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OPERATIONS ANALYSIS DIVISION

MEMORANDUM

July 30, 1982

TO: John Copeland, Lead Engineer
FROM: Mike Laney, Project Leader
SUBJECT: Trip Report - Site Visit to Air Pollution Control Division, Wayne County Health Department, Detroit, Michigan, April 1, 1982

I. Purpose

As part of EPA Project No. 80/41 to review and revise the National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos, site visits are being made to observe work practices and control systems used to reduce asbestos emissions.

II. Place and Date

Air Pollution Control Division
Wayne County Health Department
1211 E. Jefferson Ave.
Detroit, Michigan 48207
(313) 224-4650

III. Attendees

- A. Wayne County Health Dept.
 - Mr. Allen Buch
 - Mr. Paul Fekety
 - Mr. Mike Mailer
- B. U.S. Environmental Protection Agency
 - Gil Wood, Industrial Studies Branch, Emission Standards and Engineering Division
- C. Research Triangle Institute
 - Michael Laney, Operations Analysis Division

IV. Discussion

Wayne County Health Department has responsibility for NESHAP enforcement in Wayne County. They receive no (or few) notices of demolition or renovation. They regularly review the city's building permits, which include demolition/renovation jobs, for jobs that possibly involve asbestos.

They typically do not require wetting unless the work gets visibly dusty. When they require it, a high pressure water stream has been used, or water is sprayed into the bag of asbestos waste. In their opinion, they are doing good just to get the contractors to strip the asbestos and bag it for disposal before wrecking the structure. It was stated that the contractors usually follow their suggestions, however, they must constantly observe contractors. Contractors can obtain building permits at the time they apply.

Paul Fekety accompanied Gil Wood and Mike Laney to the Reserve Terminal Warehouse on Cannon Ave. Now owned by the city, the one-story warehouse was formerly owned by GM and Chrysler. The city is going to have it demolished and attempt to develop the land into a small business industrial park in an attempt to attract business back into Detroit. Asbestos insulation was found in the form of premolded pipe insulation and corrugated paper pipe insulation. The insulation had been stripped and dropped to the floor where it was being shoveled up and put into single plastic bags by two workers (Fekety told them to double bag it). Handwritten warning labels were being used on the bags. Much of the pipe insulation was covered with a canvas cloth, and some with a finer cloth. The premolded insulation was very light, and friable, the paper not so friable as the premolded material. Much of the insulation on the floor was wet, evidently from rain leaking through the building's roof; some was dry. In a separate room adjacent to the warehouse, a series of asbestos cement or plaster baffles to separate electrical panels (removed) were found. The heating plant for the building was below ground level and flooded with a thick black, oily liquid. The room would have to be pumped dry before the building could be demolished. Demolition will probably be by front-end loader. All of the building's columns will be cut by welding torch, close to the ground and the frame collapsed by either crane or front-end loader. A three or more story building would be demolished by ball. Waste goes to a Wayne County landfill.

In a recently completed project, several hundred houses were demolished. In residences of 3 or more families, asbestos was found occasionally on steam and hot water mains; none on boilers (most of which were cast iron), nor risers, nor in walls as loose insulation.

In a recent hospital demolition job, the only asbestos removal was from steam and hot water piping. Problems with the standard that were cited by Wayne Co. Health Department officials include:

- seems to be more of an OSHA problem - occupational vs. public exposure.
- absence of notifications.

Manufacturing emission sources in Wayne Co. include brake manufacture and plastic sealing compound manufacturer. They are usually in compliance with the no visible emission limit.