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481 ALLED DRIVE, P.O. BOX 11570, NASHVILLE, TENNESSEE 37211 • 615/263 6592

MAREMONT

BRAKE PRODUCTS

September 29, 1976

EXHIBIT

NO. P-22DATE 1-13-83EVD. ☐ IDENT ☒

Mr. Paul Heicher
Steiner-Liff Disposal Co.
P.O. Box 1182
Nashville, TN 37202

Dear Mr. Heicher:

The purpose of this letter is to outline our intended procedures with respect to disposal of asbestos contaminants pursuant to complying with the Nashville and Davidson County Air Pollution Control Ordinance of the Code of the Metropolitan Government, Regulation No. 4, Section 4-1-4 and Section 4-1-19, Chapter 4. Within the aforementioned regulation is stated the specific methods of disposal which are allowed. Also, with regard to the Federal Register Volume 39, Number 125, Page 23785, Subpart Z, "Toxic and Hazardous Materials," Section "1910.1061 Asbestos" Subdivision "(11) (2) Waste Disposal" (OSHA), there are specific procedures which must be completed prior to disposal of asbestos material. Therefore, procedures are hereby established to define Maremont's responsibility up to release of this material to the Steiner-Liff Disposal Company.

The procedures are as follows:

- 1) Maremont will assure that asbestos laden material will be placed in an impermeable bag, and sealed.
- 2) This bag will be identified with OSHA specified hazardous caution label.
- 3) The bags will be set aside for pick-up in a Steiner-Liff, 2-yard container.
- 4) We will assure that the bags will remain intact during reasonable loading into the disposal truck.
- 5) After the material is loaded on the truck, Maremont Corporation is no longer responsible for the ultimate disposition of the material.

May I also point out that under Section 4.7 "Emission Standards for Asbestos" in regulation number 4 of the Metro Air Pollution Control Ordinance, there are alternate methods of ultimate disposal. However, all of these methods specify Burial of this Material in a Designated Asbestos Waste Disposal Site. Disposal of this material by incineration is not only unacceptable, but forbidden.

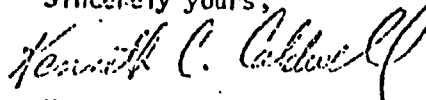
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If there are no responses to this letter in the way of alterations to agreement on responsibility, Harcourt will assume that we are in agreement with the Steiner-Liff Disposal Company with regard to the aforementioned procedures in handling asbestos material for disposal.

If there are any questions, please feel free to contact me at 833-6592.

Sincerely yours,



Kenneth C. Caldwell, P.E.
Project Engineer

KCC/sf

cc: Hubert Sluss