



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 11 1992

OFFICE OF
AIR AND RADIATION

Paul F. Miller
North Carolina State Fireman's Association
Office of Secretary
Box 188
Farmville, NC 27828-0188

Dear Mr. Miller

This letter is in response to your May 22, 1992 letter requesting clarification of the requirements of the asbestos NESHAP (40 CFR Sections 61.140 through 61.157) as it applies to buildings to be burned by fire departments for training purposes. Enclosed are some guidance documents (EPA 340/1-90-015, 016, 018, 019, and 021) that may help you understand the requirements of the asbestos NESHAP. Your specific questions are addressed below. The responses apply only to the Federal requirements of the asbestos NESHAP. The North Carolina State Firemen's Association should check to see if any delegated local agency has more stringent requirements than the Federal Rule.

1. "... what type of training would be required for the fireman who inspect for their department, and what would be the cost of training, if any?"

Response: The asbestos NESHAP does not specify any requirements for training the person(s) who thoroughly inspect the affected facility. However, EPA recommends that the person(s) who conduct the inspection of the facility attend and pass the 3-day Building Inspectors Course developed under the Asbestos Hazard Emergency Response Act (AHERA) program. The cost of the training is several hundred dollars. EPA, through its contractor ATLAS Federal Services, Inc. maintains a current listing of accredited training providers and courses throughout the United States. Also, it is possible for you to purchase a copy of the model inspector training materials if you are interested in developing an in-house training capability. For more information, you may call ATLAS at (301) 984-1929.

2. "... what would be the reporting procedure, and what kind of notification would be required prior to burning? ...what procedure would be followed if asbestos were found, and conversely, if no asbestos were found?"

Response: As stated in the letter to Congressman Howard Coble, House of Representatives (enclosed with your May 22 letter), "When the amount of ACM in the building is less than the threshold amounts discussed above, the asbestos NESHAP only requires the following: (1) that an inspection of the building be conducted and; (2) that the owner or operator notify EPA or its delegated authority of the demolition at least 10 days in advance of commencing the demolition operation." These requirements are contained in sections 61.145(a) and (b) of the asbestos NESHAP. If the amount of asbestos containing material (ACM) is greater than the threshold amounts, then the asbestos must be removed in accordance with section 61.145(c) and disposed of in accordance with section 61.150.

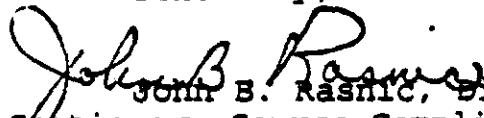
3. "... would a removal permit be required for the fire department?"

Response: EPA does not require permits to remove asbestos containing material.

Once again, these responses only address the requirements of the Federal asbestos NESHAP. Delegated agencies may have more stringent requirements. Caroline Robinson (phone # 404-347-5014) is the asbestos NESHAP coordinator for EPA Region IV which includes North Carolina. She should be able to answer further questions on the asbestos NESHAP, and give you contact names for local delegated agencies.

This determination has been coordinated with EPA's Office of Enforcement, the Emission Standards Division of the Office of Air Quality Planning and Standards, and the Office of Pollution Prevention and Toxics. If you have any questions, please contact Tom Ripp of my staff at (703) 308-8727.

Sincerely,



John B. Rasmic, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

Enclosures

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