December 4, 1974

Emission Standards and Engineering Division
Environmental Protection Agency
Research Triangle Park, N. C. 27711

Attention Mr. Don R. Goodwin

Re: Proposed Amendments to National Emission Standards for Hazardous Air Pollutants - Asbestos and Mercury 40 CFR Part 61, Federal Register, Vol. 39, No. 208 - Friday, October 25, 1974

Dear Mr. Goodwin:

Aluminum Company of America welcomes the opportunity to comment on the proposed amendments to the National Emission Standards for Hazardous Air Pollutants - Asbestos and Mercury which were published in Vol. 39, No. 208, Friday, October 25, 1974, Federal Register. Alcoa is in agreement with the intent of the regulation which is to limit the discharge of hazardous materials in significant quantities. However, I feel that these regulations should be clarified to make certain that everyone who utilizes the document for enforcement purposes understands completely the sources to which the standard is to be applied.

Aluminum Company of America operates a number of high temperature kilns, electrolytic reduction cells and furnaces in which we have utilized lining materials which contain asbestos. In 1973, Alcoa embarked upon a program to eliminate asbestos from these linings and have found substitutes which are acceptable. However, because the average life of many of these production units is in excess of four years, there are still units in our system which have asbestos materials in the linings. These units are monitored carefully and when a lining failure is indicated by changes in the operating parameters of the units, they are immediately shut down, allowed to cool for a sufficient time and relined. In most cases, this process takes only 48 to 72 hours and the time when the relining will be necessary cannot be predicted. Therefore, a ten day notification period would cause significant delay and severely restrict our production capabilities during the next three year period.

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These units are processed in enclosed areas and precautions are taken to minimize dusting. Wetting practices, proper ventilation and special digging procedures are utilized. There are no visible emissions when these operations are conducted. Since these operations do not result in the removal of load supporting structure members and no stripping of materials on the outsides of these units is conducted, it appears to me that the regulation was not designed to be applied to our type of operations. However, very literal interpretations of the regulation could result in the application of the requirements to our small relining operations. Therefore, I request that you clarify this point in the proposed rules to make it clear that relining of small furnaces, electrolytic cells and kilns which occur as a part of the routine operation of these facilities is not covered by the requirement for ten day notification, if the relining is to occur in an enclosed area with no visible emissions. In addition, I request that you modify the requirements for burial of asbestos-containing wastes so that only those wastes which contain more than 5% by weight asbestos must be handled in the manner prescribed in the proposed rules.

As I indicated earlier, Aluminum Company of America has been successful in finding substitute insulation materials for their kilns, furnaces and electrolytic cells and will not have asbestos-containing linings in our system after 1978. However, until that time, we do request that you make every effort to develop regulations which will not severely curtail our production capability since we feel that our present program for minimizing asbestos exposure and the discharge of asbestos-containing materials is quite successful.

Thank you for the opportunity to make these comments. If you have questions, please feel free to direct them to me.

Sincerely,

Miles O. Colwell, M.D.
Vice President - Health and Environment

MOC:mh

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