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GRACE

Construction Products Division

Industrial Chemicals Group
W.R. Grace & Co.
62 Whittemore Avenue
Cambridge, Mass. 02140

(617) 876-1400

February 14, 1980

Mrs. Joni T. Repasch
Record Clerk
Office of Toxic Substances (TS-793)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Commercial and Industrial Use of Asbestos Fibers--
Advance Notice of Proposed Rulemaking -
Docket No. OTS-61005 ("EPA ANPR")

Dear Mrs. Repasch:

The Construction Products Division of W. R. Grace & Co. ("Grace") has reviewed the referenced EPA ANPR and herewith submits its comments in response thereto. You will note that an identical submission was made to CPSC in response to its Advance Notice of Proposed Rulemaking relating to Consumer Products Containing Asbestos (CPSC ANPR).

In its comments Grace addresses the issue of asbestos contamination and its association with minerals such as vermiculite. This issue is not a new one to EPA and was considered by EPA at the time it established the 1% asbestos dry weight level found in EPA's National Emission Standard for Asbestos applicable to spray fireproofing materials.

None of the Regulatory Control Options set forth in the EPA ANPR which relate to possible prohibitions on manufacture, processing, use, production or importation of commercial asbestos are appropriate to the issue of asbestos contamination. Accordingly, the issue of asbestos contamination should not be the subject of any rule dealing with commercial asbestos.

Grace believes that the issue of asbestos contamination is a more difficult one than that of commercial asbestos and its uses, and should be separately addressed. If and when EPA chooses to address the contamination issue, Grace will cooperate with EPA and CPSC in an effort to arrive at a contamination level which is consistent with the prevention of unreasonable risks of injury from asbestos fiber exposure.

Very truly yours,

W. R. Grace & Co.
Construction Products Division

By B. R. Williams
B. R. Williams, Vice President

Enclosure

cc: Office of the Secretary
Consumer Product Safety Commission
Washington, D.C. 20207
Re: Asbestos