GP 0-9

Georgia-Pacific

INTERDEPARTMENTAL COMMUNICATION

DATE: June 19, 1973

TO: Mr. J. D. Rauch

LOCATION: Akron Plant

FROM: G. E. Wilson

LOCATION: Portland 8

SUBJECT: OSHA INSPECTION

PLAINTIFF'S EXHIBIT

GP-1909

I've had a chance to review the copy of the Citation that you have received from the U. S. Department of Labor on our handling of asbestos, and would of course advise you to proceed as rapidly as possible on an emergency basis to correct our deficiencies.

We are working towards the elimination of asbestos in joint cement, but I am confident that we cannot await this development as we will be using asbestos for some time in the future.

I would also ask that you send a copy of the Citation to the other joint cement operations for their information, and also so that they can proceed with corrective measures prior to OSHA inspection for the same violations.

GEW

GEW/mf

G.E.W.

CC: Mr. E. B. Hollingsworth - Wilm Del Gyp
Mr. T. W. Richards - Tigard Lab
Mr. C. W. Lehnert - Tigard Lab
Mr. John DiLorenzo - Portland

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
COMPLIANCE STATUS INFORMATION

FORM APPROVED
OMB NO. 158-R0098

I. SOURCE REPORT

INSTRUCTIONS: Owners or operators of source of hazardous pollutants subject to the National Emission Standards for Hazardous Air Pollutants are required to submit the information contained in Section I to the appropriate U.S. Environmental Protection Agency Regional Office before July 6, 1973.

A listing of regional offices is provided in § 61.04.

EPA USE ONLY

1 R S C SC 13

19 AQCR RP CITY 28 NDC 80

A. SOURCE INFORMATION

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

GEORGIA PACIFIC CORP
A9 COMPANY NAME A48

BLOOMINGDALE RD
A49 NUMBER STREET NAME A68

AIRON
B19 CITY B33

NY
B34 STATE

11401
B34 ZIP CODE B38

ERIE
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.

JACK RACH
B39 NAME B53

7165494311
B54 TELEPHONE B63

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

JOINT SYSTEM PLANT
C19 C43

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 D79

5. Compliance Status - The emissions from this source [X] can [ ] cannot meet the emission limitations contained in the National Emission Standards on or before July 5, 1973.

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.

I. 3. PROCESS INFORMATION. Part B should be completed separately for each point of emission for each hazardous pollutant.

EPA USE ONLY
G14 EP G15 G45 SCC G53

1. Process Description - Provide a brief description of each process (e.g., "hydrogen end box" in a mercury chloralkali plant, "grinding machine" in a beryllium machine shop). Use additional sheets if necessary.

MIXING HOPPER BAG PACKER
G21 G45

2. Pollutant Emitted - Indicate the type of hazardous pollutant emitted by the process. Indicate "AB" for asbestos, "BE" for beryllium, or "HG" for mercury.

AB
G19 G20

3. Amount of Pollutant - Indicate the average weight of the hazardous material named in Item 2 which enters the process in pounds per month (based on the previous twelve months of operation).

20000000
G54 G60

4. Control Devices

a. Indicate the type of pollution control devices, if any, used to reduce the emissions from the process (e.g., venturi scrubber, baghouse, wet cyclone) and the estimated percent of the pollutant which the device removes from the process gas stream.

BAGHOUSE
H19 PRIMARY CONTROL DEVICE TYPE H34

H51 99.0 H53
PERCENT REMOVAL EFFICIENCY

H35 SECONDARY CONTROL DEVICE TYPE H50

H54 . H56
PERCENT REMOVAL EFFICIENCY

b. Asbestos Emission Control Devices Only

i. If a baghouse is specified in Item 4a, give the following information:

. The air flow permeability in cubic feet per minute per square foot of fabric area.

Air flow permeability = 2.84 cfm/ft^2

. The pressure drop in inches water gauge across the filter at which the baghouse is operated.

Operating pressure drop = 2.5 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 = 9.7 oz/yd^2

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
H57

SGP 0006875

FORM APPROVED
OMB NO. 158-R0038

EPA USE ONLY

1 R 5 C 5C 13

II. WAIVER REQUESTS

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.

MIXING HOPPER & BAG PACKER

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.) Install Additional Baghouses & Redesign Exist. Hoods & Ducts

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).

The wearing of approved respriators & clothing

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.

L54 L59
MONTH DAY YEAR 01

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

L54 L59
MONTH DAY YEAR 02

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

L54 L59
MONTH DAY YEAR 03

. Date by which final compliance is to be achieved.

L54 L59
MONTH DAY YEAR 04

SGP 0006876

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

SGP 0006877

FORM APPROVED
OMB NO. 158-R0098

EPA USE ONLY

1 R S C SC 13

II. WAIVER REQUESTS

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.

   L54 MONTH DAY YEAR L59 01

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

   L54 MONTH DAY YEAR L59 02

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

   L54 MONTH DAY YEAR L59 03

   . Date by which final compliance is to be achieved.

   L54 MONTH DAY YEAR L59 04

SGP 0006878

SIGNATURE OF OWNER OR OPERATOR	DATE
Not Submitted	

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.

SGP 0006879

SIGNATURE OF THE OWNER OR OPERATOR	DATE

Not Submitted