

DATE March 7, 1972

TO Mr. P. I. Weiner  
LOCATION New York

FROM P. S. Bettoli  
LOCATION South Bound Brook

cc Messrs: C.F. Bien, Linden  
J.S. Clement, N.Y.  
W. Darrell, N.Y.  
T.A. Dent, N.Y.  
W. Fassuliotis, N.Y.  
R.P. Fraser, N.Y.  
E.C. Gutzwiller, N.Y.  
J.G. Hall, N.Y.  
H.B. Johnson, SBB  
B. Latuchie, Linden  
J.G. Wilcox, N.Y.

SUBJECT: E.P.A. MEETING, MARCH 14,  
DURHAM, NORTH CAROLINA

The Standards Development and Implementation Division Engineers held a meeting with certain industry representatives to review their draft of "Control Techniques for Asbestos Emissions" which was prepared to provide public information on asbestos pollution control techniques and serve as a backup for the EPA Standards on asbestos.

The following organizations participated in the informal conference to offer comment and criticism on the proposed document: Union Carbide, Raybestos, National Gypsum, Panacore, J-M, H. K. Porter, U. S. Bureau of Mines, N.C. Department of Water and Air Resources and Darrell, Eldred and Bettoli of GAF.

Chief Engineer, Dale Slaughter, reviewed their current thinking on the EPA Standards draft following the Los Angeles Hearings. They will not adapt our broad definition for "particulate matter" but the wording will provide exceptions for the operations we suggested and also include a provision to apply for exclusion on emissions not specifically mentioned.

Spraying was discussed with respect to inorganic "cementitious" binders being limited to 1% asbestos content. Organic binders appear acceptable, but they will probably name specific materials.

Felt will be accepted on a par with cotton fabric. Data on felt performance will also be included in the "Control Technique" publication if we provide it; which we plan to do when the tests are completed.

We may have gained some concession to permit emissions from a tailings pile. Hopefully their final draft will allow visible emissions within 100 feet of the discharge point.

A "source" will be defined as the entire operation on one piece of company property.

*Environmental Asbestos*

*PGA*

GAF 21703

The Bureau of Mines representative, Mr. R. A. Clifton, shocked everyone by his outright opposition to the whole idea of the EPA establishing any "standards" for asbestos. He was very critical of their entire approach and thinks they will be completely defeated if we take them to court. His contention is that there must be a known base ~~area~~ from which a standard is based. They have not established the hazardous level of asbestos nor developed a suitable procedure for measurement. It would be an unjustified and unsupportable restriction on industry, etc., etc.

Fenner of J-M told me they will report a required capital expenditure of \$8.5 million to meet the OSHA proposed regulations in their U.S. plants. They have no solution to the Coalinga tailings pile control and textile plants are the biggest problem. The Canadian ambassador to the U.S. has apparently called on the State Department to point out the very serious economic effect any adverse asbestos regulations will have on the economy of Quebec.

Industry comments on the "Control Techniques" book were accepted favorably in general. I again got the impression that the other industry representatives can't be counted on to carry the ball. They better show more life at the March 14th OSHA hearings.

*Phillip A. Bettoli*  
P. S. Bettoli

PSB/jc