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September 16, 1980

MEMORANDUM TO THE FILE

Re: EPA Vermiculite Risk Assessment

Today, September 11, 1980, at approximately 2:00 p.m., I received a call from Pam Basu of JRB Associates. She thanked me for the information which I had previously sent to her, namely, the comments which Grace had made to the CPSC/EPA Advanced Notices of Proposed Rulemaking relating to asbestos. She indicated that she had several questions. The questions were as follows:

1. The mode of transportation of vermiculite crude from the mine to the expanding plants? I answered that to my knowledge it was primarily by closed railroad hopper cars.

2. The methods used for loading and unloading of the crude vermiculite? I answered that I did not know for sure but I suspected it was in most cases by conveyor belt loading into closed railroad hopper cars with subsequent unloading of the crude vermiculite at the destination point by conveying equipment into ore storage silos. I indicated that I could not verify or represent that the method of unloading was as I described in each case but that it was likely that the method described was in effect in most cases.

3. The mode of transportation of expanded vermiculite from the expanding plants? I answered that I did not know for sure but suspected it was predominantly by truck.

4. Whether shipment of expanded vermiculite from expanding plants was in bulk or bags? I indicated that I was not sure but suspected it was probably predominantly in bags.

5. Distance of shipment of vermiculite crude from the mines? I answered that it could be a significant distance since vermiculite was shipped nationwide and the two mine locations were in South Carolina and Montana. Accordingly, she could assume that the shipping distances by rail were significant.

6. Did Grace sell crude ore to outsiders? I answered yes. How many outsiders? I said I did not know but likely more than 10 but less than 100.

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Basu then requested that I get for her specific information as to how many independent expanders crude ore was sold and more specific information with respect to the distances over which crude and expanded vermiculite ore was shipped both by Grace and those to whom Grace sold crude ore. I said I would try to obtain this information and give her a call.

Basu indicated during the conversation with respect to the number of vermiculite expanding plants in the country that she had information which would indicate Grace had about 30 expanding plants and there were about 60 expanding plants in total in the country.

7. Did Grace ship crude vermiculite to Virginia? I answered that I did not know.

8. Did Grace ship crude vermiculite by barge? I answered that I did not think so although I had heard that some of the vermiculite ore which came into the country was shipped by barge.

It seems obvious at this point, notwithstanding information received from Dave Evans that EPA was "calling off its consultants", that JRB Associates is still working on the task. I will talk with Evans and Mr. Callaghan at EPA before responding to Basu.

Basu's new telephone number is AC 703 821-4641.


O. M. Favorito

OMF/MS

cc/ H. C. Duecker
F. W. Eaton
H. A. Eschenbach
R. M. Vining
E. S. Wood