

August 1, 1972

PLAINTIFF'S
EXHIBIT
WRG-345

Mr. R. L. Junker
Texas Vermiculite Company
P. O. Box 6306
2651 Manila Road
Dallas, Texas 75222

Dear Bob:

I want to apologize for the delay in sending certain specific information that you requested pertaining to pollution control devices, and on certain pieces of equipment that have recently been installed at our new Pompano Beach facility. Before getting into this phase of it, I would like to comment on your recent notices of violation from the Dallas Health Department and make recommendations of how you should handle a program of compliance.

As you stated over the phone July 31, 1972, you received a notice of violation July 5, 1972 for visible emissions in excess of allowable from the Perlite bag house. The measured emissions had an opacity of 48.5 and 42.8 which was in excess of the allowable 40, or a Number Two Ringleman. These emissions were due to holes in the bag house fabric. On July 28, 1972 you received a final notice of violation while expanding #4. This was a violation of city ordinance 8737 and I assume that this ordinance pertains to visible emissions. Violations for visible emissions that have not been measured can be contested, but if any part of the violation had to do with fugitive dust or the so-called nuisance violation, there isn't much you can do but comply. The violation dated July 28 requested that plans to correct emissions be submitted to the Environmental Health Division on or before August 11, 1972. I feel very strongly that this reply should consist only of a compliance schedule and no mention should be made of the type of control devices that you are planning to install. As I stated over the phone the compliance schedule should be as long as possible, and if you plan to have the Construction Products Division do the engineering, purchasing and installation, the minimum time would be nine months.

*CAMBRIDGE WILL HAVE TO KNOW BY 9/1/72 IF CERTAIN
ENGINEERING WILL DO THE ENGINEERING*

For 8/1/72
GRACE

1120

August 1, 1972

The following is a draft of a compliance schedule that I would submit to the Dallas City Health Department:

Gentlemen:

In accordance with a notice of violation dated July 28, 1972, from the Environmental Health Division, The Texas Vermiculite Company submits the following schedule to place its two Vermiculite Expanding Furnaces in complete compliance with air pollution regulations established by the City of Dallas and the Texas Air Control Board:

Date		Description
Start	Finish	
9/1/72	1/1/73	Engage engineering services in the field of Air Pollution Abatement and conduct a preliminary investigation of manufacturing equipment and building changes required for new control devices. After review of this preliminary investigation, engineer will conduct detail design to incorporate control devices on the two vermiculite expanding furnaces.
1/1/73	2/1/73	Submit plans and specifications for review to the Control Agency.
2/1/73	5/1/73	After receipt of approved plans and specifications, and a permit to construct, procure all required equipment to place two vermiculite expanding furnaces in compliance with controlling air pollution regulations.
5/1/73	7/1/73	Install all equipment in accordance plans and specifications approved by the controlling agency. In order to fulfill sales commitments during this period of compliance, one furnace at a time will be shut down for modifications and the installation of the control device.
8/1/73		Both vermiculite expanding furnaces operating in compliance with established air pollution regulations and available for inspection by the controlling agency.



R. L. Junker

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August 1, 1972

The Texas Vermiculite Company will do everything possible to expedite its program of compliance, but would appreciate confirmation from the Environmental Health Division that it accepts the schedule set forth.

Very truly yours,

R. L. Junker

As I stated over the phone, we have had no problem in the past in obtaining approval for a nine to twelve month compliance schedule. Minneapolis is a typical case, where CPD changed its mind many times and after approximately two and a half years, submitted a final compliance schedule.

For your information, I am attaching a copy of the compliance schedule submitted to the State of Minnesota and the City of Minneapolis and the plans and specifications covered in item 1 of the compliance schedule. If Texas or the City of Dallas does not issue permits to construct, you should receive written confirmation from the agency that they accept your plans and specifications as presented.

I am enclosing a print of the Trenton Model "A" bag house installation, which will be similar to your installation, although location of the control device will be different. We have standardized on the Flex-Kleen bag house Model 84RA80, but the Mikro Pul Model 1F1 Collector is a near equal substitute. The Flex-Kleen unit has approximately 120 sq.ft. more fabric area and costs about \$200 less than the Mikro Pul. I am enclosing specs and costs on both units.

Also enclosed are prints of the Monokote mixer that we have installed in Pompano, Muirkirk, Trenton, and Santa Ana. I am also enclosing prints of the Pompano Perlite collection tower and vent system. If time permits, I will include a cost estimate for these two items in this letter, if not, it will be sent along in a few days.

Again, I apologize for my procrastination, but if I can be of any help in any problems that you have, especially pollution abatement, I will try to be a little more prompt next time.

cc: M. Norm/Tex.Verm.w/o attach.
T. Lyall -w/o attach.
J. Timmons/T.R.- w/o attach.
H. R. Brown -w/o attach.

Very truly yours,

F. W. Eaton
Frederick W. Eaton
Project Engineer
Pollution Control

FWE:hll

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