



Charles E. Brookes, Senior Vice President

W. R. Grace & Co.  
Grace Plaza  
1114 Avenue of the Americas  
New York, N. Y. 10036

December 21, 1982

Mr. Edward A. Klein, Director  
Chemical Control Division  
U.S. Environmental Protection Agency  
Industry Assistance Office  
Office of Toxic Substances  
401 M Street, S.W.  
Washington, D.C. 20460

Dear Mr. Klein:

Thank you for your letter of December 16th.

We did, in fact, receive your inquiry relating to manufacturers, processors or importers of asbestos and reporting requirements.

It was our interpretation in reading the Federal Register notices that W.R. Grace was not required to file a report. Perhaps it escaped our attention that we were required to advise you of this fact.

Therefore, please be advised that, to the best of our records, W.R. Grace is not a manufacturer, processor or importer of asbestos under Sections 15(3) and 16 of the Toxic Substances Control Act. I refer you to the second paragraph on page 33202 of the Federal Register which states in part: "This rule does not require reports by manufacturers or processors of products which contain asbestos as a contaminant or an impurity." Further, on page 33207, Section 763.63(b) reads in part: "This term does not include mixtures which contain asbestos as a contaminant or impurity."

If you wish further information, kindly contact me.

Very truly yours,

CEB/rmm

cc: O.M. Favorito  
E.E. Moore

0620802