AMERICAN SMELTING AND REFINING COMPANY
DEPARTMENT OF ENVIRONMENTAL SCIENCES
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Manager

October 31, 1974

PLAINTIFF'S EXHIBIT
ASA-641

Mr. M. O. Varner
Building

Proposed Amendments to National
Emission Standards for Asbestos

I have attached copies of the October 25, 1974, Federal Register which contains proposed amendments for hazardous air pollutants, including asbestos. The proposed amendments appear to have an impact on ASARCO operations.

1: There are a number of requirements that apply to the demolition or renovation of a tank, furnace, or structural member that is insulated or fire-proofed with "friable" asbestos material. The proposed requirements are:

a: Written notice of intention to demolish or renovate.

b: Control procedures to prevent emissions of particulate asbestos material to outside air.

c: A prohibition on visible emissions.

d: Proper waste disposal of the asbestos-containing materials.

2: A ban on molded insulating and wet-applied insulating materials (which are "friable" after drying) containing commercial asbestos. The insulating cement or "lagging" used at the various smelters would appear to fall within this category.

3: A requirement of no visible emissions to the outside air from the collection, processing, packaging, transporting, or deposition of asbestos-containing waste which is generated by asbestos fabricating sources. This requirement may affect the proposed (or installed) local ventilation systems at various carpentry shops, such as Tacoma, Corpus Christi, and Globe, where transite and other asbestos-containing materials are used.

4: A number of requirements for waste disposal sites where asbestos-containing waste has been deposited, including warning signs, fencing, use of dust suppression agents, a cover of compacted material. These requirements have an obvious application to the open dump at the CAPCO Van Buren property.

Comments on these proposed amendments should be submitted to the EPA no later than December 5, 1974.

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cc: KWNelson