

Interoffice Memorandum

TO (Name and Location)	DATE
* As Listed	February 11, 1982
FROM (Name and Location)	REFERENCE NO.
R. I. Pollard-Cavalli - Dallas (2)	RIPC-25-82

* D. O. Anderson - CCCTC
 J. Garza - Bishop
 J. M. Mullins - Pampa
 A. B. Savage - Bay City
 J. K. Stafford - Dallas (3)
 R. F. Stubbeman - CCCTC
 R. E. Tower - Clear Lake

SUBJECT: National Emissions Standards for Hazardous Air Pollutants (NESHAPS)
Requirements for Asbestos

The Texas Air Control Board (TACB) received primacy from the Environmental Protection Agency (EPA) for the NESHAPS effective November 15, 1978. At that time, the TACB required a written plant procedure for handling asbestos for each facility that had notified the agency of a demolition or renovation.

For our files, please send us a copy of your most recent plant procedure for handling asbestos. We recommend that each facility review the plan for handling asbestos every two years and, if necessary, make changes. Also, the plan should be updated if the NESHAPS regulations change.

In the event of a demolition or renovation above the minimum quantities, notification to TACB is required. The notification procedure is given in Guideline 7 of the Environmental Maintenance and Policy Manual and also in 40 CFR 61.20, page 121:0461 of the BNA Federal Regulations Book 1.

The Technical Center might have future maintenance involving removal of friable asbestos material. Since asbestos is such a sensitive issue, we recommend that the Technical Center have a plan for handling asbestos available in the plant administrative procedures. We suggest the Technical Center contact Bishop to review a copy of their plan. The Technical Center should also confer with Bishop if they can send asbestos by truck to Bishop's designated landfill. Asbestos is listed as a Class I material by TDWR.

R. I. Pollard-Cavalli
 R. I. Pollard-Cavalli

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File: Air Monitoring-General

cc: C. D. Barrett - Dallas (2)
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 R. K. Golemon - Austin
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