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UNION CARBIDE CORPORATION • METALS DIVISION • P. O. BOX 579 • NIAGARA FALLS, N.Y. 14302 • TEL: 716-278-3376

September 26, 1977

Ms. Linda S. Chaput
Environmental Protection Specialist
Standards Development Branch
Emissions Standards & Engineering Div. (MD13)
Environmental Protection Agency
Research Triangle Park, NC 27711

Dear Ms. Chaput:

This is in response to your file memorandum of September 12, 1977, on the subject of Asbestos-Containing Spray-On Materials. The only comment we would like to make on your very well organized memorandum pertains to the statement under question 3:

> "Some resinous materials may be friable after drying or after aging. Such materials as epoxies and acrylics may be somewhat brittle."

We assume that "friable" as used here has the Environmental Protection Agency Definition of:

> "... means any material that contains more than one percent asbestos by weight and that can be crumbled, pulverized, or reduced to powder by hand pressure." (Emphasis added.)

We are not aware of any resinous materials (natural or synthetic), particularly epoxies or acrylics, which meet this definition of friable. If such a material does exist it is extremely unlikely that it would be used in coating or laminating operations since it is extremely important that such coatings are not friable, but, on the contrary, long-lasting and durable.

It was a pleasure talking to you and we appreciate the opportunity to express our comments. Don't hesitate to contact me if you think we can be of any further assistance.

Very truly yours,

John L. Myers

John L. Myers
Marketing Manager

JLM:dal
CC: R. H. Mereness
H. B. Rhodes

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