

be reducing the sub 5 micron particle level.

EFFLUENT GUIDELINES - ASBESTOS INDUSTRY

One of the requirements of the EPA effluent guidelines is that manufacturers must use the best technology available in effluent control. This essentially means that they must use the dry bag house. Some members did not want to abandon wet dust collectors. Regardless, most have now moved to the dry bag house. There are problems with the dry bag house. In particular one is when a bag is broken. Another is the continual problem with fires. It was suggested that there should be pre-separator before the bag house. Some members use a Cyclone.

As at an earlier meeting, one member pointed out that when they enforced a smoking ban in the work place, they stopped the fires in the bag house. Another member indicated that he had tried this but that it did not work. It was stated that one could use fire proof bags but they are expensive. It was also suggested that while this problem can be solved, the solution is expensive. However, as regards the effluent guidelines, the way to compliance is by the use of dry bag house.

NATIONAL EMISSIONS STANDARDS FOR ASBESTOS

It was pointed out that the Friction Materials Standards Institute did comment to the EPA concerning the proposed amendments to the National Emissions Standards for Asbestos. This comment was made on December 3, 1974. The FMSI pointed out that there were two problems: (1) The inclusion of fabricators of friction products in the requirements, and (2) The requirement for warning signs on inactive waste disposal sites.

The first problem is that the fabricators were not aware that they were coming under the National Emissions Standards and there was not sufficient time for them to comment to EPA. One member took the proposed amendments and the letter to EPA and circulated these to his customers so that they would be aware of the problem and possibly comment to EPA.

The other problem affected industry directly is that private contractors were hauling the material to public land fills. The problem is the warning signs on inactive waste disposal sites and the fact that this could effectively remove the land area from future development. Mr. Weaver advised that the Asbestos Textile Institute had commented concerning the difficulties with the various EPA solid waste requirements. In particular they commented concerning sludge removal that might have to be transported to a land fill, and the requirements for covering a land fill. ATI indicated that some of the regulations were moving at cross purposes. For example, OSHA prefers wet methods to control dust whereas EPA wants dry methods to prevent water pollution. This land fill problem is going to be a major problem if implemented as indicated in the proposed amendments to the National Emissions Standards.

ASBESTOS INFORMATION ASSOCIATION (AIA/NA)

One member stated that he was disappointed that the Institute did not take steps to have closer liaison with the Asbestos Information Association. Mr. Drislane advised that this was a subject on the Board of Directors