

DATE April 3, 1972

TO P. I. Weiner ✓
LOCATION New York

FROM P. S. Bettoli
LOCATION South Bound Brook

cc Messrs: Bien, Clement, Darrell,
Dent, Faneuf, Fassuliotis,
Fraser, Gutzwiller, Hall,
Johnson, Van Buren, Wilcox

SUBJECT: EPA REGULATIONS - CURRENT STATUS

On March 15, the EPA reviewed a draft of the general provisions controlling asbestos emissions with an advisory committee. Industry specialists present were Ed Fenner, J-M, Bert Levine, Asbestospray, John Myers, Union Carbide, and Ernie Bratt, H. K. Porter. Attached is a copy of the revised regulations which were presented for consideration. John Myers of UCC sent me this copy and it contains his margin notes.

Myers returned to EPA on March 27 to submit, in writing, his additional recommendations for consideration since he believed that further changes should be made to avoid serious marketing problems with small fiber customers. Enclosed are his written recommendations which seem sound to me.

Myers said that Mr. Slaughter planned to take these proposed standards to the "next step up" on March 29, 1972, so there isn't much more that can be done at Durham. From here out, the AIA will have to convince Ruckleshous if further modifications are needed.

Changes of particular interest are as follows:

1. "Particulate matter" is still defined as any material, other than uncombined water, which exists in any finely divided form such as a liquid or solid. They still won't put in "containing asbestos".
2. They have allowed visible emissions of particulate matter from asbestos ore storage dumps and asbestos-containing tailing dumps within a fifty foot radius of the point where the matter is deposited onto the pile.
3. Asbestos tailings can be employed on roads where asbestos mining and milling operations are carried out. Tailings, however, cannot be used on roads outside the mining property.

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4. They have provided a means of exempting certain manufacturing or fabricating operations from the emission filtration requirement. The operator must make available, to the Administrator, sufficient evidence as may be required to demonstrate that the process does not generate particulate matter which contains commercial asbestos. Judgement will be based upon the degree to which the asbestos fibers are constrained by a binding agent and the extent to which the drying, cooling, coating, curing, saturating or other manufacturing operation acts to release solid asbestos-containing material.

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Att.

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