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INTEROFFICE CORRESPONDENCE
GAF Corporation

DATE December 28, 1971

TO Mr. P. Weiner
LOCATION NY

cc Messrs. Fassuliotis - Fraser - Gedettis
Holt - Matthews

FROM Mr. W. Darrell
LOCATION NY

RECEIVED
DEC 29 1971
LEGAL

SUBJECT: OSHA Emergency Standards

I need some interpretation on these standards as published in the Federal Register December 7th.

Under paragraph 1910-93A, sub-paragraph (3)F, it states that asbestos waste and scrap shall be collected and disposed of in sealed bags or other containers. We have several problems in connection with this, as follows:

1. Are tailings at our Vermont plant which contain traces of asbestos considered scrap or waste and do they have to be put in sealed containers? For your information, we generate approximately 100,000 tons of this material per year at Vermont.

2. At our Erie 16th Street plant we generate asbestos paper trim and scrap of 2 kinds. One is reuseable and we usually bale it and then refeed the material back into the process at some convenient time. The other type which contains rubber binders is not reuseable and we usually bale this and dispose of it at some public dump.

3. At our Erie 16th Street plant we purchase bales of asbestos millboard scrap from some our customers. This is both a service to our customers and a good source of low cost raw material to us. Does this material need to be in sealed bags or containers?

1) 2) what does asbestos waste scrap mean?
2) Does this scrap have to give off asbestos dust?

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4. Several of our roofing plants buy asbestos paper from Erie 16th Street for use in the manufacture of saturated asbestos roofing papers. They generally have scrap left over from this paper in the form of cores and cut off the outer laps, which material they ship back to Erie for reuse, such as I have mentioned above. Into what category does this fall?

W. Darrell

WD:mm

RGAF