



8-8-79

TO: James Mulline - Pampa
From: BOB MAUER

Ref: JMM-743-79
of 7-27-79

Asbestos Handling Procedures

as we have discussed on the telephone,
the development of the asbestos handling
Procedures at Pampa is excellent.

I am not trying to "nit-pick", but
since Weyder, Jr. picked me on the difference
between renovation and demolition I am
attaching two pages which I intend to
include in revised Guideline 7 - Reporting - if
Section 371 Spill Reg ever come out. Bob

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Insert #2

Re-revised 10-30-78

D. EPA Notification Requirements for Asbestos Removal
(Reference: Federal Register 40 CFR Parts 61.20-61.25)

a. These EPA regulations are to control asbestos air emissions under the National Emission Standards for Hazardous Air Pollutants (NESHAPS). The regulations recognize a distinction between demolition and renovation. The reporting requirements are different. To date, our plant maintenance work involving asbestos has been renovation. Both Renovation and Demolition notification procedures will be addressed to cover any future use of demolition.

b. Renovation Operation:

Notification requirement applies for plant maintenance where more than 260 feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed. With respect to adding up the asbestos stripped or removed in several operations, part 61.22 (d)(3) provides that a planned renovating operation is additive over the maximum period of time for which a prediction can be made, up to one year. Written notice is required once for a planned renovation operation where the additive total exceeds the minimum amounts within one year. Written notice shall be provided to the EPA administrator⁴ at least 10 days prior to commencement of renovation. Such notice shall include the following information:

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D. (contd)

Journal 12 (continued)

b. (contd)

- | | |
|---------------------|-----------------------------------|
| (1) owner | (5) starting and completion dates |
| (2) address | (6) nature of job |
| (3) description | (7) procedure |
| (4) address of site | (8) landfill site |

c. Demolition operation:

Where more than 260 feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material are stripped or removed, written notice shall be provided to the EPA administrator⁴ at least 10 days prior to commencement of the demolition. Such notice shall include the eight items listed above for renovation plus item nine: Name, title, and authority of the state or local governmental representative who has ordered a demolition which is subject to Part 61.22, (d)(6).

When the demolition involves friable asbestos below 260 feet of pipe or 160 square feet, written notice shall be provided to the EPA administrator⁴ at least 20 days prior to commencement of demolition. Such notice shall include the following information:

- | | |
|---------------------|-------------------------------------|
| (1) owner | (4) starting and completion dates |
| (2) address | (5) State the measured or estimated |
| (3) address of site | amount of friable asbestos material |
| | which is present. |

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