

AT&T
Bell Laboratories

subject New York State and Federal
Requirements Concerning
Asbestos Removal and Disposal

date November 2, 1984

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Lisa A. Lee:

The New York State Department of Environmental Conservation (NYSDEC) requires that asbestos removal operations follow the federal rules found in 40 CFR 61.22. Disposal guidelines are also found within 40 CFR 61.22, but in addition the landfills used for disposal of asbestos must be approved by NYSDEC.

A summary of these EPA regulations which concern environmental emissions (but not workplace requirements under OSHA, etc.) follow.

Renovations

A renovation (as opposed to building demolition) is defined in the regulations as "the removing or stripping of friable asbestos material used on any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member. Operations in which load-supporting structural members are wrecked or taken out are excluded."

The regulations apply to renovations "where more than 80 meters (ca. 260 feet) of pipe covered or coated with friable asbestos material are stripped or removed, or more than 15 square meters (ca. 160 square feet) of friable asbestos material used to cover or coat any duct, boiler, tank, reactor, turbine, furnace, or structural member are stripped or removed." The determination of whether a planned renovation meets these quantities is made by adding the amounts of friable asbestos material that can be predicted will be removed or stripped at a source over the maximum period of time for which a prediction can be made. The period, according to the regulations, must be not less than 30 days and not longer than one year.

As early as possible prior to commencement of renovation, a written notice of intention of renovate must be provided to the EPA regional administration, and generally, to a state

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or local agency concerned with asbestos. The notice must contain the following:

1. Name of owner or operator.
2. Address of owner or operator.
3. Description of the building, structure, facility, or installation to be renovated, including the size, age, and prior use of the structure, and the approximate amount of friable asbestos materials present.
4. Address or location of the building, structure, facility, or installation.
5. Scheduled starting and completion dates of renovation.
6. Nature of planned renovation and method(s) to be employed.
7. Procedures to be employed to meet the requirements of the regulations concerning renovation and waste disposal.
8. The name and address or location of the waste disposal site where the friable asbestos waste will be deposited.

The regulations require that the asbestos removal operation be controlled in such a way as to prevent visible emissions to the outside air. Additional requirements in the regulations include the wetting of the material (or other suitable emission control procedures), as well as the prohibition of handling practices such as dropping or throwing asbestos-containing materials.

Waste Disposal

"Asbestos-containing waste material" is defined in the regulations as "any waste which contains commercial asbestos and is generated by a source subject to the provisions of this subpart, including asbestos mill tailings, control device asbestos waste, friable asbestos waste materials, and bags or containers that previously contained commercial asbestos." In practice, this includes all wastes generated at a job site, including disposable protective garments, etc.

Two waste disposal methods can be used with asbestos containing waste materials: approved landfills, and the processing of asbestos-containing waste material into non-friable forms. Containers and bags used for

asbestos-containing waste material must have a warning label stating:

CAUTION

Contains Asbestos

Avoid Opening or

Breaking Container

Breathing Asbestos is Hazardous

to Your Health

Regardless of the method, there cannot be visible emissions to the outside air, and the specific landfill used must be approved to accept such wastes. The contractor or owner of the facility must pre-arrange for the disposal of the waste materials.



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