

GHQ
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TO: JOHNS-MANVILLE ENVIRONMENTAL HEALTH TASK FORCE
AIA/NA MEMBER COMPANIES
AIA/NA ADMINISTRATIVE SUB-COMMITTEE

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ILLINOIS POLLUTION CONTROL BOARD REGULATIONS ON ASBESTOS

Attached is the "Proposed Final Draft" of the State of Illinois Pollution Control Board regulations on asbestos. Substantial changes of a positive nature have been made in nearly every section of the regulations as compared with the draft published last summer.

Among the most important changes are the following:

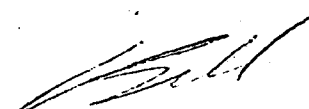
1. The section banning the use of asbestos-containing brake linings after 1975 has been eliminated. While it might appear from the comments in the "Explanation" section of the regulations on page 10-11 that this question is not completely settled, it is our belief that the Board will take no further action against brake linings unless the Federal Government does first, in which case any action taken by the state would be rather academic.
2. The plant emission standard has been raised from a level of .5 fibers per cc to a more acceptable level of 2 fibers per cc. In addition, the standard of .05 fibers per cc at the boundary line of a plant has been eliminated completely.
3. A "no visible emissions" standard has been included in various sections of the regulations where enforcement of a stricter standard would have been a problem, if not impossible.
4. The segment of the regulations requiring "total enclosure" of a structure under demolition before toppling of walls could begin has been altered to a more-or-less "do the best you can" standard.

5. The section requiring the use of a sealant on all "fibrous" materials used inside ducts or plenums has been changed to "asbestos-containing" materials only.
6. The section prohibiting the discharge of asbestos-containing process waste water into the rivers, streams and sewers of the state has been changed to permit such discharge if the waste water "is given the best available treatment consistent with technological feasibility and economic reasonableness."
7. Under the Proposed Final Draft, only manufacturing plants will be required to obtain a permit from the state. The first draft required permits for any operation or activity involving asbestos.

The vast majority of the above and other positive changes in the regulations reflect specific recommendations and corroborative evidence presented to the Board by Dr. F. L. Pundsack of Johns-Manville and Dr. Joseph L. Goodman of Raybestos-Manhattan on behalf of the AIA/NA at the public hearing on the regulations held October 15 in Chicago, and by Dr. George W. Wright and an industry team at a meeting held with Board staff representatives in September. Also participating in the overall cooperative industry effort were NIMA and the Friction Materials Standards Institute.

Attached is a copy of the specific changes submitted by the AIA/NA at Board request following the Chicago hearing. Because of the many changes in the final draft, the section and sub-section numbers on the AIA/NA recommendations do not correspond to those in the final draft. However, as you can see, the basic changes recommended by the AIA/NA have been adopted by the Board.

It is indeed an encouraging sign to find that, in this era of national environmental panic, a well-documented and well-presented industry case can produce results as fair and reasonable as those obtained in the state of Illinois. Much credit must go to the responsible yet fair attitude of the Illinois Pollution Control Board, and to all those in the industry who worked long and hard on this project.



W. P. Raines