

State of Vermont

AGENCY OF ENVIRONMENTAL CONSERVATION
Montpelier, Vermont 05602
DIVISION OF ENVIRONMENTAL PROTECTION

Air and Solid Waste Programs
Montpelier, Vermont 05602

January 6, 1972

Mr. R. J. Holloway
Corporate Environmental Engineer
GAF Corporation
P.O. Box 12
Linden, New Jersey 07036

Dear Mr. Holloway:

RE: GAF Corporation Plant
Lowell, Vermont

Mr. Donald W. Webster, Director of the Division of Protection, has asked me to comment on the preliminary engineering proposal that you have submitted to the Agency as a part of GAF Corporation's assurance of discontinuance agreement.

Although the submitted material--Elimination of Visible Dust Emission Program--seems to be a very necessary first step in the identification of pollution sources at the plant site, it does not seem to be any more than this. Although not spelled out, a preliminary engineering plan for a process operation, to me, includes a preliminary process flow diagram, a description of the types of equipment associated with these process operations, critical engineering parameters such as air flow, air-to-bag ratios, etc., and the amount of control that is needed on each operation.

To come up with a program as you have proposed, I am sure that this information should be available in your files. The completed engineering plan would include process engineering flow diagrams and a description, including drawings, of all control equipment for the various operations within the mining and milling portions. In general, the program also lacks any dates for interim time schedules on which portions of this program would be completed. Even within the context of a preliminary review of control equipment and engineering proposal, some dates should be included to show progress that the company is making, or intends to make, in completion of this comprehensive program.

There are a number of areas that deserve specific comments at this time. Response in writing to my comments would be necessary before we can complete a review of the preliminary engineering proposal. Due to the fact that this request will necessitate some additional work, I have recommended to the Secretary that the hearing be reconvened in mid February, rather than within the 30-day period stipulated in the assurance of discontinuance. The Secretary has concurred with this recommendation, and February 16th at 10 o'clock has been reserved for the reconvening of this informal hearing.

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These areas that should be specifically discussed prior to the hearing include:

1. Primary drill operation. Although the specific control equipment seems reasonable, the collection discharge of the dust to the ground seems to be self-defeating in terms of air pollution.
2. Secondary drill operations. What is meant by the phase out period of the present machine.
3. Primary crusher operation. The Division is less than enthusiastic about the use of water spray during the summer operation as a proposed emission control equipment on the primary crushing operation. The water spray systems in other mining operations we have seen, does not satisfy the regulations in terms of fugitive dust emissions. However, if you insist on the use of a water spray on this primary crusher unit, we will approve installation subject to our continuing jurisdiction in the future. It also may be well to wait for a proposed national emission standard on asbestos to become effective before a final decision is made on this particular abatement process.
4. Ore drying operations. In the remarks on the program, it stated that the amount of emissions was defined by state regulations as process dust. Although the process weight curve may be applicable to many operations, in this case, the visible emissions of 40% opacity, or section 5-465 Potentially Hazardous Particulate Matter, may be more stringent regulations. Under the latter, persons responsible for source operations from which hazardous particulate matter may be emitted such as, but not limited to lead, silica, or other such materials shall give the utmost care and consideration to the potential harmful effects of emissions resulting from such activities. Evaluation of these facilities as to the adequacy, efficiency, and emission potential will be made on an individual basis by the Director, Division of Industrial Hygiene. Also, the proposed federal regulations should be taken into account. These regulations state the type of fabric filter needed on the kiln as a minimum requirement with a resultant of no visible emission.
5. Roadway dust. Although the state has not formulated an opinion on roadway dust from roads made of asbestos tailings, the proposed federal regulations do specifically mention this source. In this preliminary engineering review, the company should give some consideration to this source of emission.
6. Dumping to the tailings pile. No mention was made of possible control equipment that could be used to suppress dust emissions as tailings are placed in their final disposal site. This should be identified at least as a source of emission. If there are no practical means to control this specific source, this should be elaborated on.

Any substantiating information on any of these abatement systems would be greatly appreciated so that we can make some evaluation to the efficiency of this proposed abatement equipment. Hopefully, at the reconvened hearing, we can go into greater detail into some of these areas.

Sincerely,

Richard A. Valentinetti

Richard A. Valentinetti
Air Pollution Control Officer

RAV:lp
cc: Mr. Donald W. Webster
Mr. I. E. Matthews

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