



U.S. Environmental Protection Agency Applicability Determination Index

Control Number: C35

Category: Asbestos
EPA Office: SSCD
Date: 12/04/1987
Title: Covering of Treated Mill Tailings
Recipient: Howekam, David P.
Author: Seitz, John S.
Comments: See section 61.154 (active waste disposal sites) 1990 NESHAP

Subparts: Part 61, M, Asbestos

References: 61.154

Abstract:

The Calaveras open mining pit, proposed for use as an active waste disposal site, can comply with the "no visible emissions" requirement for waste disposal sites, Section 61.156.

Letter:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DECEMBER 4, 1987

MEMORANDUM

SUBJECT: Calaveras Mines Proposed Asbestos Waste Site

FROM: John S. Seitz, Director
Stationary Source Compliance Division
Office of Air Quality Planning and Standards

TO: David P. Howekamp, Director
Air Management Division, Region IX

Pursuant to your November 3, 1987 memorandum, SSCD in conjunction with ESED has reviewed the Calaveras Asbestos Ltd. proposal to convert an open mining pit into an asbestos waste disposal site. We have decided that Calaveras can comply with the "no visible emissions" requirement of .61.156 by treating mill tailings with a dust suppression agent applying the treated mill tailings over incoming asbestos containing waste material to a depth of two feet, as described in Calaveras August 28, 1987 letter addressed to you.

Considering that Calaveras is "anticipating mine shutdown within the next year or two" Calaveras may find itself subject to the revised asbestos NESHAP when waste disposal activities are to begin. Although Calaveras will be unable to claim compliance based on "no visible emissions" once the revised NESHAP takes effect, Calaveras can achieve compliance by following the work practices contained in the revised NESHAP.

SSCD and ESED have determined that there is nothing peculiar to the Calaveras mine pit that would make it unsuitable for a NESHAP asbestos waste disposal site as long as all NESHAP requirements are met. However, the extraordinary dimensions and the uniqueness of the proposed disposal site calls for further review by the Region 9 Superfund office. Provided that Superfund has no objections, the Calaveras mine pit should be an acceptable asbestos waste disposal site.

If you have any questions concerning this matter, please contact Jim Engel of my staff at 382-2877.

cc: Gil Wood
Sims Roy