



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: A960009

Category: Asbestos
EPA Office: METD
Date: 11/18/1994
Title: Project Design Requirements
Recipient: Fisher, Lance
Author: Rasnic, John

Subparts: Part 61, B-Asb, Asbestos Demolition/Renovation (Now Sub. M)

Abstract:

Q. Does providing the information contained in the notification requirements for the asbestos NESHAP constitute a written project design which must be completed by an accredited "Project Designer" as required by the Asbestos Model Accreditation Plan?

A. The written notification is not a project design and does not have to be completed by an accredited Project Designer, even though information submitted for compliance may duplicate some of the information in a project design.

Letter:

Mr. Lance G. Fisher
MARCOR Delmarva, Inc.
1607 Northwood Drive
Salisbury, MD 21801-4418

Dear Mr. Fisher:

Your September 14, 1994 letter addressed to Linda V. Moos, Deputy Director, Chemical Management Division, was forwarded to me for a response. Specifically, you asked whether or not providing the information contained in the notification requirements for the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) (40 CFR Part 61, Subpart M) constituted a written project design which must be completed by an accredited "Project Designer" as required by the Asbestos Model Accreditation Plan; Interim Final Rule (Appendix C to 40 CFR Part 763, Subpart E).

Although information submitted for compliance with the notification requirements of the asbestos NESHAP may duplicate some of the information in a project design, the written notification is not a project design and does not have to be completed by an accredited "Project Designer."

This response was coordinated with the Office of Regulatory Enforcement and the Chemical Management Division of the Office of Pollution prevention and Toxics. If you have any questions, please contact Tom Ripp of my staff at (202) 564-7003.

Sincerely,

John B. Rasnic
Manufacturing, Energy, and Transportation Division
Office of Compliance

Regional Asbestos NESHAP Coordinators
Regional Asbestos Coordinators
Tom Ripp, METD (2223A)
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