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CEMENT ASBESTOS PRODUCTS COMPANY

Ragland, Alabama

TO: J. R. Carpenter February 12, 1974

FROM: Bob Baker

SUBJECT: Ragland Plant Status - EPA and OSHA Regulations

Specific EPA Regulations Applying to the Ragland Plant

I. Air

A. In the Federal Register Volume 38 Number 66, Title 40, Part 61 National Emission Standards for Hazardous Air Pollutants, paragraph 61.22c states that there shall be no visible emissions to the outside air and in paragraph 61.23 states the requirements of air cleaning equipment. EPA also requires approval of future construction and modifications of our dust system.

B. At present, the Ragland Plant is in violation of the EPA requirements since there is no provisions of collecting the dust when a dust collector is emptied and the plant uses an open dump which allows asbestos waste to become airborne. In order to comply with the regulations, the Ragland Plant will either have to recycle the dust collector waste or contain it in an impermeable container and practice sanitary land fill procedures at the dump.

II. Solid Waste

A. At present the EPA has not promulgated a specific regulation on asbestos solid waste, but relies on the OSHA regulation that any asbestos waste be collected and disposed of in sealed impermeable containers. It appears immanent that future EPA regulations will require asbestos waste to be treated as sanitary landfill, that is, spreading the waste in thin layers, compacting the waste and applying cover material at the end of each operating day.

B. Should the sanitary landfill regulation be promulgated the Ragland operation would either have to buy a bulldozer or employ an outside contractor to accomplish the work. At present, we are in violation of the EPA regulations since we do not seal our waste in impermeable containers.

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III. Liquid Waste

A. It has been proposed that regulations require 95% removal of significant wastewater pollutant by July 1, 1977 and no discharge by July 1, 1983.

B. At present the liquid waste from the Ragland Plant is about 100 gpm. The Ragland Plant now employs two settling basins and discharges the effluent into a small creek which flows into the Coosa River. In order to comply with the EPA regulation, the Ragland Plant plans to add a pump below the basins and discharge into a holding lake. The holding lake water will then be used as make up water for the plant.

Specific OSHA Regulations on Asbestos in which the Ragland Plant is not in compliance.

I. OSHA Regulations

A. - OSHA requires the permissible exposure to airborne asbestos fiber to be an 8 hour time weighted average airborne concentration not to exceed 5 fibers, longer than 5 micrometers, per cubic centimeter of air with a ceiling of 10 fibers.

B. Effective July 1, 1976, the permissible time-weighted exposure shall not exceed 2 fibers longer than 5 micrometers, per cubic centimeter of air. A ceiling concentration of 10 fibers is not to be exceeded at any time.

C. All power tools, such as grinders at finish line, lathes, are to have local exhaust ventilation.

D. Bags are not to be opened without being ventilated.

E. Special clothing is to be provided when employee is exposed to concentrations above the ceiling limits.

F. Change rooms are to be provided for employees exposed to ceiling limits.

G. Two separate lockers are to be provided in order to separate work clothes from street clothes.

E. Caution signs and labels are to be posted in areas where airborne concentrations are in excess of exposure limits. Caution labels are to be affixed to waste containing asbestos.

F. Asbestos is to be disposed of in impermeable containers.

G. External surfaces are to be free of accumulation of fiber.

The following is an area estimate of what is needed to be in compliance with the OSHA asbestos regulations.

I. Fiber Warehouse

A. A clean up vacuum cleaner system is needed to clean up asbestos spills.

B. A new fiber charging system needs to be designed so the bags will be opened under a negative pressure and have a means of placing the opened bags into a sealed impermeable container for disposal.

C. The reclaim dust collector needs some rework.

D. The kollargang dust collector needs to be tied into the reclaim system.

E. The crusher system has a number of leaks that needs repair.

II. Batch Area

A. The kollargang needs to be under a negative pressure and doors will be required on the kollargang hopper.

B. The fiber silo turntable needs to be enclosed and placed under a negative pressure.

C. The fiber conveyor needs to be enclosed and placed under a negative pressure.

D. The area needs a vacuum cleaner for clean up.

E. The dumping into the pulper will require some redesign and a dust collection system.

III. Pipe Machine
No asbestos dust problems.

IV. Coupling Lathes and Coupling Cut-off
A. Since the coupling lathes and the coupling cut-off use wet material a seperate dust collector should be employed apart from the other dry lathes.

B. A means of picking up shaving should be designed and avoid letting asbestos waste hit the floor.

V. Finishing Line
A. New hoods and hoppers need to be designed.

B. One or two new dust collectors should be purchased with capacity to handle both finishing lines.

C. A vacuum cleaner for clean up will be required.

VI. Dry Lathes
A. New pick up points need to be designed.

B. Exhaust piping should be tied into the finishing line dust collector and recycled.

C. A vacuum cleaner for clean up will be required.

VII. Cut-off Saw
A. A new cut-off saw needs to be designed using a wet system.

VIII. Special change rooms need to be provided for employees when they are exposed to concentrations in excess of permissible limits.

IX. Employees are to be provided with two seperate lockers to prevent contamination of the employee's street clothes from his work clothes.

Miscellaneous Violations

I. The Ragland Plant has a number of violations with respect to Subpart D walking-working surfaces. The Maintenance Department is correcting violations as time permits.

II. The office and shop needs emergency battery operated lighting system.

III. The Ragland Plant needs to purchase a noise level meter and correct areas of high noise levels.

IV. Traffic lanes need to be marked throughout the plant.

V. Some of the machine guarding is in violation of the regulation and is being reworked by maintenance as time permits.

VI. There are a number of violations of the National Electric Code and a complete study of the plant's electrical system needs to be done.