REPORT OF CALL

PLAINTIFF'S EXHIBIT UC-622

CC for
P. W. McDaniel
P. J. Morgan
T. P. Norris
J. W. Rawlings
KC-File
NF-File

UNION CARBIDE CORPORATION

P.O. Box 579 Niagara Falls, N.Y. 14302

RECEIVED
NOV 22 ...
UCC-CHEMICALS

By J. L. Myers

Date

Full Name Environmental Protection Agency	**Interviewed**
Address Durham, N.C. 919,688-8146, Ext. 454	Dr. J. U. Crowder
Mfrs. of	TELECONS

The following summarizes telecons with Jim Crowder on 10/12 & 21/71 and 11/16/71 to determine status of their proposed emission standards for non-occupational exposure to asbestos (reference my previous ROC dated 6/15/71).

Mr. C. R. Horres, one of our original contacts, has returned to school for his PhD.

The proposed standards were sent to the Office of Management and the Budget (OMB) in D.C. on 9/27/71 for approval of issue in the Federal Register. They were reviewed in Atlanta just prior to this by the National Control Techniques Advisory Committee. This committee was appointed by Rucklehaus and included, among others, Dr. Seliakoff and Ed Fenner of J-M, representing the Asbestos Information Agency (AIA).

Crowder could not get permission from his boss, Dale Slaughter, to send me a copy of the standards prior to OMB approval but will as soon as their return from OMB. He answered all my questions about content and said the AIA had no advantage over us. OMB approval was expected by 11/8 but on 11/16 Crowder said Slaughter was in DC with the OMB and expected approval by 11/30. This puts them two months behind the schedule dictated by the Clean Air Act.

According to Crowder the proposed standards contain nothing not now being done by industry in general -- "they put in black and white what most people are now doing".

No emission levels are established and he seems to blame "others" for not providing sufficient information for them to include TLV's for public exposure. They discuss equipment standards for mining, milling and manufacturing operations; and specify emission control levels in general terms as "those obtainable from fabric filters". There is no requirement for absolute filters, which presumably means respirator use is allowable.

There are no standards established for packaging, labelling, transprotation, etc., because of restrictions imposed by their legal advisors.

Crowder was very cooperative, as usual, and will send me info regarding State of Illinois proposed regulations which, among other things, exclude asbestos emissions from brake linings.

He has resumed work on "control techniques" and will include more about wet processing, pellets, bulk handling, etc. He said he may need more information from us and I volunteered to talk to or call on him at any time.

RECOMMENDED ACTION

1. Use the above information to verbally answer customer's questions about EPA standards and actions regarding asbestos (All concerned).
2. Stay in touch with EPA (JLM).
3. Consider joining the AIA (JWR).
4. Distribute standards when received (JLM).
5. Establish contact and arrange meeting with HEW personnel concerned with occupational exposure (JLM).

Typed 11/22/71
/cb