UNION CARBIDE

INTERNAL CORRESPONDENCE

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To (Name)
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Location

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Copy to

Messrs. R. E. Byrne, Jr.
J. L. Myers
File ✓

Date: November 16, 1973

Originating Dept.: "Calidria" Asbestos

Answering letter date:

Subject: Effluent Limitations Guidelines for Asbestos Manufacturing Point Source Category - Proposed Rules

Dear Bill:

John Myers has asked me to review and comment on the proposed rule-making noted above.

This rulemaking applies to water discharges from certain point sources which use asbestos in the specified manufacturing operations. The only end use in the group covered where UCC is now supplying product is floor tile. In this category both existing and new sources must achieve only the "best practicable control technology" criteria by July 1, 1977. This is in contrast to most of the industries covered where new sources must have zero discharge.

The required maximum discharge levels that must be met are compared in the following table with those reported as industry averages in the EPA background report:

		Proposed Rule	Background Study
TSS (Suspend Solids)	kg/mpc	0.06	0.18
COD	kg/mpc	0.14	0.36
pH		6-9	6.9-8.3

Reductions on the order of 1/2-1/3 are to be required for TSS and COD but the final values are still substantially above zero. These do not seem to be particularly stringent requirements but we are obviously not in a position to assess this or provide comment to EPA.

In 1983 all plants must comply with zero discharge to navigable waters or to publicly owned treatment works. For this industry, this does not seem to be particularly burdensome to meet.

Overall, it would appear that this particular rulemaking will not have any direct effect on our business but this should be verified at our floor tile accounts as part of the preparation of the Market Profile for this industry. We have no basis to provide written comment to the EPA.

Very truly yours,

Harry

H. B. Rhodes

H3R:cjb

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