

PLAINTIFF'S
EXHIBIT

ETCO-409

ETHYL CORPORATION

INTER-OFFICE

To	S.A. D'Armond	Address	BRP
From	H.M. Taylor, Jr.	Address	BRT
Subject	Asbestos Fibers in Effluent Streams	Date	August 26, 1974

At this time there isn't a federal government standard for asbestos in user plant effluent streams. However, the Environmental Protective Agency (EPA) has published standards applicable to industries which manufacture asbestos products (attachment).

Interpretation of the EPA asbestos manufacturing information may forecast trends in federal controls for asbestos users. Interpretation of the EPA information has been provided by Dr. Ian Stewart of McCrone Associates, a Chicago based analytical company. McCrone Associates has conducted much of the asbestos analytical contract work for EPA and presently has a contract to answer basic questions concerning effluent asbestos levels. The EPA information limits the quantity of total settleable effluent solids per some weight of plant product. The EPA deadline for instituting effluent treatment by sedimentation, for asbestos manufactures, is 1977. (From this it is inferred that someone thinks most asbestos fibers will settle out by ponding waste water streams.) The asbestos industry is expected by the EPA to recycle all waste water by 1983. Therefore

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no process waste water pollutants shall be discharged to navigable water from the asbestos manufacturing industry after 1983.

Dr. Stewart indicated the concentration of asbestos at Deluth which has caused a great deal of national commotion, as the Reserve Mining Case, was between 2×10^6 and 10^7 fibers per liter. He also indicated concern that two states, Illinois and Minnesota, have passed no detectable effluent asbestos type of legislation.

The writer believes the entire question of zero contamination level is bound to be subject to modification before 1977 and the assumption involving the settling of asbestos fibers will be challenged. However if the preliminary analysis of effluent asbestos at the Baton Rouge Plant of 1.5×10^6 fibers per liter is characteristic, there may be some long range benefit achieved by not increasing the concentration.

Grab Sample 7/15/74

24 Hr. Composite " Was 42,760

Rem Tec did Lab Work - F.P.E.

Lentz got Samples.

Hank
H.M. Taylor
Industrial Hygienist

HMT:daw

cc: W.E. Rinehart, Sc.D.	w/o attachment
T.R. Robinson, M.D.	w/o attachment
W.C. Strader	w/o attachment
M.R. Zavon, M.D.	w/o attachment

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