

Cargo Building 2

Guidance for Asbestos-Containing Roofing Material

The EPA and OSHA documents referenced below state that Category I asbestos-containing roofing materials do not fall under EPA NESHAP regulations as long as the material is removed using methods outlined in the guidance documents (i.e. wet methods, manual removal, utilizing powered slicing equipment with HEPA vacuum attachments, etc.). However, disruption (including drilling) or removal of Category I asbestos-containing roofing materials does fall under OSHA worker protection regulations at 29 CFR 1926.1101; therefore, a roofing contractor who will disrupt or remove Category I asbestos-containing roofing must adhere to the requirements of this OSHA standard.

The referenced OSHA interpretation document states that data from multiple Negative Exposure Assessment (NEA) studies have been compiled to show that as long as the NESHAP-required work methods are utilized, a NEA is not required for this type of work. However, if the removal deviates from the methods outlined in this interpretation, the contractor would need to either perform a NEA for this project and workers would need to wear respirators until the NEA proves fibers are below exposure limits or, the results of a NEA performed by this contractor on a similar project could be used.

In the event the contractor causes any potential exposure into the interior workspaces (i.e. drilling through the deck), MSCAA will require that the contractor perform interior air sampling, similar in scope to an NEA, in order to provide definitive data that the operations are not exposing building occupants to asbestos.

References:

Applicability Of The Asbestos NESHAP To Asbestos Roofing Removal Operations, Guidance Manual, EPA 340-B-94-001, August 1994 (<https://www.epa.gov/sites/default/files/documents/roofing-guidance-manual-199408.pdf>).

U.S. Department of Labor, Occupational Safety and Health Administration, Industry Settlement Agreements - National Roofing Contractors Association, March 15, 1995 (<https://www.osha.gov/laws-regs/isa/national-roofing-contractors-association-03151995>).