Calidria ASBESTOS

UNION CARBIDE

THE DISCOVERY COMPANY

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PLAINTIFF'S EXHIBIT

UC-4529

March 22, 1972

Dr. J. U. Crowder
Environmental Protection Agency
Office of Air Programs
Research Triangle Park, N.C. 27711

Dear Jim:

Reprinted below are additional comments from our Engineering Department on the "Control Techniques" document.

" I reviewed sections 3.2.3 and 4.1 to 4.19 of the draft of "Control Techniques for Asbestos Emissions" with L.C. Rowe, the Engineering Department's Cost Engineer.

His figures indicate that a standard open belt conveyor, with walkway along one side, will cost about $200/linear foot. Adding hinged belt covers would add about $5-6/linear foot, depending on belt width. A conveyor in a completely enclosed gallery would cost $325/L.F.

The best reference I have seen on tailings stabilization is an article in the "Journal of Soil and Water Conservation", Vol. 26, No. 4, July-August, 1971, "Temporary Wind Erosion Control-Cost and Effectiveness of 34 Commercial Materials". The eight materials that were judged effective ranged in cost from $26.90 to $49.50 per acre for material alone, which would be $0.063 to $0.114 per 100 square feet, plus an estimated $71 per acre, $0.163 per 100 square feet, for application. The total cost is thus $0.226 to $0.277 per 100 square feet for the coatings mentioned in the article. Note that these gave only temporary protection. We have tried sodium silicate and Coherex on King City tailings and found them ineffective.

Actual price comparisons for shaken-bag filters indicate that the exponent (n) in the cost vs capacity relationship

$$C_2 = C_1 \left(\frac{Q_2}{Q_1}\right)^n$$

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should be 0.94. This results from the direct relationship of capacity to bag area, and hence to cost.

Referring to Table 4-3, our total installed costs are usually 3.5 times the purchased cost of the basic device, and this should be increased to five times for high energy wet scrubbers, since the basic device is relatively simple but the fans and slurry handling equipment is the expensive part. These should be the typical values, rather than the extremes. "

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We feel that the emission factor in Table 5-1 (p. 5-3) for mining and basic processing of "93 lb/ton of asbestos produced" is ridiculously high but we have no data on which to establish a lower number. This would indicate to a local inspector that we were emitting an average of 9300 pounds of asbestos to the surrounding countryside every day!

Very truly yours,

John L. Myers

John L. Myers
Marketing Manager

/cvb

cc: JWR/WNJ
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