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RE: MARINITE DUST CONTROL

In your May report of Air and Water Pollution Control, I noted the results of efficiency tests of Rotoclone-N scrubbers in controlling Marinite dusts. If your Rotoclones discharge into the working area, it is important that the asbestos fiber content of the discharge air be below the present standard of five fibers per cc. By 1976, the concentration will have to be something less than 2 fibers per cc.

The above are the usual limitations of contaminants not being returned to the room in concentrations considered as harmful. The Threshold Limit Value is the concentration used by hygienists in determining if a concentration is "harmful." You should be aware that some jurisdictions do not allow recirculation unless specifically approved. If you don't already know, it would be wise to determine if the state of Washington has such restrictions.

I must admit to having some misgivings about returning this air to the working area. This is based on the toxicity of asbestos dust, the horrible publicity it has gotten and the usual lack of attention given to Rotoclone maintenance. To minimize concern and to assure compliance, frequent monitoring of exhaust returned to the room will be necessary.

If you already exhaust the Rotoclones to the outside, or are forced to do so in the future, EPA may require that asbestos-contaminated air be captured by specific methods prior to exhausting it to the atmosphere. The proposed emission standard for asbestos is quite specific on this. Although it doesn't appear wise to take any action on changing air cleaning devices at this time, you should keep in mind that this is a distinct possibility and keep an eye out for the final standard which should be published soon in the Federal Register.

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