PLAINTIFF'S EXHIBIT

UC-3344

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.

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FORM APPROVED
OMB NO. 158-R0098

EPA USE ONLY

1 R S C SC 13

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 6-21-73

UCC 009305

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UCC 009306