

MR. M. A. KASSING - R-141
ENVIRONMENTAL CONTROL DEPARTMENT
POINT COMFORT OPERATIONS

MR. CHASE PHILLIPS
CIVIL MAINTENANCE
POINT COMFORT OPERATIONS

cc: Mr. C. L. Green
Mr. A. A. Rasmussen
Mr. W. W. Brown
Mr. R. E. Podhora

March 03, 1976

RE: ASBESTOS - CONTAINING WASTE DISPOSAL

Asbestos-containing waste is generated in two (2) areas of the Smelting Plant; Casting Department preparation of marinite molds and Pot Repair digging of hi-temp pots. The waste marinite is taken to the Alcoa solid waste disposal site and the hi-temp potlining to either the Cryolite Plant or Smelting dug potlining pile between SOMICO Road and Lavaca Bay.

The disposal of the asbestos-containing waste must follow regulations set down by the E.P.A.

- (1) "At the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing material which was deposited at the site during the operating day or previous 24-hour period shall be covered with at least 15 centimeters (ca. 6in) of compacted non-asbestos-containing material." or
- (2) "At the end of each operating day or at least once every 24-hour period while the disposal site is in continuous operation, the asbestos-containing waste material which was deposited at the site during the operating day or previous 24-hour period shall be covered with a resinous or petroleum-based dust suppression agent which effectively binds dust and controls wind erosion. Such agent shall be used as recommended for the particular dust by the dust suppression agent manufacturer. Other equally effective dust suppression agents may be used upon prior approval by the Administrator. For purposes of this paragraph waste crankcase oil is not a dust suppression agent."

When the requirements of Paragraph 1 are met, warning signs and fencing are not required. Paragraph 2 requires warning signs at entrances



APC 005193



and every 100-yards around the perimeter of the sections of the site where asbestos-containing waste material is deposited.

My recommendations are that in the case of the asbestos-waste generated at the marinite shop, that the requirements of Paragraph 1 be followed and the asbestos-waste which is deposited shall be covered with at least 6-inch of compacted non-asbestos-containing material within 24-hours. In the case of the Smelting dug potlining pile and Cryolite crushed potlining pile, I recommend that a test be run to determine the amount of asbestos in the air and whether a dust suppression agent of petroleum or resinous base is needed.

M. A. KASSING

MAK:ech

APC 005194