FROM A. A. RAMBIKUR
ENVIRONMENTAL CONTROL

TO MR. WAYNE GENTER
ENGINEERING

cc: Mr. C. L. Green
Mr. C. F. Scott
Mr. T. Flores
Dr. P. R. Atkins - Pittsburgh

September 26, 1973

RE: SPRAYING CABLE TRAYS WITH FLAMEMASTIC FLAME RETARDANT

Considerable delay has been encountered in obtaining clarification as to whether EPA regulations permit use of Flamemastic for coating cable trays in Refining. The writer originally objected to use of Flamemastic on the basis of a paragraph in the Federal Register, Vol. 38, Number 66, April 6, 1973, Section 61.22(e):

> "e. Spraying: There shall be no visible emissions to the outside air from the spray on application of materials containing more than 1 percent asbestos, on a dry weight basis, used to insulate or fireproof equipment and machinery except as provided in paragraph (f) of this section. Spray-on materials used to insulate or fireproof buildings, structures, pipes and conduits shall contain less than 1 percent asbestos on a dry weight basis."

It seemed that the last sentence was the pertinent one, "Spray on materials.....shall contain less than 1 percent asbestos....." Flamemastic contains 7% asbestos and was to be sprayed outdoors on cable trays.

However, we now have a copy of a letter from EPA's Region IX, San Francisco (attached), in which they state that our type of spraying "is included under the provisions.....for equipment and machinery" which requires that no visible emissions be generated. Since Dyna-Therm Corporation has supplied us with a report from an independent analytical laboratory stating there were no visible asbestos fibers found on the sample filter, the writer withdraws his objections to use of Flamemastic for fire retardation at Point Comfort Operations. It is suggested that all personnel in the immediate vicinity be supplied with respiratory protection and that the spraying be monitored to insure that there are no visible emissions. In addition, Mr. T. Flores, extension 277, should be notified when spraying is to occur so he may monitor the atmosphere with personnel samplers.

APC 005243

A. A. RAMBIKUR

81-4563 (REV. 11-68)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
100 CALIFORNIA STREET
SAN FRANCISCO, CALIFORNIA 94111

JUL 27 1973

Mr. Robert Groves, Senior Vice-President
The Dyna-Therm Corporation
11120 Sherman Way
Sun Valley CA 91352

Dear Mr. Groves:

This is in response of your request of June 25, 1973 for a determination of the applicability of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) to the spraying of material containing more than 1% asbestos for the purpose of providing fireproofing of electrical cables.

Section 61.22(e) of the NESHAPS regulation applies to the spraying of asbestos for purposes of insulating and fireproofing. Spraying of electrical cables is included under the provisions of this section for equipment and machinery. Therefore, no visible emissions to the outside air are allowed from the spray on application of Flameastic 71A.

Questions regarding this determination may be directed to Mr. Stanley Zwicker of our Permits Branch (415-556-3450).

Sincerely,

Richard L. O'Connell
Director, Enforcement Division

APC 005244