



# U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: C4**

**Category:** Asbestos  
**EPA Office:** DSSE  
**Date:** 11/08/1977  
**Title:** Fencing Requirements for Active Waste Site  
**Recipient:** Bergman, Howard G.  
**Author:** Reich, Edward E.  
**Comments:** NOTE: Asb. Reg.s were in Sub. B (61.20 et seq.) before 4/85

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

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**References:** 61.154

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**Abstract:**

Fencing requirements for an active asbestos waste disposal site at an oil company's facility are discussed. References .61.25(c).

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**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

11/8/77

MEMORANDUM

SUBJECT: NESHAPS Asbestos Determination

FROM: Director, Division of Stationary Source Enforcement

TO: Howard G. Bergman, Director  
Enforcement Division, Region VI

We have reviewed your memo of October 7, 1977, requesting a determination regarding the fencing requirements for active asbestos disposal sites in 40 CFR 61.25(c).

In response to a comment concerning the October 25, 1974, proposal of amendments to the asbestos standard, the Agency decided the requirement in Section 61.25(c) could be satisfied by placing a fence either along the property line of a plant containing an asbestos disposal site or around the perimeter of the disposal site itself. (See 40 Fed. Reg. 48294, October 14, 1975.)

Assuming that the fence surrounding the Lion Oil Company's plant is adequate to deter access to the general public, an additional fence surrounding the actual disposal site is not required.

If you have any further questions please call Libby Scopino at FTS 755-2564.

Edward E. Reich