

OHIO DEPARTMENT OF HEALTH

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BOB TAFT
Governor

J. NICK BAIRD, M.D.
Director of Health

July 6, 2006

Donald J. Obermier
Clayton Group Services, Inc.
520 S. Main St. Suite 2444
Akron, OH 44311-1087

Dear Mr. Obermier:

This letter is in response to your letter requesting clarification regarding drywall and joint compound and how ODH regulations apply to this issue in regards to demolition projects. You asked the following specific questions:

Question:

Would ODH define the demolition of asbestos-containing joint compound as an asbestos hazard abatement activity?

Response:

No, demolition of a building that contains asbestos-containing joint compound or any other friable asbestos containing material would not be defined as an asbestos hazard abatement activity. However, the removal of greater than fifty linear or fifty square feet of asbestos-containing joint compound or any other friable asbestos containing material from a demolition site would be an asbestos hazard abatement activity requiring both notification and the use of a licensed contractor and certified persons.

Question:

Can you provide guidance on how ODH will be regulating this issue when it relates to removal of composite drywall system described above and how ODH will regulate the waste being transported from the site?

Response:

ODH would require a drywall system or any other material to be analyzed by layer and if any layer is found to contain greater than one percent asbestos and the amount abated is greater than 50 linear feet or 50 square feet then the abatement must be performed by a licensed contractor in accordance with ODH, OSHA and EPA regulations. ODH requires our license and certification holders to comply with both OSHA and EPA regulations therefore we must require them to comply with the most stringent regulation. We would require waste from this site to be transported and disposed of in accordance with OSHA and EPA.

If you have any further questions regarding this information please call me at (614) 466-0061.

Sincerely,

Mark J.S. Needham, Administrator
Asbestos Program
Division of Quality Assurance

