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SOUTH CHARLESTON PLANT

ENVIRONMENTAL
PROTECTION



Bldg. 406 - 2nd. Floor
South Charleston, WV 25303

TO: S. W. Drake

DATE: April 1, 1987

COPY: J. R. Soice
J. L. Worstell

SUBJECT: ASBESTOS LANDFILLS

Concerning your question of whether asbestos wastes can be landfilled anywhere as long as it is marked with signs - it is EPD's opinion that this is not true.

The EPA regulation for asbestos, National Emission Standards for Hazardous Air Pollutants (NESHAPs) - Subpart M, states in part that to be an acceptable site for the disposal of asbestos containing wastes:

- access by the general public must be deterred by a natural barrier or by warning signs and fencing, or
- the asbestos wastes must be covered with at least 6 inches of non-asbestos containing material at least once every 24-hour period.

However, discussion with Mr. Mitch Barido, Solid Waste Division of DNR, revealed the following DNR requirements and guidelines:

- Natural barriers or fencing is a permit requirement for all new landfills. Additionally, DNR is considering groundwater monitoring as a permit requirement.
- Asbestos wastes must be covered with soil immediately upon receipt.
- A map showing the exact location of the asbestos disposal area must be kept on site, as well as a copy forwarded to DNR.
- The amounts of asbestos wastes deposited must be documented and a record of the asbestos cell dimensions must be kept.

