THIS COPY TO: MR. R. H. CARWILE - 7

004888

GARY CROUTH

PITTSBURGH OFFICE - 7

MS. JOAN E. SANDER

PITTSBURGH OFFICE - 6

RECEIVED
MAR 11 1983
Air & Solid Waste

1983 March 10

RE: ASBESTOS CLEANUP AND DISPOSAL GUIDELINES

At your request, I have prepared general guidelines for cleanup and disposal of asbestos-containing material. These guidelines are attached.

As we have discussed, these guidelines will be incorporated into an asbestos handling manual for distribution to the plants. Depending on the thrust and scope of the manual, I may want to alter the "cleanup and disposal" section. For this reason, I would like to see a draft of the manual when it has been assembled.

GARY CROUTH

GC:kad

Attachment

cc: R. H. Carwile - 7

Copy

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MAR 11 1983
G. J. CROUTH

PLAINTIFF'S EXHIBIT AL-1548

ALCOA

SF-3956 (REV. 2/81)

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VII. Cleanup and Disposal

All asbestos-containing materials require special handling and disposal procedures. This summary briefly reviews applicable regulations and outlines general guidelines for the cleanup and disposal of asbestos material.

Regulatory Considerations - The Clean Air Act regulates removal, cleanup, and disposal of asbestos materials under certain circumstances.

1. Asbestos material is "friable asbestos," i.e., contains over 1% asbestos by weight and can be crumbled by hand pressure and

2. Asbestos material is removed from renovation or demolition work and

3. Asbestos material quantity is more than 260 linear feet of pipe covering and 160 ft^2 from other sources.

If only the first two conditions exist, only notification procedures are required. If all three conditions exist, Clean Air Act regulations Subpart B, parts 61.22(d), (j), (i), (l) must be followed.

Cleanup - Persons performing cleanup, demolition, or removal of asbestos-containing material should be trained in knowledge of asbestos hazards, personal protective equipment and proper handling procedures.

Asbestos dust generation must be controlled during all stages of the work to minimize exposure to workers and emissions to outside air.

Material should be kept wet during handling by spraying with water or other wetting agent.

Material should be handled carefully. Pieces should be carried and placed rather than thrown, and lowered to ground level rather than dropped.

If the work is regulated under Clean Air Act regulations, and water cannot practically be used for dust control, a dust collection/exhaust system is required. Such a dust control system may be necessary even if not mandated by regulation depending on the specifics of the job and potential for air emissions and worker exposure.

Disposal - Asbestos-containing material should be wetted and placed into leak-tight containers, lined with plastic bags. Enough water should be used to adequately wet the asbestos material. Any excess water should be absorbed by adding asbestos or an absorbant. The plastic bags should be sealed or tied before securing the container top. The container should be labeled with a warning label that reads:*

CAUTION
Contains Asbestos
Avoid Opening or Breaking Container
Breathing Asbestos is Hazardous
To Your Health

Containers should be transported, with proper Department of Transportation shipping documents, to a permitted landfill with state approval for asbestos disposal. Before using a landfill for asbestos disposal, it is recommended that the site be visited and investigated to confirm that it is permitted, operating in accordance to Part 61.25 of Clean Air Act regulations, and is being operated by reputable management.

* OSHA warning labels may be substituted.