



FEB 28 1977

754015

GRACE

Construction Products Division

GRACE

To: O. M. Favorito

Date: February 25, 1977

From: R. H. Locke

Subject: Marks Bill Amendment

cc: W. F. McCord
B. R. Williams
J. W. Wolter
E. S. Wood

W. F. McCord
B. R. Williams
J. W. Wolter
E. S. Wood

I am bringing the attached note on this subject to your attention. You and I had talked about this last week and I believe you indicated that you were going to be pursuing this yourself. The alternatives seemed at that time to be:

1. A possible rider to the Torres Bill to add a f/ml trigger level exclusion for asbestiform tremolite to supplement the proposed exclusion of non-asbestiform tremolitic talc from the Board's authority. Since it could easily be proved that most, if not all, tremolitic talcs contain detectable quantities of asbestiform tremolite, it would seem that all informed talc users would be agreeable to such a rider. It would also be necessary to delete or change the "talc" specification in order to benefit CPD.
2. Independent of the Marks Amendment, pursuing a 1.0 or 0.5 f/ml trigger level guideline in the Carginogen Advisory Committee, procedurally limiting the Gregorio Act's scope and by precedent also the Marks Bill's. This would seem to be of broad appeal. Reference, Jim Joyce, Dave Kandel, George Borg, Union Carbide and J.M. George Clyde was exploring a parallel inquiry direct with Dr. Ottoboni.
3. Last in priority, due to publicity potential, would be to find out Marks' reaction to a 2nd Marks Amendment excluding non-asbestiform tremolite (S.C. payoff and no identifiable hazard) or all tremolite (Libby payoff) from the enforcement scope of the original

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G. M. Favorito

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Marks Bill as modified first by Dresley and second by Marks. This would seem to be of limited interest (CPD only to my knowledge). I have no reason to believe Marks would be positive. I thus put this lower priority than the first two.

I think you had other ideas you were going to pursue as well.

The above are, of course, independent of other variance/exemption petition representations.

R. H. Locke
R. H. Locke

RHL/cf

Attachments: E. S. Wood 2/24/77
R. H. Locke 2/14/77
with Attachments

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