U.S. Environmental Protection Agency
Applicability Determination Index

Control Number: A060004

Category:	Asbestos
EPA Office:	Region 8
Date:	12/21/2005
Title:	Test Method for Spray-applied Acoustical Materials
Recipient:	Perry Gottesfeld
Author:	Hestmark, Martin
Comments:	

Part 61, M	Asbestos

References:	61.141

Abstract:

Q1: Has EPA issued guidance specifically about spray-applied acoustical materials under 40 CFR part 61, subpart M?

A1: No. EPA has not issued guidance under the asbestos NESHAP specifically about spray-applied acoustical materials.

Q2: Does EPA recommend that the public assure spray-applied acoustical materials to contain asbestos without testing, and, what method(s) should be used to test these materials under 40 CFR part 61, subpart M?

A2: No. EPA is not recommending that the public assure spray-applied acoustical materials to contain asbestos without testing. In regards to testing spray-applied acoustical materials, Polarized Light Microscopy (PLM) is specified in 40 CFR part 63 as the approved testing method; however, Transmission Electron Microscopy (TLM) is also an acceptable method.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Ref: 8ENF-AT

Mr. Perry Gottesfeld
Occupational Knowledge International
220 Montgomery Street, Suite 1027
San Francisco, CA 94104

Dear Mr. Gottesfeld,

We have received your letter dated June 14, 2005, in which you requested an update on when EPA expects to release a new method for testing vermiculite insulation. You also asked if EPA has issued guidance concerning spray-applied acoustical materials, if there is a method for testing spray-applied materials, and if spray-applied acoustical materials should be considered asbestos-containing material.

In response to your first question concerning the timeframe for the new vermiculite test method, EPA does not currently have a release date. Research on the new test method is ongoing. Please contact Robert Courtnage with EPA's Office of Prevention, Pesticides and Toxic Substances, at 202-566-1081, for future updates on the new test method.

In response to your question about whether or not EPA has issued guidance specifically concerning spray-applied acoustical materials: EPA has not issued such guidance. Although several EPA asbestos guidance documents mention spray-applied acoustical materials along with other suspect asbestos-containing materials, there are no guidance documents specifically written only on the topic of spray-applied acoustical materials.

In response to your question about what method should be used to test spray-applied acoustical materials, Polarized Light Microscopy (PLM), which is specified in 40 Code of Federal Regulations (CFR) part 763, is the approved method. However, Transmission Electron Microscopy (TEM) is also an acceptable (and superior) method.

In response to your question about whether spray-applied acoustical materials should be considered asbestos-containing materials, no, EPA is not recommending that the public consider spray-applied acoustical materials to contain asbestos without testing. Like all other suspect asbestos-containing materials, except vermiculite insulation, EPA recommends that the public either assume spray-applied acoustical materials contain asbestos or test spray-applied acoustical materials using PLM. As you are aware, EPA recommends that the public not test vermiculite insulation, due to the inaccuracy of PLM used on vermiculite insulation, but consider vermiculite insulation as asbestos-containing material.

Thank you for the opportunity to answer your questions on vermiculite and spray-applied acoustical materials. This determination has been coordinated with EPA's Office of Enforcement and Compliance Assurance. If you have any further questions, please contact me, at 303-312-6776, or Brenda South, of my staff, at 303-312-7076.

Sincerely,

Martin Hestmark, Director
Technical Enforcement Program

cc: Robert Courtnage, OPPTS