



E. I. DU PONT DE NEMOURS & COMPANY
WILMINGTON, DELAWARE 19898

CC: E. W. Helmers
IC 13 - AESW

ENGINEERING DEPARTMENT

March 8, 1976

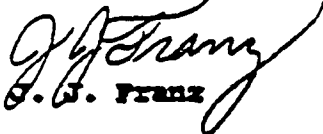
R. C. OTT
INDUSTRIAL CHEMICALS DEPARTMENT
WILMINGTON

J. G. PLASKY
TEXTILE FIBERS DEPARTMENT
WILMINGTON

DU PONT INPUT TO NATIONAL EMISSION STANDARDS FOR HAZARDOUS
AIR POLLUTANTS (OCTOBER 14, 1975, FEDERAL REGISTER)

Attached is the EPA response to our comments submitted on the then proposed subject regulation in the October 25, 1974 Federal Register. Our comments based on your input appeared to reduce the potential operation problem inherent in the original proposed standard. Hopefully most unscheduled "renovation" can be categorized as "routine renovation" and reported once per year. Thought you might be interested - thanks for your comments.

ENGINEERING SERVICE DIVISION


J. J. Franz

JJF:gl
atch

DUP 0904130

84

SC-DP-04985

Section
Comment
Number

Commentator

Comment

Response

100

9/29
pupont

The frequency and lead time for written notice of intention to do repetitive renovation work on certain processes is excessive.

the OSHA standard to protect employees' health can be achieved by the use of respiratory equipment, even in those situations where wetting is not implemented and emissions may produce concentrations in excess of the OSHA exposure limit. The extent to which emissions to the outside air are reduced cannot be determined.

The Agency intends that OSHA regulated industries report renovation operations to the Administrator. Without the reporting requirements, the Agency's enforcement of the renovation standard will be relatively ineffective; therefore, the standard has not been revised.

101

29

The proposed regulations should be modified to include definitions of "emergency and routine maintenance renovating," and to stipulate that written notice of intention to perform these operations must be filed once every year for each plant site.

The Agency has reevaluated the reporting requirements of the amendments and a discussion of the revised reporting requirements for renovation operations is presented in the response to comment number 101. The notice of intention to do renovating work must be postmarked or otherwise delivered to the Administrator as soon as possible, prior to commencing renovation. The Agency believes that the frequency and lead time reporting requirements are reasonable and will not cause untenable hardships for any renovation operation.

The Agency agrees that routine and emergency renovation operations should be distinguished and reported to the Administrator by separate reporting procedures. Therefore, the standard has been revised by adding a definition for "planned renovation" and "emergency renovation."

DUP 0904131

Section
ment

55

Commentator

Comment

Response

ontd)

96

The primary characteristic that distinguishes these types of renovation operations is the degree of predictability of their occurrence. Planned renovation operations are defined as those renovation operations in which the amount of friable asbestos material that will be removed within a given period of time can be predicted. Included in this category of renovation are individually non-scheduled renovations, provided a number of such operations can be predicted to occur during a given period of time based on operating experience.

Emergency renovation operations are defined as those renovation operations that are not planned and result from a sudden, unexpected event for which immediate renovation is required. Renovation operations due to significant malfunctions and failure of equipment are included in this category.

The standard has been revised to specify more clearly how the amounts of friable asbestos material removed during renovation will be quantified in planned renovation and emergency renovation operations. The quantity of friable asbestos material that must be removed in a renovation operation for the standard to apply is 80 meters of pipe insulated with friable asbestos material or 15 square meters of friable asbestos material used to insulate or fireproof any boiler, duct, tank, reactor, turbine, furnace, or structural member. For a planned renovation operation, the amount of friable asbestos material that is subject to the standard is the summation of the friable asbestos material removed during the planned renovation period.

DUP 0904132

1. Section
1 Comment
Number

Commentator

Comment

Response

1-(Contd)

Emergency renovation operations that involve the removal of more than the stated quantity of friable asbestos material are covered by the standard and must report for each individual emergency situation.

The Agency does not believe that reporting for a definite period of time, such as the suggested one-year period, is appropriate in all planned renovation operations because of the many variations that occur between renovation operations at different plants. The period of time for which the removal or stripping of friable asbestos material will be predicted for planned renovation operations shall be not less than 30 days nor more than one year. This range of periods provides the flexibility to deal with variations from facility to facility. Periods of less than 30 days will cause much Agency enforcement manpower to be spent in reviewing such reports, while periods in excess of one year generally provide inaccurate estimates.

2

3

It would be practical to state that if proper work practices are observed to minimize asbestos emissions to the environment (no visible emissions) during renovation, the notice of intent to renovate is unnecessary.

The Agency believes the notice of intent to renovate is necessary. The notice of intent is required to inform Agency personnel of the renovating operation so that inspections can be made during the operation. These inspections are necessary to verify compliance with the standard and to ensure that proper work practices are being observed.

3

DUP 0904133

3,4

The alternatives to wetting asbestos during demolition allowed under sub-freezing temperature should be allowed in all cases.

It had been brought to the attention of the Agency by a demolition contractor association prior to proposing these amendments that worker safety may be jeopardized during wetting of asbestos prior to stripping and removal under freezing conditions. The Agency considered the following two alternatives in an attempt to correct this situation:

Unsub. Rec.
Exempt - Jones
7-12-77

Asbestos Blamed for Disorders

SAN FRANCISCO (AP) — Thousands of persons who worked in San Francisco Bay area shipyards since World War II may have developed lung abnormalities from exposure to asbestos, a physician says. Dr. Phillip L. Polakoff of Berkeley joined union leaders at a news conference yesterday to describe what he called a potential "mammoth epidemic" of lung disease in shipyard workers. He disclosed results of a preliminary study of workers at Mare Island naval shipyard exposed to asbestos for the first time at least 10 years ago. Of 359 employees X-rayed, 59 per cent showed lung abnormalities. "The long lapsed period between onset of asbestos exposure and clinical appearance of disease . . . now brings the World War II shipyard work people to a period of risk," a report released by Polakoff said. The study was made by the Federal Employees Metal Trades Council at Mare Island because the Navy failed to inform some X-rayed workers they had lung problems, said John Robinson, president of the union.

478

DUP 0904134