

August 23, 1971

DOCUMENT REVIEW COMMITTEE MEETING
NATIONAL EMISSION STANDARDS FOR ASBESTOS
SUMMARY REPORT

At the conclusion of the meeting, Mr. Dale Slaughter, who is chief of the National Emissions Standards Development Section in EPA, stated that the standards would be nearly completely rewritten using the written and verbal input from the attendees at the meeting as the basis for the rewrite. Additional input in writing would be welcome, but must be received by Mr. Slaughter not later than September 1st, as the document must be ready for top level EPA review by September 7th.

I believe that certain of our suggestions will be incorporated in the new standards.

My comments on the discussion regarding specific sections are as follows:

1.1 Asbestos Mining

AIA comments included as written. *6-1-71*

1.2. Asbestos Milling

1.2.1 Ore Dumping

1.2.2 Ore Dumps

AIA comments as written.

1.2.3 Conveyors

It is doubtful that our suggestions concerning external conveyors will be accepted. *NE ORE TAILINGS DUMP*

1.2.7 Product Packaging

There was very little discussion on product packaging and no discussion on product labeling.

1.2.8 Tailings Dumps

AIA comments as written.

During the discussion on asbestos mining and milling, Dr. Selikoff commented that the emissions from these mining and milling operations up to the point of ore drying presented no significant health hazard to the general public. It was unanimously agreed that the two major sources of airborne asbestos were the dryers and the tailings dumps.

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The discussion then passed on to asbestos processing. There was no comment concerning our proposal to categorize asbestos fiber using products as (1) locked-in; (2) unlocked; (3) asbestos textiles; except that after the meeting in a private discussion, Mr. Slaughter mentioned he liked this procedure and would take it under advisement.

1.3 Asbestos Processing

1.3.1 Manufacturing

There was a lengthy discussion back and forth between members of the committee and Mr. Slaughter concerning fabric bag filters and how they should be specified in the standards. After the discussion, Mr. Slaughter agreed this section needed further intensive study and rewriting.

1.3.3 Product Shipment

There was very little discussion on this section.

1.4 Product Use

During the discussion on product use, Dr. Selikoff made numerous comments. These comments are summarized in the attached copy of a letter to Dr. George W. Wright from E. M. Fenner.

There were no conclusions reached as to how the standards for product use would finally be written.

1.5 Waste Disposal and Demolition

There was very little discussion on the subject of waste disposal. There was a short discussion on demolition with no conclusions reached.

1.6 Specific prohibitions

There was considerable discussion on the AIA comments which exempted sprayed asbestos insulation from the specific prohibition section. Dr. Selikoff commented that it is probably O.K. to use asbestos for insulation purposes, if proper application precautions are observed. However, he believes it should be banned in any fireproofing application since it cannot be controlled readily. He also questioned the use of asbestos containing sprays for acoustical treatment because of "fallout" in future years.

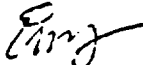
2.1 Equipment Specifications

2.2 Equipment Maintenance

There was considerable discussion on these sections, with no conclusions being reached, other than they had to be rewritten.

There were a number of interesting points raised by members of the committee including:

- (1) Do the standards as written meet the requirements of the Clean Air Act of 1970? The Act states that emission standards shall be set for hazardous materials. This document contains no such standards but is written based on best available control techniques. One committee member suggested that Dr. Selikoff's "no visible emissions" might satisfy the requirements of the Act.
- (2) The legality of the banning and labeling provisions of the standards was questioned. Certain members of the committee believe that if these sections were challenged in court, they could be overthrown.


E. M. Fenner

EMF/ems

ATTENDEES
DOCUMENT REVIEW MEETING
NATIONAL EMISSION STANDARDS FOR ASBESTOS

Environmental Protection Agency

Donald Walters, Meeting Chairman
Dale Slaughter, Assistant Chairman
C. Russell Horres
Norman Georgieff
Dr. James Crowder

Bruce Hogarth, Executive Secretary

National Air Pollution Control Techniques Advisory Committee

Paynal W. Andrews, Jr.
Robert L. Chass
Charles Copley
Arthur R. Dammkoehler
G. P. Ferreri
Charles M. Heinen
William A. Munroe

William A. Munroe
V. D. Parton
Dr. Robert W. Scott
William M. Smith
Dr. R. S. Sholtes
Dr. A. J. Teller (a)
Arthur von Frank
Benjamin F. Wake

Invited Guests

Industry

AIA/NA

Edmund M. Fenner
Isaac Weaver
Frank Zimmerman

Medical

Mt. Sinai School of Medicine

Dr. Irving J. Selikoff
William B. Nicholson
Arthur M. Langer

Asbestos Mining

Dr. D. W. Jaquays (a)

- Note:
1. (a) indicates absent
 2. The affiliations of the majority of the Advisory Committee are noted in Attachment 1.
 3. In addition to the above, approximately 6 people were present from regional offices of the EPA and from HEW.

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