

December 5, 1974

Mr. Don R. Goodwin, Director
Emission Standards and Engineering Division
U. S. Environmental Protection Agency
Research Triangle Park
North Carolina 27711

Subject: EPA Proposed Amendments to National Emission Standards - Asbestos.

Dear Mr. Goodwin:

We have reviewed subject proposed amendments as presented in the October 25 issue of Federal Register and submit the following comments for EPA's consideration:

1. Emissions from Fabrication Operations -

Numerous relatively low volume brake shoe reprocessors (including several of our customers) use debonding furnaces that emit small but visually detectable amounts of smoke or haze during a limited portion of each debonding cycle. It is doubtful that detectable asbestos fibre is present in these emissions. Cost of replacing these debonding facilities with devices having sophisticated emission controls to completely eliminate smoke emission would impose additional capital and operating costs without commensurate benefits. Therefore, we recommend EPA consider modification of the proposed rules to permit emission of limited visible smoke or haze from friction materials debonding operations that do not generate airborne asbestos fibre.

2. Waste Disposal -

Asbestos-containing waste is generated in many forms, some of which present no airborne fibre problem and little, if any, problem associated with direct contact with material. It seems unnecessarily restrictive to require fencing, signs and/or cover for deposits of waste material of this nature. Therefore, we recommend consideration be given to elimination of the proposed requirement for fencing, warning signs and/or ground cover for deposits of non-friable asbestos-containing waste and other stable deposits of asbestos waste materials that do not emit detectable amounts of airborne asbestos fibre.

3. Warning Labels -

Considerable effort was devoted by OSHA to development of a caution label that was designed to be a warning for all users and/or handlers of asbestos-containing products and materials including asbestos-containing waste materials. It would appear desirable to permit use of the approved OSHA caution label alone on asbestos waste containers rather than require a separate and different EPA warning label in addition to the OSHA label as proposed. This would simplify labeling requirements and avoid confusion that might be caused by use of two different labels for asbestos waste.



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4. Warning Signs -

We believe the proposed requirements that warning signs be posted and displayed indefinitely at the property line of all inactive asbestos waste disposal sites is overly restrictive and would have costly repercussions. Many waste disposal contractors operate disposal sites with the intention of developing them for other purposes in the future. In many cases the proposed sign requirements for inactive sites would preclude such development, or resale of reclaimed land for development purposes, even though there are ways such development could be accomplished without exposing asbestos waste deposits or creating airborne fibre emissions. The requirement for posting inactive disposal sites should be reconsidered and changed to cope with this problem.

We appreciate the opportunity to offer these comments to EPA for consideration and stand ready to confer with you or your people further if this should prove necessary or desirable prior to promulgation of amendments to the Standard.

Yours very truly,

I. H. Weaver
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cc-Messrs. R. H. Mereness
E. M. Penner ✓
E. W. Drislane
J. H. Marsh

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