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To: DEQ Asbestos Online Submission Notice
Subject: Asbestos-Containing Cement Pipe

ASBESTOS CONTROL PROGRAM

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Asbestos-Containing Cement Pipe in Montana

The Asbestos Control Program (ACP) recently was asked about the regulation of asbestos-containing cement (AC) pipe in Montana. AC pipe is considered part of a facility and as such is regulated under the NESHAP. We have been steering inquiries about the removal of this kind of pipe to the Oregon Best Management Practices for some usable guidelines (www.deq.state.or.us/aq/asbestos/docs/ASBPIPE).

AC pipe can be left in place; however, it cannot be crushed or “burst” in place. The U.S. Environmental Protection Agency (EPA) describes the practice of pipe bursting as a practice that, when used on AC pipe, renders the material friable. As a result of the practice, the friable material requires handling under an asbestos project permit and disposal at a proper landfill.

There is a lot of AC pipe in Montana which is scheduled to be taken out of service, and many of you may be involved in the bidding, the inspection, and removal of this pipe. Pipe removal, like any renovation or demolition, must be inspected by a Montana-accredited asbestos inspector.

EPA does have some background on the removal of AC pipe for us to use here in Montana. ACP was able to get some good guidance from the Applicability Determination Index (ADI) # A960010. In that determination, EPA references the methods for determining when their threshold for permitting is reached. The same method would apply in Montana, but the threshold here is three square or linear feet.

EPA states in part in ADI #A960010:

"The NESHAP would apply if at least 260 (3 in MT) linear ft. of the AC pipe has become or will become RACM as defined in section 61.141. If at least 260 (3 in MT) linear feet of pipe has become or will become crushed, crumbled or pulverized, then NESHAP applies. Only that portion of the pipe will be counted toward the threshold amount if the debris caused by the disjoining operation is cleaned so that other pipe is not contaminated."

So, if you keep your site clean, keep the non-impacted pipe from becoming contaminated, and keep the impacted pipe below three linear feet, the work does not need to be permitted. OSHA rules still apply. They will be looking for wet methods, for trained oversight, and proper disposal (contact OSHA at (406) 247-7499).

Regarding the transport and disposal, ACP's definition for asbestos waste is taken from NESHAP. DEQ does not consider the transport of non-regulated ACM to be an asbestos project. For this reason, the bulk of AC pipe removed under the above described conditions should not require permitting from DEQ.

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