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PLAINTIFF'S EXHIBIT

CEL-1066

Part V

Environmental Protection Agency

Asbestos-Containing Materials in School Buildings; Advance Notice of Proposed Rulemaking

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ENVIRONMENTAL PROTECTION AGENCY

[40 CFR Ch. 1]

[FRL 1298-3; OTS 61004]

Asbestos-Containing Materials in School Buildings; Advance Notice of Proposed Rulemaking

AGENCY: EPA, Office of Toxic Substances.

ACTION: Advance Notice of Proposed Rulemaking (ANPRM).

SUMMARY: EPA has initiated a rulemaking proceeding under the Toxic Substances Control Act (TSCA) regarding friable asbestos-containing materials in schools. this action is a continuation of EPA's school asbestos program announced March 23, 1979 (44 FR 17790).

This ANPRM discusses EPA's plan for a rulemaking to require 1) a survey of elementary and secondary schools to determine whether they contain friable asbestos-containing materials; 2) corrective action in situations which present an unreasonable risk to the health of students, teachers, or others who use or work in the school buildings; and 3) periodic reevaluation of friable asbestos remaining in schools to determine whether subsequent corrective action is necessary. EPA hopes to propose this rule in January, 1980 and promulgate it in June, 1980.

DATE: All comments should be received by the TSCA Document Control Officer by November 5, 1979.

ADDRESS: EPA has established a public docket for this rulemaking. All comments and other materials concerning this notice should bear the document control number (61004) and should be sent to: document Control Officer, ATTN: Joni T. Repasch, Office of Toxic Substances, TS-793, EPA, 401 M Street, S.W., Washington, D.C. 20460.

Comments received on this Notice and other materials relating to EPA's investigation of asbestos in schools will be available for viewing and copying from 9:00 a.m. to 4:00 p.m., Monday through Friday, excluding holidays, in Room E447, EPA Headquarters, 401 M Street, S.W., Washington, D.C. 20460. Copies of a guidance manual prepared as part of the school asbestos program can be obtained by calling, toll-free, 800-424-9065. In Washington, D.C., call 554-1404.

FOR FURTHER INFORMATION CONTACT: John Ritch, Industry Assistance Office (TS-799), Office of Toxic Substances, EPA, 401 M Street, S.W., Washington, D.C. 20460, Phone: (202) 755-8274.

SUPPLEMENTARY INFORMATION: EPA has initiated a rulemaking proceeding to regulate asbestos-containing material in schools under the Toxic Substances Control Act (TSCA), 15 U.S.C. 2601 *et seq.* The Agency has determined that the proper way to formally commence the proceeding is by publication of this advance notice of proposed rulemaking. This rulemaking will raise many complex issues which have not yet been decided under TSCA and the Agency will benefit from public comment before issuing a proposed rule itself. Moreover, since a rule may involve regulation of the State governments and in particular the school districts, the Agency believes that there is a particular need for consultation and coordination before formal proposal of a regulatory scheme. Publication of this advance notice and early public participation will assist the Agency in more timely promulgation of its regulatory approach.

I. Background

Asbestos is a general term for a number of naturally occurring fibrous mineral silicates. Exposure to asbestos has been related to a number of diseases including several types of cancer and asbestosis. Inhaled asbestos fibers can be trapped indefinitely within the lungs. As is the case with all known or suspected carcinogens, no threshold level (exposure level below which the risk of cancer incidence would not be increased) can be established for asbestos. Although the evidence is not conclusive, children may be more susceptible to the effects of asbestos than are adults. Certainly their long life expectancy increases the chance that cancer, which may occur 15 to 40 years after first exposure, will develop within their lifetimes.

In many buildings across the nation, asbestos has been sprayed or applied onto structural surfaces for fire-proofing, sound deadening, thermal insulation, and in some cases for decoration. Several hundred thousand tons of asbestos were used for these purposes between 1940 and 1973.

Asbestos-containing materials have been identified in numerous school buildings. Surveys undertaken prior to or as part of EPA's school asbestos program indicate that between five and fifteen percent of the nation's schools contain asbestos which was sprayed or troweled on ceilings or other building structural parts.

Some of this asbestos-containing material is now known to be damaged or deteriorating, releasing fibers into the building air. Fibers released into air can remain suspended for many hours. Fibers which have settled to the floor can be reentrained by activity in the area. Thus, even though the release of fibers may be intermittent, there is a potential for nearly continuous exposure to asbestos.

Friable material, i.e., material which crumbles under hand pressure, is particularly likely to release fibers with minimum disturbance of the surface. This rulemaking is intended to regulate only friable materials. Asbestos-containing materials such as ceiling tiles, floor tiles, laboratory counter tops, asbestos-cement pipes or other nonfriable materials, all of which may be found in schools, will be addressed as part of a separate rulemaking. For a full discussion of the health risks posed by asbestos and the details of assessing the potential for fiber release from friable asbestos-containing materials, consult the EPA guidance documents "Asbestos Containing Materials in School Buildings" Part I and Part II, numbered C00090, March 1979. They are available by calling EPA's toll-free number 800-424-9065 (in Washington, D.C., call 554-1404).

EPA's Current Technical Assistance Program

Concern over asbestos exposure from damaged or deteriorating asbestos-containing materials prompted EPA to initiate a program to provide guidance and technical assistance to state and local governments for identifying and correcting asbestos hazards in schools.

EPA undertook this program in conjunction with the Department of Health, Education and Welfare and the Occupational Safety and Health Administration (OSHA). For the program, EPA prepared guidance documents explaining how to identify and correct deteriorating friable asbestos-containing materials. EPA has distributed these documents and has held training sessions in EPA's Regional Offices for interested state and local officials. In addition, EPA established a toll-free telephone number to assist people in analyzing asbestos in bulk samples. Finally, EPA established a reporting system to collect information on the results of the inspections of school buildings and on any corrective actions taken (44 FR 17791).

On September 18, 1978, the Honorable Brendan T. Byrne, Governor of New Jersey, filed a citizen's petition with EPA requesting the Agency to develop a regulation to control asbestos contamination in buildings. On December 21, 1978, the Environmental Defense Fund (EDF) filed a citizens'

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petition with EPA under section 21 of the TSCA. 15 U.S.C. § 2620, requesting EPA to control sprayed asbestos-containing materials in public schools under section 6 of TSCA. The Administrator denied the petitions largely because at that time EPA was preparing its technical assistance program and because it regarded the technical assistance program as the fastest way to solve the asbestos problem in schools. EPA stated, however, that it would continue to study the problem and gather information toward a possible rulemaking. EPA also stated it would, at a later date, reevaluate the need to initiate rulemaking (44 FR 20291; 44 FR 25257; 44 FR 40900).

EDF filed suit in the District Court for the District of Columbia to compel the Agency to initiate rulemaking. *Environmental defense Fund vs. Douglas M. Costle, et al* C.A. No. 79-1360. EPA proceeded with its efforts to put the technical assistance program into operation. When that effort was completed, it turned its attention once again to EDF's request that EPA initiate rulemaking action. It now had resources available to initiate rulemaking. The Agency also had developed, through its work with contractors on the technical assistance program, additional technical information to support a rulemaking proceeding. In particular, advances have been made in the technology of encapsulation, exposure assessment, and training in control techniques.

Further, EPA reasoned that if it began promptly to work on the rule, it could have a regulation in place if the technical assistance program failed to adequately reduce the risk from asbestos in schools. EPA therefore decided to grant EDF's petition to begin rulemaking (44 FR 40900/July 13, 1979).

II. EPA's Approach to the Rulemaking

EPA intends to propose a rule by early 1980 which would have the effect of: 1) requiring surveys of schools to determine whether they contain friable asbestos-containing materials, requiring that an exposure assessment be performed for all such materials identified, and requiring that friable asbestos-containing materials be marked; 2) requiring corrective actions with respect to friable asbestos-containing materials for which the exposure assessment exceeds a level determined by EPA as presenting an unreasonable risk; and 3) requiring periodic reevaluation of the friable asbestos-containing materials to determine whether the exposure assessment is still valid or whether additional corrective action is required under the regulation. With respect to the first requirement (i.e., surveys, exposure assessments and marking) EPA is considering making this requirement immediately effective upon proposal in order that the public be notified of risks as expeditiously as possible. Before proposing any rule, however, EPA is inviting comment on the issues discussed below.

Any rule implemented by EPA will adhere closely to the guidance published as part of the technical assistance program. States and school districts which have participated in the program would not be subject to new requirements under the rule, with the exception of marking and reevaluation provisions. Inspections, exposure assessments, and corrective actions carried out according to EPA's guidance materials would not have to be repeated.

The first aspect of the rule would require a survey of schools to identify potential hazards and to mark asbestos-containing materials which may pose such a hazard. EPA anticipates that the survey rule would be drawn without major changes from the inspection and analysis procedure included in the guidance manual. An inspector would be required to locate friable materials which may contain asbestos, take bulk samples of suspect materials and analyze the samples to determine whether they contain asbestos.

Upon confirmation that the friable material contains asbestos (in excess of 1%), the inspector would be required to perform an exposure assessment. Under the regulations the exposure assessment could take one of several forms, as discussed in more detail under Issue 1. Currently EPA believes the most workable form of exposure assessment generally applicable to many buildings would be to require the inspector to evaluate the following:

1. Does the material contain more than 1% asbestos?
2. Is it friable?
3. Is it damaged or deteriorating?
4. Is it accessible to children, maintenance workers, or others?

Based on this evaluation, under section 6(a)(3) of TSCA, EPA may require that friable asbestos-containing materials be marked in a manner to provide adequate warning to occupants of the building that there is a potential for exposure to asbestos. The inspection and sampling provisions of the survey rule would be promulgated ancillary to this marking requirement.

EPA believes that a school official, such as a superintendent, is capable of performing the inspection. EPA recognizes, however, that technical assistance may be necessary for performing an exposure assessment. Currently EPA Regional Offices provide such assistance under the technical assistance program. It may be necessary to require in the regulation that states provide inspectors to perform exposure assessments once a school has been identified as containing friable asbestos, especially if the criteria for this assessment are particularly complex.

The second step of the rule could require corrective actions as needed. As stated above, an exposure assessment would be completed in the first step for all friable asbestos-containing materials. EPA will establish criteria which will require removal of the asbestos-containing material. An alternative to removal may be to close or isolate all or parts of a building to school use if EPA's criteria are exceeded. Under section 6(a)(5) of TSCA, no school would be permitted to continue to use friable asbestos-containing materials unless an exposure assessment has shown that the condition of the materials and other factors do not exceed EPA's criteria for removal. Materials which do not exceed the criteria for removal would be treated by following the recommended action in the guidance package for encapsulation, enclosure, or deferred action, but these actions might not be required by rule. These materials, however, would have to be marked and periodically re-evaluated.

The final aspect of the regulatory program would require periodic reevaluation of friable asbestos-containing materials remaining in schools, whether that material is encapsulated, enclosed, or left untreated. The condition of friable asbestos-containing materials can change over time due to factors such as deterioration of the binder used in the original formulation, water damage or activity. Also, the sealants used to encapsulate asbestos may deteriorate. The purpose of reevaluation is thus to ensure that if changing conditions have increased the likelihood of asbestos release, corrective actions are implemented. The rule would require (under the authority of section 6(a)(5) and 6(a)(3) of TSCA) that the exposure assessment be periodically applied to all friable asbestos-containing materials left in the school and that appropriate action be taken to either mark or remove the material.

Before imposing a requirement under section 6 of TSCA, the Administrator must determine that the manufacture, processing, distribution in commerce, use, or disposal of the chemical substance presents an unreasonable risk

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of injury to health or the environment. A determination of unreasonable risk regarding asbestos in schools requires consideration of the health effects of asbestos, the magnitude of exposure to asbestos in the schools, the effects on the environment, the benefits of the asbestos-containing material, and the reasonably ascertainable economic consequences of a rule. EPA will evaluate these factors in depth before taking regulatory action.

EPA is continuing a health effects review of asbestos. The extent of exposure to asbestos in schools will be estimated using results of the reports now being submitted to EPA. The Agency will combine this exposure and health information to estimate the human health risk due to exposure to asbestos in schools.

The economic consequences of the rule will largely be determined by the specific criteria chosen to trigger removal. EPA will estimate the number of square feet of friable asbestos-containing materials in schools from the results of school reports now being received. Using data on several hundred buildings (many of which are schools) with friable asbestos-containing material, EPA will estimate the amount of material which is in such a condition that removal is needed (i.e., the amount for which the exposure assessment exceeds a particular level). Costs will be estimated by applying an average cost per square foot for removal. Also, information on corrective actions which have already occurred will be analyzed to refine these cost estimates. Other costs, such as the cost of implementing an inspection program, will be estimated based on data from programs already in operation.

An important factor in the unreasonable risk determination will be the ability of school districts to pay for corrective actions. If large amounts of asbestos-containing material must be removed, it can be very expensive. In several schools asbestos has been removed at a cost exceeding one hundred thousand dollars.

EPA is considering covering private as well as public elementary and secondary schools in this rulemaking. The specific mechanism (e.g., state involvement) by which a rule is implemented may differ for the two types of institutions. However, EPA believes that the potential for exposure in private schools is similar to that in public schools and that both can be addressed in one rulemaking.

EPA may require phased compliance to the several aspects of a rule. It would appear that the survey and marking portions of the rule could be satisfied within a short period because EPA's program will have been in effect for more than a year and in many schools the identification of friable asbestos-containing materials will already have been accomplished. EPA is considering making this provision of the regulation immediately effective upon proposal. An alternate approach to an immediately effective rule would be a requirement for school officials to search school construction and other administrative records (contracts, bids, etc.) that would provide an indication or verification of the presence of asbestos. Upon a positive finding, marking of the asbestos-containing materials would be required. EPA intends to require expeditious removal of asbestos in the worst cases.

EPA is currently focusing its effort on the problem of friable asbestos-containing materials in the schools. After the school program is in place, EPA will examine the need for and viability of regulation of friable asbestos-containing materials in other public and commercial buildings.

III. Issues

There are a number of important issues which will have to be resolved as part of this rulemaking. EPA invites comment on the specific issues discussed here and any others identified by the public.

1. *What Form Should the Exposure Assessment Take*

As mentioned above, EPA is developing criteria for determining the degree of potential exposure to asbestos associated with various conditions. These criterial will determine what kind of marking or corrective action is necessary. The criteria selected as part of this rulemaking must be uncomplicated enough to be used in thousands of schools, yield reproducible results, be enforceable, and prompt appropriate measures to adequately protect the health of the school population without unnecessary cost.

EPA believes that the best approach may be an exposure ranking system, or algorithm, which places a numerical value on conditions found in a building or an area of a building. Comparison of this numerical value to a pre-established scale would then indicate what control, if any, is appropriate.

EPA has prepared such an algorithm and has distributed it in draft form for use by EPA's Regional Asbestos Coordinators. Copies are available for interested persons upon request. The algorithm includes the following eight factors: material condition, water damage, exposed surface area, accessibility, activity, presence of an air plenum, percent asbestos content, and friability. For each area to be assessed the inspector assigns a score to each factor from a stipulated range. The stipulated ranges reflect the importance of each factor according to its contribution to exposure, that is, one factor may be weighted more heavily than another. The scores are then combined by a simple mathematical formula to derive an "exposure number". The exposure number is then compared to a "corrective action scale". Depending on where along the scale the exposure number falls, the inspector can determine EPA's recommended corrective action.

For rulemaking purposes it may be useful to simplify the algorithm. EPA is considering developing an algorithm using only the four most important factors: asbestos content, friability, material condition and accessibility. If each of these factors is given a high score or, in simplest form, if each evokes a yes response (to a yes/no question), the asbestos-containing material would have to be removed.

EPA is testing its algorithm now. There may be refinements in the algorithm as the Agency evaluates: (1) the correlation of an "exposure number" with either air sampling results or "expert" opinion, and (2) the ease with which untrained persons may apply the algorithm.

EPA does not now consider an air standard as a feasible criterion for corrective action. difficulties in taking, analyzing and interpreting air samples may prevent their use as a decision mechanism. In particular, the Agency is concerned that air samples do not reflect the range of conditions which may be encountered in schools, especially the potential for changing conditions due to student activity or long-term deterioration of a friable asbestos-containing surface.

Also, the air sampling and analysis method currently in use (OSHA method) does not specifically identify asbestos fibers; other fibers which may be in the air are counted. Many sprayed ceilings contain cellulose or fiberglass, with or without asbestos. In such a nonindustrial setting where both the origin and identity of fibers in the air may be questioned, bulk sampling of the ceiling and other materials is necessary. This is not to say that under very specific, reproducible conditions air sampling could not be useful. EPA invites comment on the possibility of developing standard test criteria (e.g., a measured energy input to a ceiling to determine how many fibers are

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released) which might be used in setting criteria.

2. *To Whom Should the Rule Apply*

A major issue is to whom the requirements of a rule should apply. The alternatives appear to be to require states, school districts, or asbestos manufacturers and processors to inspect schools, to mark asbestos, and to take any control actions which may be necessary. Any or all of these organizations could be involved in the several phases of the program.

The states and school districts, as operators of the facilities in which asbestos may be found, would appear to be in the best position to carry out the necessary actions. State and school district officials have been the major participants in EPA's technical assistance program. Participation of the state officials would assist the administration of the program and may decrease variability in taking action.

EDF has suggested that the school districts should be required to perform the necessary sampling and analyses to determine whether friable asbestos materials are contained in the schools and to mark the asbestos and that the manufacturers and processors of the asbestos fiber which went into the friable materials should be required to take the necessary corrective action (under the authority of section 6(a)(7)). This scheme would require the manufacturers and processors to assemble a number of teams of experts to be available (at the school's request) to take necessary corrective actions. EPA solicits comment on the alternative approaches.

3. *Schedule for Promulgation and Compliance*

Other issues concern whether any part of a rule should be immediately effective upon proposal and, concomitantly, the length of time to be allowed for compliance with each portion of the rules. Specific comment is invited on the appropriate time limit for completion of the initial surveys, carrying out corrective actions and the appropriate interval for the periodic re-evaluations of friable asbestos-containing materials remaining in schools.

The Agency could, for example, make either the survey and marking rule or a control action rule immediately effective upon proposal. EDF suggested that EPA issue an immediately effective survey and marking rule and require that immediate control action be taken in schools with proven asbestos-containing materials in visibly deteriorating condition. The statutory tests to support such action are given in section 6(d)(2) of TSCA. EPA welcomes comment on this issue.

EPA's goal would be to have a complete regulatory program by the school summer vacation of 1980. The Agency recognizes that, in order to have a regulatory program in place by next summer, it may be necessary to make a proposed rule immediately effective under TSCA section 6(d)(2). EPA invites comment on which, if any, parts of the rule should be made immediately effective. To implement a program by next summer, the Agency would have to issue the proposed rule in January, 1980 and a final rule in June, 1980. This schedule, however, is very ambitious and would require significant cooperation and coordination of all interested parties. Most EPA rulemakings require significantly longer to complete.

As stated earlier, EPA might require compliance with the survey and marking rule within a relatively short period of time since most states will have undertaken these actions prior to proposal of the rule. The availability of laboratory facilities will in part determine how quickly this can be accomplished. Currently, 36 laboratories have indicated their ability to perform polarized light microscopic analysis (PLM) of bulk samples on a commercial basis.

4. *Asbestos Analysis*

Another issue concerns the measurement of asbestos in bulk materials. In order to determine whether a material should be removed or otherwise treated, it is first necessary to positively identify asbestos in the material. EPA recommends the use of polarized light microscopy (PLM), supplemented by x-ray diffraction as necessary, to identify asbestos in bulk. However, there is no standard method for the PLM technique nor are there standard reference materials. Analytical results vary, especially for the quantity of asbestos in the sample. EPA invites comment on prescribing a specific method or methods for identification of asbestos (by PLM) or for confirmation of identity and quantity of asbestos (by x-ray diffraction) where PLM results estimate that the asbestos concentration is low (e.g., less than 10%).

EPA has prepared and is distributing a list of all laboratories which claim competence in analyzing asbestos, but EPA cannot certify that all the work performed by these laboratories will be valid. This uncertainty can be reduced by use of reference materials as controls, multiple laboratory testing, and/or by cross-checking PLM results with x-ray diffraction, as recommended by EPA. The Agency has promoted the development of reference materials and other quality control procedures. Since mistaken identification of asbestos can lead to either continued exposure to hazardous conditions or unnecessary expensive treatment of non-asbestos materials, what should EPA do to ensure proper identification and quantification?

5. *Potential Sources of Funding*

EDF has suggested that under the authority of section 6(a)(7) of TSCA, asbestos manufacturers or processors should be required to pay part or all of the costs of the regulatory action even if they are not required to take the actions. Section 6(a)(7) authorizes EPA to require the manufacturer or processor of a chemical substance to replace or repurchase the substance. EDF suggested that the manufacturers should be required to contribute to a fund to pay for the cost of the regulatory action, based on a firm's share of the asbestos market over a specified period of time. EPA is not inclined to pursue this option because of the legal problems associated with this approach, the complexity of this option and the significant delays to the rulemaking which EPA believes such a requirement would entail. However, EPA invites comments on how such a reimbursement scheme could be imposed. Persons are referred to analogous provisions under Section 15 of the Consumer Product Safety Act, 15 U.S.C. 1274 concerning repurchase of banned hazardous substances and the Consumer Product Safety Commission's regulation set 16 CFR Part 1115. Comments on this and alternative funding plans are welcome.

6. *Other Federal Laws*

Another issue is the relationship of TSCA to other Federal laws. Before taking regulatory action under TSCA, section 9 of the act requires the Administrator to consider whether an unreasonable risk may be controlled to a sufficient degree by action taken under another Federal law.

On Federal laws which may be used to control exposure to asbestos in schools is the Consumer Product Safety Act (CPSA), 15 U.S.C. 2051 et seq. In order to be regulated under the CPSA, asbestos-containing materials in schools would have to be a "consumer product." EPA will work with the Consumer Products Safety Commission (CPSC) to determine if its authorities could control the risks from asbestos in schools. EPA will also work with OSHA to determine whether controls under the Occupational Safety and Health Act would be effective.

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The Agency is also concerned about the potential risks to workers and to the environment during the removal, transportation, and disposal of asbestos as required by this regulation and invites comment on our intent to utilize Interagency Regulatory Liason Group inspections and referrals. Comment is also solicited on the issuance of any special procedures or standards to reduce health or environmental risks for either the isolation or removal processes not addressed by other authorities.

7. Legal Issues

A number of legal issues are raised by regulation of asbestos-containing material in schools. The approach described above would rely on the authority of section 6(a)(3) to require the survey, sampling and marking of asbestos-containing materials. If the manufacturers and processors were required to take this action, EPA would also rely on the authority of section 6(a)(7). The authority of section 6(a)(5) would be used to require the necessary corrective actions. In addition, if manufacturers and processors were required to monitor and conduct tests to ensure compliance with a requirement on asbestos in schools, EPA may rely on the authority of section 6(a)(4). If manufacturers or processors were required to reimburse schools for this regulatory action it would be under the authority of section 6(a)(7). As part of this rulemaking EPA is evaluating the adequacy of these legal authorities to regulate asbestos-containing materials in schools.

Public Record. EPA has established a public record for this rulemaking (docket number OTS-61004) which, along with a complete index, is available for inspection in the OTS Reading Room from 9:00 a.m. to 5:00 p.m. on working days (Room 447, East Tower, 401 M Street, S.W., Washington, D.C., 20460). This record included basic information considered by the Agency in developing this Advance Notice of Proposed Rulemaking. The Agency will supplement the record with additional information as it is received. The record includes the following categories of information:

1. This notice.
2. The Environmental Defense Fund petition and the public record of that proceeding.
3. The State of New Jersey petition and the public record of that proceeding.
4. All public documents concerning EPA's technical assistance and guidance program for asbestos in schools.

EPA anticipates adding to the rulemaking record the following types of information:

1. All comments on this Advance Notice and the proposed rule.
2. All relevant support documents and studies (including economic analyses performed) considered by EPA.
3. Records of all communications between EPA personnel and persons outside the Agency pertaining to the development of this rule. (This does not include any inter- or intra-agency memoranda or conversations unless specifically noted in the index of the rulemaking record).
4. Minutes, summaries, or transcripts of any public meetings held to develop this rule.
5. Any factual information considered by the Agency in developing the rule.

EPA will identify the complete rulemaking record on or before the date of promulgation of a regulation, as prescribed by section 19(a)(3) of TSCA, and will accept additional material for inclusion in the record at any time between this notice and such designation. A final rule would also permit persons to point out any errors or omissions in the record.

(Section 6 of the Toxic Substances Control Act (TSCA) (90 Stat. 2003; 15 U.S.C. 2601).)

Dated: September 14, 1979.

Douglas M. Costle,

Administrator.

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GEN 2354 (9-67)

CELANESE CHEMICAL COMPANY

A DIVISION OF CELANESE CORPORATION

SPEED LETTER

REFERENCE

☐ MY ☐ LETTER ☐ MEMO ☐ TELEGRAM

☐ YOUR ☐ PHONE CALL ☐ INQUIRY ☐

DATED

NUMBER

TO

INTEROFFICE MAIL

TO (DEPT. AND LOCATION) EMC's

FROM (DEPT. AND LOCATION) R.A. Maurer

SUBJECT

FOLD National Emission Standards for Hazardous

DATE 8-24-78

MESSAGE

Air Pollutants — asbestos

I am in the process of preparing a reporting procedure for publication in the CCC Policy & Guidelines manual under Guideline 7 — Reporting.

In the interim, for plant maintenance jobs (renovation) involving less than 80 meters or 15 square meters of asbestos it is not necessary to give written notice to EPA.

cc. Bill McNair
Hayden Head Jr.
George Rodenhauser
Jack Underwood
FILE: Air Monitoring

FOLD

SIGNATURE Bob

REPLY

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SIGNATURE

DATE

ORIGINAL - PLEASE RETURN PINK COPY WITH ANSWER