



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C11

Category: Asbestos
EPA Office: SSCD
Date: 05/06/1988
Title: Temporary Storage for Asb.
Recipient: Harrity, Bernadine
Author: Seitz, John S.
wrapping need not be wetted.

Subparts: Part 61, M, Asbestos

References: 61.145(c)
61.150

Abstract:

The asbestos NESHAP does not prohibit the temporary storage of ACM, but it does contain certain requirements. While in storage, the ACM must be adequately wetted and sealed in leak-tight, properly labelled containers to ensure that the ACM remains wet until disposed. No visible emissions are allowed at the temporary storage site.

Letter:

Ms. Bernadine T. Harrity, Esq.
Attorney at Law
Renaissance Building
933 Liberty Avenue
Pittsburgh, Pennsylvania 15222

Dear Ms. Harrity:

This is in response to your April 12, 1988 letter to Mr. James Engel of my staff regarding above-ground storage of asbestos containing materials (ACM) subject to NESHAP requirements. The asbestos NESHAP does not prohibit the temporary storage of ACM, but it does contain certain requirements. While in storage the ACM must be adequately wetted and sealed in leak-tight, properly labelled containers to ensure that the ACM remains wet until disposed. No visible emissions are allowed at the temporary storage site.

As long as the ACM removed from the Veterans Administration Medical Centers in Allegheny County is adequately wetted and remains adequately wet in sealed leak-tight containers which remain leak-tight until disposal, the temporary storage of the ACM is permissible under the EPA asbestos NESHAP. Any questions concerning this response should be addressed to Jim Engel at 202-382-2877.

Sincerely,

John S. Seitz, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

cc: Bernie Turlinski, Region III