PROCESS SURVEY - ENVIRONMENTAL IMPACT ANALYSIS

PLAINTIFF'S EXHIBIT
UC-1247

PROCESS ASBESTOS PLANT King City

COMPLETED BY F. H. Larrison DATE March 1973

XIV.- OTHER EMISSIONS, POLLUTION PROBLEMS AND EMPLOYEE COMMENTS

MINE

Ore Dust During Ore Screening and Ore Haulage

The mine dust suppression program keeps the ore stockpile, screened ore, and, in general, the entire pit working area relatively free of airborne dust particulates. There are occasions, however, mostly due to area winds and extreme temperature, when dust conditions will be less favorable.

All UCC personnel are required to wear approved respirators when dust conditions occur. Ore haulage trucks are covered with tarps and only minor amounts of dust escape along the haul route.

Ore Dust During Stripping and Mining

Airborne dust particulates are more noticeable when stripping and mining is being performed. The contractor is responsible for keeping the conditions at a minimum. Haul road blading and watering is necessary not only to improve the dust situation, but also to attain peak operating efficiency.

Approved respirators are provided for the contracted workmen.

Dust samples are taken on an average of two times per operating year.

Noise Levels

The maximum noise level of 90 decibels is exceeded when the ore screening equipment is in use, therefore, earplugs or muffs are necessary.

MILL

A 10469

Airborne Asbestos Fiber

Ore stockpiles, as well as the temporary tailings pile, are immediately adjacent to the mill process building, office building, warehouse, laboratory, and maintenance facilities. During the spring-summer-fall months, a 20-30 mph wind from north to south is a daily occurrence in this area and control of blowing dust is a problem. Water sprays are used to keep the stockpile area wet while a sprinkler truck is employed to control dusting on level surfaces. A contract sweeper cleans the parking area and asphalted and concrete areas around the mill buildings. External process transfer points, i.e., in the dryer and dust collector areas - are enclosed and internal negative pressures are maintained.

Airborne fiber levels in the process and service buildings generally range below the TLV. However, in the product grinding and bagging circuit, there are times when the level is well above the TLV. Modifications have been made in the department by enclosing the bagging and conveying machines and maintaining a negative pressure in the hoods but levels remain too high when using the palletizer. Use of respirators is required in this area.

Noise levels are right at or slightly above 90 dBA in all production areas and on loaders. Earplugs are necessary.

ENVIRONMENTAL PROTECTION SURVEY - ENVIRONMENTAL IMPACT ANALYSIS

PLANT King City, CA DATE March 1973

COMPLETED BY F. H. Larrison

XV. - SPECIAL PROBLEMS

A. Other Problems (Such as radiation, odor, fugitive dusts, undesirable aesthetic features (Describe)

MINE

The UCC private portion of the ore haulage route includes 5-1/2 miles of salt-stabilized red shale roadbase material. During the hot and dry summer months, ore truck traffic produces clouds of dust. Attempts are made to minimize the problem by periodic re-blading and watering of the roadway.

Since our stripping and mining operations result in a single pit with wide benches at controlled elevations, we do not encounter any land reclamation problems at this time.

The dumping of overburden material at several convenient locations outside the immediate pit vicinity might create some future problems since the waste piles are steeply sloping at the natural angle of repose.

The moisture content of overburden and ore material will range between 15 and 20 per cent, and after material is placed in piles, a semi-crust is formed on the exposed surfaces which effectively eliminates wind-blown dust unless the crusts are disturbed by vehicular traffic.

In general the mine is located in an isolated area with the nearest inhabitant 9 miles distant, and the nearest town (Coalinga, California) some 30 miles to the southeast.

MILL

Product Packaging

Development of leakproof packages to stop leakage of asbestos into shipping containers is necessary. All product is at present packed by a pressure packer and perforation of the multi-layer paper bags is necessary. Another leakage point is the bag fill spout which is not positive sealing. Asbestos is leaked from the palleted bags during transit in RR cars, truck vans, overseas containers, and flat-bed trucks. A contamination problem is thus created for the party unloading the shipping container and for customers storing our product.

A 10300

ENVIRONMENTAL PROTECTION SURVEY - ENVIRONMENTAL IMPACT ANALYSIS

PLANT King City

COMPLETED BY F. H. Larrison DATE March 1973

XV. - SPECIAL PROBLEMS

B. Community Complaint and Attitude Towards Industry

MINE

Public comments have been limited to two groups: one group being the Bureau of Land Management and the other being the San Benito County Supervisors.

In August 1971 the Bureau of Land Management finalized its designation of the San Benito Mountain natural area. Prior to this, UCC had agreed to curtail any immediate development of their claims located within this area.

The San Benito County Board of Supervisors initiated, in June 1972, a proposed quarrying ordinance which would be directed toward reclamation of mined areas. As of this writing, UCC has no further word on the status of the ordinance.

Note: The UCC present mining operations and the majority of its claims are located in San Benito County. Some claims are in adjacent Fresno County.

MILL

There have been no community complaints directed toward the mill. Some complaints have been voiced verbally to people working at the mill - concerning truck traffic on the Bitter Water road during the time ore is being hauled from the mine to the mill.

Community attitude toward the mill operation has been favorable so far as we know.

A10501

ENVIRONMENTAL PROTECTION SURVEY - ENVIRONMENTAL IMPACT ANALYSIS

PLANT King City, CA

COMPLETED BY F. H. Larrison DATE March 1973

XV. - SPECIAL PROBLEMS

C. Emissions/Items not in Compliance with Existing Regulations or Regulatory Agency Requests (Describe Items and Plans for Compliance)

MILL

Fiber count in the bagging still exceeds TLV at times when operating the palletizer - due to the air-magnet mode of operation of the machine. A new palletizer is on order and will be installed by mid 1973.

EPA regulations call for cloth filter type collectors on asbestos ore dryer off-gas stacks. Baghouse collectors are on order, engineering is completed, and installation of the collectors should be complete by mid 1973.

A 10502

PROCESS SURVEY - ENVIRONMENTAL IMPACT ANALYSIS

PLANT King City, CA

COMPLETED BY F. H. Larrison DATE March 1973

XVI. - MISCELLANEOUS

MINE

1. Plans for Improvement

   A. Resurface portions of the UCC private ore haulage road with asphaltic pavement. This will improve the dust problem and reduce road maintenance costs as well as insuring greater vehicular safety and performance.

   B. Insist on more adequate ore truck side boards and better tie downs for the tarps. Past conditions have resulted in minor spillage over the sides of the trucks.

   C. Investigate the benefits of cab pressurized air conditioning units on the front end loaders. This would eliminate the wearing of respirators except during severe dust conditions.

   D. Continue to collect airborne dust samples during mining operations to determine the need for increased dust suppression methods.

   E. Improve and enlarge the water spraying dust control systems installed in 1972.

MILL

Improvements

1. It is possible that government regulations will result in our having to build a change house where each man can have two lockers so separated that his street clothes will not be contaminated by his work clothes. This is in a state of flux and depends upon interpretation of the regulations and our success of failure in achieving TLV levels in the bagging area. It was thought that if necessary a change house would not be required before 1974.

2. Plant engineering will direct efforts at noise abatement in the mill as time is available.

3. Installation of a pellet cooling circuit will allow bagging of pellets in non-perforated bags by an auger packer rather than a pressure packer, which will help control dust levels somewhat. Other engineering efforts are directed toward bags with positive sealing fill spouts and shrink wrapping of individual bags and pallets to minimize spillage both internally and externally to the mill.

Monitoring - The operation is presently monitored for airborne asbestos fiber by sampling at nine locations each month. Future monitoring will probably require time weighted exposure determinations at six month intervals on operators.

A 10503