VI.E.8

UNION CARBIDE CORPORATION • METALS DIVISION • P. O. BOX 579 • NIAGARA FALLS, N.Y. 14302 • TEL: 716-278-3376

March 9, 1981

Mr. Stanley T. Cuffe
Chief, Industrial Studies Branch
Emission Standards and Engineering Division
United States Environmental Protection Agency
Office of Air Quality Planning and Standards
Research Triangle Park, NC 27711

Dear Mr. Cuffe:

This is in response to your letter of February 25, 1981, Union Carbide Corporation agrees to allow Mr. Mike Laney and Ms. Laura Conrad of Research Triangle Institute and Messrs. George Sverdrup and Salo Miller of Battelle Columbus Laboratory to visit its "Calidria" asbestos mill located in King City, California on a mutually agreeable day. Mr. Copeland of your staff may accompany them at your option.

Regarding the listing of information in Enclosure 5 of your letter, we do not believe that the data requested under Items 5(a) through (f) (inclusive) are directly relevant to your contractors' objectives. We will be glad to show the contractors the plant and answer general questions but specific details on these items will not be provided. We will be glad to respond to the remaining items, i.e., 1, 2, 3, 4, 5(g), 6, 7, and 8 to the extent that the information is reasonably available.

Very truly yours,

H. B. Rhodes

H. B. Rhodes
Technology Manager

cc: W. B. DeAtley
R. F. X. Fusaro
J. L. Myers (2)
J. B. Rouse
R. W. Rebholz
W. C. Thurber
A. G. Voress
File

HBR:dal

A 16632

PLAINTIFF'S EXHIBIT UC-36

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CC/WCT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

FEB 2 5 1981

Dr. Harry Rhodes, Technology Manager
Union Carbide Corporation
Metals Division
Post Office Box 579
Niagara Falls, New York 14302

Dear Dr. Rhodes:

As you may know, the United States Environmental Protection Agency (EPA) is currently gathering background information on the air pollutant asbestos and control techniques relating to asbestos milling and manufacturing; the spraying and fabrication of asbestos containing materials; the surfacing of roadways with asbestos; the demolition and renovation of buildings containing asbestos; and asbestos waste disposal. This information will be used to determine the need to revise the existing National Emission Standards for the Hazardous Air Pollutant (NESHAP) asbestos (40 CFR 61 Subpart B) in accordance with Section 112 of the Clean Air Act as amended August 1977. In order to perform an assessment of the industry to determine whether the standard should be revised, we need information on plants and processes that appear to be among the best controlled and most effective, respectively. Therefore, to use EPA and industry time efficiently in gathering support data, EPA must write and visit a number of those companies and plants that appear to have the best systems of emission reduction.

This letter is to request a visit by Mr. Mike Laney and Ms. Laura Conrad of the Research Triangle Institute (RTI) and Messrs. George Sverdrup and Salo Miller of Battelle Columbus Laboratory to the Union Carbide mill located in King City, California on a mutually agreeable date. We understand that your King City facility performs wet milling of asbestos ore. Mr. John Copeland of my staff may accompany them on the visit. Laura Conrad of RTI discussed this visit with you in a telephone conversation on February 17, 1981.

The authority for EPA's information gathering and source testing is included in Section 114 of the Clean Air Act (42 U.S.C. 7414). Enclosure 1 contains a summary of this authority. If you believe that disclosure of the information we request would reveal a trade secret, you should clearly identify such information as discussed in the enclosure. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. 1905. All emission data, however, will be available to the public.

A 16633

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EPA has contracted with RTI (Contract Number 68-02-3056) and Battelle Columbus Laboratory (Contract No. 68-02-3169) to obtain information pertinent to the assessment of the NESHAP for asbestos. Thus, as noted in Enclosure 2 and 3, they have been designated by EPA as authorized representatives of the Agency. Therefore, they have the rights discussed above and in Enclosure 1. As designated representatives of the Agency, they are subject to the provisions of 42 U.S.C. 7414(c) respecting confidentiality of methods or processes entitled to protection as trade secrets.

Enclosure 4 summarizes Agency and Emission Standards and Engineering Division policies and procedures for handling privileged information and describes EPA contractor commitments and procedures for use of confidential materials. It is EPA's policy that compliance by an authorized representative with the requirements detailed in Enclosure 4 provides sufficient protection for the rights of submitters of privileged information.

The following policies concerning liability should also be of interest to you:

1. If a Federal employee is injured in the course of his employment, he has compensation coverage from the Government under the Federal Employees Compensation Act (5 U.S.C. 8108 et seq.); and

2. If, due to the employee's negligence, property damage or personal injury to third parties occurs, the Federal Tort Claim Act (28 U.S.C. 1346) provides a means of fixing any liability upon the Federal Government.

The Office of General Counsel, EPA, has informed the Agency that a firm may not condition EPA's "right of entry" upon consent to a waiver of liability and has instructed employees not to sign such waivers. If you have any questions regarding this refusal, please contact Mr. Donnell L. Nantkes, Office of General Counsel, at (202) 426-8830.

To expedite the collection of information, a list of questions (see Enclosure 5) concerning your operation and asbestos emission control system is included. These questions outline our information needs that will be gathered by RTI. In addition, Battelle will be observing asbestos atmospheric emission sources to determine what might be done in the future to characterize asbestos emissions from plants such as yours (see Enclosure 6 for Battelle's work assignment). Obviously, as we tour your facility, other questions specific to your operation will arise. However, at this time we would appreciate any consideration of the enclosed questions prior to our visit.

A 16634

If you have any questions, please call Mr. Copeland at (919) 541-5295.

Sincerely yours,

Stanley T. Cuffe

Stanley T. Cuffe, Chief
Industrial Studies Branch
Emission Standards and
Engineering Division

6 Enclosures

A 16655

Enclosure 1

EPA's Information Gathering Authority Under Section 114 of the Clean Air Act

Congress has given the Environmental Protection Agency broad authority to secure information needed in the development of National Emissions Standards for Hazardous Air Pollutants sources under Section 112 of the Clean Air Act (42 U.S.C. 7412). Among other things, Section 114 of the Act (42 U.S.C. 7414) authorizes EPA to make inspections, conduct tests, examine records, and require owners or operators of emission sources to submit information reasonably required for the purpose of developing such standards. In addition, the EPA Office of General Counsel has interpreted Section 114 to include authority to photograph or require submission of photographs of pertinent equipment, emissions, or both.

Under Section 114, EPA is empowered to obtain information described by that section even if you consider it to be confidential. You may, however, request that EPA treat such information as confidential. Information obtained under Section 114 and covered by such a request will ordinarily be released to the public only if EPA determines that the information is not entitled to confidential treatment.* Procedures to be used for making confidentiality determinations, substantive criteria to be used in such determinations, and special rules governing information

* Section 114 requires public availability of all emission data and authorizes disclosure of confidential information in certain circumstances. See 40 FR 36902, 36912 (September 1, 1976).

A 16636

obtained under Section 114 are set forth in 40 CFR Part 2 published in the Federal Register on September 1, 1976 (40 FR 36902).

If you believe that disclosure of any information EPA requests would reveal trade secrets or other confidential information, you should clearly identify such information [see Section 2.203(b)]. If you wish, you may also set forth reasons for your claim and include supportive data or legal authority at the time the claim is submitted (in most cases, there will be an opportunity to do so later if a question concerning public availability of the information arises).

A 16337

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

Enclosure 2

DESIGNATION OF AUTHORIZED REPRESENTATIVE FOR STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES (SECTION 111) AND NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (SECTION 112)

Research Triangle Institute (RTI) is hereby designated an Authorized Representative of the Administrator of the United States Environmental Protection Agency for the purpose of assisting in the development of national emission standards for hazardous air pollutants under 42 U.S.C. 7412 and standards of performance under 42 U.S.C. 7411 for maleic anhydride, coke oven door leaks and wet charging and topside leaks, coke oven by-product plants, metal coil coating, large appliance coating, vegetable oil, can coating, BOPF fugitive, textiles, coke oven dry charging, plywood/plywood veneer, asbestos, copper smelters, and oil shale under Contract Number 68-02-3056.

This designation is made pursuant to the Clean Air Act, 42 U.S.C. 7414. The United States Code provides that, upon presentation of this credential, the Authorized Representative named herein: (1) shall have a right of entry to, upon, or through any premises in which an emission source is located or in which records required to be maintained under 42 U.S.C. 7414(a)(1) are located, and (2) may at reasonable times have access to and copy any records, inspect any monitoring equipment or method required under 42 U.S.C. 7414(a)(1), and sample any emissions which the owner or operator of such source is required to sample.

Authorized Representatives of the Administrator are subject to the provisions of 42 U.S.C. 7414(c) respecting confidentiality of methods or processes entitled to protection as trade secrets, as implemented by 40 CFR 2.301(h) (41 FR 36912, September 1, 1976).

Date: NOV 20 1980

Designation Expires: October 12, 1983

Donald J. Walters
for Walter C. Barber
Deputy Assistant Administrator for Air Quality
Planning and Standards

A16638

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

Enclosure 3

DESIGNATION OF AUTHORIZED REPRESENTATIVE
FOR NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (SECTION 112)

Battelle Columbus Laboratories is hereby designated an Authorized Representative of the Administrator of the United States Environmental Protection Agency for the purpose of assisting in the development of asbestos national emission standards for hazardous air pollutants under 42 U.S.C. 7412 under Contract Number 68-02-3169.

This designation is made pursuant to the Clean Air Act, 42 U.S.C. 7414. The United States Code provides that, upon presentation of this credential, the Authorized Representative named herein: (1) shall have a right of entry to, upon, or through any premises in which an emission source is located or in which records required to be maintained under 42 U.S.C. 7414(a)(1) are located, and (2) may at reasonable times have access to and copy any records, inspect any monitoring equipment or method required under 42 U.S.C. 7414(a)(1), and sample any emissions which the owner or operator of such source is required to sample.

Authorized Representatives of the Administrator are subject to the provisions of 42 U.S.C. 7414(c) respecting confidentiality of methods or processes entitled to protection as trade secrets, as implemented by 40 CFR 2.301(h) (41 FR 36912, September 1, 1976).

Date: FEB 0 6 1981

Designation Expires: June 1, 1981

for Walter C. Barber
Deputy Assistant Administrator for Air Quality
Planning and Standards

A16339

February 28, 1978

Enclosure 4

Procedures for Safeguarding Privileged Information

1. Purpose: This memorandum summarizes Agency policy and procedures pertaining to the handling and safeguarding by the Emission Standards and Engineering Division (ESED), Office of Air Quality Planning and Standards, Office of Air and Waste Management, U.S. Environmental Protection Agency, information that may be entitled to confidential treatment for reasons of business confidentiality.

2. Other Applicable Documents:

a. Clean Air Act, as amended

b. 40 CFR, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information

c. EPA Security Manual, Part III, Chapters 8 and 9

3. Background:

Section 114(c) of the Clean Air Act, as amended, reads as follows:

"Any records, reports or information obtained under subsection (a) shall be available to the public, except that upon a showing satisfactory to the Administrator by any person that records, reports, or information, or particular part thereof, (other than emission data) to which the Administrator has access under this section if made public, would divulge methods or processes entitled to protection as trade secrets of such person, the Administrator shall consider such record, report, or information or particular portion thereof confidential in accordance with the purposes of Section 1905 of title 18 of the United States Code, except that such record, report, or information may be disclosed to other officers, employees, or authorized representatives of the United States concerned with carrying out this Act or when relevant in any proceeding under this Act."

A 10340

On September 1, 1976, EPA promulgated regulations (40 CFR Part 2) which govern the treatment of business information, including that obtained under Section 114 of the Clean Air Act. These regulations require EPA offices to include a notice with each request for information which informs the business (a) that it may assert a claim of confidentiality covering part or all of the information; (b) of the method for asserting a claim; and (c) of the effect of failure to assert a claim at time of submission. In addition, the regulations (a) set forth procedures for the safeguarding of confidential information; (b) contain provisions for the release of confidential information to authorized representatives; (c) contain provisions for the release of information to the Congress, Comptroller General, other Federal agencies, State and local governments, and courts; (d) restrict the disclosure of information within EPA to employees with an official need for the information; and (e) set forth penalties for the wrongful disclosure of confidential information. Further, the regulations contain the Agency's basic rules concerning the treatment of requests for information under the Freedom of Information Act (5 USC 552).

4. Procedures:

a. Request for Information

Each request for information made under the provisions of Section 114(a) will be signed by the Division Director. The request will include ESED's standards enclosure "EPA's Information Gathering Authority Under Section 114 of the Clean Air Act," which was designed to meet the requirement of 40 CFR 2 discussed above.

A10341

b. Receipt of Privileged Information

Upon receipt of information for which confidential treatment has been requested, the Office of the Director (OD) will direct the logging in of the material and the establishment of a permanent file. If confidential treatment is requested but is not specifically marked, the material will be stamped "Confidential Pending Determination." In compliance with sections 2.204 and 2.208 of 40 CFR Part 2, the Branch Chief responsible for the information requested will review the information to determine whether it is likely to be confidential, in contrast to being available in open literature, and whether it likely provides its holder with a competitive advantage. If the information is clearly not entitled to confidential treatment, e.g., emission data, the Branch Chief will prepare a letter notifying the business of this determination. The letter will be signed by the Division Director and copied to the General Counsel. If the information is possibly confidential, the Branch Chief will, by memorandum, notify the OD of this finding, give a brief description of the material (what it is, how many pages, etc.), identifying it with the correct ESED project number, and list those persons who will be authorized to access the information. The information and memorandum will be hand carried to the OD and filed with the material. If privileged information is received from an authorized representative or a third party the same procedure shall be followed with the addition of clearly identifying the information and its source. EPA Form 1480-21, "Privileged Information Control Record" shall be enclosed with the folder containing the information.

A 1983-2

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By law, information for which confidential treatment is requested must be so marked or designated by the submitter and be accompanied by a statement as to why the information is confidential. EPA merely takes additional measures to ensure that the proprietary designation is uniformly indicated and immediately observable. All unmarked or undesignated information (except as noted below) will be freely releasable.

c. Storage of Privileged Information

Privileged information folders, documents, or material shall be secured, at a minimum, in a combination locked cabinet. Normal ESED procedure is to secure this information in a cabinet equipped with a security bar and locked using a four way, changeable combination padlock. The locked file shall be under the control of the Office of the Director.

Knowledge of the combination of the locking device will be limited to the minimum number of persons required to effectively maintain normal business operations. Records of the locking device combination may be made but shall be stored elsewhere in conformance with the requirements of the EPA Security Manual.

The combination of the lock will normally be changed whenever a person with knowledge of the combination is transferred, terminates employment, or is no longer authorized access, or whenever the possibility exists that the combination may have been subjected to compromise.

Files may be checked out upon confirmation that the person is authorized to receive the information. All confidential files will be

A 18343

returned the same day they are removed, no later than 3:30 p.m. The intended user must sign the Privileged Information Control Record in the presence of an Office of the Director staff member when the file is checked out and when it is returned.

The individual who signs out a confidential file is responsible for its safekeeping. The file shall not be left unattended. The information shall not be disclosed to any non-authorized personnel.

Storage procedures for privileged information by an authorized representative of EPA (see Section d. below) shall be, at a minimum, as secure as those established here for EPA. Whenever privileged information is removed from the EPA files to be transmitted to an authorized representative, a memorandum shall be placed in the file indicating what information was transmitted, the date, and the recipient.

d. Access to Privileged Information

Only authorized EPA employees shall open and distribute privileged information.

Only EPA employees who require and are authorized access to privileged information in the performance of their official duties shall be permitted to review documents and, after reviewing, shall sign and date EPA Form 1480-21 to certify their access to the document.

The privileged information file shall be controlled by the Office of the Director, ESED. Access to the information shall be strictly enforced by that office.

The ESED Branch through which the privileged information has been requested or sent shall provide a memo for the record designating those

A 18644

personnel who are authorized to use privileged information in performance of their official duties in a program under which privileged information can be requested. No person is automatically entitled to access based solely on grade, position, or security clearance. A need to know must exist. Where a person with a need to know is not designated on the memo for the record, the applicable Branch Chief shall review that need and, if appropriate, prepare an amendment to the memo of record. In any case, the memo designating authorized personnel should be reviewed and revised from time to time to ensure that it is current.

Persons under contract to EPA to perform work for EPA may be designated authorized representatives if such designation is necessary in order for the contractor to carry out the work required by the contract. Under Sections 114, 208, and 307(a) of the Clean Air Act, as amended, 42 U.S.C. 1857 et seq., EPA possesses authority to disclose to authorized representatives information which might otherwise be entitled to confidential treatment. The following conditions shall apply when it has determined that such disclosure is necessary in order that an authorized representative may carry out the work required by EPA:

(1) The authorized representative and its employees shall (a) use such confidential information only for the purposes of carrying out the work required; (b) refrain from disclosing the information to anyone other than EPA without having received from EPA prior written approval of each affected business or of an EPA legal office; and (c) shall return to EPA all copies of the information (and any abstracts or excerpts therefrom) upon request or whenever the information is no longer required for the performance of the work.

A 18345

(2) The authorized representative will obtain a written agreement to honor the above-noted limitations from each of its employees who will have access to the information, before such employee is allowed such access. A copy of each such agreement shall be furnished to EPA in a format substantially complying with that shown in Enclosure B.

(3) The authorized representative acknowledges and agrees that the conditions concerning the use and disclosure of business information are included for the benefit of, and shall be enforceable by, both EPA and any affected business having a proprietary interest in the information.

Although it is EPA's policy that compliance by an authorized representative with the requirements here provides sufficient protection for the rights of submitters of privileged information, EPA may permit the authorized representatives to execute third party secrecy agreements with submitters of privileged information. However, the third party agreement may not in any way abrogate or supersede any authority or responsibility of EPA as provided by the Clean Air Act.

Information may be released to or accessed by employees of other EPA elements only upon receipt of a written justification signed by a Division Director, or equivalent. Release must be approved by the Director, ESED.

Requests from other Federal Agencies, Congress, Comptroller General, Courts, etc. will be handled by the Office of the Director, ESED.

A 10346

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Requests under the Freedom of Information Act shall be handled in accordance with 40 CFR Part 2 Subpart A. The ESED Freedom of Information Coordinator shall be consulted prior to responding to any request for information where a claim of confidentiality has been asserted or where a claim might be made if the business knew release was intended. (The latter could occur in the case of information received before we were required to give the above discussed notice.)

e. Use and Disclosure of Privileged Information

Privileged information may not be used in publications, supporting documents, memoranda, etc. that become a part of the public domain, except as provided for in 40 CFR, Chapter 1, Part 2, Subpart B.

Privileged information may not be summarized, tabulated, photocopied, or in any other way reproduced without the expressed written approval of the Branch Chief responsible for the information request. Any authorized reproduction shall be sparing and all procedures herein strictly followed. Further, all authorized reproductions shall be introduced into the privileged information control system and treated according to the same procedures applicable to the original confidential material.

EPA generated documents or material, or extracts of information containing privileged information, shall be stamped "For Official Use Only" and include on the first page and/or cover sheet the following statement:

> "This document contains data obtained under a pledge of confidence and shall be handled and stored in accordance with Part III, Chapter 9 of the EPA Security Manual."

A 10647

f. Handling of Other Information

Reports, memoranda, documents, etc. prepared by EPA or its authorized representatives are not normally circulated outside EPA for comment or review prior to publication except in such cases as described above where information claimed to be privileged is expressedly included. However, because industry data gathering visits, plant inspections, and source testing can involve inadvertent receipt of privileged information, it is the policy of ESED to protect all parties involved in the following manner.

Prior to a plant inspection, data gathering visit, or source test, EPA or its authorized representatives will discuss with the responsible industry official the desired types of information to be obtained, how it is to be used, and in general how it is to be protected. A copy of this document may be provided if so desired.

Following an inspection, visit or test, a trip report will be prepared to include, as best practicable, all information received by EPA or its authorized representative during the visit or test. The report may be prepared by either EPA or its authorized representative. The draft of that report will be prepared and clearly identified, for example, on an enclosed, colored, cover sheet, as "Privileged Information - Pending Company Review." One copy of the draft trip report will be made and forwarded to the responsible industry official for reivew. The responsible industry official will be requested by cover letter to review the report, clearly mark any information considered to be confidential, and return the marked report to the originator within two weeks of receipt.

A 10348

The reviewed report and the copy will be simultaneously edited of any privileged information, as marked by the responsible plant official. Such information will be so designated and placed in the privileged information files as described above. The edited trip report will then be completed and issued.

At all times until the report is returned by the responsible industry official and any information considered to be privileged is removed, the draft report shall be treated as privileged information and the procedures described here strictly adhered to.

5. Exceptions

This document was prepared as a summary of data gathering and handling procedures used by the Emission Standards and Engineering Division, Office of Air Quality Planning and Standards, EPA. Nothing in this document shall be construed as superseding or being in conflict with any applicable regulations, statutes, or policies to which EPA is subject.

6. Definitions:

Privileged Information - Information received under a request of confidence which concerns or relates to trade secrets, processes, operations, style of work or apparatus, or the identity, confidential statistical data, amount, or source of any income, profits, losses, or expenditures. This information may be identified by industry with such titles as trade secret, secret, administrative secret, company secret, secret proprietary, confidential, administrative confidential, company confidential, confidential proprietary, proprietary, etc. NOTE: These markings should not be confused with the classification markings of National Secruity information identified in Executive Order 11652,

A 16349

ENCLOSURE A

PART III - DOCUMENT SECURITY
CHAPTER 9 - PRIVILEGED INFORMATION

SECURITY

EPA Order 1350,
June 12, 1974

DO NOT DETACH

APPLICATION NO.

ENVIRONMENTAL PROTECTION AGENCY

PRIVILEGED INFORMATION CONTROL RECORD

The attached information was received under a pledge of confidence. Aside from any possible security classification, it is considered privileged information. This information must be strictly restricted in its dissemination, being made available only to those Environmental Protection Agency officials with a valid need for it. All persons reviewing this information must sign below.

INFORMATION REFERRED TO:

NAME	SIGNATURE	DATE

UNAUTHORIZED DISCLOSURE OF THE ATTACHED INFORMATION IS PUNISHABLE BY $1,000.00 FINE OR IMPRISONMENT OF NOT MORE THAN ONE YEAR, OR BOTH, AND REMOVAL FROM OFFICE OR EMPLOYMENT. (18 USC 1905)

DO NOT DETACH

EPA Form 1480-21 (7-71)

TN 1
8-9-76

Figure III-9-1. Privileged Information Control Record

CHAP 9

A 0350

ENCLOSURE B

TREATMENT OF CONFIDENTIAL INFORMATION

It is understood that performance under EPA Contract No. _____ will require the Contractor (_____) and its employees to have access to confidential information obtained by EPA under section _____ of the Clean Air Act. In fulfillment of the conditions of disclosure contained in the Contract, I _____ _____, hereby affirm that I personally will honor the limitations expressed in the contract concerning my access to such information.

Specifically, I shall:

1. use the information only for the purpose of carrying out the work required by the Contract;

2. refrain from disclosing the information to anyone other than EPA without the prior written approval of each affected business or of an EPA legal office; and

3. return to EPA, through the Contractor, all copies of the information (and any abstracts or excerpts therefrom) upon request by the EPA Program Office or whenever the information is no longer required by the Contractor for the performance of work required by the Contract.

Dated this _____ day of _____, 1976.

_____

Signature

A 10351

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Enclosure 5

Asbestos Milling, Manufacturing, and Fabricating Request for Information*

1. Name and Location of Site _____

2. Type of Operation(s) _____

3. Date of Visit _____

4. Persons Interviewed (including title and telephone number) _____

5. Process (Obtain detailed flow diagram and design specifications, if possible)

   a. Products Raw [illegible] & Fiber

   b. Actual Production Rates About 30,000 TPY

   c. Production Capacity " 32,000 "

   d. Normal Operating Schedule (hrs/day, days/wk, wks/yr) 24 7 50

   e. Process instrumentation used to monitor operations for production rate

      Normal range of readings

   f. Rate of feed of asbestos into the process About 60,000 TPY [illegible]

   g. Design and range of actual exhaust gas volumes (cfm) entering each baghouse

Baghouse #	1	2	3	4
Design cfm				
Actual cfm				

6. Air Pollution Control Equipment (Obtain drawings and design specifications, if possible)

   a. Number of baghouses

   b. For each baghouse, indicate manufacturer _____ _____ _____ _____

*Answer "not applicable" to questions that do not apply to your plant.

A 10352

c. Identify process or operations serviced by each baghouse

d. Number of compartments per baghouse

e. Number of bags per compartment

f. Bag diameter and length

g. Air-to-cloth ratio

h. Bag material

i. Total cloth area

j. Pressure drop
   Design
   Actual

k. Date of installation

l. Bag cleaning mechanism

m. Cleaning frequency and cleaning cycle duration

n. Method of monitoring baghouse operation

o. Baghouse emission concentrations, and test methods used

p. Maintenance practices and schedules

q. Problems encountered with control system

7. Work Practices

Describe any work practices that you have implemented that help to control asbestos emissions. For example, are waste piles wetted; how are emissions prevented when waste is being removed from baghouse and prepared for transport to disposal site; have you introduced a nonasbestos product line?

A 10353

8. Waste Disposal

a. How is baghouse waste collected?

b. How is other asbestos containing waste collected?

c. How is waste disposed of (reused, landfilled, etc.)?

d. Describe disposal operation, including the transportation of asbestos-containing waste to disposal site, disposal site operation, and site ownership.

A10654

Enclosure 6

WORK ASSIGNMENT	68-02-3169
ENVIRONMENTAL PROTECTION AGENCY	CONTRACTOR: Battelle, Columbus.
Research Triangle Park, N.C. 27711	ASSIGNMENT NO.
	ASSIGNMENT CHANGE NO
TITLE: PREPARATION OF REPORT ON FEASIBILITY OF SOURCE SAMPLING METHODS FOR ASBESTOS EMISSIONS IN INDUSTRIES USING, PROCESSING, OR CONTAINING ASBESTOS	DATE: December 17, 1980

DESCRIPTION

Requester

Kenneth T. Knapp
Environmental Sciences Research Laboratory
Research Triangle Park, N.C. 27711
Telephone: (919) 541-3085

Background

No sampling method exists for measuring asbestos in the emissions of industries using, processing, or containing asbestos. Such a method is needed so that standards in these industries can be set. An analytical method developed to determine the amount of asbestos on membrane filters has been developed and is being collaboratively tested. This can be used with a source sampling method. However, the samples collected with the source sampling method must be in such a form that they are compatible with the analytical method now being tested.

Scope of Work

The contractor shall make a feasibility study of source sampling methods for the collection of asbestos containing emissions from all major sources that use, process, or contain asbestos. The sources that must be included are the ore processing plants, the asbestos-cement, asbestos felt and paper, and asbestos containing friction meterials plants. The samples collected by proposed methods must be compatible with the provisional methods for airborne asbestos as described in EPA Report EPA-600/2-77-178. The contractor must perform sufficient laboratory and field tests to provide needed data

ESTIMATE OF	GOVERNMENT ESTIMATE	CONTRACTOR ESTIMATE	
LABOR HOURS	2651		
DURATION OF WORK	6 months		
COMPLETION DATE	June 30, 1981		
REQUESTER'S SIGNATURE	ORG CODE	TELEPHONE	DATE

APPROVALS AND CONCURRENCES	SIGNATURE	DATE
PROJECT OFFICER		
INVESTIGATOR		
CONTRACTOR ORGANIZATION	A10655	
CONTRACTOR TECHNICAL DIRECTION		

CONTRACTOR'S SIGNATURE AUTHORIZING PERFORMANCE

TYPED NAME	TITLE	DATE

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so that adequate estimations of time and efforts needed to develop the methods can be provided. The contractor shall provide by May 31, 1981 a draft of a report on the feasibility of the needed methods.

Reporting Requirements

The contractor shall:

1. Prepare a work plan and submit it to the Project Officer within fifteen calendar days after the date of the award.

2. Submit a monthly technical progress narrative covering work accomplished during each calendar month.

3. Submit by May 31, 1981 six (6) copies of a draft of the feasibility report.

4. Submit an error free master within thirty (30) days following approval of the draft by the Task Officer.

A 19353