


GEORGIA-PACIFIC

INTERDEPARTMENTAL COMMUNICATION

DATE:

June 20, 1973

TO: *See Below

LOCATION:

FROM: J. B. Moss

LOCATION: Wilmington

 SUBJECT: ASBESTOS REGULATION

*Messrs. J. D. Rauch - Akron
 R. V. Favero - Marietta
 H. W. Scharf - Milford

THIS COPY FOR

PLAINTIFF'S EXHIBIT

GP-1913

The Environmental Protection Agency has passed asbestos regulations, which became effective April 6, 1973, with a mandatory 90-day period maximum for filing the attached forms.

These regulations are in the Federal Register, Volume 38, Number 66, Part II; copies of the pertinent parts are attached. This information is to be sent to the Regional Offices involved as follows:

~~Mr. Carr (Covers Virginia)~~
~~Curtis Building, 6th & Walnut Sts.~~
~~Philadelphia, PA (215) 597-2485~~

X { Mr. Conrad Simon (Covers New York)
 E.P.A. - Region II
 Federal Plaza
 New York, New York 10007 (212) 264-2517

*must be in the
 office by 7/6/73.
 see Instructions - I.
 Page 1*

~~Mr. Tommie Gibbs (Covers Georgia)~~
~~E.P.A. - Region IV~~
~~1421 Peachtree St., N.E.~~
~~Atlanta, Georgia 30309~~

Note!

Would you please submit copies of the form to Mr. Peele at the time that you send them to the Regulatory Agency?

J. B. M.

JBM:pjr

SGP 0006893

Attachments

cc: Messrs. E. B. Hollingsworth - Wilmington
 H. W. Peele - Wilmington

Ed-

*Will you & Bill Hanna
 please fill out the copy
 attached? I will discuss
 while in Portland and see
 you before mailed. Thanks*

Jack

FORM APPROVED
OMB NO. 158-R0098

EPA USE ONLY

19 AQCR RP CITY 28 NDC 8

GEORGIAPACIFIC CORP

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A 40 NUMBER STREET NAME A 68

A K R I O N I CITY B33
 NY STATE B34 ZIP CODE B38

ERLE COUNTY

- JACK RAOULH
839 NAME 853
1711654257431
854 TELEPHONE 854

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- C44 NUMBER STREET NAME C63

C64 CITY C77 C78 C79 STATE D78 ZIP CODE D79

- SIGNATURE OF OWNER, OPERATOR OR OTHER RESPONSIBLE

SGP 0006894

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

EPA USE ONLY

G14	EP	G16	G40	SCC	G53
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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 POUCHER

G21

G48

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).

200000

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

SECONDARY CONTROL DEVICE TYPE

H35

SECONDARY CONTROL DEVICE TYPE

H50

99.0

PERCENT REMOVAL EFFICIENCY

PERCENT REMOVAL EFFICIENCY

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/ft²

- . 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 = 1.0 oz/yd²

- ii. If a wet collection device is specified in Item 4a, give the de unit contacting energy in inches water gauge.

- . Unit contacting energy = _____ inches w.g.

EPA USE ONLY

CC H57

II. WAIVER REQUESTS

EPA USE ONLY

1	R	S	C	SC	13
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- 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 emission of hazardous pollutants to an acceptable level. (Use additional sheets if necessary.)

INSTALL ADDITIONAL BAGHOUSES
& REDUCED EXHAUST 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 RESPIRATORS & 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.

LS4				LS9
MONTH	DAY	YEAR		

01

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

LS4				LS9
MONTH	DAY	YEAR		

02

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

LS4				LS9
MONTH	DAY	YEAR		

03

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

LS4				LS9
MONTH	DAY	YEAR		

04

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

II. WAIVER REQUESTS

EPA USE ONLY

1	R	S	C	SC	13
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- 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.

L 54 L 59
[] [] [] 01
MONTH DAY YEAR

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

L 54 L 59
[] [] [] 02
MONTH DAY YEAR

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

L 54 L 59
[] [] [] 03
MONTH DAY YEAR

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

L 54 L 59
[] [] [] 04
MONTH DAY YEAR

SGP 0006898

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.

SGP 0006899

SIGNATURE OF THE OWNER OR OPERATOR

DATE

W. T. Schmitt

Subpart B—National Emission Standard for Asbestos

§ 61.10. Appendix.

The provisions of this subpart are applicable to those sources specified in § 61.10.

§ 61.11. Definitions.

Terms used in this subpart are defined in the act, in subpart A of this part, or in this section as follows:

(a) "Asbestos" means actinolite, amosite, anthophyllite, chrysotile, crocidolite, tremolite.

(b) "Asbestos material" means asbestos or any material containing asbestos.

(c) "Particulate asbestos material" means finely divided particles of asbestos material.

(d) "Asbestos tailings" means any solid waste product of asbestos mining or milling operations which contains asbestos.

(e) "Outside air" means the air outside buildings and structures.

(f) "Visible emissions" means any emissions which are visually detectable without the aid of instruments and which contain particulate asbestos material.

§ 61.12. Emission standard.

(a) Asbestos mill: There shall be no visible emissions to the outside air from any asbestos mill except as provided in paragraph (f) of this section. Outside storage of asbestos materials is not considered a part of an asbestos mill.

(b) Roadways: The surfacing of roadways with asbestos tailings is prohibited, except for temporary roadways on an area of asbestos ore deposits. The deposition of asbestos tailings on roadways covered with snow or ice is considered "surfacing."

(c) Manufacturing: There shall be no visible emissions to the outside air, except as provided in paragraph (f) of this section, from any building or structure in which the following operations are conducted or directly from any of the following operations if they are conducted outside of buildings or structures:

(1) The manufacture of cloth, cord, wicks, twine, tape, twine, rope, thread, yarn, roving, lap, or other textile materials.

(2) The manufacture of cement products.

(3) The manufacture of fireproofing and insulating materials.

(4) The manufacture of friction products.

(5) The manufacture of paper, millboard, and felt.

(6) The manufacture of floor tile.

(7) The manufacture of paints, coatings, caulks, adhesives, sealants.

(8) The manufacture of plastics and rubber materials.

(9) The manufacture of chlorine.

(d) Demolition: Any owner or operator of a demolition operation who intends to demolish any institutional, commercial, or industrial building (including apartment buildings having more than four dwelling units, structure, facility,

installation, or portion thereof which contains any boiler, pipe, or load-supporting structural member that is insulated or fireproofed with friable asbestos material shall comply with the requirements set forth in this paragraph.

(1) Notice of intention to demolish shall be provided to the Administrator at least 10 days prior to commencement of demolition or anytime prior to commencement of demolition subject to paragraph (d)(1) of this section.

Such notice shall include the following information:

(i) Name of owner or operator.

(ii) Address of owner or operator.

(iii) Description of the building, structure, facility, or installation to be demolished.

(iv) Address or location of the building, structure, facility or installation.

(v) Scheduled starting and completion dates of demolition.

(vi) Method of demolition to be employed.

(vii) Procedures to be employed to meet the requirements of this paragraph.

(2) The following procedures shall be used to prevent emissions of particulate asbestos material to outside air:

(i) Friable asbestos materials, used to insulate or fireproof any boiler, pipe, or load-supporting structural member, shall be wetted and removed from any building, structure, facility, or installation subject to this paragraph before wrecking of load-supporting structural members is commenced. The friable asbestos debris shall be wetted adequately to insure that such debris remains wet during all stages of demolition and related handling operations.

(ii) No pipe or load-supporting structural member that is covered with friable asbestos insulating or fireproofing material shall be dropped or thrown to the ground from any building, structure, facility, or installation subject to this paragraph, but shall be carefully lowered or taken to ground level.

(iii) No friable asbestos debris shall be dropped or thrown to the ground from any building, structure, facility, or installation subject to this paragraph or from any floor to any floor below. For buildings, structures, facilities, or installations 50 feet or greater in height, friable asbestos debris shall be transported to the ground via dust-tight chutes or containers.

(3) Sources subject to this paragraph are exempt from the requirements of §§ 61.05(a), 61.07, and 61.09.

(4) Any owner or operator of a demolition operation who intends to demolish a building, structure, facility, or installation to which the provisions of this paragraph would be applicable but which has been declared by proper State or local authority to be structurally unsound and which is in danger of imminent collapse is exempt from the requirements of this paragraph other than the reporting requirements specified by paragraph (1) of this section and the wetting of friable asbestos debris as specified in paragraph (d)(3)(i) of this section.

(b) Spraying: There shall be no visible emissions to the outside air from the application of materials containing more than 1 percent asbestos, on any work done, used to insulate or protect equipment and machinery, as provided in paragraph (f) of this section. Spray-on materials used to insulate or fireproof buildings, structures, pipes, and conduits shall contain less than 1 percent asbestos on a dry weight basis.

(1) Sources subject to this paragraph are exempt from the requirements of § 61.25(a), § 61.27, and § 61.29.

(2) Any owner or operator who intends to spray asbestos materials to insulate or fireproof buildings, structures, pipes, conduits, equipment, and machinery shall report such intention to the administrator at least 30 days prior to the commencement of the spraying operation. Such report shall include the following information:

- (i) Name of owner or operator.
- (ii) Address of owner or operator.
- (iii) Location of spraying operation.
- (iv) Procedures to be followed to meet the requirements of this paragraph.

(3) Rather than meet the no-visible-emission requirements of paragraphs (a), (c), and (e) of this section, an owner or operator may elect to use the methods specified by § 61.23 to clean emissions containing particulate asbestos material before such emissions escape to, or are vented to, the outside air.

§ 61.23 Air-cleaning.

If air-cleaning is elected, as permitted by § 61.22(2), the requirements of this section must be met:

(1) Fabric filter collection devices must be used, except as noted in paragraphs (b) and (c) of this section. Such devices must be operated at a pressure drop of no more than 4 inches water gage, as measured across the filter fabric. The airflow permeability, as determined by ASTM method D737-49, must not exceed 30 ft³/min/ft² for woven fabrics or 35 ft³/min/ft² for felted fabrics, except that 40 ft³/min/ft² for woven and 45 ft³/min/ft² for felted fabrics is allowed for filtering air from asbestos ore dryers. Each square yard of felted fabric must weigh at least 14 ounces and be at least one-sixteenth inch thick throughout. Synthetic fabrics must not contain fill yarn other than that which is spun.

(2) If the use of fabric filters creates a fire or explosion hazard, the administrator may authorize the use of wet collectors designed to operate with a unit collecting energy of at least 40 inches water gage pressure.

(3) The administrator may authorize the use of filtering equipment other than that described in paragraphs (a) and (b) of this section if the owner or operator demonstrates to the satisfaction of the administrator that the filtering of particulate asbestos material is equivalent to that of the described equipment.

(4) All air-cleaning equipment employed by this section must be properly installed, operated, and maintained. Such equipment may be used only during emergency conditions and then

only for so long as it takes to shut down the operation generating the particulate asbestos material.

§ 61.24 Reporting.

The owner or operator of any stationary source which has subject to this section shall, within 30 days after the effective date, provide the following information to the administrator:

(1) A description of the emission control equipment used for each process;

(2) If a fabric filter device is used to control emissions, the pressure drop across the fabric filter in inches water gage.

(3) If the fabric filter device utilizes a woven fabric, the airflow permeability in ft³/min/ft²; and, if the fabric is synthetic, indicate whether the fill yarn is spun or not spun.

(4) If the fabric filter device utilizes a felted fabric, the density in oz/yd², the minimum thickness in inches, and the airflow permeability in ft³/min/ft².

(5) Such information shall accompany the information required by § 61.10. The appropriate form is contained in appendix A to this part.

Subpart C—National Emission Standard for Beryllium

§ 61.20 Applicability.

The provisions of this subpart are applicable to the following stationary sources:

(1) Extraction plants, ceramic plants, foundries, incinerators, and propellant plants which process beryllium ore, beryllium, beryllium oxide, beryllium alloys, or beryllium-containing waste.

(2) Machine shops which process beryllium, beryllium oxides, or any alloy when such alloy contains more than 5 percent beryllium by weight.

§ 61.21 Definitions.

Terms used in this subpart are defined in the act in subpart A of this part, or in this section as follows:

(1) "Beryllium" means the element beryllium. Where weights or concentrations are specified, such weights or concentrations apply to beryllium only, excluding the weight or concentration of any associated elements.

(2) "Extraction plant" means a facility chemically processing beryllium ore to beryllium metal alloy, or oxidizing or performing any of the intermediate steps in these processes.

(3) "Beryllium ore" means any naturally occurring material mined or gathered for its beryllium content.

(4) "Machine shop" means a facility performing cutting, grinding, turning, honing, milling, accounting, lapping, electrochemical machining, etching, or other similar operations.

(5) "Ceramic plant" means a manufacturing plant producing ceramic items.

(6) "Foundry" means a facility engaged in the melting or casting of beryllium metal or alloy.

(7) "Beryllium-containing waste" means material contaminated with beryllium and/or beryllium compounds, used or generated during any process or operation performed by a source subject to this subpart.

(8) "Beryllium-containing waste" means material contaminated with beryllium and/or beryllium compounds, used or generated during any process or operation performed by a source subject to this subpart.

(9) "Propellant plant" means a facility engaged in the manufacturing of propellant.

(10) "Beryllium alloy" means beryllium alloy or compound which undergoes commercial production.

(11) "Propellant plant" means a facility engaged in the manufacturing of propellant.

§ 61.22 Emission standard.

(1) Emissions to the atmosphere from stationary sources subject to this subpart shall not exceed 0.01 gram of beryllium over a 30-day period, except as provided in part of this section.

(2) Rather than meet the requirements of paragraph (1), an owner or operator may prevail from the Administrator an ambient concentration limit in the vicinity of source of 0.01 µg/m³ on a 30-day period.

(3) Approval of such a standard by the Administrator shall:

(i) At least 2 years of data which indicate that the Administrator demonstrates that the ambient concentration in the vicinity of the station will not exceed 0.01 µg/m³ on a 30-day period. Such data shall be the 3 years ending 30 days before the effective date of this standard.

(ii) The owner or operator obtain approval in writing after the effective date of

(iii) The owner or operator report to the Administrator 30 days after the effective date of the standard which reports the following information:

(1) Description of station, including the method of calculation.

(2) Method of sample

(3) Averaging technique

(4) Number, identity,

(5) Address, coordinates,

(6) Ground elevation

(7) Plant and same

(8) Showing emission point

(9) Showing distance

(10) Showing height and

(11) Including

(12) Information

(13) Showing

(14) Showing

(15) Showing

(16) Showing

(17) Showing

(18) Showing

(19) Showing

(20) Showing

(21) Showing

denial pursuant to § 61.07 was submitted, will not proceed or operate, nor make emissions in violation of a standard, until the Administrator approves the construction or modification of such source.

(1) Prior to denying an application for approval of construction or modification of a source, the Administrator shall notify the owner or operator of such source of the Administrator's intention to issue such denial, and shall afford the owner or operator an opportunity to be heard.

(2) Notice of the information and findings on which such intended denial is based and the reasons therefor shall be provided to the owner or operator.

(3) Notice of opportunity for such owner or operator to present, within such time limit as the Administrator shall specify, additional information or arguments to the Administrator prior to final action on such application shall be provided.

(4) A final determination to deny any application for approval shall be in writing and will set forth the specific grounds on which such denial is based. Such final determination will be made within 30 days of presentation of additional information or argument on 60 days after the final date specified for presentation, if no presentation is made.

(5) Neither the submission of an application for approval nor the Administrator's granting of approval for construction or modification shall constitute:

(1) Release of an owner or operator of legal responsibility for compliance with any applicable provision of this part or of any other applicable Federal, State, or local requirement, or

(2) Prevent the Administrator from implementing or enforcing this part or finding any other action under the act.

§ 61.09. Notification of startup.

(a) Any owner or operator of a source which has an initial startup after the effective date of a standard prescribed under this part shall furnish the Administrator written notification as follows:

(1) A notification of the anticipated date of initial startup of the source not more than 60 days nor less than 30 days prior to such date.

(2) A notification of the actual date of initial startup of the source within 15 days after such date.

§ 61.10. Source reporting and waiver request.

(a) The owner or operator of any existing source, or any new source, to which a standard prescribed under this part is applicable which had an initial startup which preceded the effective date of a standard prescribed under this part shall, within 90 days after the effective date, provide the following information in writing to the Administrator:

(1) Name and address of the owner or operator.

(2) The location of the source.

(3) The type of hazardous pollutants emitted by the stationary source.

(4) A brief description of the nature and design and method of operation of the stationary source including the operating design capacity of such source. Identify each point of emission for each hazardous pollutant.

(5) The average weight per mole of the hazardous materials being processed by the source, over the last 12 months preceding the date of the report.

(6) A description of the existing control equipment for each emission point.

(7) Primary control device(s) for each hazardous pollutant.

(8) Secondary control device(s) for each hazardous pollutant.

(9) Estimated control efficiency (percent) for each control device.

(10) A statement by the owner or operator of the source as to whether he can comply with the standards prescribed in this part within 90 days of the effective date of the standard.

(b) The owner or operator of an existing source unable to operate in compliance with any standard prescribed under this part may request a waiver of compliance with such standard for a period not exceeding 2 years from the effective date. Any request shall be in writing and shall include the following information:

(1) A description of the controls to be installed to comply with the standard.

(2) A compliance schedule, including the date each step toward compliance will be reached. Such list shall include as a minimum the following dates:

(i) 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 component parts to accomplish emission control or process modification.

(ii) Date of initiation of onsite construction or installation of emission control equipment or process changes.

(iii) Date by which onsite construction or installation of emission control equipment or process modification is to be completed, and

(iv) Date by which final compliance is to be achieved.

(3) A description of interim emission control steps which will be taken during the waiver period.

(c) Changes in the information provided under paragraph (b) of this section shall be provided to the Administrator within 30 days after such change, except that if changes will result from modification of the source as defined in § 61.02.

(d) The provisions of § 61.07 and § 61.08 are applicable.

(e) The format for reporting under this section is included as appendix A of this part. Advice on reporting the status of compliance may be obtained from the Administrator.

§ 61.11. Waiver of compliance.

(a) Based on the information provided in any request under § 61.10, or other information, the Administrator may grant a waiver of compliance with a standard for a period not exceeding 2 years from the effective date of such standard.

(b) Such waiver will be in writing and will include:

(1) Identify the stationary source covered.

(2) Specify the termination date of the waiver. The waiver may be terminated at an earlier date if the conditions

underlying the waiver are no longer met.

(3) The Administrator may, at any time during the waiver period, require the owner or operator to submit additional information or arguments to the Administrator.

(4) Prior to denying a waiver pursuant to this section, the Administrator shall notify the owner or operator of such denial, together with the reasons therefor.

(5) Notice of the findings on which such denial is based and the reasons therefor shall be provided to the owner or operator.

(6) Notice of opportunity for such owner or operator to present, within such time limit as the Administrator shall specify, additional information or arguments to the Administrator prior to final action on such request shall be provided.

(7) A final determination to grant or deny a waiver shall be in writing and will set forth the specific grounds on which such denial is based. Such final determination will be made within 30 days of presentation of additional information or argument on 60 days after the final date specified for presentation, if no presentation is made.

(8) The granting of this section shall not constitute a release of the Administrator's authority under the act.

§ 61.12. Emission testing.

(a) Emission tests shall be conducted and reported in accordance with the provisions of this part.

(b) The owner or operator of a source subject to this part shall, upon request of the Administrator, provide the following information:

(1) Sampling points and methods applicable to the source.

(2) Safe access for sampling.

(3) Safe access for sampling.

(4) Waiver for same equipment.

§ 61.13. Waiver of emission testing.

(a) Emission testing shall be conducted upon written application to the Administrator. If in his judgment the Administrator is operating under a waiver or has requested a waiver.

(b) If application for emission testing is made, the owner or operator shall accompany the application with a waiver request as defined in § 61.10. The waiver is contained in appendix B of this part.

(c) Approval of any waiver pursuant to this section shall be granted by the Administrator. The Administrator may, at any time during the waiver period, require the owner or operator to submit additional information or arguments to the Administrator.

(d) Such waiver will be in writing and will include:

RULES AND REGULATIONS

"Cell room" means a horizontal or vertical chamber which is part of a mercury processing plant and in which water-soluble mercury compounds are converted to elemental mercury, and which is connected to a short-circuited, electrochemical cell.

"Electrochemical stream" means a stream of mercury formed in the electrochemical cell.

"End box" means a container or chamber at one or both ends of a mercury chlor-alkali electrolyzer which serves as a condenser between the electrolyzer and condenser for methanol-stripped mercury.

"End box ventilation system" means a ventilation system which collects mercury emissions from the end boxes, the mercury pump-sumps and their water collection systems, and discharges them to the atmosphere.

"Emission standard" means a standard for the amount of mercury emitted from a source.

Emissions to the atmosphere from stationary sources subject to the provisions of this subpart shall not exceed 2,300 grams of mercury per 24-hour period.

§ 61.53- Stark sampling.

(a) Mercury ore processing facility.

(1) Unless a waiver of emission testing is obtained under § 61.13, each owner or operator processing mercury ore shall test emissions from his source.

(i) Within 90 days of the effective date in the case of an existing source or a new source which has an initial startup date preceding the effective date.

(ii) Within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.

(3) The Administrator shall be notified at least 30 days prior to an emission test, so that he may at his option observe the test.

(3) Samples shall be taken over such a period or periods as are necessary to accurately determine the maximum emissions which will occur in a 24-hour period. No changes in the operation shall be made, which would potentially increase emissions above that determined by the most recent source test, until the new emission level has been estimated by calculation and the results reported to the Administrator.

(4) All samples shall be analyzed, and mercury emissions shall be determined within 30 days after the source test. Each determination will be reported to the Administrator by a registered letter dispatched before the close of the next business day following such determination.

(5) Records of emission test results and other data needed to determine total emissions shall be retained at the source and made available for inspection by the Administrator for a minimum of 5 years.

(6) Mercury chlor-alkali plant—dry-down and end-box ventilation gas streams.

(1) Unless a waiver of emission testing is obtained under § 61.13, each owner or operator employing mercury chlor-alkali shall test emissions from his source.

(i) Within 90 days of the effective

date in the case of an existing source or a new source which has an initial startup date preceding the effective date.

(ii) Within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.

(3) The Administrator shall be notified at least 30 days prior to an emission test, so that he may at his option observe the test.

(3) Samples shall be taken over such a period or periods as are necessary to accurately determine the maximum emissions which will occur in a 24-hour period. No changes in the operation shall be made, which would potentially increase emissions above that determined by the most recent source test, until the new emission has been estimated by calculation and the results reported to the Administrator.

(4) All samples shall be analyzed and mercury emissions shall be determined within 30 days after the source test. All the determinations will be reported to the Administrator by a registered letter dispatched before the close of the next business day following such determination.

(5) Records of emission test results and other data needed to determine total emissions shall be retained at the source and made available for inspection by the Administrator.

the Administrator of a station in a plant.

(1) Within 90 days of the effective date in the case of an existing source or a new source which has an initial startup date preceding the effective date.

(ii) Within 90 days of startup in the case of a new source which did not have an initial startup date preceding the effective date.

(3) The Administrator shall be notified at least 30 days prior to an emission test, so that he may at his option observe the test.

(3) Samples shall be taken over such a period or periods as are necessary to accurately determine the maximum emissions which will occur in a 24-hour period. No changes in the operation shall be made, which would potentially increase emissions above that determined by the most recent source test, until the new emission has been estimated by calculation and the results reported to the Administrator.

(4) All samples shall be analyzed and mercury emissions shall be determined within 30 days after the source test. All the determinations will be reported to the Administrator by a registered letter dispatched before the close of the next business day following such determination.

(5) Records of emission test results and other data needed to determine total emissions shall be retained at the source and made available for inspection by the Administrator.

(5) An owner or operator may carry out approved design, maintenance, and housekeeping practices. A list of approved design, maintenance, and housekeeping practices may be obtained from the Administrator.

APPENDIX A

National Emission Standards for Hazardous Air Pollutants

Compliance Status Information

1. SOURCE REPORT

Instructions: Owners or operators of sources 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 Environmental Protection Agency Regional Office before (data which is 90 days after the standards are promulgated). A listing of regional offices is provided in § 61.04.

2. SOURCE INFORMATION

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

EPA USE ONLY	
1	10
2	20
3	30
4	40
5	50
6	60
7	70
8	80
9	90
10	100

(2) Contact - Indicate the name and telephone number of the owner or operator or other responsible official whom EPA may contact concerning this report.

101	102	103	104	105	106	107	108	109	110
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----

2. If the source is located in a foreign country, indicate the country and the name of the country in the space provided below.

C19 _____

4. Alternative Polluting Address - Indicate an alternative mailing address if correspondence is to be directed to a location different than that specified above.

C21 _____
C22 _____
C23 _____
C24 _____
C25 _____
C26 _____
C27 _____
C28 _____
C29 _____
C30 _____
C31 _____
C32 _____
C33 _____
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C90 _____
C91 _____
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C93 _____
C94 _____
C95 _____
C96 _____
C97 _____
C98 _____
C99 _____
C100 _____

C. Compliance Status - The emissions from this source can meet the emission limitations contained in the National Emission Standards on or before 1/1/75 which is 90 days after the promulgation of the standards.

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 Environmental Protection Agency. The information needed for such waivers is listed in Section II of this form.

EPA USE ONLY _____
G14 G15 G16 _____
G17 _____
G18 _____
G19 _____
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G95 _____
G96 _____
G97 _____
G98 _____
G99 _____
G100 _____

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

(e.g., baghouse and cyclone) to a baghouse and cyclone. If the process is a baghouse and cyclone, indicate the type of baghouse and cyclone in the space provided below.

G21 _____

2. Pollutant Inlet - Indicate the type of pollutant inlet used by the process. Indicate "no" for selection, if not applicable, or "yes" for selection.

G22 _____
G23 _____
G24 _____
G25 _____
G26 _____
G27 _____
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G32 _____
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G93 _____
G94 _____
G95 _____
G96 _____
G97 _____
G98 _____
G99 _____
G100 _____

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

G54 _____
G55 _____
G56 _____
G57 _____
G58 _____
G59 _____
G60 _____
G61 _____
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G63 _____
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G93 _____
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G95 _____
G96 _____
G97 _____
G98 _____
G99 _____
G100 _____

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.

G59 _____
G60 _____
G61 _____
G62 _____
G63 _____
G64 _____
G65 _____
G66 _____
G67 _____
G68 _____
G69 _____
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G87 _____
G88 _____
G89 _____
G90 _____
G91 _____
G92 _____
G93 _____
G94 _____
G95 _____
G96 _____
G97 _____
G98 _____
G99 _____
G100 _____

b. Asbestos Emission Control Devices Only

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

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

Air flow permeability = _____ cfm/ft²

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

Operating pressure drop = _____ inches w.g.

• If the earhouse material contains synthetic fill yarn, check whether this material is spun ☐ or not spun ☐

If the baghouse utilizes a felted fabric, give the minimum thickness in inches and the density in ounces per square yard.

Thickness = _____ inches Density = _____ oz/yd²

11. If a wet collection device is specified in item 4a, give the designed unit contacting energy in inches water gauge.

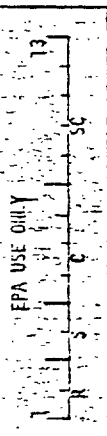
Unit contacting energy = _____ inches w.g.

TPA USE ONLY

157 CC ☐

A. WAIVER OF COMPLIANCE. Owners or operators of sources unable to operate in compliance with the National Emission Standards for Hazardous Air Pollutants by (date which is 90 days after the standards are promulgated) may request a waiver of compliance from the Administrator of the 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.

11. WATER REQUESTS



The reporting information provided in Section 11 is for informational purposes only. Applications should be sent to the nearest regional office.

1. Processes involved - Indicate the process or processes used to produce hazardous pollutants to which additional 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 system or process modifications will be awarded; or date by which orders will be issued for the purchase of the component parts to be added; or emission control or process modification.

154 MONTH DAY YEAR 01

154 MONTH DAY YEAR 02

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

154 MONTH DAY YEAR 02

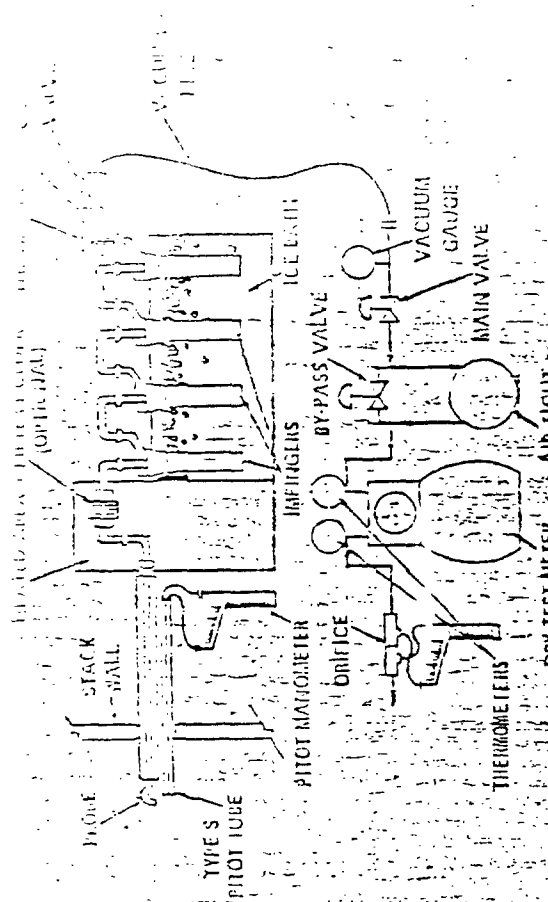


Figure 101-17 Jetting Sampling Train

2.1.1. Nozzle. Stainless steel or glass with sharp tapered leading edge.
 2.1.2. Probe. Smoothed, Pyrex glass, heating system capable of maintaining a minimum gas temperature of 260° F at the probe outlet during sampling may be used to prevent condensation from occurring.
 2.1.3. Pitot tube, Type B (Figure 101-12), or equivalent, with a coefficient within 5 percent over the working range, attached to probe to monitor stack gas velocity.
 2.1.4. Impingers. Four Greenburg-Smith impingers connected in series with glass ball joint fittings. The first, third, and fourth impingers may be modified by replacing the tip with a one-half inch ID glass tube extending to one-half inch from the bottom of the flask.
 2.1.5. Acid Trap. Falm Safety Appliances Air Line Filter, Catalogue Number 01667, with acid absorbing cartridge and suitable connections, of equivalent.

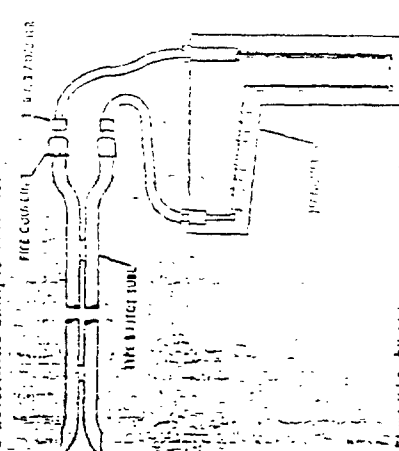


Figure 101-18 Filter Holder (Optional) Type A

2.1.7. Filter. A filter may be used in one type of stream to be sampled.

Signature of owner or operator

B. VALVES FOR EMISSION TESTS. A valve of emission testing may be granted to carriers or operators of sources of toxic or hazardous pollutants in the jurisdiction of the Environmental Protection Agency that 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 reprinting information provided in Section 1.

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

Appendix B—Test Methods
 METHOD 101. REFERENCE METHOD FOR DETERMINATION OF PARTICULATE AND GASEOUS MERCURY EMISSIONS FROM STATIONARY SOURCES (METHANE)

1. Principle and applicability—1.1. Principle. Particulate and gaseous mercury emissions are mechanically sampled from the source and collected in a suitable solution. The mercury collected (in the methanol solution) is reduced to elemental mercury in an oxidation-reduction reaction by hydroxylamine and analyzed using spectrophotometry.
 1.2. Applicability. This method is applicable for the determination of particulate and gaseous mercury emissions when the carrier gas is not in the gaseous phase. The method is not applicable to dust or gases at stationary sources.



GEORGIA-PACIFIC
CORPORATION

BLOOMINGDALE ROAD • AKRON, NEW YORK 14001 • 716-842-8431

July 20, 1973

Mr. Conrad Simon
E.P.A. Region 11
Federal Plaza
New York, New York 10007

Re: Joint System Plant

Dear Sir:

Please be advised that there are no visible emissions from the baghouse at this location.

Very truly yours,

Georgia Pacific Corp.

Jack Rauch
Plant Manager

k

SGP 0006907

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.

G E O R G I A P A C I F I C C O R P
A 29 COMPANY NAME A 48

B L O O M I N G D A L E R D
A 49 NUMBER STREET NAME A 68

A K R I O N N Y 1 4 0 0 1
B 19 CITY B 33 STATE B 34 ZIP CODE B 38

E R I 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.

J A C K R A U C H 7 1 6 5 4 2 5 4 3 1
B 39 NAME B 53 B 54 TELEPHONE B 63

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

J O I N T S Y S T E M P L A N T
C 19 C 43

4. Alternative Mailing Address - Indicate an alternative mailing address if correspondence is to be directed to a location different than that specified above.

C 44 NUMBER STREET NAME C 63
C 64 CITY C 77 C 78 STATE C 79 D 75 ZIP CODE D 79

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.

Jack Rauch
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.

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

EPA USE ONLY

G14 EP G15 G46 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.

M I X I N G H O P P E R & B A G P A C K E R

G21

G46

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

A B

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).

2 0 0 0 0 0 0

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.

B A G H O U S E

H19

PRIMARY CONTROL DEVICE TYPE

H34

H35

SECONDARY CONTROL DEVICE TYPE

H50

H51

H53

9 9 . 0

PERCENT REMOVAL EFFICIENCY

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/ft²

- . 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 = oz/yd²

- 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

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.

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

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

CONTAINER DIVISION
SAMPLE

A Prestige
Package Design

BUFFALO PLANT

1110 Military Road Buffalo, N. Y. 14217

Phone 377-1500

SAMPLE NO.: 73 0772 DAY: 7/20/73

FOR

Georgia Paper Co.

ATTENTION OF:

Jack Rouck

IDENTIFICATION

SIZE: *48 x 23 x 30*

STOCK *1/2 x 1/2 AB* STYLE *3" 1/2 RSE*