

1011456

CAMBRIDGE

TO: W. R. WRIGHT DATE: November 24, 1969
FROM: F. W. EATON ✓ SUBJECT: Trenton Air Pollution
CC: R. E. Schneider

On November 18, 1969, I met with members of the State of New Jersey Air Pollution Control Program to discuss corrective action taken at our Trenton plant, and the results of stack emission tests conducted on October 8, 9, and 10. Very briefly, this meeting was not necessary from their standpoint, and the items in question could have been handled in the normal fashion, that is, a letter in the legal sense, stating noncompliance. Rather than doing this, I received a phone call requesting that we get together and work things out.

Items discussed and actions to be taken are as follows:

1. Because we cannot meet allowable emissions from the perlite operation, namely the vent stack over the furnace and the product fines stack, I stated we plan to, a) replace the top of the perlite furnace, and b) install a bag house for the bagging tower fines and vent system. They went along with this approach, and will extend our Temporary Certificates To Operate to April 30, 1970, as requested in my letter to the State of New Jersey of October 23.
2. They will accept our emission level from the Model A furnace, but I must submit an alteration to the Application To Construct permit because the emissions were higher than those originally submitted on the application and approved on the permit. (3 Vs. 1.5 lbs. per hour) Results will have to be certified by a Registered Professional Engineer in the state of New Jersey.
3. In spite of my reasons and arguments that we are within allowable emission limits on the D-16, the State does not agree. The phrase that was constantly presented to me was that our equipment was not the latest "state-of-the-art". In other words, there is other equipment available (scrubbers and bag houses) that would do a much better job controlling emissions.

I feel that with my honest and sincere attitude on the subject, we were able to arrive at a satisfactory approach to be taken in determining and maintaining allowable emissions. It was agreed that we would conduct additional stack tests on the D-16; and this time I would set the furnace for normal operating conditions; and that the tests would be conducted by a Registered Professional Engineer in the state of New Jersey. They talked about installing sophisticated controls to insure that we

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maintained allowable emission, but would accept an audit control program that I proposed. This audit control is basically an inspection check list of all points that would contribute to particulate or smoke emission. The audit would be made twice each shift by the Plant Superintendent or Shift Leader, and made a permanent record of the plant files. Any abnormal conditions would be noted and corrected. If we can reduce the emissions down to approximately 8-10 lbs. per hour, they will approve it as meeting the Code, although it is not the latest "state-of-the-art".

The enforcement people had rather caustic comments to make about the plant's condition before changes were made, and about emissions recently observed in passing. I stated that the emissions that they had seen were from the perlite stack and not from the vermiculite stack. Mr. Harold Christiff, Senior Industrial Hygienist, (Enforcement Section), was asked by the Supervisor of Enforcement and Supervisor of Permits and Certificates to make an inspection of the plant and observe emissions. It was stated that his inspection report will be the major factor in determining whether we are granted a Permanent Certificate To Operate with present installed control equipment.

Based on what has been done, what has to be done, and commitments made, I am very concerned about the present condition and the apparent attitude in Trenton. There has been a general improvement in the plant; but very frankly, maintenance and proper operation of the equipment is the poorest I have ever seen. I am not going to itemize the conditions observed during my visits; but if these conditions and procedures are not changed, you do not have a ghost of a chance of getting air pollution control approval, and in another six to twelve months, the equipment will be no better than it was one year ago.

I reviewed my meeting with Jerry Ecott and Lloyd Marshall and outlined to them what I thought must be done. Since some of these items concern the plant's operation, I would like to list them.

1. Until certain modifications are made to the after burner, all masonry fill must be run after daylight hours. Shop order 029-13000-250 will cover this work and it should be completed by January 15, 1970.
2. Until Permanent Certificates To Operate are issued, an audit or inspection of equipment must be made twice a shift by the Shift Leader. Whether this program, or modification of it, are continued after Permanent Certificates are issued is up to you.



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3. Known maintenance or operational problems will be corrected as soon as possible; but in general they should not remain on the to do list longer than one week.

4. When unloading perlite, the dust collector should be used. Certain changes are required, such as closing off dampers to those vents not being used, and covering the furnace feed hopper. Personnel should keep the cyclone waste hopper empty to prevent any discharge of this material to the atmosphere.

5. Shop order 030-13000-250 has been written to enclose the vermiculite ore bins and once approved, work can start immediately. Closing off the ore bins will greatly improve the general housekeeping of the plant.

6. Shop order 031-13000-250 is for replacing the top of the perlite furnace and installing temperature and flame safety control equipment. I can start work on this shop order as soon as final approval is made. Installing the bag house on the perlite bagging tower will require an RCA; and I hope to have the estimate complete in approximately two weeks.

7. There is a great need for improved housekeeping at and around all equipment.

F. W. EATON

FWE:jrs

