E. I. DU PONT DE NEMOURS & COMPANY
INCORPORATED
WILMINGTON, DELAWARE 19898

ENVIRONMENTAL QUALITY COMMITTEE

BCC: R. R. Bonczek, C. F. Reinhardt, B. W. Culpepper, F. E. French, Jr., T. E. Lewis, P. G. Gilby, V. R. Rice, G. A. Hapka, M. H. Christman, R. A. Harrington, C. B. Hagerty, B. J. Reilly

August 5, 1983

C-337

Document Control Officer (WH-557)
Chemical Information Division
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Gentlemen:

Du Pont is aware that EPA is currently investigating asbestos manufacture and use activities and that, as part of this effort, the Agency has requested information on industrial filters containing asbestos components. 47 Fed. Reg. 33198 (1982). Because the asbestos present in such filters is bound up so as to prevent airborne release during handling, storage and use, the filter pads are not generally labeled as containing asbestos. It has come to our attention that disposal of the filters by incineration or destruction by some other mode might result in the potential release of airborne levels of the bound asbestos fibers. Absent labeling of the asbestos content by the filter manufacturer, downstream customers and processors might not be adequately put on notice so as to ensure compliance with applicable OSHA requirements. 29 CFR 1910.1001. Du Pont believes that this information could be useful to EPA's assessment of exposure potential.

Since 1970 Du Pont has used at one of its plants a cellulose industrial filter which contains ten percent chrysotile asbestos. Subsequent to use, Du Pont sent the spent filter medium containing precious metal residues to various reclaimers who reprocessed the material to extract the precious metal content. Recently Du Pont recognized that during this reclamation activity, asbestos fibers could become airborne. However, Du Pont has no knowledge that this, in fact, occurred. Moreover, Du Pont has no reason to believe that the reclamation operations were not in compliance with applicable OSHA standards. Du Pont has notified its current reclaimer of the asbestos content of the spent filters and has retrieved both unprocessed and semi-processed drums of the material from the reclaimer's site. Other processors, who had in the past reclaimed such process residue, are being notified that the asbestos-containing filters were included in the process material that had been reclaimed.

870