



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management
200 Pine Street
Williamsport, Pennsylvania 17701-6510

November 21, 1986

RECEIVED

Change In Asbestos Conditions
Lycoming County Landfill - ID# 100963
Brady Township, Lycoming County

NOV 25 1986

SOLID WASTE DEPT.

Mr. Wayne Alexander, Manager
Lycoming County Solid Waste Authority
R. D. 2, Box 587
Montgomery, PA 17752

Dear Mr. Alexander:

As you probably are aware, we are working on our asbestos procedures. I know that Wayne Billings spoke with Bonnie regarding this. This letter is written with the intent of making all of the landfills in our region consistent in terms of their asbestos handling methods. Therefore, the following changes in procedure are being made part of your generic asbestos approval:

1. Generators are to submit their letters of request directly to you. You, in turn, are to request permission by the Department to accept the waste. We have provided a sample letter which shows the format we would find simplest to process. As we had explained to Bonnie, our old system required monitoring multiple generators when we more appropriately should be monitoring the landfill.
2. Prior to disposal, the generator must complete and notarize a "Certification of the Generator" form (see enclosure). Essentially this form stipulates that the generator is aware of the conditions of the permit and this letter. This certification is to be kept on file by you and to be available to the Department upon request.
3. The asbestos must be wetted prior to removal and bagged and sealed as follows:

The Department approves the use of multiple leakproof plastic bags with a total thickness of 12 mils and in this case, would not require the bags to be sealed in drums. Another option would be to place the asbestos in multiple leakproof plastic bags with a total thickness of 6 mils and seal them in steel or heavy duty fiberboard drums, as leaktight containers.
4. Approved respirators are required to be worn by all personnel working with asbestos during the disposal operation.

Mr. Wayne Alexander, Manager
Lycoming County Solid Waste Authority
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5. The Department requests that your landfill engineer submit to us a letter specifying reasonable daily volume limits that you feel can be managed effectively. These volume limits will then be assessed for approval or rejection by the Department.

If you have any questions, please call me at (717) 327-3598.

Sincerely,



Richard L. Bittle
Regional Solid Waste Manager

RLB/bls

Enclosure

cc: Lycoming County Commissioners



Fact Sheet

Commonwealth of Pennsylvania • Department of Environmental Protection

UNDERSTANDING ASBESTOS

WHAT IS ASBESTOS?

Asbestos is a generic term used to describe a variety of natural mineral fibers. From the early 1930s until the 1970s, manufacturers used asbestos to strengthen products and to provide heat insulation and fire resistance. Asbestos also resists corrosion and is a poor conductor of electricity. Because few products contained all of these properties, asbestos was widely used in the construction of homes, schools and other buildings.

HOW CAN I BE EXPOSED TO ASBESTOS?

Most people are exposed to small amounts of asbestos in their daily lives. However, if materials containing asbestos are disturbed – for example sawed, scraped, or sanded into a powder – fibers are more likely to become airborne and inhaled into the lungs. Fibers that get into water or food also may be ingested, although they usually pass through the digestion system and do not cause a problem.

HOW CAN ASBESTOS AFFECT MY HEALTH?

Studies of people who were exposed to asbestos for a long time in factories and shipyards show that breathing high levels of asbestos fibers can lead to an increased risk of lung cancer; mesothelioma, a rare but fatal form of cancer in the thin membrane lining of the chest and abdominal cavities; and asbestosis, a serious non-cancerous respiratory disease in which asbestos fibers aggravate and scar lung tissue. The risk of health problems also increases for smokers.

WHERE CAN ASBESTOS BE FOUND?

Until the 1970s, many types of building products and insulation materials used in homes contained asbestos, although most products made today do not. The only way to get a positive identification of asbestos is to analyze a sample using a special type of microscope.

If you discover asbestos in your home, it does not pose a serious problem as long as it remains in good condition. Usually, it is best to leave asbestos material alone. Over time, it may become damaged, either from being disturbed or from age, at which point it is more likely to become airborne and a health hazard.

Common products in your home that might contain asbestos include:

- **Insulation around steam pipes, furnaces and air ducts** – Asbestos fibers may be released when insulation is damaged or removed improperly.
- **Vinyl floor covering** – Vinyl tiles, the backing on vinyl sheet flooring and adhesives used for installing floor covering may become a problem if sanded or scraped during removal.
- **Roof shingles and siding** – These products, if they contain asbestos, are not likely to release asbestos fibers unless sawed or drilled.
- **Soundproofing or decorative material** – If sprayed on walls and ceilings, material that is loose, crumbly or water-damaged may release fibers. So could material that is sanded, drilled or scraped.
- Other products that may contain asbestos:
 - Cement sheet, millboard;
 - Door gaskets in furnaces;
 - Patching and joint compounds;
 - Textured paints;
 - Artificial ashes and embers for gas fired fireplaces;
 - Fireproof gloves, stove-top pads, ironing board covers and hairdryers; and
 - Automobile brake pads and linings, clutch facings and gaskets.

HOW DOES PENNSYLVANIA REGULATE ASBESTOS?

Because asbestos in certain forms can cause serious health problems, the Pennsylvania Department of Environmental Protection (DEP) regulates the removal, collection, transportation and disposal of asbestos materials. DEP's Bureau of Air Quality has adopted and enforces the federal asbestos regulations (40 CFR Part 61 Subpart M). DEP does not regulate the removal of asbestos from private homes. Contact your municipality to find out about local regulations.

Pennsylvania requires certifications for the following asbestos occupations: contractor, inspector, management planner, project designer, supervisor and worker. Call the State Department of Labor and Industry at (717) 772-3396 for more information about the Asbestos Occupations Accreditation and Certification Act of 1990 (Acts 194 and 161).

ASBESTOS IN SCHOOLS

All nonprofit private and public schools with children in grades one through 12 are required to inspect their buildings for asbestos, develop a plan for controlling the release of asbestos fibers and maintain asbestos that is in good condition. Questions should be directed to DEP at (717) 787-9257.

ENFORCEMENT/COMPLAINTS

If you suspect improper asbestos removal or repair projects, contact your regional DEP office listed below.

ATTENTION ASBESTOS CONTRACTORS

Asbestos contractors in Pennsylvania must abide by the U.S. Environmental Protection Agency (EPA) Asbestos NESHAP (National Emission Standards for Hazardous Air Pollutants) regulations. Questions about NESHAP regulations may be referred to any DEP regional Air Quality program office listed below.

The Pennsylvania Asbestos Accreditation and Certification Act (Act 194 and Act 161) requires contractors to be certified and licensed by the Department of Labor and Industry to perform demolition and renovation projects involving asbestos. For more detailed information about these requirements, call (717) 772-3396.

Additional regulations exist for demolition and renovation of any building containing ACM in Philadelphia and Allegheny counties. In Philadelphia County, call (215) 685-7576. In Allegheny County, call (412) 578-8115. It is important to contact either office if your project is located in either of these counties.

HOW CAN I GET MORE INFORMATION?

1. Call the DEP Bureau of Air Quality central office in Harrisburg (717) 787-9257. On-line information about asbestos can be found at www.dep.pa.state.us (Choose Subjects/Air Quality).
2. Call the Air Quality program at the DEP regional office nearest you:
 - Southeast (Conshohocken), (610) 832-6241
 - Southcentral (Harrisburg), (717) 705-4702
 - Northwest (Meadville), (814) 332-6940
 - Southwest (Pittsburgh), (412) 442-4194
 - Northeast (Wilkes-Barre), (570) 826-2511
 - Northcentral (Williamsport), (570) 327-3648
3. If you live in Allegheny County, call (412) 578-8133 for information and special regulations.
4. If you live in Philadelphia County, call (215) 685-7576 for information and special regulations.
5. Contact your municipality to find out if there are any local regulations.
6. The EPA Asbestos Ombudsman, (800) 368-5888, has an asbestos information package available to the public.
7. The U.S. Consumer Product Safety Commission, (800) 638-2772, will send information about asbestos upon request.
8. Pennsylvania's Department of Labor and Industry, (717) 772-3396, has information about worker certification.

The American Lung Association, the U.S. Consumer Product Safety Commission and EPA provided much of the information included in this fact sheet.

This fact sheet and related environmental information are available electronically via Internet. For more information, visit us through the Pennsylvania homepage at <http://www.state.pa.us> or visit DEP directly at <http://www.dep.state.pa.us> (choose Subjects/Air Quality).



www.GreenWorksChannel.org - A web space dedicated to helping you learn how to protect and improve the environment. The site features the largest collection of environmental videos available on the Internet and is produced by the nonprofit Environmental Fund for Pennsylvania, with financial support from the Pennsylvania Department of Environmental Protection, 800 334-3190.



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MAR 28 1991

SOLID WASTE DEPT.

ASBESTOS FACT SHEET

This information is being provided in order to clarify the Department of Environmental Resources' regulations concerning the removal, collection, transportation and disposal of asbestos-containing material.

There are two classifications of asbestos: friable and non-friable. Friable asbestos can be easily crumbled with hand pressure while non-friable cannot.

The friable asbestos-containing material (ACM) is regulated in Pennsylvania under the National Emission Standard For Hazardous Air Pollutants (NESHAPS). If more than 260 linear feet or 160 square feet of friable ACM is to be removed from a building, other than a private residence, during renovations, notification of the removal must be made to the appropriate regional office of the Bureau of Air Quality Control and the Environmental Protection Agency prior to the work. In addition, the removal must comply with the NESHAPS and OSHA regulations (such as wearing NIOSH-approved asbestos respirators) and the waste must be properly bagged and labeled. The waste must then go to a landfill approved to accept friable ACM and the transportation of the friable ACM must be handled correctly. Given the health risks associated with friable asbestos, it is suggested that all individuals be referred to the Bureau of Air Quality Control for information on safe removal techniques.

Prior to the demolition of any building, except a private residence, notification must be made to the appropriate regional office of DER as well as the EPA. Demolition should not commence until the project has been reviewed by the department. If you suspect that asbestos in any form is present in or on the structure to be demolished, contact the department immediately for assistance.

Non-friable ACM normally does not require notification prior to its removal. However, if during the removal the ACM is rendered friable, the NESHAPS requirements, including prior notification, immediately take effect. Since prior notification in this situation would be impossible, the remover would be in violation of the regulations. If members of the air quality staff became aware of the violation, enforcement action could follow. Therefore, it is recommended that notification be made when removing non-friable ACM. In addition, the removal should not render the material friable otherwise the remover will have to comply with all of the requirements of the NESHAPS regulation. The non-friable ACM should be wrapped or covered in plastic before it is transported to a permitted disposal site. Again, given the health risks associated with asbestos, and the likelihood of fugitive air emissions with improper removal, it is recommended that all individuals contact the BAQC for information on proper removal and packaging.

Forms and information for work done in Cameron, Centre, Clearfield, Clinton and Potter Counties may be obtained from DER's Hawk Run Office by calling (814) 342-0410. Forms and information for work done in Bradford, Columbia, Lycoming, Montour, Northumberland, Snyder, Sullivan, Tioga and Union Counties may be obtained from the Williamsport Regional Office at (717) 327-3641.

Remember, if you suspect that asbestos is present, contact the Bureau of Air Quality Control before you proceed.

Federal Register

**Tuesday
November 20, 1990**

Part III

Environmental Protection Agency

40 CFR Part 61

**National Emission Standards for
Hazardous Air Pollutants; Asbestos
NESHAP Revision; Final Rule**

**ENVIRONMENTAL PROTECTION
AGENCY**

40 CFR Part 61

[AD-FRL-3814-7]

RIN 2060-AC57

**National Emission Standards for
Hazardous Air Pollutants; Asbestos
NESHAP Revision**

AGENCY: Environmental Protection Agency.

ACTION: Final rule.

SUMMARY: This Federal Register notice promulgates rules under section 112 of the Clean Air Act (CAA) for asbestos emissions and is based on the Administrator's determination that asbestos presents a significant risk to human health as a result of air emissions from one or more source categories and is therefore a hazardous air pollutant (see 36 FR 3031, March 31, 1971). The purpose of the revisions promulgated today is to enhance enforcement and promote compliance with the current standard without altering the stringency of existing controls. On January 10, 1989 the Environmental Protection Agency (EPA or the Agency) proposed amendments to the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP) that would require control device and fugitive emission monitoring, recordkeeping, and reporting for asbestos milling, manufacturing, and fabricating operations. For planned demolitions and renovations, revisions to the notification requirements were proposed, and safety was added as a reason for exemption from the use of wet removal methods. Recordkeeping requirements were proposed for asbestos waste disposal. Clarifying revisions to several definitions and provisions were also proposed. Numerous comments were received on the proposed revisions, and today's notice responds to those comments, and incorporates changes as a result of those comments.

EFFECTIVE DATE: November 20, 1990. Under section 307(b)(1) of the Clean Air Act, judicial review of the actions taken by this notice is available only by filing a petition for review in the United States Court of Appeals for the District of Columbia Circuit within 60 Days of today's publication of these rules. Under section 307(b)(2) of the Clean Air Act, the requirements that are the subject of today's notice may not be challenged later in civil or criminal proceedings brought by EPA to enforce these requirements.

ADDRESSES: Background information document. The background information document (BID) for the promulgated revisions may be obtained from the U.S. EPA Library (MD-35), Research Triangle Park, North Carolina, 27711, telephone no. (919) 541-2777. Please refer to "Background Information for Promulgated Asbestos NESHAP Revisions," (Publication No. EPA 450/3-90/017). The BID contains a summary of all the public comments made on the proposed revisions and the Administrator's responses to the comments.

Dockets. Docket No. A-88-28 contains supporting information used in developing the final revisions to the asbestos NESHAP and is available for public inspection and copying between 8:30 a.m. and 3:30 p.m., Monday through Friday, at EPA's Air Docket (LE-131), Room M-1500, 1st Floor, Waterside Mall, 401 M Street, SW., Washington, DC 20460. A reasonable fee may be charged for copying.

FOR FURTHER INFORMATION CONTACT: For further information and official interpretations of applicability, compliance requirements, and reporting aspects of the promulgated revisions, contact the appropriate Regional, State or local office contact as listed in 40 CFR 61.04. For further information on the background of the regulatory decisions in the promulgated revisions, contact Mr. Sims Roy, Standards Development Branch, Emission Standards Division (MD-13), U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, telephone no. (919) 541-5263. For further information on the technical aspects of the promulgated revisions, contact Mr. Ronald Myers, Industrial Studies Branch, U.S. Environmental Protection Agency, Research Triangle Park, North Carolina 27711, telephone no. (919) 541-5407.

SUPPLEMENTARY INFORMATION:

I. The Standards

The promulgated revisions implement section 112 of the Clean Air Act (CAA) and are based on the Administrator's determination that asbestos presents a significant risk to human health as a result of air emissions from one or more source categories and is therefore a hazardous air pollutant (see 36 FR 3031 (March 31, 1971)). The revisions promulgated today amend the asbestos NESHAP to enhance enforcement and promote compliance with the current standard without altering the stringency of existing controls.

Milling, Manufacturing and Fabricating

The revisions to the standards require asbestos milling, manufacturing and fabricating sources to conduct daily monitoring for visible emissions. While the absence of visible emissions does not mean there are no asbestos fibers being emitted, the presence of visible emissions does indicate a serious control device malfunction. Because visible emissions monitoring is intended primarily to detect serious control device malfunctions, weekly inspections of air cleaning devices are also required. In addition, the revisions promulgated require these sources to maintain records of the results of visible emissions monitoring and control device inspections, and to submit quarterly a copy of visible emissions monitoring records of visible emissions occurred during the quarter. The revision requires owners or operators who install fabric filters after the effective date of this rule to provide for easy inspection of the bags.

Demolition and Renovation

The revisions require the owner or operator of a demolition or renovation activity to provide additional information in notifications, and to renotify EPA if the start date of a demolition or renovation changes from that given in the original notification. Another revision requires owners or operators to give a 10-day notice for renovations. A person trained in the provisions of this rule and the means of complying with them is required to be on site when asbestos-containing material (ACM) is stripped, removed or disturbed. When wetting is suspended due to freezing temperatures, owners or operators are required to measure air temperature in the work area three times during the workday and keep daily temperature records for at least 2 years. The revisions also clarify EPA's position regarding the handling and treatment of nonfriable asbestos materials such as resilient floor covering, including vinyl asbestos floor tile, and roofing material.

Waste Disposal

The revisions require vehicles used to transport asbestos-containing waste material to be marked with the sign prescribed by the Occupational Safety and Health Administration during loading and unloading to warn people of the presence of asbestos. For all asbestos-containing waste material transported offsite, the revisions require that a waste shipment record (WSR) be provided to the waste site owner or operator at the time that the waste is

delivered to the waste disposal site. If a copy of the WSR signed by the waste site owner or operator is not received within 35 days of the date the waste was accepted by the initial transporter, the revisions direct the waste generator to contact the transporter and/or disposal site owner or operator to determine the status of the waste shipment. The revisions further direct the waste generator to submit an exception report to EPA if a signed copy of the WSR is not received within 45 days of the date the waste was accepted by the initial transporter. Labels are required on containers of asbestos-containing waste material from manufacturing, fabricating, demolition and renovation activities indicating the name of the waste generator and the location where the waste was generated.

Inactive Waste Disposal Sites

The revisions require the owner or operator of an inactive waste disposal site for a milling, manufacturing or fabricating operation to notify the Administrator in writing prior to excavating or otherwise disturbing asbestos-containing waste material that has been deposited at the disposal site and to record on the deed to the property a notation that will inform future purchasers of the property that it has been used for the disposal of asbestos-containing waste material and that the survey plot and record of the location and quantity of such waste material are on file with the Administrator.

Active Waste Disposal Sites

The revisions require the owner or operator of an active waste disposal site to maintain WSRs and report in writing the receipt of a significant amount of improperly enclosed or uncovered waste to EPA by the following working day. The owner or operator of an active waste disposal site is required by the revisions promulgated today to send a signed copy of the WSR back to the waste generator no more than 30 days after receipt of the waste, to attempt to reconcile any discrepancy between the quantity given on the WSR and the quantity actually received and, failing to do so within 15 days after receiving the waste, to report the discrepancy and any attempts to reconcile it to the Administrator. The revisions promulgated today also require the owner or operator of an active disposal site to maintain records of the location, depth and area, and volume of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area. Upon closure, the owner or operator must comply with all the

rules promulgated for inactive waste disposal sites. A revision requires the owner or operator of an active waste disposal site to notify the Administrator in writing prior to excavating or otherwise disturbing asbestos-containing waste material that has been deposited at the disposal site and covered.

Asbestos Conversion Processes

A section is promulgated to clarify that operations that convert asbestos-containing waste material into nonasbestos (asbestos-free) material are covered by the NESHAP. The provisions promulgated require the owner or operator of such an operation to obtain prior written approval of the Administrator to construct the facility, and conduct a start-up performance test using specified analytical methods and procedures. Requirements for continuous monitoring during and after the initial 90 days of operation, emissions control, maintenance of records of test results on site, and reports to the Administrator are also promulgated today.

II. Environmental, Energy and Economic Impacts

The environmental, energy, and economic impacts of the revisions for demolition and renovation, including waste disposal, were estimated from two baselines. One is full compliance with the NESHAP, and the other is current use of engineering controls and work practices. Enforcement experience indicates that many asbestos removal operations related to demolition and the subsequent waste disposal operations are performed out of compliance with the NESHAP. The lack of compliance with the NESHAP removal provisions leads to the improper disposal of some waste, especially demolition waste, with the result that emissions from the disposal of demolition waste greatly exceed other emissions, including process emissions from milling, manufacturing, and fabricating. Liability and other considerations generally lead the owners of buildings being renovated to follow or even exceed the requirements of the NESHAP. Thus, the appropriate baseline for demolition is current use of work practices rather than full compliance. At asbestos milling, manufacturing, and fabricating facilities, the required air pollution control devices are generally in place. Thus, for milling, manufacturing, and fabricating, full compliance with the NESHAP, including the waste disposal requirements, is assumed for the baseline.

Few emission measurement data exist for asbestos sources. Thus, emissions were estimated using engineering methods and assumptions, which resulted in substantial uncertainty. A detailed description of the approaches used to estimate emissions is found in "Asbestos Emission Estimates for Milling, Manufacturing, Fabricating, Demolition, Renovation, and Waste Disposal," which is contained in Docket A-88-28. Estimated process emissions under the current NESHAP at full compliance for milling, manufacturing, and fabricating are approximately 7,400 kg/yr. Based on current practices, estimated emissions from the removal activities associated with demolition and renovation are approximately 1,300 kg/yr and estimated waste disposal emissions from all sources are 227,000 kg/yr. If demolition and renovation were in full compliance, estimated emissions from asbestos removal activities associated with demolition and renovation would be about 700 kg/yr. Estimated emissions from waste disposal, assuming full compliance with the NESHAP by all sources, would be about 600 kg/yr.

The costs of the revisions are expected to be small relative to normal operating costs for these industries. The revisions are intended to promote compliance and enhance enforceability. Small additional costs are associated with the recordkeeping and reporting requirements of the revisions. Economic impacts of the promulgated alternatives are expected to be minimal. Adverse impacts of the promulgated revisions on water, noise, and energy were considered. Due to the nature of the revisions, no significant adverse impacts on water, noise, or energy are anticipated.

III. Public Participation

The revisions were proposed and published in the Federal Register on January 10, 1989 (54 FR 912). The preamble to the proposed standards revisions noted the availability in the docket of the supporting information used in developing the proposed revisions. Public comments were solicited at the time of proposal.

To provide interested persons the opportunity for oral presentation of data, views, or arguments concerning the proposed revisions, a public hearing was held on February 8, 1989, at Research Triangle Park, North Carolina. The hearing was open to the public, and 6 persons presented comments.

The public comment period specified in the Federal Register notice was from January 10, 1989 to March 7, 1989. One