PLAINTIFF'S
EXHIBIT
GF-1906

FORM 2518-6-68 PRINTED IN U.S.A.
INTEROFFICE CORRESPONDENCE
GAF Corporation

R.P.F.

MAY 1 1972

DATE April 26, 1972

TO LOCATION Mr. R. P. Fraser
New York

cc Messrs. Gedettis - Hall - Holt

FROM LOCATION Mr. W. Darrell
New York

SUBJECT: In-Plant Asbestos Levels

This refers to Mr. Hall's April 7th memo and yours to me. We have only 2 plants in the Industrial Products Division which are concerned with asbestos fibre. One of these is the Vermont operating mine and the other is our Erie 16th Street plant.

In regards to the Vermont mine, we are presently under the Bureau of Mines' standards. Their most recent inspection was several months ago and that uncovered a condition on the 2nd floor of the mill which had more fibre in the area than the Bureau of Mines' standards allow. In order to correct this, the mine people designed and installed enclosures on belts, bagging bins and other areas of the plant for approximately $10,000. On reinspection, the Bureau of Mines abated the citations and, as far as they are concerned, we are in compliance with the applicable standards for asbestos fibre at the mine and in the mill.

However, should the Vermont mine eventually come under OSHA standards, we have very large doubts as to our ability to control the level of 5 fibres per milliliter, and have no hopes whatsoever of controlling it at 2 fibres at least within any bounds of reasonable economic investment.

As far as the Erie 16th Street plant is concerned, recent readings made by Mr. Bien's department show we have 2 areas where we would have a problem with either the 5 or the 2 fibre standards. One is in the unloading of the asbestos and the other is in the millboard beater area. The latter condition is presently being corrected and we feel it will not be expensive, less than $10,000. Correction of the unloading of box cars will be more difficult because of bag breakage but as long as OSHA has standards which include the use of respirators for areas above their prescribed levels, we should have no problems.

As far as our plans for measuring fibre levels are concerned, we have at Vermont all the equipment necessary for measuring by both of the methods now being used, the one by the Bureau of Mines and the other by OSHA, and we are conducting frequent, 2 month checks, of the entire plant.

At the Erie 16th Street plant we must rely on Mr. Bien's department to make the measurements. After we have done more work at Erie, we will call them back for another measurement.

As you know, for the last 3 years we have had a vigorous and effective correction program at Vermont, both internally and externally, and the results of our efforts have been that we are in compliance with the Bureau of Mines' standards which are the applicable standards.

As a side note in reference to Vermont, information recently received from the EPA indicates that the standards they are setting for external emissions are ones with which we believe we can comply. Of particular note is they are proposing that it will be satisfactory for mine roads to be surfaced with tailings but that the use of tailings for roads off of the mine property will be prohibited. They have also given an area at the point of discharge on the tailings pile, outside of which area no visual emissions are to be present. We believe by changing our discharge at the tailings conveyor, we should not have any major problem with the tailings pile. In order to learn how to design for this, we are going to send our mine engineer out to Johns-Manville's Coalinga operation where they allegedly have perfected a relatively dustfree discharge method.

I am very encouraged by the new EPA proposals which also include needled felt as an acceptable baghouse media, and feel that the work done by GAF people in attending the EPA technical meetings, hearings and escorting the EPA people to several of our operations have shown them what they needed to know to write regulations which will accomplish their purpose and also permit continued operation at the mine. Messrs. Bettoli, Dennis Eldred of Vermont and I handled the technical work and escorted these people, and Mr. Wiener attended one meeting from the legal standpoint.

WD

W. Darrell

WD:mm