

FILE NAME: Calaveras (CALV)

DATE: 1984 Nov 20

DOC#: CALV014

DOCUMENT DESCRIPTION: Calaveras Response to EPA Findings of Violation

REQUEST 3

000086



November 20, 1984

Mr. Steve Cimperman
Environmental Engineer
Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105
Mail Stop A-3-3

Dear Steve:

Please be advised that Calaveras Asbestos, Ltd. has installed the following dust control devices on our waste conveyor system in order to eliminate the slight visible emission at the E-5 head pulley:

1. Return Scrapers

A. 96 ft of 2 in channel	\$ 59.00
B. 18½ ft of ½ in skirting	41.00
C. 9½ ft of ½ in Teflon	39.00
D. 64 man-hours @ \$12.50/hour	<u>800.00</u>
Approx. Cost to Date	\$939.00

2. Boomerang Scrapers

A. 32 ft of ½ in MS Plate	\$ 145.00
B. 10 ft of 2½ in x 2½ in angle	8.00
C. 10 ft of 3 in x 5 in x 5/16 in angle	20.00
D. 10 ft of ½ in x 6 in skirting	23.00
E. 5 ft of ½ in x 6 in Teflon	21.00
F. 15 ft of 6 in channel	24.00
G. 17 ft of ¼ in x 2½ in flatbar	7.00
H. 13 ft of 3 in x 3 in angle	12.00
I. 160 man-hours @ \$12.50/hour	<u>2,000.00</u>
Approx. Cost to Date	\$2,260.00

3. Belt Enclosure

A. 68 ft of 1/8 in MS Plate	\$ 65.00
B. 3 ft of ½ in x 4 in flatbar	3.00

000087

Mr. Steve Cimperman
November 20, 1984
Page 2

3. Belt Enclosures continued.

C. 6 ft of 3/16 in x 2 in x 2 in angle	\$ 3.00
D. 33 ft of 3 in channel	30.00
E. 22 ft of 1/2 in x 6 in rubber skirting	50.00
F. 33 ft of 1/4 in x 15 in plastic skirting	96.00
G. 72 man-hours @ \$12.50/hour	<u>900.00</u>
Approx. Cost to Date	\$1,147.00

4. Water and Dustrol Spray System

A. 30 ft of 1 in pipe	\$ 12.00
B. 33 ft of 1/2 in pipe	9.00
C. 10 1/2 in sprinkler heads	14.00
D. 10 1/2 in gate valves	30.00
E. One 7 1/2 HP pump	700.00
F. One 1 in solenoid valve	143.00
G. One 1000 gallon tank	900.00
H. 80 man-hours @ \$12.50/hour	<u>1,000.00</u>
Approx. Cost to Date	\$2,708.00

Total = 7,254.00

5. Continual Items

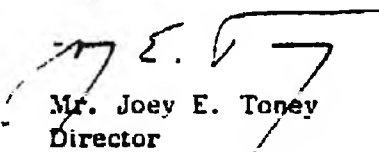
A. Approx. 1,056 man-hours per year @ \$12.50/hour for maintenance	\$13,200.00
B. Approx. 4,900 gallons of Dustrol per year @ \$3.47 per gallon	<u>16,656.00</u>
Approx. Cost per Year	\$29,856.00

The total approximate cost of these control measures to date is \$36,910.00.

These control measures have effectively eliminated the slight visible emission at the E-5 head pulley. If any additional information is needed, please call.

Sincerely,

CALAVERAS ASBESTOS, LTD.


Mr. Joey E. Toney
Director
Environmental Affairs

JET/kf

000088

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

27 NOV 1984

CERTIFIED MAIL NO. 2407113639
Return Receipt RequestedIn Reply A-3-3
Refer To: EIR 3-6
Docket No. 9-74-19

Calaveras Asbestos, Ltd.
Mr. Gordon A. Coats, President
Calaveras National Resources, G.P.
P.O. Box 127
Copperopolis, CA 95229

Dear Mr. Coats:

Enclosed is a copy of a Finding of Violation issued pursuant to Section 113(a)(3) of the Clean Air Act, as amended (42 USC 5743) et seq.) (the Act) notifying you that the Director, Air Management Division, EPA, Region 9, finds Calaveras Asbestos, Ltd. in Copperopolis, California, in violation of 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos.

If you wish to meet with my staff to discuss this matter, please contact Mr. Stephen A. Cimperman of our Compliance Section, at (415) 974-6053.

Thank you for your cooperation in this matter.

Sincerely,

Original Signed By
David P. Howekamp

David P. Howekamp
Director,
Air Management Division

Enclosure

cc: California ARB
Calaveras County APCD

Mr. Keith Jones
Vice President for Operations
Calaveras Asbestos, Ltd.

bc: SSCD (EN-341)
A-3-1

A-3-2

CONCURRENCES

SYMBOL	A-3-3	A-3-1 (Cimperman)	A-3-2 (Bergstrom)	ONE				
SURNAME	Wiley	SAC	WLD					
DATE	11/1/84	Cimperman	Bergstrom	et	Bergstrom	et	Notice.draft	11/1-9
EPA Form 1320-1 (12-78)								

000089

OFFICIAL FILE COPY

GPO : 1982 O - 403-201

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for service(s) requested.

1. 11/30/84 Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
**Mr. James D. Boyd
Executive Officer
1102 "Q" Street
Sacramento, CA 95814**

4. Type of Service: Article Number
☒ Registered ☐ Insured **P 497 113 687**
☐ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and
DATE DELIVERED.

5. Signature - Addressee
James D. Boyd

6. Signature - Agent
☒

7. Date of Delivery
DEC 3 1984

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
**Calvaeras Asbestos, Ltd.
Mr. Gordon A. Coats, President
P.O. Box 127
Copperopolis, CA 95228**

4. Type of Service: Article Number
☐ Registered ☐ Insured **P 497 113 689**
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and
DATE DELIVERED.

5. Signature - Addressee
☒

6. Signature - Agent
☒ Benita Gelling

7. Date of Delivery
11-30-84

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

000090

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of	)	
	)	
Calaveras Asbestos , Ltd.	)	Docket No. 9-84-19
Copperopolis, California	)	
	)	
Proceeding Under Section 113(a)	)	
Clean Air Act, as amended	)	

FINDING OF VIOLATION

- I. The Director of the Air Management Division, Environmental Protection Agency (EPA), Region 9, pursuant to authority delegated by the Administrator and redelegated by the Regional Administrator, makes the following findings:
 - A. Pursuant to Section 112 of the Clean Air Act as amended in 1977 (42 USC §7401 et seq.) the Administrator of the EPA repromulgated on June 19, 1978 and April 5, 1984, 40 CFR Part 61 Subpart M - National Emission Standards for Asbestos. These regulations apply, in part, to the waste disposal for asbestos mills and are attached as Attachment A.

- II. Calaveras Asbestos, Ltd. has failed to comply with §61.151 of the attached regulations in that:
 - A. On June 19, 1984, the California Air Resources Board (CARB) conducted an on-site inspection of the Calaveras Asbestos, Ltd. facility near Copperopolis, California. The CARB inspectors observed visible emissions emanating from equipment known as the water screw No. 2 and the E-5 head pulley of the tailings conveyor.

000091

III. On the basis of the facts enumerated above the Director, Air Management Division, Environmental Protection Agency, Region 9 finds that:

A. Calaveras Asbestos, Ltd. has violated 40 CFR Part 61 §61.151 in that visible emissions were observed being emitted from equipment known as the water screw No.2 and the E-5 head pulley of the tailings conveyor.

Dated: _____

11/27/94



David P. Howekamp
Director
Air Management Division

000092

27 NOV 1984

CERTIFIED MAIL NO. 017117636
Return Receipt Requested

IN REPLY A-3-3
ATTN: 3-6
District No. 0-01-14

Mr. Robert E. Marshall, M.D.
Air Pollution Control Officer
Calaveras County APCD
Government Center
San Andreas, CA 95249

Dear Mr. Marshall:

Enclosed, for your information, is a copy of the finding of Violation issued by the Environmental Protection Agency, Region 9, to Calaveras Asbestos, Ltd. in Copperopolis, California. The finding cites a violation of 40 CFR Part 61, Subpart M - National Emission Standard for Asbestos, at their mill in Copperopolis.

If you have any questions regarding this matter, please contact Mr. Stephen A. Cimperman of our Compliance Section, at (415) 974-8063.

Sincerely,

David P. Howkaco
David P. Howkaco
Director
Air Management Division

Enclosure

Identical letter sent to:

James D. Boyd, Executive Officer
California Air Resources Board

cc: SSCD (EN-341)
ORC (Berstrom)
Cimperman A-3-3 (Lundholm)

21 disk C cimperman ltr & calvarascondemned 11-14-84							
SYMBOL	A-3-3	A-3-5					
SURNAME	Deby	SPC					
DATE	11/2/84	11/23/84					

EPA Form 1320-1 (12-79)

OFFICIAL FILE COPY
GPO : 1983 O - 625-201

000093

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.	
1. ☒ Show to whom, date and address of delivery.	
2. ☐ Restricted Delivery.	
3. Article Addressed to: Mr. Robert E. Marshall, M.D. Calaveras County APCD Government Center San Andreas, CA 95249	
4. Type of Service: ☐ Registered ☒ Certified ☐ Express Mail	Article Number P 497 113 688
Always obtain signature of addressee or agent and DATE DELIVERED	
5. Signature - Addressee X <i>[Signature]</i>	
6. Signature - Agent X	
7. Date of Delivery 11-30-84	
8. Addressee's Address (ONLY if requested and fee paid)	

DOMESTIC RETURN RECEIPT

000094

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the Matter of)
)
Calaveras Asbestos, Ltd.) Docket No. 9-14-19
Copperopolis, California)
)
Proceeding Under Section 113(d))
Clean Air Act, as amended)

FINDING OF VIOLATION

I. The Director of the Air Management Division, Environmental Protection Agency (EPA), Region 9, pursuant to authority delegated by the Administrator and redelegated by the Regional Administrator, makes the following findings:

A. Pursuant to Section 112 of the Clean Air Act as amended in 1977 (42 USC §7491 et seq.) the Administrator of the EPA re promulgated on June 19, 1978 and April 5, 1984, 40 CFR Part 61 Subpart M - National Emission Standards for Asbestos. These regulations apply, in part, to the waste disposal for asbestos mills and are attached as Attachment A.

II. Calaveras Asbestos, Ltd. has failed to comply with 401.151 of the attached regulations in that:

A. On June 19, 1984, the California Air Resources Board (CARB) conducted an on-site inspection of the Calaveras Asbestos, Ltd. facility near Copperopolis, California.

THE CARB 1130P CONCURRENCE EVALUATION VISIBILITY ASBESTOS EMISSIONS							
SYMBOL	A-3.3	A-3.3	ALL	from equipment known as the water screen No. 2 and the			
SURNAME	Ardley	SAC	WJ	of the tailings conveyor.			
DATE	11/21/84	11/23/84	11/26/84				

OFF 000095

III. On the basis of the facts enumerated above the Director, Air Management Division, Environmental Protection Agency, Region 9 finds that:

- A. Calaveras Asbestos, Ltd. has violated 40 CFR Part 61 561.151 in that visible emissions were observed being emitted from equipment known as the water screw No.2 and the F-5 hand pulley of the millings conveyor.

67 NOV 20
Dated: _____

Original Signed By:
David P. Hovensamp

David P. Hovensamp
Director
Air Management Division

cimperman/PJ d-C let/berolzheimer & Notice.draft 11/1-9
FINAL 11-14-84

000096

AIR RESOURCES BOARD

1102 Q STREET
P.O. BOX 2813
SACRAMENTO, CA 95812



November 2, 1984

David P. Howekamp, Director
Air Management Division
EPA, Region 9
215 Fremont Street
San Francisco, CA 94105

Dear Mr. Howekamp:

Report of Violation

On June 19, 1984, the Compliance Division of the California Air Resources Board conducted an inspection of Calaveras Asbestos, Ltd. in Copperopolis, CA. A violation of the NESHAPs standard, Subpart B, was observed along the tailings conveyor system and we have enclosed a Report of Violation to assist you in taking appropriate enforcement action.

Please let me know, within 15 days, what action you plan to take in this matter.

If you have any questions regarding the Report of Violation, please feel free to contact Mary Boyer at (916) 322-6037.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Morgester".

James J. Morgester, Chief
Compliance Division

Enclosure

000097