

bcc: Mr. Wallace F. Armstrong  
Mr. H. O. Bourque  
Mr. C. B. Hunt  
Mr. J. C. Klock  
Mr. S. D. Motsinger  
Dr. W. E. Rinehart

June 15, 1973



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

Dear Mr. Busch:

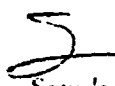
Compliance with National Emission  
Standards for Hazardous Air Pollutants

Attached is a completed Compliance Status Information Source Report on hazardous air pollutants at Ethyl's Baton Rouge plant. Ethyl uses asbestos for renewal of diaphragms in caustic-chlorine cells at the plant, but the slurring, diaphragm deposition, and washing operations involved result in no visible emissions to the outside air. Ethyl does not surface the plant's roadways with asbestos tailings, nor is there any spray on application of asbestos containing materials for insulating or fireproofing purposes.

In the past, some facilities at the plant have been insulated with asbestos containing materials. Any significant demolition of such facilities in the future will be preceded by the required notification to the Administrator and will be in accord with procedures specified in 40 CFR 61 Subpart B.

Regulations governing beryllium and mercury emissions are not applicable to Ethyl's Baton Rouge operations.

Very truly yours,

  
W. C. Strader  
Resident Manager

WCS:jd  
Attach.

ETC 15899

E-02055

FORM APPROVED  
OMB NO. 158-RU098

## EPA USE ONLY

**A listing of regional offices is provided in § 61.04.**

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

|                      |   |   |   |   |   |   |             |   |   |       |   |                  |   |   |     |   |
|----------------------|---|---|---|---|---|---|-------------|---|---|-------|---|------------------|---|---|-----|---|
| E                    | T | H | Y | L | C | O | R           | P | O | R     | A | T                | I | O | N   |   |
| A29 COMPANY NAME A48 |   |   |   |   |   |   |             |   |   |       |   |                  |   |   |     |   |
| P                    | O | B | O | X | 3 | 4 | 1           |   |   |       |   |                  |   |   |     |   |
| A49 NUMBER           |   |   |   |   |   |   | STREET NAME |   |   |       |   |                  |   |   | A68 |   |
| B                    | A | T | O | N | R | O | U           | G | E |       |   |                  |   |   |     |   |
| B19 CITY B33         |   |   |   |   |   |   |             |   |   | L     | A |                  |   |   |     |   |
|                      |   |   |   |   |   |   |             |   |   | STATE |   | 7                | 0 | 8 | 2   | 1 |
|                      |   |   |   |   |   |   |             |   |   |       |   | B34 ZIP CODE B38 |   |   |     |   |
| E                    | B | A | T | O | N | R | O           | U | G | E     |   |                  |   |   |     |   |
| 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.

|     |      |   |   |   |   |   |   |   |  |  |  |  |  |  |     |           |   |   |   |   |   |   |   |   |   |     |
|-----|------|---|---|---|---|---|---|---|--|--|--|--|--|--|-----|-----------|---|---|---|---|---|---|---|---|---|-----|
| W   | C    | S | T | R | A | D | E | R |  |  |  |  |  |  |     | 5         | 0 | 4 | 3 | 5 | 7 | 4 | 3 | 6 | 1 |     |
| B39 | NAME |   |   |   |   |   |   |   |  |  |  |  |  |  | B53 | TELEPHONE |   |   |   |   |   |   |   |   |   | B56 |

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

[illegible]

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 C63  
 C64 CITY C77 C78 STATE C79 D75 ZIP CODE D78

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.

W. C. Strader

**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.

- A S B E S T O S S L U R R Y I N G

- |A|B|

- 
- A number line starting at 654 and ending at 660. The line is divided into segments by tick marks. Above the line, the numbers 5, 3, 0, and 0 are written, corresponding to the values 655, 658, 660, and 660 respectively.

- PRIMARY CONTROL DEVICE TYPE

H86 SECONDARY CONTROL DEVICE TYPE H50

H51                      H53  
  
 PERCENT REMOVAL EFFICIENCY  
 H54                      H50  
  
 PERCENT REMOVAL EFFICIENCY

- Air flow permeability = \_\_\_\_\_ cfm/ft<sup>2</sup>

- 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<sup>2</sup>

- 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 U  
H57

ETC 15901

**II. WAIVER REQUESTS**

EPA USE ONLY

|   |   |   |   |    |    |
|---|---|---|---|----|----|
| 1 | R | S | C | SC | 13 |
|---|---|---|---|----|----|

- 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.

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.)
- 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).

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.

LS4                      LS9  
[ ] [ ] [ ]                      01  
MONTH      DAY      YEAR

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

LS4                      LS9  
[ ] [ ] [ ]                      02  
MONTH      DAY      YEAR

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

LS4                      LS9  
[ ] [ ] [ ]                      03  
MONTH      DAY      YEAR

- . Date by which final compliance is to be achieved.

LS4                      LS9  
[ ] [ ] [ ]                      04  
MONTH      DAY      YEAR

SIGNATURE OF OWNER OR OPERATOR

DATE

- II. B. WAIVER OF EMISSION TESTS. A waiver of emission testing may be granted to owners or operators of sources of beryllium or mercury pollutants if, in the judgment of the Administrator of the U.S. Environmental Protection Agency the emissions from the source comply with the appropriate standard or if the owners or operators of the source have requested a waiver of compliance or have been granted a waiver of compliance.

This application should accompany the reporting information provided in Section I.

1. Reason - State the reasons for requesting a waiver of emission testing. If the reason stated is that the emissions from the source is within the prescribed limits, documentation of this condition must be attached.

SIGNATURE OF THE OWNER OR OPERATOR

DATE