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UNION CARBIDE — INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION • P. O. BOX K, KING CITY, CALIFORNIA 93930

RECEIVED
JUL 5 1973
W. C. THURBER

To (Name) R. G. Beverly
Division Mining & Metals
Location Grand Junction

Date June 14, 1973

Originating Dept.

Answering letter date

Subject

Copy to J. F. Emerson
W. N. Johnson
W. C. Thurber
Dr. J. S. Whitaker

Attached find a copy of the waiver request, and accompanying cover letter, which was submitted to the EPA on 6-14-73 regarding operation of the main circuit dryer at the King City Asbestos Mill.

The mine operation was inspected 6-14-73 by Mr. Ed Davies of the California Division of Industrial Safety. He informed the mine foreman, R. O. Hopper, that he closed down the Atlas Chemical Asbestos Plant on June 12 due to dust pollution and safety hazards.

F. H. Larrison, Jr.

/clg

JUN 18 1973

PLAINTIFF'S EXHIBIT
tabbies
UC-1591

UNION CARBIDE
THE DISCOVERY COMPANY

Calidria ASBESTOS

UNION CARBIDE CORPORATION • MINING & METALS DIVISION • P.O. BOX K • KING CITY, CALIF. 93930 • TEL: 408-385-5961

June 14, 1973

Mr. S. L. Zwicker
Enforcement Division-Region IX
100 California Street
San Francisco, California 94111

Dear Mr. Zwicker:

This is a waiver request for one emission source at Union Carbide's King City, California Asbestos Plant as provided for in Section 61.10, of the Federal Register dated April 6, 1973. This was discussed with you by phone by Mr. R. G. Beverly, Director of Environmental Control, on June 7, 1973.

In October, 1973 we initiated projects to install two bag collectors on two product drier discharges. These projects are essentially complete and we expected to be in complete compliance with the National Emission Standards for Asbestos prior to the compliance date of July 5, 1973. For this reason we did not file a waiver request earlier. One of the bag collectors was installed and put in operation early in June. Tests of the second collector show that the manufacturer's fan curves were in error and that a larger fan is required. This waiver request is for a period until December 31, 1973 in order to purchase and install a larger fan and the required accompanying electrical distribution equipment. During this period we expect to be in compliance with the emission standard a large portion of the time in that there will be no visible emission. While producing certain products slight emissions are visible. Ambient air samples and observations indicate no significant off-property discharge will occur.

Completed Waiver Request Form OMB No. 158-R0098 is enclosed along with a chart showing the project schedule and significant dates pertaining to the completion of the project.

If there are any questions concerning this waiver request, please call me at 408-385-5961.

Very truly yours,

Floyd H. Larrison, Jr.
Manager King City Operation

/clg
enc:

This paper contains "Calidria" asbestos T-135, an efficient, low-cost opacifier. It is 60-lb. Fairmount offset produced by Tileston & Hollingsworth Co., a subsidiary of Diamond International Corporation.

FORM APPROVED
OMB NO. 158-R0098

EPA USE ONLY

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## II. WAIVER REQUESTS

A. WAIVER OF COMPLIANCE. Owners or operators of sources unable to operate in compliance with the National Emission Standards for Hazardous Air Pollutants by July 5, 1973 may request a waiver of compliance from the Administrator of the U.S. Environmental Protection Agency for the time period necessary to install appropriate control devices or make modifications to achieve compliance. The Administrator may grant a waiver of compliance with the standard for a period not exceeding two years from the effective date of the hazardous pollutant standards, if he finds that such period is necessary for the installation of controls and that steps will be taken during the period of the waiver to assure that the health of persons will be protected from imminent endangerment.

The reporting information provided in Section I must accompany this application. Applications should be sent to the appropriate EPA regional office.

1. Processes Involved - Indicate the process or processes emitting hazardous pollutants to which emission controls are to be applied.

   Asbestos Product-Kiln type-Rotary Dryer

2. Controls

   a. Describe the proposed type of control device to be added or modification to be made to the process to reduce the emissions of hazardous pollutants to an acceptable level. ( Use additional sheets if necessary.)

   Mdl. 500-12 ICA Clean Dust Collector with single hopper-480 tubes and pulse clean cleaning system. Manufacturer-Industrial Clean Air Inc.

   b. Describe the measures that will be taken during the waiver period to assure that the health of persons will be protected from imminent endangerment. (Use additional sheets if necessary).

   Dryer off-gas currently meets emission standard for particulate matter as required by Monterey-Santa Cruz County Unified Air Pollution Control District.

3. Increments of Progress - Specify the dates by which the following increments of progress will be met.

   - Date by which contracts for emission control systems or process modifications will be awarded; or date by which orders will be issued for the purchase of the component parts to accomplish emission control or process modification.

     L54 [1|1] MONTH [1|3] DAY [7|2] L59 YEAR 01

   - Date of initiation of non-site construction or installation of emission control equipment or process change.

     L54 [0|1] MONTH [2|6] DAY [7|3] L59 YEAR 02

   - Date by which on-site construction or installation of emission control equipment or process modification is to be completed.

     L54 [1|2] MONTH [1|5] DAY [7|3] L59 YEAR 03

   - Date by which final compliance is to be achieved.

     L54 [1|2] MONTH [3|1] DAY [7|3] L59 YEAR 04

| SIGNATURE OF OWNER OR OPERATOR | DATE |
|---|---|
| [signature] | 6-11-73 |



*Union Carbide trial exhibit UC-1591: F. H. Larrison, Jr. to R. G. Beverly Transmitting EPA Asbestos Emission Waive...* Published by AsbestosClaims.Law
ACL Doc 16689 · Page 3 of 4 asbestosclaims.law/library/16689/3

TITLE: Dryer Dust Collectors — Job No.- 935-1077-4

PROJECT ENGINEER: J.A. Riddle and V.O. Holt | PROCESS ENGINEER:

COST ESTIMATE No: | DATED: Revised 6-8-73 | ESTIMATE: CAPITAL - $209,000 NON CAPITAL -

ENGINEERING WORK: ☐ ENGINEERING DEPT. ☐ OUTSIDE ENGINEERING

| ITEM | YEAR / MONTH | 1972 Oct. 1 | Nov. 2 | Dec. 3 | 1973 Jan. 4 | Feb. 5 | Mar. 6 | Apr. 7 | May 8 | June 9 | July 10 | Aug. 11 | Sept. 12 | Oct. 13 | Nov. 14 | Dec. 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 2 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Design Engineering | | | | | | | | | | | | | | | | | | | | | | | | | |
| Purchasing | | | | | | | | | | | | | | | | | | | | | | | | | |
| Fab. + Delivery | | | | | | | | | | | | | | | | | | | | | | | | | |
| Construction: R.G. 244 Bag Filter | | | | | | | | | | | | | | | | | | | | | | | | | |
| Multi-Louvre Dryer Bag Filter | | | | | | | | | | | | | | | | | | | | | | | | | |
| New Blower | | | | | | | | | | | | | | | | | | | | | | | | | |
| New Electric Supply | | | | | | | | | | | | | | | | | | | | | | | | | |
| Engr. Check-Out | | | | | | | | | | | | | | | | | | | | | | | | | |

REMARKS:

Project revision because of marginal performance of Multilouvre Dryer off-gas exhaust fan.

SCOPE No M+M 72-1

DESIGN MEMO No 3

SUPPLEMENT No 0

DATE ISSUED Oct. 16, 1972

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