FROM P. R. ATKINS

PITTSBURGH OFFICE

TO ~~MR. E. B. PARKER~~

ROCKDALE WORKS

~~FBB~~

RPC

May 16, 1973

RE: EPA HAZARDOUS MATERIAL REPORT

I reviewed the Asbestos Source Report in which you proposed to identify several Marinite fabricating operations and the dumping of potlining as sources of hazardous air emissions. I have concluded that these sources do not fall under the April 6 regulation and, therefore, should not be mentioned in your source report. Since the Rockdale Works uses no beryllium, mercury or asbestos in operations covered by the National Emission Standards for Hazardous Air Pollutants, you should draft a letter to this effect for submission to Art Bush of Region VI. I would like to review this draft when it is complete.

Even though the present regulation does not cover the operations discussed above, we certainly should not use this fact as an excuse for inaction. We all recognize that emissions from Marinite cutting should be eliminated or minimized. Continue to work toward centralizing the Marinite working equipment into a single well-hooded area equipped with an adequate air-cleaning device such as a bag filter. Also continue to seek ways to reduce the dusting that occurs during the pot dumping operation. I suggest you look into ways of more effectively wetting the lining material and methods of removing the bath material without dumping. Please keep me posted on your plans and progress in these areas. I will be happy to discuss these matters as soon as you wish.

Pat Atkins

PATRICK R. ATKINS

PLAINTIFF'S EXHIBIT AL-431

vmd

cc: T. B. Bonney - Pittsburgh
R. P. Carter - Pittsburgh
M. O. Colwell - Pittsburgh
L. V. Cralley - Pittsburgh
V. W. Rieke - Pittsburgh
F. E. Mueller - Pittsburgh
G. R. Swany - Pittsburgh
F. P. Bergeron - Rockdale
H. A. Bower - Rockdale
B. M. Starner - Rockdale
D. D. McGregor - Rockdale
H. W. Franseen - Rockdale
E. C. Remaley - Rockdale
J. D. Shinn, J. O. Tesh - Rockdale

ALCOA

SF-4568 (REV. 11-68)

409653 0056

Mr R P Canter - Pittsburgh

FROM E. B. Parker

Rockdale Works

TO Dr. P. R. Atkins

Pittsburgh Office

May 8, 1973

EPA ASBESTOS SOURCE REPORT

Attached is a copy of information to be submitted to EPA in accordance with the requirements of regulations covering emissions of asbestos, mercury and beryllium published in the Federal Register on April 6, 1973. The mercury and beryllium standards are definitely not applicable to Rockdale, and there is at least some question about the asbestos standard. If they do apply, Rockdale's potential sources of asbestos or asbestos containing material are:

1) Emissions from Bldg. 27 resulting when spent potlinings are dumped from potshells.

2) Emissions from the wet cyclone collector serving the Marinite saw in the carpenter shop (Bldg. 47).

3) Emissions from the cyclone-bag filter-spray chamber combination collector serving the Marinite machining equipment in Bldg. 44.

4) Emissions from the bag filter collector serving the Marinite milling machine in Bldg. 44.

After studying the regulations, there is considerable doubt in my mind if any of these operations would fall under the regulations in question. For example, the sawing and machining of Marinite would appear to fall in the category of fabricating operations and the commentary preceding the regulation (Page 8821) specifically excludes fabricating operations. It would appear the dumping of spent potlining material would fall in the category of demolition. That part of regulations concerned with demolition would appear to be directed at building demolition and not a small scale operation like potlining demolition. For your information, we normally dump a maximum of 13 pots per week, or slightly less that 3 pots per day. Dumping is carried out on the 12-8 shift when the number of workers in the area is a minimum. For these reasons, we question the applicability of the regulations to our operation. However, we have completed the necessary forms in the event that in your judgment, they should be submitted. We would ask for a waiver for the potlining dumping operation, on the basis of a change of materials. It would also be necessary to ask for a waiver for the Marinite sawing operation, since, when heavy sawing is

being done, the homemade wet cyclone emits some dust. Our waiver would indicate the consolidation of all Marinite fabricating operations in one location and an RFA for this is presently in Pittsburgh. The schedule developed for the waiver application is contingent on approval of this RFA in June, 1973. Perhaps you could verify this when you review the report.

None of the other areas where asbestos is used would constitute an outside emission source.

We will welcome your comments and questions.

E. B. Parker

EBP:ak
Attachment
Copies: R. P. Carter - Pittsburgh
L. V. Cralley - Pittsburgh
V. W. Rieke - Pittsburgh
F. E. Mueller - Pittsburgh
G. R. Swany - Pittsburgh
F. P. Bergeron - Rockdale
H. A. Bower - Rockdale
B. M. Starner - Rockdale
D. D. McGregor - Rockdale
H. W. Franseen - Rockdale
E. C. Remaley - Rockdale
J. D. Shinn, J. O. Tesh - Rockdale

ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1600 PATTERSON, SUITE 1100
DALLAS, TEXAS 75201

APR 20 1973

OFFICE OF THE
REGIONAL ADMINISTRATOR

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Plant Manager
Sources of Asbestos, Beryllium, and Mercury Emissions
Arkansas, Louisiana, New Mexico, Oklahoma, and Texas

Dear Sir:

Section 112 of the Clean Air Act, as amended, authorizes the Administrator of the Environmental Protection Agency (EPA) to promulgate and enforce regulations for hazardous materials. On April 6, 1973, National Emission Standards for Hazardous Air Pollutants (NESHAPS) were promulgated for asbestos, beryllium, and mercury. Notice of promulgation was published in the April 6, 1973, issue of the Federal Register (40 CFR Part 61). All existing affected facilities having emissions of the above materials must register with EPA, through the Regional Office, within 90 days of promulgation of NESHAPS, and must either be in compliance with the regulations, be operating under a waiver granted by EPA, or shut down after 90 days. No new source may be constructed or an existing source modified after the effective date of NESHAPS without EPA approval.

A copy of the April 6, 1973, Federal Register and a set of registration and waiver forms are enclosed with this notice. If applying for a waiver, you are encouraged to submit the application as soon as possible so that it may be processed before July 6, 1973. No source may operate out of compliance after this date without a waiver. New sources wishing to construct or existing sources wishing to modify must apply for approval through this office. For your reference a list of affected facilities is enclosed. If you are in doubt as to the applicability of the NESHAPS to your facility, you are encouraged to contact this office.

Since your facility is listed in our files as a potential hazardous material emission source, we are requesting that you state, in writing, whether or not you process asbestos, beryllium or mercury and give a brief description of the process(es). This information is requested under Section 114(a) of the Clean Air Act, as amended, which requires the owner or operator of any emission source to provide the information to EPA upon request.

409653 0059

Under Section 113(a) (3) of the Act (42 U.S.C. §1857c-8(a)), failure to provide the information required by the NESHAPS regulations promulgated on April 6, 1973, pursuant to Section 112 of the Act (42 U.S.C. §1857c-7) or information requested under Section 114 (42 U.S.C. §1857c-9) may result in an order requiring compliance or in a civil action for appropriate relief. In addition, Section 113(c)(1) provides that any person who knowingly fails or refuses to comply with any such order shall be subject to a fine of not more than $25,000 per day of violation, or imprisonment for not more than one year, or by both.

Additionally, Section 113(c)(2) of the Act (42 U.S.C. §1857c-8(c)(2)) provides that any person who knowingly makes any false statement in any application, or other document filed under this Act shall be punished, upon conviction, by a fine of not more than $10,000 or by imprisonment for not more than six months, or by both.

In order to aid sources in methods of controlling emissions, the following three documents may be obtained from the Region VI Office: (1) Control Techniques for Asbestos Air Pollutants, AP-117; (2) Control Techniques for Beryllium Air Pollutants, AP-116; and (3) Control Techniques for Mercury Emissions from Extration and Chlor-Alkali Plants, AP-118.

If you have any questions concerning this matter, please contact Mr. Jack Divita, Hazardous Emissions Program Officer, Enforcement Division, at (214) 749-2142.

Sincerely yours,

Arthur W. Busch
Regional Administrator

Enclosure

SOURCES AFFECTED BY NESHAPS REGULATIONS

Asbestos

1. Asbestos Mills
2. Manufacturing
    a. Cloth, cord, wicks, tubing, tape, twine, rope, thread, yarn, roving, lap, or other textile materials
    b. Cement products
    c. Fireproofing and insulating materials
    d. Friction products
    e. Paper, millboard, and felt
    f. Floor tile
    g. Paints, coatings, caulks, adhesives, and sealants
    h. Plastics and rubber materials
    i. Chlorine
3. Demolition of buildings and structures containing asbestos
    a. Institutional
    b. Industrial
    c. Commercial
    d. Apartment houses of more than four dwelling units
4. Spraying
    a. Equipment and machinery
    b. Buildings, structures, pipes, and conduits
5. Roadways - asbestos tailings

409653 0061

Beryllium

1. The following are affected sources when processing beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing wastes:

   a. Extraction plants

   b. Ceramic plants

   c. Foundries

   d. Incinerators

   e. Propellant plants

2. Machine shops when processing beryllium, beryllium oxides, or alloys containing over five percent beryllium by weight.

3. Beryllium rocket motor firing.

Mercury

1. Processing of mercury ore to recover mercury.

2. Mercury chlor-alkali cells.

409653 0062

[illegible]

ROCKDALE TEXAS

May 8, 1973

Mr. Arthur W. Busch
Regional Administrator
Environmental Protection Agency
Region VI
1600 Patterson, Suite 1100
Dallas, Texas 75201

Dear Mr. Busch:

Attached you will find the completed compliance status report describing the situation existing at Aluminum Company of America, Rockdale, Texas, Works with respect to sources of asbestos, beryllium and mercury emissions.

The data is concerned only with asbestos, since those sections of the regulations publiched in the April 6, 1973, Federal Register dealing with beryllium and mercury are not applicable to our plant operations.

Included with the information are two waiver requests. One covers an operation involving the dumping of spent reduction cell linings which contain a small amount of asbestos insulation. As noted in the report, this material has been replaced with asbestos free insulation and cells relined subsequent to February 1, 1973, do not contain asbestos. However, we estimate that it will be three years before all cells containing asbestos have been removed from service and relined.

The second waiver relates to a wet cyclone dust collector serving a saw which is used to cut Marinite, a hard, board-life asbestos containing product supplied by Johns-Manville. On occasion visible emissions can be detected from this device. The emissions are related to the type of work being done and can be minimized by controlling the material feed rate to the saw. It is our intent to centrally locate all Marinite fabricating operations and purchase a new dust collector to handle them all, including the saw.

We will be happy to answer any further questions you may have.

Sincerely,

E. Brooks Parker
Works Environmental Engineer

EBP:ak
Attachment

409653 0063

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
COMPLIANCE STATUS INFORMATION

FORM APPROVED
OMB NO. 158-R0035

I. SOURCE REPORT

INSTRUCTIONS: Owners or operators of source of hazardous pollutants subject to the National Emission Standards for Hazardous Air Pollutants are required to submit the information contained in Section I to the appropriate U.S. Environmental Protection Agency Regional Office before July 6, 1973.

A listing of regional offices is provided in § 61.04.

EPA USE ONLY

1 | R | S | C | SC | 13

16 ACCR | RP | CITY 28 | REC 60

A. SOURCE INFORMATION

1. Identification/Location - Indicate the name and address of each source.

A	L	C	O	A															

A29 COMPANY NAME A48

B	O	X		4	7	2													

A49 NUMBER STREET NAME A68

R	O	C	K	D	A	L	E												

B19 CITY B33

T	X

STATE

7	6	5	6	7					

B34 ZIP CODE B38

M	I	L	A	M															

COUNTY

2. Contact - Indicate the name and telephone number of the owner or operator or other responsible official whom EPA may contact concerning this report.

F	R	E	D		P		B	E	R	G	E	R	O	N					

B39 NAME B53

5	1	2	4	4	6	5	8	1	1

B54 TELEPHONE B63

3. Source Description - Briefly state the nature of the source (e.g., "chlor-alkali Plant," or "Machine Shop").

A	L	U	M		I	N	U	M		R	E	D	U	C	T	I	O	N		P	L	A	N	T

C19 C43

4. Alternative Mailing Address - Indicate an alternative mailing address if correspondence is to be directed to a location different than that specified above.

C44 NUMBER STREET NAME C68

C78 C79

C64 CITY C77 STATE

D75 ZIP CODE D79

5. Compliance Status - The emissions from this source ☐ can ☐ cannot meet the emission limitations contained in the National Emission Standards on or before July 5, 1973.

SIGNATURE OF OWNER, OPERATOR OR OTHER RESPONSIBLE OFFICIAL

NOTE: If the emissions from the source will exceed those limits set by the National Emission Standards for Hazardous Air Pollutants, the source will be in violation and subject to Federal enforcement actions unless granted a waiver of compliance by the Administrator of the U.S. Environmental Protection Agency. The information needed for such waivers is listed in Section II of this form.

409653 0064

I. B. PROCESS INFORMATION. Part B should be completed separately for each point of emission for each hazardous pollutant.

EPA USE ONLY

G14 G15 G46 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

   M A R I N I T E S A W
   G21 G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

   A B
   G19 G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

   1 1 0 0
   G54 G60

4. Control Devices

   a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

   W E T C Y C L O N E
   H19 PRIMARY CONTROL DEVICE TYPE H34

   H51 H53
   9 5 . +
   PERCENT REMOVAL EFFICIENCY

   H35 SECONDARY CONTROL DEVICE TYPE H50

   H54 . H56
   PERCENT REMOVAL EFFICIENCY

   b. Asbestos Emission Control Devices Only

      i. If a baghouse is specified in Item 4a, give the following information:

         . The air flow permeability in cubic feet per minute per square foot of fabric area.

         Air flow permeability = _____ cfm/ft^2

         . The pressure drop in inches water gauge across the filter at which the baghouse is operated.

         Operating pressure drop = _____ inches w.g.

         . If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

         . If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

         Thickness = _____ inches Density = _____ oz/yd^2

      ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

         . Unit ~~contacting energy~~ pressure drop = 2.5 inches w.g.

EPA USE ONLY

cc H57

409653 0065

I. B. PROCESS INFORMATION. Part B should be completed separately for each point of emission for each hazardous pollutant.

EPA USE ONLY

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

M	A	R		I	N	I	T	E		M	I	L	L	I	N	G		M	A	C	H	I	N	E	

C21 C45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

A	B

G19 G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

				9	0	0

G54 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

B	A	G	H	O	U	S	E							

H19 PRIMARY CONTROL DEVICE TYPE H34

H51 | 9 | 9 | . | + | H53 PERCENT REMOVAL EFFICIENCY

H35 SECONDARY CONTROL DEVICE TYPE H50

H54 | | . | | H56 PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

- The air flow permeability in cubic feet per minute per square foot of fabric area.

  Air flow permeability = 40-50 cfm/ft^2 at .5" H_2O

- The pressure drop in inches water gauge across the filter at which the baghouse is operated.

  Operating pressure drop = ~2.0 inches w.g.

- If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☒ or not spun.

- If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

  Thickness = .1 inches Density = 7 oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

- Unit contacting energy = _____ inches w.g.

EPA USE ONLY

cc H57

409653 0066

I. B. PROCESS INFORMATION. Part B should be completed separately for each point of emission for each hazardous pollutant.

EPA USE ONLY

G14 G15 G16 G45 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

   MAR INITE MACHINING
   G21 G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

   AB
   G19 G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

   900
   G54 G60

4. Control Devices

   a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

   CYCLONE+BAGHOUSE) H51 . H53
   H19 PRIMARY CONTROL DEVICE TYPE H34) PERCENT REMOVAL EFFICIENCY

   PLUS SPRAY CHAMBER) H54 99 . + H56
   H35 SECONDARY CONTROL DEVICE TYPE H50 PERCENT REMOVAL EFFICIENCY

   b. Asbestos Emission Control Devices Only

   i. If a baghouse is specified in Item 4a, give the following information:

   - The air flow permeability in cubic feet per minute per square foot of fabric area.

     Air flow permeability = 50 cfm/ft^2 at .5" H_2O

   - The pressure drop in inches water gauge across the filter at which the baghouse is operated.

     Operating pressure drop = 2.0 inches w.g.

   - If the baghouse material contains synthetic fill yarn, check whether this material is [ ] spun [X] or not spun.

   - If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

     Thickness = .1 inches Density = 7 oz/yd^2

   ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

   - Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC H57

409653 0067

I. B. PROCESS INFORMATION. Part B should be completed separately for each point of emission for each hazardous pollutant.

EPA USE ONLY

G14 G15 G16 G20 G22 G23

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

R E D U C T I O N C E L L R E L I N I N G

G21 G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

A B

G19 G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

1 7 0 0

G54 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

N O N E

H19 PRIMARY CONTROL DEVICE TYPE H34

H51 H53

PERCENT REMOVAL EFFICIENCY

N O N E

H35 SECONDARY CONTROL DEVICE TYPE H50

H54 H53

PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

- The air flow permeability in cubic feet per minute per square foot of fabric area.

  Air flow permeability = _____ cfm/ft^2

- The pressure drop in inches water gauge across the filter at which the baghouse is operated.

  Operating pressure drop = _____ inches w.g.

- If the baghouse material contains synthetic fill yarn, check whether this material is ☐ spun ☐ or not spun.

- If the baghouse utilizes a felted fabric, give the average thickness in inches and the density in ounces per square yard.

  Thickness = _____ inches Density = _____ oz/yd^2

ii. If a wet collection device is specified in Item 4a, give the designed unit contacting energy in inches water gauge.

- Unit contacting energy = _____ inches w.g.

EPA USE ONLY

cc H57

409653 0068

EPA USE ONLY

VI. 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.

   Reduction Cell Relining

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.)

   Substitution of asbestos-free insulating material for material containing asbestos. Estimate three years before asbestos material is out of the system.

   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).

   Spent linings will be dumped during off-shift periods when number of employees in area is a minimum

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 [0][2] MONTH [0][1] DAY [7][3] YEAR L59 — 01 — No asbestos containing insulation received after this date

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

     L54 [ ][ ] MONTH [ ][ ] DAY [ ][ ] YEAR L59 — 02 — Not applicable

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

     L54 [0][2] MONTH [0][1] DAY [7][6] YEAR L59 — 03 — Estimate all old linings will have been removed by this date.

   - Date by which final compliance is to be achieved.

     L54 [0][2] MONTH [0][1] DAY [7][6] YEAR L59 — 04 — Same as (03)

SIGNATURE OF OWNER OR OPERATOR	DATE

409653 0069

II. WAIVER REQUESTS

EPA USE ONLY

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.

   Marinite sawing

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.)

   A new bag filter dust collector will be purchased to serve all marinite fabricating operations.

   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).

   Will control the rate of sawing to minimize visible emissions from existing wet cyclone.

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 [0|7] MONTH [0|1] DAY [7|3] L59 YEAR — 01

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

     L54 [0|9] MONTH [0|1] 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|1] DAY [7|4] L59 YEAR — 03

   - Date by which final compliance is to be achieved.

     L54 [0|3] MONTH [0|4] DAY [7|4] L59 YEAR — 04

SIGNATURE OF OWNER OR OPERATOR	DATE

409653 0070