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### Determination Detail

Control Number: A960016

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 04/21/1994  
**Title:** Joint Compound  
**Recipient:** Intlekofer, Stephen  
**Author:** Rasnic, John  
**Comments:**

**Subparts:** Part 61, B-Asb

Asbestos Demolition/Renovation  
(Now Sub. M)

#### Abstract:

Q. Does the statement in the "Joint Compound/Wallboard" section of the Asbestos NESHAP Clarification Regarding Analysis of Multi-Layered Systems contradict any statements in the "Add-on-Material" section of the clarification?

A. No. When a joint compound and tape is used to cover nail holes, cracks, wall corners and other minor patch work, it becomes an integral part of the wall system. A joint compound used as such would be covered under the "Joint Compound/Wallboard" section of the clarification. The Add-on-Materials section includes "joint compound" or other material used as a texturing or sprayed on material that is required to be analyzed separately.

#### Letter:

Mr. Stephen J. Intlekofer  
 American Asbestos Training Center, LTD  
 121 East Grand  
 Monticello, Iowa 52310

Dear Mr. Intlekofer:

This is in response to your letter dated March 9, 1994, requesting a clarification of the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP). In your letter, you asked for further explanation on the recently published Federal Register notice entitled "Asbestos NESHAP Clarification Regarding Analysis of Multi-layered Systems" (the clarification) dated January 5, 1994.

The statement from the "Joint Compound/Wallboard" section of the clarification, "When joint compound and/or tape is applied to wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system" is consistent with our position relative to both the NESHAP and the Asbestos Hazard Emergency Response Act (AHERA). We do not believe this statement contradicts any statements in the "Add-on-Material" section of the clarification. The explanations for this position are as follows:

When a joint compound and tape is used to cover nail holes, cracks, wall corners, and other minor patch work, the U.S. Environmental Protection Agency (EPA) believes that the material becomes an integral part of the wall system. Therefore, a joint compound used as joint compound would be covered under the "Joint Compound/Wallboard" section of the clarification.

The "Add-on-materials" section includes "joint compound" or any other material used as a texturing material or sprayed on material that is required to be analyzed separately. For example, in the case you described in your letter, a company that found 5-8 percent asbestos joint compound spread over the entire building would be covered by the "Add-on-material" section of the clarification and not under the "Joint Compound/ Wallboard" section. The joint compound in this case is clearly an add-on-material. If any layer of the material is greater than one percent asbestos, then the NESHAP regulations are applicable. Our position on the "Joint Compound/Wallboard" section is also consistent with the AHERA protocol. The initial clarification on the joint compound/wallboard issue (a letter addressed to Law Engineering dated September 4, 1990), was written in coordination with the AHERA program at EPA Headquarters. In addition, the AHERA program is currently working to develop or adopt a similar protocol for the "add-on-material".

This determination has been coordinated with EPA's Office of Enforcement and the Emission Standards Division of the Office of Air Quality Planning and Standards and the Office of Pollution Prevention and Toxic Substances. If you have any questions, please contact Chris Oh of my staff at (703) 308-8732.

Sincerely,

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

cc: Tom Ripp, SSCD (6306W)  
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