would have to sell its short fibers. We do not know how great the demand is. Nor do we know the percentage of collected fibers which can be recycled under optimal economic conditions. Johns-Manville in Waukegan claims to re-use "most" of the filtered short fibers. But it manufactures transite, brake linings, sheet packing and gaskets, which facilitates and makes cheaper the use of captured fibers in transite production.

Generally, the asbestos collected through the filters or swept up is disposed into plastic bags. A special disposal procedure is followed by some manufacturers of asbestos paper products. Water is used in the production, which picks up asbestos fibers and is then drained off into settling ponds. The heavy material settles out and the water is then channeled back to the plant for re-use. The sludge is at the bottom of the pond and is shovelled up and dumped. The material is not buried.

We do not know if any factory directly or eventually discharges this water into natural water flows or sewage systems, which could pose a considerable hazard. The Johns-Manville Waukegan plant uses a pond system, but the water is recycled.

While our regulations are enacted in the context of other governmental controls of asbestos, they necessarily go beyond these regulations to deal with significant emission sources not covered elsewhere.

The Federal Environmental Protection Agency proposed asbestos standards on December 7, 1971, under its authority to regulate hazardous air pollutants (40 CFR, Part 6). All emission sources which exist in Illinois and which are proposed for coverage by the Federal Environmental Protection Agency are covered by today's regulation. Also, our regulation covers waste disposal and water pollution; imposes procedural safeguards for construction and demolition; and sets a numerical emission standard in addition to a "no visible emission" standard for manufacturing emissions beyond the plant.

The Illinois Department of Labor adopted the recommended safety standard of the American Conference of Governmental-Industrial Hygienists for "in-plant" air. The regulation we adopt today does not control the levels of asbestos inside a plant, largely an occupational hazard beyond our jurisdiction. Insofar as this Board's regulation affects what transpires inside a plant or on a construction site, the impact is merely incidental to the relationship between certain "in-plant" activity and a significant hazard of air pollution beyond the site of such activity.

For example, Sec. 201(c) requires that facilities be provided at the work site to prevent the removal of visible amounts of asbestos from the site on the clothing of employees. The evidence shows that human transport of asbestos fiber is a health hazard to those coming into contact with asbestos workers beyond the confines of the job.