UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

January 2, 1991

Mr. Ed Antz
Division of Municipal & Operational Services
Bureau of Solid Waste Management
Department of Environmental Protection
State House Station 17
Augusta, ME 04333

Dear Mr. Antz:

This letter is in response to your correspondence dated December 6, 1990, requesting a determination from EPA regarding bead-blasting of floor tile mastic. In your letter you also ask for EPA's position regarding a process developed by Futura Stone of Maine (Futura) which can "ensure wetness throughout the bead-blasting process including waste load out."

As you may be aware, EPA issued two determinations which discussed the applicability of shot blasting (bead-blasting) to the asbestos NESHAP. These two determinations clearly state that: 1) Shot blasting is an abrasive method of removing floor tile mastic and, therefore, is subject to the asbestos NESHAP, and; 2) if shot blasting is used, the mastic material must be adequately wet before and during the removal operation and must remain wet until collected for disposal. Visible emissions which occur during the waste collection procedure are evidence that the material was not adequately wetted and could result in EPA enforcement actions against owners or operators involved in the project. Copies of these determinations are enclosed.

I am pleased to hear that a wet method has been developed for use in the shot blasting, or bead-blasting, removal technique for asbestos-containing mastic. As long as the work practice and disposal requirements of the asbestos NESHAP are followed (i.e., adequately wetting the mastic before and during the shot blasting operation, keeping the shot blasted material adequately wet before collection, and disposing of the waste properly), this would be an acceptable method of removing mastic. However, you should be aware that EPA does not formally approve or endorse specific removal techniques. This letter should not be interpreted as an approval from EPA regarding Futura's process.

I have also taken the liberty of forwarding your letter and attachments to EPA Headquarters in Washington. Since this is a

national issue, it is important that other Regions are aware of the latest developments in removal techniques. I would also like to thank you for your letter and I hope to speak with you in the near future.

Sincerely,

Damien F. Houlihan
Asbestos NESHAP Coordinator

cc: Neil Bowser, President
Futura Stone of Maine

Scott Throwe, EPA