

cc: Mr. S. A. D'Armond
Mr. H. O. Bourque

ETHYL CORPORATION

INTER-OFFICE

To Mr. R. E. Conrad

FROM W. D. Skipper

SUBJECT Asbestos Standard



ADDRESS Baton Rouge Plant

ADDRESS Baton Rouge Plant

DATE April 15, 1976

At the request of Mr. S. A. D'Armond, Maintenance Engineering has carefully reviewed the EPA standard on asbestos titled "National Emission Standards for Hazardous Air Pollutants - Asbestos and Mercury" as listed in the Federal Register on October 14, 1975. The following information is an accurate synopsis of the EPA standard concerning asbestos; the standard for mercury is not applicable to our plant.

Definitions, Section 61.21, page 48299.

The following definitions have been established for the purposes of this standard.

Demolition - The wrecking or taking out of any load-supporting structural member and any related removing or stripping of friable asbestos material. Section 61.21(j), page 48299.

Friable Asbestos Material - Any material that contains more than 1 percent asbestos by weight and that can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure. Section 61.21(k), page 48299.

Renovation - The removing or stripping of friable asbestos material used to insulate or fireproof any pipe, duct, boiler, tank, reactor, turbine, furnace, or structural member. Section 61.21(m), page 48299.

Planned Renovation - A renovation operation, or a number of such operations, in which the amount of friable asbestos material that will be removed or stripped within a given period of time can be predicted. Operations that are individually non-scheduled are included, provided a number of such operations can be predicted to occur during a given period of time. Section 61.21(n), page 48299.

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Emergency Renovation - A renovation operation that results from a sudden, unexpected event, and is not a planned renovation. Section 61.21(o), page 48299.

Demolition

Under the definition of "demolition" as set up for the standard, we do not expect to be performing any work of this nature at the Baton Rouge Plant. However, should the situation arise the same basic procedure as that for renovation is to be followed. Written notice is required 10 days prior to commencement of demolition.

Renovation

The following requirements shall apply to any owner or operator of a renovation operation who intends to renovate any institutional, commercial, or industrial building, structure, facility, installation, or portion thereof where more than 260 feet of pipe insulated or fireproofed with friable asbestos material are stripped or removed, or more than 160 square feet of friable asbestos material used to insulate or fireproof any duct, boiler, tank, reactor, turbine, furnace, or structural member are stripped or removed. Section 61.22(d), page 48299.

1. Written notice of intention to renovate shall be provided to the Administrator by the owner or operator of the renovation operation. Such notice shall be postmarked or delivered as early as possible prior to commencement of renovation. Section 61.22(d)(2), page 48299, 48300.
2. Written notification of intention to renovate shall include all information outlined in Attachment I. Section 61.22(d)(2), page 48300.
3. For planned renovating operations involving individually non-scheduled operations, the additive amount of friable asbestos material that can be predicted will be removed or stripped at a source over a maximum period of time for which a prediction can be made. The period shall not be less than 30 days and not longer than 1 year. Section 61.22(d)(3)(i)(A), page 48300.

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As noted above these requirements shall apply to any renovation where more than 260 feet of pipe is stripped or more than 160 square feet of area covered with friable asbestos material is stripped. The requirement for 260 feet of pipe and above is not considered to be a probable occurrence since most jobs would involve less than this amount. However, the 160 square feet of area would apply in a number of cases. Examples include:

1. TEL or TML Stills
2. Alloy Manufacturing Pots
3. Alloy Distribution Pots
4. Furnace Lead Pots

Handling Asbestos Waste

The following procedures shall be followed when handling friable asbestos waste material:

1. Friable asbestos materials used to insulate or fireproof pipes, ducts, boilers, tanks, reactors, turbines, furnaces or structural members shall be adequately wetted during stripping. Section 61.22(d)(4)(ii), page 48300.
2. Such materials that have been stripped or removed more than 50 feet above ground level shall be transported to the ground via dust-tight chutes or containers. Section 61.22(d)(4)(v), page 48300.
3. Local exhaust ventilation and collection systems may be used instead of the wetting procedure. Section 61.22(d)(4)(vii), page 48300.
4. After wetting, all asbestos-containing waste material shall be sealed into leak-tight containers while wet and such containers shall be deposited at waste disposal sites which are operated in accordance with the standard for waste disposal. Section 61.22(j)(3)(i)(B), page 48301.
5. Containers with waste friable asbestos materials shall be labeled with a warning label that states:

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CAUTION
Contains Asbestos
Avoid Opening or Breaking Container
Breathing Asbestos is Hazardous
To Your Health

Section 61.22(j)(3)(i)(C), page 48301

Our present method of handling asbestos waste complies with the requirements with the exception of the labeling procedure. Asbestos material is wetted when removed, placed in plastic bags and sealed, and deposited for disposal. The only change needed would be to label the bags which could be accomplished through the use of printed tags.

Waste Disposal Site

We are presently investigating all possible sources of an existing waste disposal site which meets the requirements for asbestos disposal. If none are found a site shall be developed on property belonging to Ethyl Corporation which will meet the standard as detailed in Section 61.25, page 48302.

Worker Safety

All employees working with asbestos material shall be provided with respiratory protection. The wetting procedure shall be strickly adhered to in order to control any asbestos dust hazards. Page 48295.

Insulating

Molded insulating materials which are friable and wet-applied insulating materials which are friable after drying, installed after the effective date of these regulations, shall contain no commercial asbestos. Section 61.22(i), page 48301.

We are in compliance with this ruling at the Baton Rouge Plant. No molded asbestos containing insulations are stocked; substitute insulation are in use.

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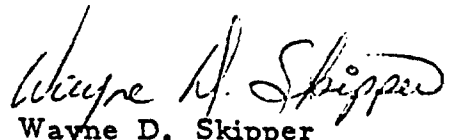
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Recommendations

The following changes in our present procedure should be made in order to assure compliance with the EPA standard:

1. Submit a notice of intention to renovate 10 days prior to renovation.
2. Utilize a form such as shown on Attachment I to assure all needed information is included.
3. Label all containers of waste asbestos materials.
4. Proper disposal at approved waste disposal sites.
5. Develop our own disposal site if necessary.
6. Make a specific written procedure covering the Baton Rouge Plant suitable for use by field supervision and the appropriate wage roll employees.
7. Make a list of vessels, towers, etc. which are insulated with asbestos and have more than 160 square feet of surface area.


Wayne D. Skipper

WDS:jct

Attachment

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ATTACHMENT I
Section 61.22(d)(2), Page 48299, 48300
NOTICE OF INTENTION TO RENOVATE

DATE:

Name of Firm:

Address of Firm:

Description of Facility
to be Renovated:

Age of Facility:

Size of Facility:

Use of Facility:

Approximate Amount of
Asbestos to be Removed:

Location of Facility:

Scheduled Starting and
Completion Dates:

Nature of Renovation
and Methods:

Procedure for Handling
Asbestos Waste Material:

Name and Address of
Disposal Site:

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