



Minnesota
Pollution
Control
Agency

Metro District,
Regular
Facilities
Section

Guidance for the Removal, Transport, and Disposal of Category II Asbestos-Containing Materials

Air Quality/Asbestos Program/#4.05/January 2002

This document offers guidance on the removal, transport, and disposal of Category II Asbestos-Containing Materials (ACM) as defined by the asbestos National Emission Standards for Hazardous Air Pollutants (asbestos NESHAP), 40 Code of Federal Regulations (CFR) pt. 61, subp. M, which has been incorporated into Minn. R. 7011.9920.

What is Category II ACM

Category II ACM consists of any material, excluding Category I nonfriable ACM (i.e. floor tile, linoleum, asphalt roofing products), containing more than one percent asbestos as determined using the methods specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized or reduced to a powder by hand pressure. The most common form of Category II ACM is cementitious asbestos board, which is often referred to by its trade name "Transite®." Other Category II ACM includes but is not limited to, Transite® shingles and siding, asbestos cement, asbestos putties, asbestos sealants, and certain asbestos-containing adhesives.

When Does the Asbestos NESHAP Apply

Category II ACM is regulated by the asbestos NESHAP if it is or will become friable and/or crushed, crumbled and reduced to a powder, due to the forces expected to act on the ACM during a

renovation or demolition project. Friable ACM is any ACM that can be crushed, crumbled, pulverized, or reduced to powder by hand pressure when dry.

Category II ACM that is going to be or has been subjected to demolition forces or removal methods that would crush, crumble, pulverize, or reduce the Category II ACM to a powder including sanding, cutting, grinding, abrading, or intentional burning, is considered Regulated Asbestos-Containing Material (RACM) and therefore, must be removed by licensed asbestos abatement contractors using specific work practice methods.

Removal of Category II ACM

The first consideration in your renovation or demolition project must be the determination of what materials are present that contain asbestos. Certain building materials have been known to contain asbestos (i.e. slate-like siding on homes) but others must be tested to determine if the material contains asbestos. Once you have identified a Category II ACM in your renovation or demolition project, the next considerations are the quantity of ACM and the methods of removal. If the removal involves quantities greater than 160 square feet, then the following procedures must be followed:

- A) Friable ACM must be removed by licensed asbestos removal contractors. Category II ACM that is able to be





crushed or crumbled by hand pressure is friable. The determination of friability must be made prior to any other regarding the removal of the Category II ACM. If you elect to remove nonfriable Category II ACM, the removal must be done in such a manner that does not cause the Category II ACM to be crushed, crumbled, pulverized, or reduced to powder and does not subject the ACM to any sanding, cutting, grinding, or abrading which would cause the Category II ACM to become RACM. Examples of removal methods that would render the Category II ACM to RACM are smashing it, dropping it to the ground, intentional burning, subjecting it to crushing by heavy machinery, or specific grinding, sanding, cutting, or abrading.

- B) Nonfriable Category II ACM that is carefully removed by hand tools and not subject to extensive breakage may be removed by nonlicensed contractors. During the removal, care must be taken to keep the Category II ACM as intact as possible. For example, in removal of Category II ACM panels, the bolts or nails holding the panels in place can be removed first allowing for the panel to be removed intact which is not likely to cause the Category II ACM to become RACM.
- C) The Minnesota Pollution Control Agency reminds you that asbestos removal projects may be subject to other applicable rules and regulations regarding asbestos removal and disposal. Removal of asbestos is also governed by:
 - 1) 29 CFR Parts 1910 et. al., Occupational Safety & Health Administration (OSHA) laws; and
 - 2) Minn. R. 4620.3000 - 4620.3700, Asbestos Abatement Rules, administered by the Minnesota Department of Health. For more info call (651) 215-0900.
- D) The determination of who is allowed to remove Category II ACM is dependent on the removal method used and the quantity of ACM involved. Proceeding with an incorrect understanding of applicable rules, regulations, or standards could lead you to be out of compliance and subject you to an enforcement action that could potentially include monetary penalties.

Packaging and Transport of Category II ACM

- A) All Asbestos-Containing Waste Material (ACWM) must be adequately wet, packaged in leak-tight containers, and appropriately labeled with asbestos warning signs and waste generator labels.
- B) All Category II ACM must be packaged and transported in the same manner as RACM. In addition, landfills will only accept ACWM that has been properly wetted, packaged, and manifested.
- C) Some types of Category II ACM may have sharp edges and will need to be packaged to avoid any further breakage of the ACWM or puncturing or tearing of the containers.
- D) Asbestos is considered a hazardous air pollutant and a class 9 hazardous waste. Proper labeling and transportation of ACWM includes identification of it as a class 9 hazardous waste and proper placards placed on the vehicle or dumpster. Asbestos warning signs must be placed on the vehicle or dumpster during the loading and unloading of ACWM in accordance with 40CFR 61.150(c).

Disposal of Asbestos-Containing Waste Material

- A) All ACWM must be disposed of at a site approved by the U.S. Environmental Protection Agency which is operated in accordance with 40 CFR § 61.154.
- B) For a complete listing of landfills currently approved to receive ACWM in Minnesota please contact the MPCA asbestos team.

Category II ACM in Demolition Projects

The forces of a demolition project can and will cause Category II ACM to be crushed, crumbled, and reduced to a powder. Therefore, in a demolition project all Category II ACM is considered to be RACM and must be removed prior to the commencement of demolition.



If you have any questions regarding the classification, removal, transport, disposal, or any questions regarding asbestos rules, regulations, or standards, please feel free to contact the MPCA asbestos team at the numbers below. If you intend to remove Category II ACM on your own please call for instructions specific to your situation.

(651) 296-6300

(800) 657-3864

This guidance document is not intended as a substitute for reading the rules or regulations and making your own independent determination of their applicability to your asbestos removal or demolition project. Examples in this guidance document do not represent an exhaustive listing of projects or removal methods to which the regulation might apply.

MPCA Web site: <http://www.pca.state.mn.us>