FRICTION MATERIALS STANDARDS INSTITUTE, INC., E-210 ROUTE 4, PARAMUS, N.J. 07652

Original

BULLETIN

NO. 478

June 14, 1973

PLAINTIFF'S EXHIBIT

MAR-155

Subject: ASBESTOS STUDY COMMITTEE ACTIVITIES

At the June 1, 1973 meeting of the Asbestos Study Committee, it was recommended that the following information be distributed to the Membership.

1. OSHA Labeling Requirements
2. In-plant CAUTION Sign (W. H. Brady Co.)
3. EPA Emissions Standards - A Discussion.

OSHA Labeling Requirements

Attached is Exhibit I, a display of four different OSHA CAUTION labels. One is with a gummed backing to attach to packaging. Another is in the form of a tag. Others are imprinted on the cartons or boxes when purchased from the box manufacturer.
The Committee adopted a resolution at an earlier meeting which essentially recommended that Members obey the law. That resolution stated:

> That (1) where asbestos containing materials do not have their asbestos fiber completely locked in, or (2) where subsequent operations may be performed on asbestos containing materials, the hazardous labeling practice be adhered to in accordance with the Label Specifications in the OSHA Standards for Exposure to Asbestos Dust.

The Committee has decided to make no recommendations on style, minimum dimensions, etc. It recommends that the manufacturer comply with the requirements of the act, demonstrating "good faith" in their observation of the requirements. In other words, printing a miniature CAUTION label on the bottom of a large box would not be demonstrating "good faith." According to the Standards the labels "shall be printed in letters of sufficient size and contrast as to be readily visible and legible."

In-plant CAUTION sign (W.H.Brady Co.)

Enclosed also is a copy of a letter from the W.H.Brady Co., Milwaukee, Wisconsin, to which we've added a CAUTION sign as manufactured by the Brady Co. This sign conforms to the requirements of the OSHA Standards. Several Committee members feel the cost of these signs is attractive.

See Exhibit II.

D-6
(8)

EPA Emissions Standards - A Discussion

At this recent Committee meeting, the new EPA Emissions Standards were discussed. As there were several different interpretations by Members and Regional EPA personnel, a digest of the minutes of the meeting are enclosed.

It will be noted that there are different interpretations concerning several items: (1) "new source" versus "existing source," (2) whether to quantify machines under "Process Description," and (3) whether "Amount of Pollutant" - if given total into each Process - will then be construed as being 5 to 10 times the total asbestos entered into the process.

See Exhibit III.

EWD/erc
Enclosures:

E. W. Drislane
Executive Director

To: Active Members
Regional Members

FRICTION MATERIALS STANDARDS INSTITUTE, INC.

CAUTION
Contains Asbestos Fibres
Avoid Creating Dust
reathing Asbestos Dust May
Cause Serious Bodily Harm

CAUTION
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
BREATHING ASBESTOS DUST MAY CAUSI
SERIOUS BODILY HARM

— CAUTION —

Contains Asbestos Fibers

Avoid Creating Dust

Breathing Asbestos Dust
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CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust Ma
Cause Serious Bodily Harm

REPRESENTATIVE OSHA CAUTION LABELS - ASBESTOS PRODUCTS

EXHIBIT I

W H BRADY CO Est. 1914
727 West Glendale Ave. • Milwaukee, Wis. 53201
Phone (414) 332-8100 • Telex 26-677 • Teletype 810-262-3151 • Cable Bradyc

Attention: Plant Engineer

Dear Sir:

As a supplier of asbestos materials to industry and commerce we thought you'd like to know Brady has asbestos hazard signs in stock, ready for immediate shipment. The sign complies in color, and size and wording with OSHA 1910;93a(g). A reproduction of the sign is attached.

Stock #CAU-PP-11-5 signs are made of non-corrosive, non-conductive Brady B-450 linear polyethylene. The contrasting color black and yellow signs can be used indoors or outdoors and have built-in ultraviolet light inhibiter for long life. They are mechanically mounted with fasteners.

These 14"x20" tough, durable signs are priced at $3.99 ea. (10-40 quantity) and $3.79 each in 50-99 quantities, F.O.B. Milwaukee, Wisc. or from any Brady Distributor listed on the enclosed sheet.

A copy of our latest catalog MS-520 is also enclosed for your review of OSHA marking requirements.

We look forward to receiving orders for your OSHA marking needs.

Yours truly,

W. H. BRADY CO.

P. G. Gengler
Sales Manager
Industrial Products Division

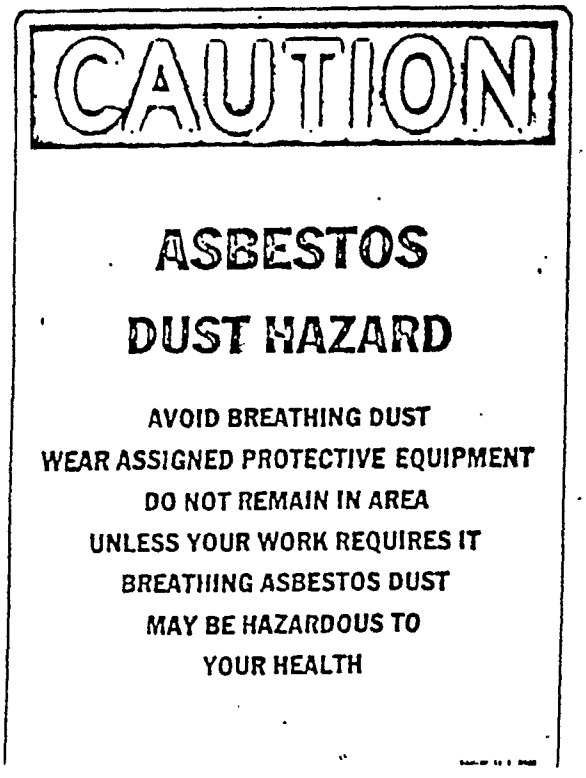


EXHIBIT 11

EPA EMISSIONS STANDARDS FOR ASBESTOS - A DISCUSSION

The following comments are digested from a June 1973 discussion of an Asbestos Study Committee meeting at the Institute. These comments may be of some interest to those filing the EPA Source Reports.

While the new EPA emissions standards appear to be reasonable, there is some difficulty in interpretation. For example, the standards are not simply "No visible emissions," but (1) there could be no visible emissions even if they do not meet the air cleaning requirements, or (2) one could even have visible emissions if they were using a collector with the specifications recommended by the EPA. In other words, if you have the EPA's recommended collector you could possibly have visible emissions and still be complying with the EPA requirements. It goes without saying, that interpretation of the requirements by individuals in the different EPA regions may vary quite a bit.

The EPA is saying in their Standards that the wet collector is not as efficient as the dry-bag collector. If an EPA Enforcement Officer sees a vapor from the stack where a wet collector is used, the source best be able to prove there is no asbestos being discharged. In other words, it can be inferred that if a source has wet collectors they may more likely be cited for visible emissions.

While it is apparent that the EPA's emissions standards promote the dry collection of asbestos in bags, many problems have been indicated with these collectors. One of the problems was repeated fires in the collection system. Another member stated that he too had this problem until cigarette smoking was banned in the factory. Since discontinuing smoking in the factory, he claims they have not had more than one or two fires in the last 25 years. Another member said that may be, but they have had the No Smoking rule for many years and they still have fires. This party blames the fires on the incentive program where the workers receive a bonus for exceeding certain work standards. This promotes the taking of heavier cuts with grinding wheels and creates sparks which apparently promote the fires in the system. The operation that has not had any fires for the past 25 years does not have an incentive system and does not permit smoking in the work place. Where the wet collectors are now in use, apparently the EPA is permitting their use as complying with the requirements.

At this point, the disposal of the materials picked up by the collectors was brought up. One member sent the dust to a pelletizing machine. In this process they add 5%-10% cement to the pelletizer. A volume reduction in the order of 3 to 1 was developed. The pellets are taken by truck and dumped as land fill. While the pellets could be broken down into a powder, if they receive reasonable handling they can be readily moved from the pelletizing machine to the land fill operation. It is this member's intention to install a vacuum system from the collecting areas to go to a central pelletizing machine. One member described his handling of dust from (1) a central collector, to (2) a screw conveyor, to (3) a truck, and to (4) the land fill. The workers in this case use respirators.

The pelletizing operation not only reduces the transportation cost by three times but eliminates the need for the watering truck and an individual to wet down the land fill. However, the costs of this pelletizing equipment are substantial. A manufacturer of pelletizing equipment is Ferro Tech Inc., 1231 Banksville Road, Pittsburgh, Pa. 15216.

EXHIBIT III

Several members mentioned that in dealing with the EPA Regional Offices they were having difficulties deciding what was a "new source" and what was an "existing source." Also, where one manufacturer adds one machine to an existing collection system he may not be in compliance without getting a Waiver of Compliance. Apparently the EPA will not give a Waiver of Compliance that will take more than 12 months to complete. An applicant must give the steps to be taken and the schedule to be met. When each date arrives, the applicant must advise EPA concerning completion of that stage of the schedule.

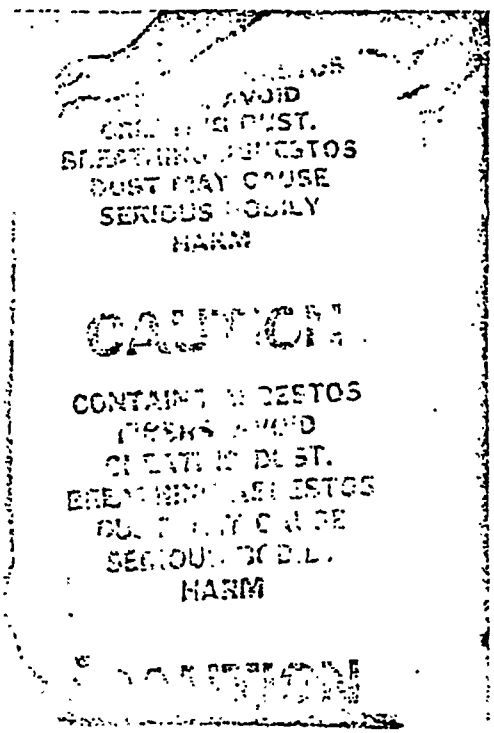
One member felt that we should review the EPA source report form to get a better understanding of what they were calling for. Page one of the report would be used for each factory. As there would most likely be several points of emission, page 2 would be completed for each stack or collector that emits asbestos.

If a manufacturer wished to make an addition or modification in his plant with equipment that might put asbestos into the atmosphere, he must file with the EPA. On page 1 of the report he would cross off the words "Source Report" and type in either "Application to Construct a New Source," or Application to Modify Existing Source." In reviewing page 2 of the report under "Process Description," some questions came up as to how to complete this section. One member who had worked on this report with the EPA said you should enter here the type of machinery used without quantifying. Another member indicated that the EPA insisted that he list the type of equipment and the numbers of each piece of equipment. If the EPA specifically said to list the numbers and types of equipment in this section it was suggested that they would have said so on page 2 of the report. The question of putting down the numbers and types of equipment could become very cumbersome where a manufacturer wished to move a grinding machine from a location with one collector to another location where it would be hooked into another collector. The member who filed with the EPA worked on reports in 2 different jurisdictions: New York and Tennessee. He indicated that at neither location did he enter the number of pieces of equipment on this form. (Since the meeting he called to advise that the application filed in Tennessee without quantities was accepted by the EPA. His application in New York State had not been either accepted or rejected as of June 4, 1973.) It would appear that Regional Offices are not in agreement as regards quantification of the equipment under the "Process Description."

The question came up concerning interpretation of question 3, the "Amount of Pollutant." In many factories a set of dry mix brake blocks could emit into a collection system at the mixer, at the briquette press, at the cut-off wheels, at grinding, at drilling, and at inspection and boxing. The problem is that this is the same original asbestos which entered the process and might be counted 6-8 times. So, in effect, a factory taking in one million pounds of asbestos might list one million pounds of asbestos going into 8 different collection systems. This, in turn, would make it appear that eight million pounds of asbestos is going into the operation. From the wording of the form, it would appear that this is exactly what the EPA wants. However, another member was told that this is not what the EPA wants. He suggests that if a factory takes in one million pounds of asbestos into the process that it should not report in total more than one million pounds of asbestos. If he had 10 different emission points, he would divide the one million pounds of asbestos by 10 to give the "amount of pollutant." Again, their apparently has been a difference in interpretation from different Regional Offices of the EPA.

On page 3 of the report, under "Waiver of Compliance," it was stated that Sections 2a and 2b did not have to be completed unless EPA specifically requests this information.

SIMPLIFY LABELING OF ASBESTOS PRODUCTS AND ASBESTOS WASTE MATERIALS



- No extra labels to buy or put on.
- No tags to come off.
- No labels to come unglued.
- OSHA specified wording printed directly on bag.
- Continuously and conspicuously displayed.
- Yellow lettering on a green background.
- Available in two sizes and two thicknesses.
- Ideal for waste such as stripped insulation, scraps, etc.

Strong, durable polyethelene bags are available in two sizes, 30"x48" and 30"x37", and two thicknesses, 0.002 and 0.004 inches. These bags were conceived as a workable solution to labeling asbestos waste according to OSHA 1910.93a. You will discover they have many other uses such as consolidating storage space for preformed asbestos insulation when removed from shipping boxes, and transporting soiled coveralls to laundry facilities once used in asbestos work.

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MAR 000568

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Total Quantity per Order	Cost per Case(200)/Cost per 1000			
	.004" thickness		.002" thickness	
	30" x 48"	30" x 37"	30" x 48"	30" x 37"
1,000	53.60/268.00	42.00/210.00	29.00/145.00	23.50/117.5(
2,500	52.90/264.50	41.68/208.40	28.50/142.50	22.75/113.7!
5,000	52.00/260.00	41.00/205.00	28.00/140.00	22.35/111.7!
10,000	51.90/259.50	40.80/204.00	27.75/138.75	22.15/110.7!

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