



ATTACHEMENT III

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WILMINGTON, DELAWARE 19898

LEGAL DEPARTMENT

September 27, 1978

MANUFACTURING ENVIRONMENTAL COMMITTEE

ASBESTOS REMOVAL
REPORTING AND DISPOSAL

Prior to removing asbestos from pipes, containers or structural members, notice and controls are required in certain circumstances. This is a consequence of asbestos being designated a hazardous air pollutant under Section 112 of the Clean Air Act. 40 CFR 61.20, reprinted in "Environment Reporter" (BNA) at 121:0466.

These requirements have been in effect since April 6, 1973. Because of several recent questions, and since the regulation is worded so awkwardly, I feel this letter is warranted. I will use the term asbestos to include "friable asbestos material" — any material that contains more than one percent asbestos by weight and that can be crumbled, pulverized or reduced to powder, when dry, by hand pressure.

RENOVATIONS

The most common situation at the plants is called renovation. It involves removing or stripping away asbestos from pipes, ducts, boilers, tank reactors, furnaces or structural members. If a load-supporting structural member is actually removed or wrecked, the operation is not a renovation, but a demolition, covered below.

Large Renovations

If you plan to renovate and therefore must remove or strip asbestos from over 80 meters (260 feet) of pipe or over 15 square meters (160 square feet) of ducts, etc., you must notify the Regional EPA office "as soon as possible" prior to renovation. 861.22(d)(2).

This notice must include the name and address of the owner, description and address of the facility, amount of

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asbestos present, renovation dates, nature of renovation, disposal procedures and disposal site.

To determine the quantity of asbestos involved in a renovation, the regulation provides the following:

- (i) Planned but not individually scheduled renovations. If you plan to or routinely renovate on a non-scheduled basis, you should make a long-range prediction of the total amount of asbestos that will be removed or stripped. Long range means at least a 30-day period, but not over a year. If the totals exceed the 80 meters or 15 square meters, or both, you should send in the notice. I suggest that 20 days notice is adequate for "as soon as possible."
- (ii) Planned scheduled renovations. For planned and scheduled renovations, consider just the amount of asbestos you plan to remove or strip.
- (iii) Emergency renovations. In the event of an emergency renovation, consider the amount of asbestos to be removed or stripped as a result of just the emergency. Again, notice should be "as soon as possible" before renovation -- but for an emergency the notice might only occur after the act in some situations.

See below for emission controls and disposal of asbestos.

Small Renovations

If your "nonscheduled," "scheduled" or "emergency" renovation involves less than the 80 meters and 15 square meters, notice is not necessary. See below for emission controls and disposal of asbestos.

DEMOLITIONS

A demolition occurs only when asbestos is removed or stripped prior to the wrecking or taking out of a load-supporting structural member (beams or load-supporting walls).

Large Demolitions

If you plan a demolition that involves over 80 meters (260 feet) of asbestos-coated pipe or 15 square meters (160

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square feet) of asbestos on ducts, structural members, etc., you must notify the Regional EPA office at least 10 days prior to demolition.

This notice must include the name and address of the owner, description and address of the facility, amount of asbestos present, demolition dates, nature of demolition, disposal procedures and disposal site.

See below for emission controls and disposal of asbestos.

Small Demolitions

If you plan a demolition that involves less than both 80 meters and 15 square meters, you must notify the Regional EPA office at least 20 days prior to demolition. This notice must include the name and address of the owner, address of the facility, demolition dates and amount of asbestos present.

See below for emission controls and disposal of asbestos.

EMISSION CONTROLS

Large Demolitions or Renovations

The following emission controls apply to demolitions and renovations over the 80 meters or 15 square meters limits.

For demolition operations asbestos must be removed from any pipe, duct, boiler, tank, reactor, furnace or structural member prior to any taking out or wrecking of the item, unless the item can be removed intact with its asbestos coating. For demolition and renovations asbestos must be adequately wetted during stripping or cutting.

During demolitions large units may be removed, intact, rather than wetting. A local exhaust ventilation and collection system may be employed if it is sufficiently efficient to result in no visible emissions. During renovations this system may be used if the source demonstrates that water would damage equipment.

Removed asbestos must be kept wet during handling. Asbestos may not be thrown to the ground and must be transported to the ground in dust-tight chutes or containers if removed or stripped more than 50 feet above ground level.

Wetting is not necessary when the temperature is below 0°C (32°F). In this situation, for demolitions, removal of intact units, with asbestos, is required to the maximum extent possible.

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Small Demolitions or Renovations

The above emission controls do not apply to small demolitions or renovations (under 80 meters and 15 square meters).

TRANSPORTATIONS

During collection, processing, incineration, packaging, transportation or disposition, no visible emissions are allowed. Specially marked drums are not necessary in this case.

If an asbestos dust collector is used, a water slurry type of control is permitted. In this latter case, the slurry must be put in drums marked:

CAUTION
CONTAINS ASBESTOS
AVOID OPENING OR BREAKING CONTAINER
BREATHING OF ASBESTOS IS HAZARDOUS
TO YOUR HEALTH

DISPOSAL

Asbestos must be disposed of at a site that is either properly fenced and marked with the above legend or is protected by a natural barrier or which covers waste on a 24-hour basis by either 15 cm (6 inches) of compacted, nonasbestos material or a petroleum-based dust suppression agent.

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