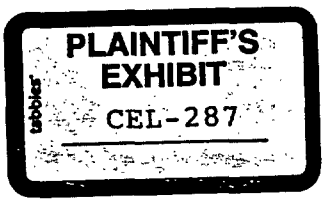
CELANESE CHEMICAL COMPANY
Chemcel Plant
Bishop, Texas



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TO: Mr. R. H. Maurer

FROM: J. M. Sawyer JMS-1128 June 28, 1978

ASBESTOS EMISSION STDS.

STANDARDS 1978

As I promised, I have outlined the "National Emission Standard for Asbestos" as contained in 40CFR61, Sub-part B. My pencil notes are attached, and can be used to help clarify the regulations.

The notification requirements for demolition and renovation are confusing, to say the least. However, after studying the notification requirement, I am convinced that we do not have to notify EPA of renovation involving less than 260 linear or 160 square feet of asbestos-containing insulation. [40 CFR61.22 (d) says, in part, "Demolition or renovation: The requirements of this paragraph shall apply to an owner or operator of a demolition or renovation operation who intends to demolish--------or who intends to renovate any---facility--where more than 80 meters (ca. 260 feet) of pipe insulated or fireproofed with friable asbestos material----or more than 15 square meters (ca. 160 square feet) of friable asbestos material---.]

Please notify me if you do not agree with this.

J. M. Sawyer

JMS/ch

c: Messers. C. DeRose - Clear Lake
J. Mullins - Pampa
J. Schaefer - Bay City
J. Garza - Plastics

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Subpart B

National Emission Std for Asbestos

61.20 Applicability - Applies to sources in 61.22.

61.21 Definitions:

(a) Asbestos - Actinolite etc.

(b) Asbestos Material - Asbestos or any material containing asbestos

(c) Particulate asbestos Material - Friable - divided particles of asbestos material

(d) Asbestos tailing - Asbestos wastes from mining or milling.

(e) Outside air - Air outside bldgs and structures

(f) Visible emissions - Asbestos visually detectable without instruments.

(g) Asbestos mill - facility to make commercial asb.

(h) Commercial asbestos - Produced by extracting asbestos from ore.

(i) Manufacturing - Making products in 61.22(c)

(j) Demolition - Removal of load supporting member and related stripping of friable asbestos.

(k) Friable asbestos material - 1% asb. crush by hand.

(l) Control device asbestos waste - Asb. collected in pollution control device.

(m) Renovation - Stripping insulation. Demolition excluded.

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(n) Planned renovat'n - Operation or number of operations in which amt of friable asbest in a given period can be predicted. Operat'n non-scheduled included, if number in this can be predicted, based on experience.

61.21 Definitions (Continued)

(o) Emergency renovation - Sudden, unexpected event such as non-routine equipment failure.

(p) Adequately wetted - No dust emissions.

(q) Removing - Taking out friable asbestos.

(r) Stripping - Taking off friable asbestos.

(s) Fabricating - Processing mfg. product.

(t) Inactive waste disposal site - No more deposition - no surface disturbance by vehicles

(u) Active waste disposal site - Site other than an inactive site.

(v) Road ways - Surfaces where vehicles travel.

(w) Asbestos-containing waste material - Asbestos generated by source, includes: tailings, control device waste, friable waste, bags + containers that held asbestos.

(x) Structural member - Load or non load bearing.

61.22 - Emission standard

(a) Asbestos mills - No visible emissions except as in (f) below.

(b) Roadways - No surfacing with asbestos except temporary roads at mines.

(c) Manufacturing - No visible emissions, except as in (f) below from:

(1) Manu. of cloth, cord, etc or other textiles.

(2) Manu of cement products.

(3) Manu of fireproofing or insulation.

6122- Emission Standard (Continued)

(c) (4) Manufacturing of friction product.

(5. Manufacturing of paper, millboard, felt

(6. Manufacturing of floor tile.

(7. Manufacturing of paints, caulks, coatings, etc.

(8. Manufacturing of plastics and rubber goods

(9. Manufacturing of chlorine

(10. Manufacturing of asphalt concrete

(11. Manufacturing of shotgun shells.

(d) Demolition and Renovation: The requirements of this paragraph apply to demolition except as in (d)(1) below, or to renovations more than 260 lineal or 160 sq ft of asbestos.

(1) (i) Demolitions exempted provided:

(1) less than 260 linear or 160 sq ft asbestos

(2) Notifications in (d)(1)(ii) are met.

(ii) Written notif to Adm. 20 days prior to start of demolition and includes info in (d)(2) except (d)(2)(iii), (vi), (vii), (viii) and (x), and state amount of asbestos.

(2) Written notification to Adm 10 days prior to demol. or renovation, or as early as possible prior to emergency demolition subject to (d)(k)

Notification to include:

(i). Name of owner

(ii) address of owner

(iii) Description of installation to be demo or renovated: size, age, process, amt friable asbestos

61.22 Emission Standard (Cont'd)

(d) (2) (iv) Location of installation

(v) Start and completion dates.

(vi) Nature and methods of demol. or renov.

(vii) Procedures to comply with (d) and (j) of 61.22.

(viii) Name and address of disposal site.

(ix) Name, title, authority ordered demolition in 61.22(d)(6)

(3) (i) To determine if an operation is a renovation:

(A) Amount of asbestos stripped in 30 days to 1 year.

(B) For all others, Amt asbestos to be stripped

(ii) To determine if an operation is emergency renovation, amt of asbestos to be removed as a result of a sudden, unexpected event.

(4) To prevent particulate emissions to outside air:

(i) Friable asbestos to be removed prior to wrecking.

(ii) Insulation to be wetted thoroughly during strip

(iii) Insulated lines or vessels may be removed prior to operations, if wetted and not dropped, but lowered

(iv) Friable asbestos to be wetted, except can use local exhaust ventilation and collection, no vis. emissions

(v) Wet thoroughly, don't drop. If more than 50 ft above ground, transport via dust-tight chutes or containers.

(vi) Don't wet if below 32°F. Observe (d)(4)(iv)(v)

(vii) For renovation, exhaust may be used, no visible emissions

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61.22 Emission Standard (Continued)

(d) (5) Sources subject to this paragraph exempt 61.05(a), 61.07, (61.09)

(6) Demolition ordered by agency exempt except

(i) Notification requirements of 61.22(d)(2).

(ii) Stripping as specified in 61.22(d)(4)(iv)

(iii) Wetting as specified in 61.22(d)(4)(v)

(iv) Structure containing friable asbestos to be wetted

(e) Spraying: No visible emissions, spray to contain <1% asb.

(1) Sources subject to this paragraph exempt 61.05(a), 61.07, 61.09

(2) If sprays contain >1% asbestos, notify Adm 20 days prior

(i) Name of owner

(ii) Address of owner.

(iii) Location of spraying operation.

(iv) Procedures to meet requirements of this paragraph.

(f) Instead of no visible emissions, can use air cleaning 61.23

(g) If water causes no visible emissions, not a violation.

(h) Fabricating: No visible emissions from manu of

(1) Cement building products.

(2) Friction products except putting on autos

(3) Cement or silicate boards.

(i) Insulating: Molded insulation to contain no asbestos

(j) Waste disposal from manufacturing, fabrication, demol, renov, + spray:

(1) No visible emissions.

(2) Waste to sites described in 61.25.

(3) Rather than (j)(i), may use (j)(3)(i)(ii)

(i) Treatment of asbestos with water:

(A) Control-device asbestos slurry, no vis emiss

(B) Seal in containers while wet, dispose at site as in 61.25.

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61.22 Emission Standard (Continued)

(j) (3) (i) (c) Label containers with EPA or OSHA label

(ii) Processing into non-friable form:

(A) Make into non-friable pellets, dispose in (61.25)

(B) No visible emissions.

(4) For paragraph (j), asbestos means only control-device and fin

(k) Asbestos mills waste disposal:

(1) No visible emissions

(2) Deposit in site specified in 61.25.

(3) May use alternate:

(i) No visible emissions.

(ii) Wet thoroughly, except below 15°F.

(l) Inactive waste disposal site:

(1) No visible emissions.

(2) Proper warning signs.

(3) Fence perimeter except in (l)(4).

(4) Warning sign + fence not required if (l)(5)(i),(ii) mi

(5) May use following

(i) Cover with 6" dirt and vegetation.

(ii) Cover with 2' dirt.

(iii) For asbestos tailings, spray with oil dust suppressant

61.23 Air cleaning:

(a) Fabric filter, < 4" H_2O pressure drop, air permeability < 30 ft^2/min/ft^2 woven, 14 g/sq yd.

(b) If fabric fields cause fire hazard, Adm may allow wet collector

(c) Adm may allow other equiv methods.

(d) Equip must be used and maintained, bypass only long enough to shut down.

6.24 Reporting: Must report in 90 days:

(a) Description of emission control equipment

(b) Pressure drop across fabric filter, "H2O

(1) Airflow permeability for woven fabrics

(2) Density, min thickness, airflow perm for felted.

(c) For sources in 6.22(j), (k):

(1) Brief description of each process

(2) Kg/day of waste disposed

(3) Emission control methods

(4) Type of disposal site, name of operator, name + location

(d) For sources in 6.22(l):

(1) Brief description of site

(2) Methods used for compliance

(e) This info to accompany that required in 6.10, see Appendix A

6.25 Waste disposal sites:

(a) No visible emissions except as in (e)

(b) Proper warning signs

(c) Fenced, except as in (d)

(d) No fence required if (e)(1) or natural barrier met

(e) Rather than no visible emissions:

(1) 6" of dirt daily or

(2) Spray with oil dust suppressant