

cc: Mr. H. C. Bourque  
Mr. E. W. Elmore  
Mr. J. H. Huguet  
Mr. S. D. Motsinger

# ETHYL CORPORATION

INTER-OFFICE

**PLAINTIFF'S  
EXHIBIT**

ETCO-283

To Mr. W. C. Strader

ADDRESS

FROM C. B. Hunt

ADDRESS

SUBJECT National Emission Standards for  
Hazardous Air Pollutants (EPA)

DATE Aug. 22, 1972

We have reviewed Arthur Busch's July 26, 1972, letter to you advising you of the near term promulgation of standards for beryllium, mercury and asbestos.

We know of no uses of beryllium on the Baton Rouge plant at all, and hence, we should be exempt from such regulations. We do use some mercury in the sodium area rectifiers, in some plant instrumentation, and in the laboratories, but as I read the regulations, we are completely exempt here also.

It appears that our past practice of spraying asbestos insulation on sodium cells is in violation of the proposed regulations and Hugh Bourque tells me that Maintenance is proceeding to implement a different insulation procedure. I understand that Houston is not using asbestos insulation, so perhaps we could continue to use the spray technique but with a non-asbestos material. Dale Motsinger has reviewed the caustic chlorine diaphragm cell rebuilding operation in light of the proposed regulations and believes that there is no problem here. Possibly we might check with the Chlorine Institute to see what the industry consensus is.

Overall, I believe we will have no trouble in reporting full compliance with the standards ninety days after their promulgation.

CBH

C. B. Hunt

CBH:ar  
Attachment

ETC 15343

E-02300