ZONOLITE

CONSTRUCTION PRODUCTS DIVISION

77174/8

PLAINTIFF'S EXHIBIT WRG-706a

April 6, 1973

TO: Zonolite BPD Regional Sales Organization

R. L. Asher 10
C. R. Love 20
W. K. Rogers 35
T. P. Egan 35
[illegible] 50

RE: MONOKOTE and EPA Regulations

On Monday, April 2, 1973, we were informed by the Environmental Protection Agency that the standards for the control of asbestos emissions had been finalized and sent to the Government Printing Office for publication in the Federal Register. At that time we were given a copy of the final regulations. The regulations have become effective with the publication in the Federal Register which took place on April 6, 1973.

In our opinion the effect of these EPA regulations is:

(a) All MONOKOTE 3 jobs can continue until July 4, 1973, which is 90 days from the date of publication of the regulation in the Federal Register.

(b) MONOKOTE 4 or MONOKOTE 5 jobs are not affected.

This is based on our discussions with EPA in Washington on April 2 and 4, 1973, and our understanding of the regulations and enforcement policy.

Copies of EPA's "National Emissions Standards for Hazardous Air Pollutants" will be available at our district and regional offices. We can provide our customers with these regulations to inform them of the EPA requirements.

At the same time, we should make it clear that the regulations affect the user and that our interpretation of the regulations and the enforcement policy does not discharge our customers of their responsibility to comply with the requirements.

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The following Zonolite policy is hereby initiated in view of the EPA action:

1. Production of MONOKOTE 3 will cease June 23, 1973, which is within 80 days from the date of publication of the regulations in the Federal Register.

2. During the changeover period, it will be important that our customers are made aware of the mixing and pumping characteristics different from MONOKOTE 3. In most instances, this will require on-site visits with job foremen (first) and mixer men.

3. Each job which will be changed from MONOKOTE 3 will require a review to determine that the applicable approvals are appropriate for the substitute material. This matter should be reviewed with your district manager.

Tom

Thomas P. Feit

TPF/rw

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