PLAINTIFF'S
EXHIBIT
GF-2270

EDEN..It was reported to us Friday that Nixon's head of the Environmental Conservation Agency, William Ruckleshouse, has signed and put into effect a set of federal regulations to ban the use of asbestos tailings on roads. The new law also prohibits emissions of particulate matter from asbestos conveyors, dryers or any structure containing any milling process, when those emissions exceed what is allowed in conjunction with fabric filter installations.

It sounds innocent enough, another precaution invoked under the banner of pollution abatement. But the move significantly affects operations up at the GAF Corporation's mine in Eden, where 25 percent of the nation's asbestos is produced. There is no way to control completely particulate emissions from conveyors -the studies show that. If the laws are tightly enforced, and GAF is restrained from selling asbestos tailings to towns for highway maintainance, it might be enough for the management of GAF to conclude that continuing operations in Eden is not economically feasible. Prohibiting the use of tailings on the roads would place a financial burden on the towns too. Although it's been said that only Vermont and South Africa indulge in this practice, its interesting to note that asbestos tailings are cheaper than dirt. If the towns up here that buy tailings from GAF must instead buy salt and sand, well it means another expense to be added to town budgets.

Jack Holloway, GAF Environmental Engineer, admitted last week that GAF is currently making "a complete evaluation of the status of the plant" as a result of the new regulations. At a public hearing on the proposed law conducted by the state's Agency of Environmental Conservation last Tuesday, Holloway added that the cost of installing the necessary emission controls would be great and still might not solve the problem.

GAF reportedly has already invested some $170,000 for emission control both inside and outside the plant and Holloway said fiber emissions have been reduced considerably, although apparently not to the standards of the new law. As to the prohibition against the use of tailings rock for road maintainance, Holloway said that in the first place there are "relatively insignificant amounts of asbestos in the tailings -- less than one-half of one percent of free asbestos fibers." This, coupled with the fact that snow and ice cover generally keep the asbestos fibers wetted down makes it clear, to Holloway, that using tailings on the roads does not constitute a health hazard to the general public. And he has independent studies to back that up.

It appears then that the real issue is whether the regulations will bend enough to allow limited emissions from the conveyors, dryers and other in-plant milling operations. Early in 1972 the Agency agreed to give consideration to the technological problems of controlling emissions and according to Holloway admitted that some of the standards were unachievable. Negotiations between GAF and the Agency are continuing; another public hearing is planned, this one to be convened in Lamoille County. But the federal regulations are now in effect, and that means that the state Agency must either come up with a set of state regulations in accordance with the federal ones or surrender responsibility for enforcement of the law to federal agents. That may not sound like much of a choice but it is to everyone's benefit to settle the problem locally, not leaving it up to impersonal bureaucrats. As was pointed out by Representative Stub Earle of Eden at last week's hearing, if the plant was to close down for some reason, "Eden would become a ghost town."

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Asbestos Regulation May Threaten GAF