Interoffice Memorandum

TO (Name and Location) See Distribution	DATE November 21, 197
FROM (Name and Location) J. M. Sawyer	REFERENCE NO. JMS-653

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Asbestos Regulations

The handling of asbestos is a very highly-regulated operation. This is under the jurisdiction of the Environmental Protection Agency. Regulations are outlined in the Federal Register for April 6, 1973, and for October 14, 1975, under the "National Emission Standards for Hazardous Air Pollutants."

I have combined the two issues of the Federal Register into a master of asbestos regulations. This report will show our required actions to comply with the four regulated areas that affect our operations: (1) Construction permits, (2) manufacturing, (3) renovation and demolition and (4) solid waste disposal. These are discussed below:

Construction Permits

There are several steps involved in building a new unit, or modifying an existing unit, which has asbestos usage. We cannot construct or modify the unit without obtaining written approval from the Regional Administrator of EPA, prior to the start of construction. After the unit is constructed, we must give notice of the estimated startup, 30 - 60 days prior to that date. After the unit has been started up, we must report the actual startup date, within 15 days after startup. Within 90 days after startup, we must report on our emission data, including the actual weight of asbestos processed per month. Finally, we must monitor and report air emissions, and provide sampling ports, platforms, ladders, and utilities for the sampling procedures.

Manufacturing

The emission standard for manufacturing processes is "no visible emissions" of asbestos to the ambient air. We can control this by the use of baghouses. Filters will be woven (maximum air flow 30 $ft^3/min/ft^2$) or felted (maximum air flow 35 $ft^3/min/ft^2$), and the fabric will be at least 1/16" thick and weigh at least 14 oz per square yard. A maximum of 4" H_2O pressure drop is allowed.

No bypassing of the air filter is allowed, except under emergency conditions. Under those circumstances, bypassing is allowed only for the length of time it takes to shut down the unit.

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Asbestos material which is removed from the baghouse must be stored in leak-tight, waterproof containers (plastic liners) and properly disposed of in the landfill site. There must be no visible emissions at any time.

Renovation and Demolition

If we remove piping, ducts, vessels, etc., which are covered with asbestos - containing insulation, we must comply with several requirements. If the amount of insulation is more than 260' from piping, or 160 square feet from other sources, we must report our planned renovation or demolition 10 days prior to the start of operation. This report will include the name and address, description of the renovation, the amount of friable asbestos, location of the building, the start and completion dates, nature of demolition (if used), the emission controls planned, and the location of the waste disposal site.

There are several suggested emission control methods. These are: remove the asbestos-covered equipment prior to demolition, wet the insulation prior to stripping from piping, no dropping of equipment more than 50', and using dust-tight chutes for transporting asbestos to ground level. This operation does not require a construction permit, and we do not have to apply for approval of modification or notification of startup. However, we must notify EPA, as outlined previously. This became effective October 14, 1975.

Waste Disposal Sites

There are two classes of waste disposal sites - active and inactive. The requirements for each are practically identical. No visible emissions are allowed. We must have fences and warning signs, unless the asbestos material is covered with 6' of soil and planted (inactive site) or with 24" of soil (inactive site). We can also cover the asbestos with 6" of soil daily (active site) or use a dust suppressant daily (active aite).

I believe that the requirements of putting our asbestos material into plastic-lined cartons will meet these requirements.

Conclusions

These are the essential features of the EPA regulations concerning asbestos These regulations govern asbestos emissions to the ambient air, and should not be confused with the requirements of the Occupational Safety and Health act (OSHA) which regulate workers exposures in working areas. The OSHA regulations are "in addition to" the EPA regulations, and are handled by the Safety Department.

This is a very brief summary, and will probably raise many questions.

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If so, I have the copies of the Federal Register, and an outline of the combined sets of regulations. Please feel free to contact me.

J. M. Sawyer

JMS:kf

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