UC 149-2

PLAINTIFF'S EXHIBIT UC-31

4:4:17 GJ
Sub dtd 4.4.4.16

UNION CARBIDE

INTERNAL CORRESPONDENCE

METALS DIVISION

P. O. BOX 579 · 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 14302

To (Name) Mr. J. B. Browning
Division UCC-HS & EA Div.
Location 22nd Floor
270 Park Avenue
New York, NY 10017

Date December 14, 1979

Originating Dept. "Calidria" Asbestos

Answering letter date

Subject EPA Study-Asbestos Mining Counties in California

Copy to G. R. Adams
W. B. DeAtley
R. F. X. Fusaro/J. J. Sibley
E. W. Kantz/R. G. Beverly
O. J. Malacarne
H. B. Rhodes
F. J. Shortsleeve

The following visited the King City Asbestos plant on December 11, 1979, to discuss the Subject with W. B. DeAtley, the plant manager, and me: R. A. Ziskind and J. L. Hahn of Science Applications and J. Aquavella of EPA. Dr. Aquavella is the EPA monitor for the contract with Science Applications, as described in prior communications.

Mr. Ziskind advised me by phone on 12/4/79 that they were visiting the areas covered by their contract to determine preliminary geographical and other physical parameters, such as plant locations. They would like monitoring and plant "historical" data from us, but I advised him this would not be available during the visit.

They were given a tour of the plant, including the tailings disposal area, and rather lengthy discussions were held. The topics included the nature of our deposit compared to Canadian, product applications, employee health, safety programs and procedures, emission control equipment, and monitoring methods and results. They were shown data from the enclosed report; but they are primarily interested in data from 1963 to 1969, and information about emission control efforts during that period. Dr. Hahn specifically asked about what performance tests we may have conducted on installed dust control equipment to verify that it met specifications.

Although we indicated that we would assist wherever possible and relevant, it was left that they should send you a letter requesting the specific information they would like to have. They readily accepted this as a reasonable approach and you should be hearing from them very soon.

On leaving King City, they planned to drive up Bitterwater Road toward our mining area, and then on to Coalinga to visit the Atlas operation. From there they will go to the Calaveras operation at Copperopolis.

I am sending them some sales-type literature which will give them background information on our deposit, products and applications.

Please let me know if you have any questions. A:0435

John L. Myers

John L. Myers

Phase I dust control went in operation January 1977; both Table I and Figures I through 4 show the improvements in dust levels after January 1977. It is also evident from this data that we have a long way to go before we reach the 0.5 fiber/cc standard promulgated by NIOSH.

We have reviewed your Phase II recommendations and decided there was a need for more background data on dust levels around the plant area so we spent several weeks collecting samples. This data is attached in the Appendix; the sample conditions and results are listed day by day. Sample locations are shown on the plant layout included in the Appendix.

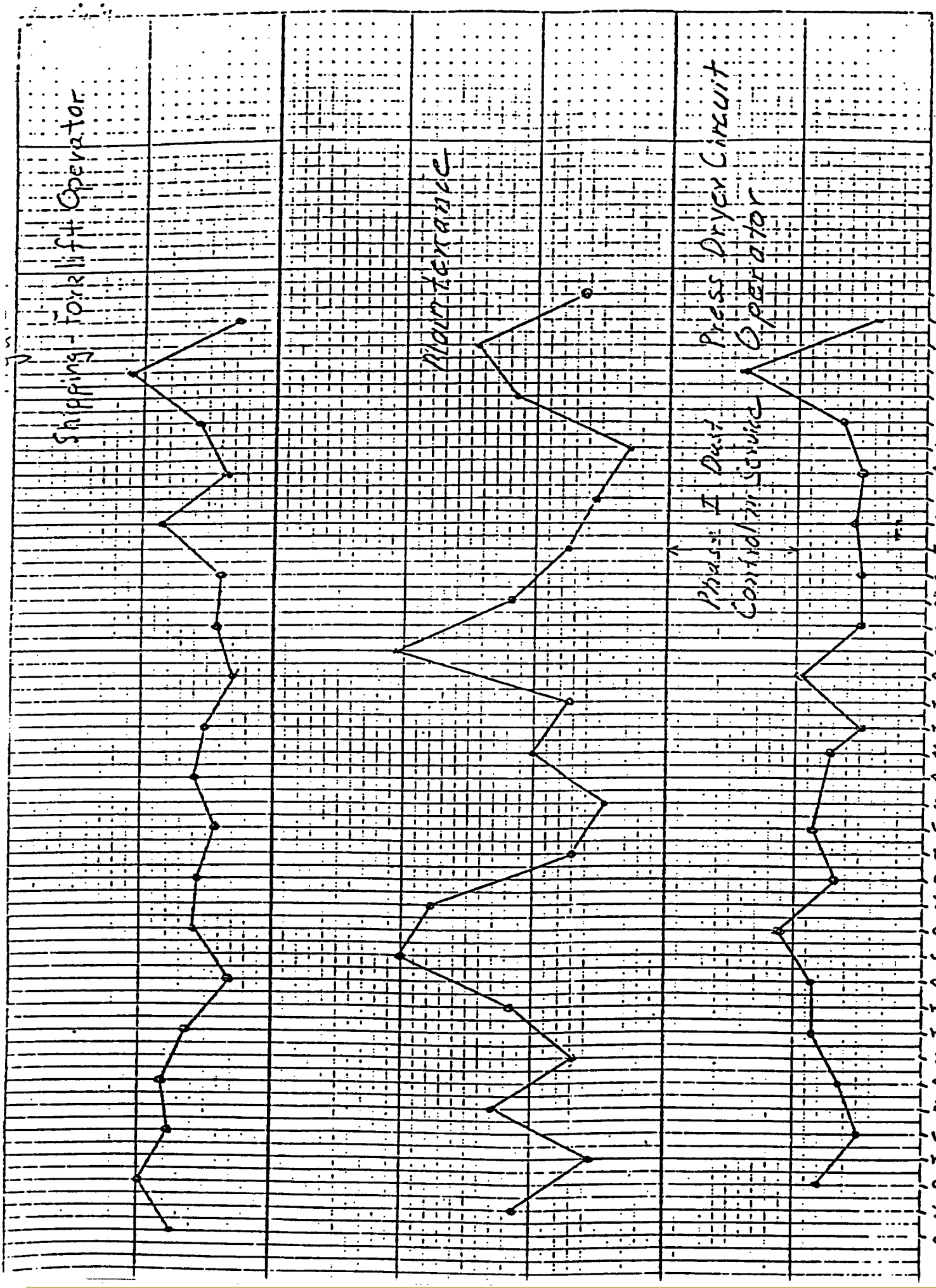
We would like you to review this data and update your Phase II recommendations taking into account the possibility that we may have to reach 0.5 fiber/cc levels in the near future. If you should need more information give me a call.

Earl W. Shortridge

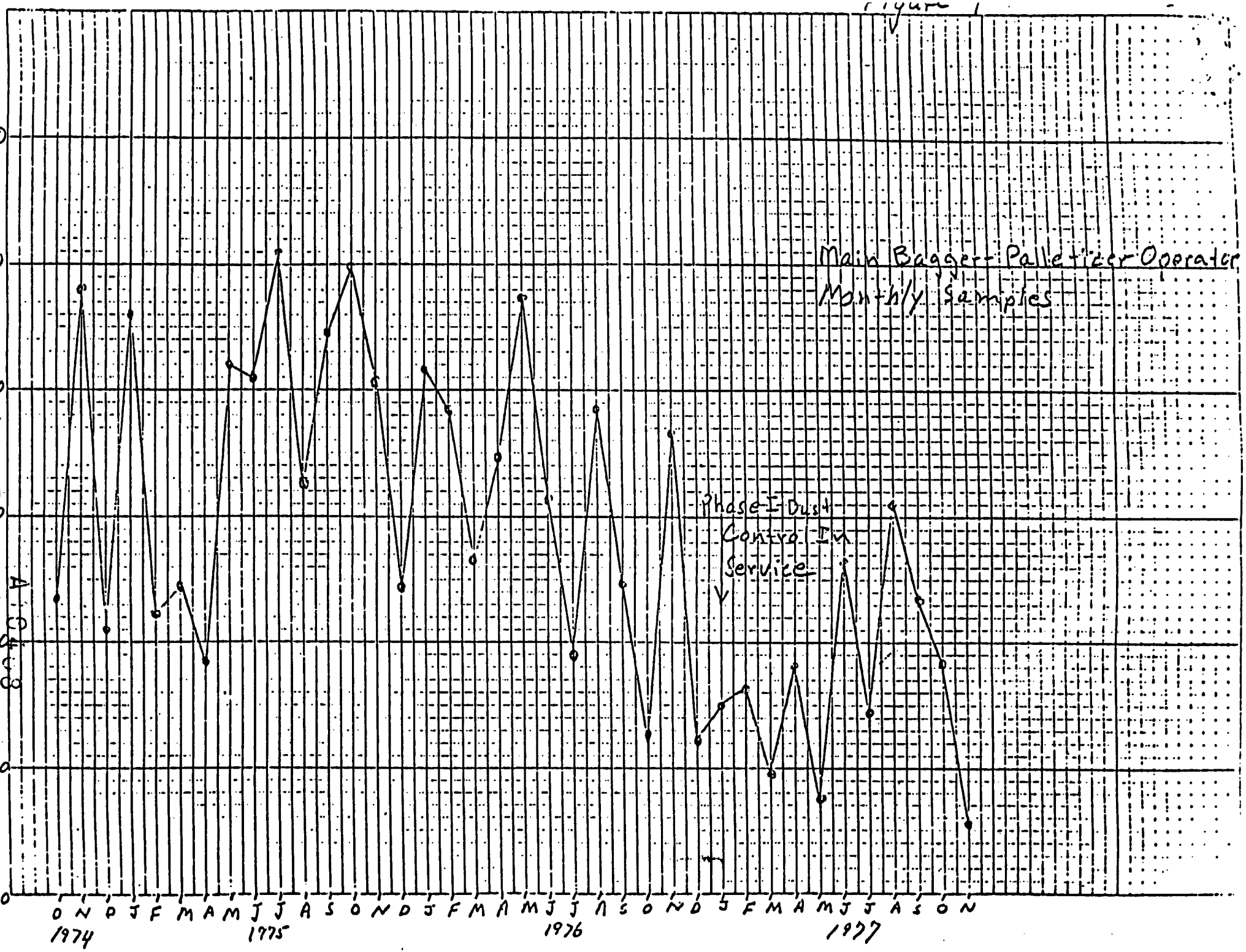
Earl W. Shortridge

/bd

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Union Carbide trial exhibit UC-31: John L. Myers to J. B. Browning on EPA Study of California Asbestos Mining Cou...
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OCTOBER 26, 1977

Conditions: 1. Wind - from the North

	North Fence
10:35 A.M. - 11:35 A.M.	3-5 mph
11:35 A.M. - 12:35 P.M.	15-20 mph
12:35 P.M. - 1:35 P.M.	15-23 mph
1:35 P.M. - 2:35 P.M.	15-23 mph
2:35 P.M. - 3:35 P.M.	22-30 mph

2. Temperature: 62 - 70° F - foggy early A.M. - clear day @ 11:15 A.M. to partly cloudy @ 3:00 P.M.

3. Traffic - typical forklift traffic.
feeding ore.
loading bulk car all day.

4. Wet down - Parking lot wetted down early day shift.

Time	North Fence	Parking Lot	Back of Maint.Shop	South Fence
10:35 A.M. - 11:35 A.M.	.04 *	.05	.05	.09
11:35 A.M. - 12:35 P.M.	.08 *	.05	.08	.11
12:35 P.M. - 1:35 P.M.	.04	.04	.10	.09
1:35 P.M. - 2:35 P.M.	.05	.09	.11	.08
2:35 P.M. - 3:35 P.M.	.08	.14	.25	.14
	.06	.07	.12	.10

* Some cows were moved across area near sample station.

4:6406

OCTOBER 14, 1977

Conditions: 1. Wind 9:30 A.M. - 12:30 P.M. from the South
12:30 P.M. - 2:30 P.M. from the North

North Fence	and	South Fence
9:30 A.M. - 10:30 A.M.		5 mph
10:30 A.M. - 11:30 A.M.		5-10 mph
11:30 A.M. - 12:30 P.M.		0-5 mph
12:30 P.M. - 1:30 P.M.		0-5 mph
1:30 P.M. - 2:30 P.M.		0-5 mph
2:30 P.M. - 3:30 P.M.		0-5 mph

2. Temperature: 68 - 98° F - clear day.

3. Traffic - typical forklift traffic.
working tails.
feeding ore.

4. Wet down - none - dry roads.

Time	North Fence	Parking Lot	Back of Maint.Shop	South Fence
9:30 A.M. - 10:30 A.M.	.03	.04	.11	.04
10:30 A.M. - 11:30 A.M.	.06	.04	.05	.01
11:30 A.M. - 12:30 P.M.	.04	.03	.18	.05
12:30 P.M. - 1:30 P.M.	.03	.08	.04	.03
1:30 P.M. - 2:30 P.M.	.04	.05	.05	.01
	.04	.05	.09	.03

A/C404

APPENDIX

AREA SAMPLE DATA

A16459

AUGUST 25, 1977

Conditions: Same as August 23, 1977 except

1. Wind out of north

	North Fence	Back of Main Bagging Room
10:25 A.M. - 11:25 A.M.	5-6 mph	2-4 mph
11:25 A.M. - 12:25 P.M.	7-10 mph	5-8 mph
12:25 P.M. - 1:25 P.M.	8-11 mph	3-9 mph
1:25 P.M. - 2:25 P.M.	8-12 mph	2-10 mph
2:25 P.M. - 3:25 P.M.	10-17 mph	2-10 mph

2. Water truck traverse of road between ore pile and tailings pile.

3. Started bulk car @ 1:30 P.M.

Time	North Fence	East corner outside of RG-Bagging Room	Backside of RG-Surge Tank	Backside of Main Baggin
10:25 A.M. - 11:25 A.M.	.10	.11	.11	.81
11:25 A.M. - 12:25 P.M.	.11	.11	.13	.69
12:25 P.M. - 1:25 P.M.	.09	.20	.19	.92
1:25 P.M. - 2:25 P.M.	.14	.16	.16	.87
2:25 P.M. - 3:25 P.M.	.33 - 2	.33	.37	.72
	.15	.18	.19	.80

A-1641

October 5, 1977

Conditions: 1. Wind out of the north	North Fence	South Fence
10:33 A.M. - 11:33 A.M.	no wind	no wind
11:33 A.M. - 12:33 P.M.	very light wind	0-1 mph
12:33 P.M. - 1:33 P.M.	1-3 mph	1-3 mph
1:33 P.M. - 2:33 P.M.	2-6 mph	3-6 mph
2:33 P.M. - 3:33 P.M.	3-6 mph	3-6 mph

2. Temperature 55 - 70° F cloudy A.M. - clear P.M.

3. Traffic - typical forklift traffic & ore handling.
No ore trucks.
Ore truck loading @ dock in A.M.
Dozer pushing tailings.

Time	North Fence	Parking Lot	Back of Maint.Shop	South Fence
10:33 A.M. - 11:33 A.M.	.05	.05	.05	.08
11:33 A.M. - 12:33 P.M.	.05	.05	.06	.09
12:33 P.M. - 1:33 P.M.	.06	.08	.06	.11
1:33 P.M. - 2:33 P.M.	.10	.08	.10	.09
2:33 P.M. - 3:33 P.M.	.10	.11	.10	.08
	.07	.07	.07	.09

A-16402