

**From:** MR AUBREY V GODWIN <GDWA23A@prodigy.com>  
**To:** WND1.WNP9(phl)  
**Date:** 8/6/96 4:11pm  
**Subject:** Prior message relating to 10CFR40.13

Our investigation indicates that the material discovered at Emco Recycling is exempt pursuant to 40.13(c)(8). Since the material can from an aircraft reworking company, and the material was sold to a metal recycler, several questions arise regarding these materials and our enforcement policies:

1. Can the aircraft reworking company remove the parts from an aircraft engine and then sell it to a recycler?
2. Can the recycler melt or otherwise modify the engine part?
3. Has an assessment been made of the public exposure if these parts are melted and their products enter the public steel supply?
4. If an enforcement action should be taken, should it be against the aircraft reworker, the scrape yard, or who ever melts the parts? Should we establish a program to detect any possible diversion to melting companies?

Thank you

Aubrey

**CC:** WND1.WNP9(lab),WCD1.WCP1(jwh3)