VC 143-2

cc: P. C. Weeks 4/23/75

cc: A E Dameron
W. Gertsen
H. Fukuma
F. S. Wada

II. E.

UNION CARBIDE

INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION

P. O. BOX 579, NIAGARA FALLS, NEW YORK 14302

To (Name)	Messrs. R. E. Byrne, Jr.	Date	April 16, 1975
Division	G. L. Dickson		
Location	B. L. Ingalls	Originating Dept.	"Calidria" Asbestos
	E. J. Kleber	Answering letter date	
	J. L. Myers ✓		
	T. P. Norris		
Copy to	W. C. Thurber	Subject	OSHA Regulations on Occupational Exposure to Crystalline Silica
	J. E. Walsh		
	File		

The long delayed NIOSH Criteria Document to serve as the basis for the above noted regulation has been transmitted from NIOSH to OSHA. As expected, the suggested regulations follow the general pattern of the asbestos standard. A notable exception is a clear definition of a cut-off exposure level below which the regulations do not apply.

It is our understanding that the recommended allowable level is so low that it will be very difficult for a number of common industrial operations to meet it. The monitoring requirement is particularly burdensome as is the need for warning labels and Material Safety Data sheets for all products containing free silica. Undoubtedly, some of these requirements will be tempered as the recommendations pass through the rulemaking procedures but the basic pattern seems to be pretty well set. This procedure is slow and any final silica regulations are a year or more away.

The attached commentary on the highlights of the proposed regulations may be useful in dealing with customers. You should be aware that we have checked RG-144 and RG-244 and have not found any evidence of crystalline silica. The pyrogenic silicas have also been checked and their exact situation is not yet clear. We will provide you with the appropriate position as soon as it has been defined. Until that time it is strongly recommended that you make no statements on how the pyrogenic silica materials relate to the regulations and suggest that the customers using them check with their supplier.

Also, we have limited, secondhand, but probably reliable, information that almost anyone sanding a finished tape joint will be well over the limit. This may be useful to cause some reexamination of formulations that are under revision to eliminate asbestos.

If you have any questions, please let me know. A copy of the proposed regulations can be supplied if you feel you need it.

PLAINTIFF'S EXHIBIT Union Carbide 323

A08652

HBR:gt
Attachments

H. B. Rhodes

H. B. Rhodes

To cc: This information may be of interest to you as we asbestos evaluations also utilize silica in some form.