

PITTSBURGH PROCUREMENT
CHEMICALS, PLASTICS & COATINGS
PITTSBURGH OFFICE - 19

TO R. M. JAMES

PITTSBURGH OFFICE - 7

1981 JULY 02

RECEIVED

JUL 6 - 1981

RE: ASBESTOS IN ALCOA PAINT COATINGS

INDUSTRIAL HYGIENE

A review of some of our active coating materials indicated that one of them, Colonial Refining and Chemical Company's Corro Coat, lists asbestos as one of its components. No question has arisen from the field as yet regarding this material; but in anticipation of some future discussion, we requested the vendor to furnish us with his comments on why we should continue to use his material.

Corro Coat is a heavy bitumastic, low cost black protection coating, which you have no doubt seen many times around foundation steel and its corrosion resistance and thick, long life application coating has served us very well in almost all of our plants. On a weight basis, Corro Coat has approximately 11.1% asbestos.

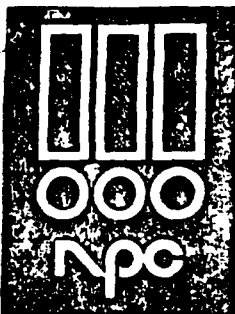
Attached is a copy of Colonial Refining's letter and a copy of the article referencing the EPA's ammended emission standard.

Would you please give us your comments, as we would like to be prepared to meet questions, if they should come up in the future. This low cost coating has served us well, and we would not like to change unless it became manditory.

H. P. Brueschke
H. P. BRUESCHKE

HPB/rvg

cc: T. I. ALKIRE - PITTSBURGH 21
R. FLANNIGAN - PITTSBURGH 6



coatings

August 14
1978

EPA Issues Wastewater Pretreatment Strategy

On June 26, 1978 the U.S. EPA issued general wastewater pretreatment regulations. The regulations will affect existing as well as new industrial facilities discharging to municipal treatment systems, commonly called publicly owned treatment works or POTWs. The regulations become effective on August 25, 1978.

The general strategy contained in the June 26 regulations outlines EPA's views on pretreatment of industrial wastewater discharges. The strategy will be reflected in the specific pretreatment standards which EPA will issue for the 21 individual categories. One such category is the paint manufacturing industry which has been further divided into three subcategories. A zero pretreatment standard was established for the "oil-based paint, solvent wash" subcategory in 1975. Pretreatment standards for the remaining two subcategories, "oil-based paint, caustic wash" and "water-based paints," will be proposed in early 1979 and finalized 9-12 months later.

Specifically, the June 26 strategy requires that any POTW holding a National Pollution Discharge Elimination System (NPDES) permit must develop a pretreatment program consistent with the June 26 strategy by 1983. With certain exceptions, POTWs with a daily capacity of less than five million gallons are exempted.

Of immediate impact, the June 26 regulations prohibit the introduction into POTWs of any discharge which: 1. would create a fire or explosion hazard, 2. are corrosive, 3. would obstruct sewers, 4. are so solid or concentrated as to interfere with the POTW, or 5. contain excessive heat. The prohibition is effective as of August 25, with the exception of the prohibition on excessive heat which takes effect three years from that date.

EPA AMENDS ASBESTOS EMISSION STANDARD

In the June 19, 1978 *Federal Register*, the U.S. Environmental Protection Agency (EPA) issued an amendment to its Asbestos Standard which exempts from control all spray-on application of materials in which asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and which are not friable (easily crumbled) after drying. The Asbestos Standard is part of EPA's National Emission Standard for Hazardous Air Pollutants.

This exemption would exclude from control such products as roofing compounds, waterproofing of insulation exposed to the weather, automobile undercoatings and industrial maintenance coatings.

In their proposed amendments issued on March 2, 1977, EPA considered banning the spray-on application of any material containing more than one-percent asbestos. This proposed amendment would have been an expansion of the control of spray-on application asbestos products which originally related only to the prevention of visible emissions from the application of such coatings. The major purpose of EPA's

control of the spray-on application of asbestos-containing materials is to prevent friable asbestos, that is, asbestos which crumbles easily and is separated into discreet particles, from becoming an air-borne contaminant and a potential health hazard.

NPCA filed comments on the proposed amendments with EPA on May 2, 1977 (See *Coatings*, June 6, 1977) stating that certain classes of coatings, i.e. roof coatings, waterproofing compounds, and industrial maintenance systems which may contain asbestos should not be subject to these Standards. Such coatings are not a potential source of friable asbestos because even if spray-applied they do not constitute a major source of asbestos emissions.

The final amendments to the Asbestos Standard issued on June 19th reflect our industry's positions and provide us with the exclusion necessary for us to continue supplying these essential coating systems.

Additional information on this subject can be obtained by contacting Ray Connor, Technical Director, at (202) 462-6272.

If certain conditions are met, industrial dischargers to POTWs may have their specific categorical pretreatment requirements revised to reflect consistent pollutant removal by the POTW. The pretreatment regulations reflect, however, that such removal by a POTW must not interfere with the operation of the POTW or contaminate its sewage sludge, or pass through the treatment works into clean receiving waters.

After categorical pretreatment standards are issued for the 21 industrial categories, existing sources must comply with their respective categorical pretreatment requirements within three years. New sources must comply immediately.

NPCA's Water Quality-Waste Management Task Force is presently review-

ing the pretreatment regulations. As additional information is available regarding the regulations and their impact on the categorical pretreatment standards applicable to paint manufacturers, it will be reported to our members. In the meantime, questions concerning the strategy should be directed to either Bob Nelson or Mike Duff at NPCA.

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DEPENDABLE THEN

COLONIAL

216-333-1722



DEPENDABLE NOW

REFINING AND CHEMICAL COMPANY

EXECUTIVE OFFICES

20575 CENTER RIDGE ROAD • ROCKY RIVER, OHIO 44111

May 29, 1981

Mr. H.P. Brueschke
Senior Staff Buyer
Chemicals, Plastics & Coatings
Aluminum Co. of America
Alcoa Building
Pittsburgh, PA 15219

Dear Mr. Brueschke:

Attached to this letter is a reprint of an article from NPC Coatings, which is the official organization which handles standards being established by EPA.

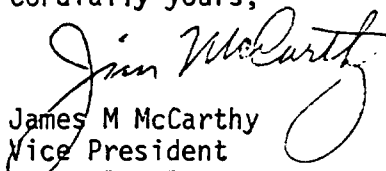
The article on asbestos is the one I feel that you would want for your records. It does exempt those products using asbestos when those products are mixed in a bituminous binder.

As pointed out in the article, once the fibers are mixed with the bituminous binder, they are not friable and constitute no hazard.

If any further information is requested, please do not hesitate to contact me.

I did enjoy the opportunity of talking to you this morning and I hope that your coming vacation is a very pleasant one in every respect.

Cordially yours,


James M. McCarthy
Vice President
General Sales Manager

JMC/cw

Handwritten notes:
asbestos
10.2%
11.1%
3 R. dunn
C. H. Co. & S.

RECEIVED
JUN 02 1981
C. H.