Part IV expresses, ironically, what may be a key reason for banning spray asbestos. It would require that procedural safeguards be pursued in order to demolish a structure whose destruction would otherwise expose members of the public to asbestos fiber. Clouds of dust are often raised by demolition work. The fact that great numbers of persons may be exposed to this dust in urban areas and that the post-war generation of high-rises were the first buildings to use asbestos insulation extensively speak in favor of such regulation.

Part IV is intended to require an enclosure only when necessary to prevent dispersion of dust during demolition and only an enclosure which is reasonably compatible with the structure to be demolished. In some cases, total enclosure can be feasibly achieved. With other structures, a ground level enclosure may be the limit of compatibility.

Part V, controlling manufacturing sources, is changed to require an emission standard of two fibers per cubic centimeter and no visible emissions. While some testimony indicated the difficulty in measuring compliance with a numerical emission standard, overall, the evidence establishes both the need (protection against the great proportion of invisible fiber) and the ease of measurement of such a criterion. A "no visible emission" standard has been added to the numerical standard to simplify enforcement against exceptionally dirty emission sources. A grace period, until June 30, 1972, has been added to permit acquisition of the necessary control equipment to attain the emission standard.

References are made to the method to be used in collecting and counting emission samples. The sampling method is that generally used in sampling particulate emissions. The counting method is that reliably used by the U. S. Public Health Service.

A requirement has been added, at the Environmental Protection Agency's suggestion, to channel all asbestos emissions inside the plant through control equipment and to exhaust such emissions through points where samples can be taken. This is intended to prevent venting through windows or doors or other avenues of escape on which sampling cannot be adequately performed. The Agency is also given the power to inspect manufacturing premises at reasonable times to determine compliance. Also, the manufacturer must engage in monitoring and reporting. The latter two additions are in keeping with the Board's practice in most areas of regulation.

The waste water discharge provision now requires no discharge of process water to which the manufacturer has added asbestos unless best available treatment technology is first utilized.