimedia Permitting and Planning Division, on July 18, 2006

1. **COMMENT:** The regulation adopts the Asbestos NESHAP, 40 C.F.R. Part Subpart M, and it requires owners or operators to comply with the Subpart M and the Oklahoma regulation on Asbestos. My comment is in respect to the word wet or wetting being omitted from the regulation for the handling, storing, and transporting requirements.

252:100-40-5(1)(C) - This paragraph should include that the approval will be consistent with the requirements of the Asbestos NESHAP. (2) When demolition/renovation operations must, of necessity take place in the outdoor air . . . Again, wetting is omitted. In order for the owner or operator to understand that wetting is still required in the Oklahoma regulation, the word should be included in the regulation.

**RESPONSE:** Staff agrees and will add “wetting” to the proposed rule.