******* DRAFT *******

PLAINTIFF'S EXHIBIT
UC-525

Mr. W. P. Ellis
Director of Research
Amchem Products, Inc.
Foster Division
P. O. Box 9695
Philadelphia, PA 19131

Dear Mr. Ellis:

This is in response to your letter of June 30 and confirms our telephone conversation of July 16, 1975. As we discussed, asbestos has received a great deal of adverse publicity in the last few years and has been the subject of a number of government regulations. A balanced picture of the current situation published by the Asbestos Information Association is attached for your general information.

One important reason for much of the asbestos-health controversy is the long time periods, typically 20-50 years, for asbestos related diseases to develop. This, combined with the fact that low levels of asbestos fibers occur naturally in the environment, makes it difficult to define accurately a dose-response curve and say with absolute certainty what exposure levels are safe.

About four years ago, the National Institute of Occupational Safety and Health reviewed the available asbestos data in great detail and recommended a maximum occupational time-weighed average exposure level of 2 fibers/cc. longer than 5μ. This recommendation was incorporated into the OSHA regulations and, after a delay to allow asbestos users to achieve compliance, goes into effect on July 1, 1976.

A 19466

UNION CARBIDE INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION

4625 ROYAL AVE., P. O. BOX 579, NIAGARA FALLS, NEW YORK 143

To (Name) Messrs. R. E. Byrne, Jr.
Division G. L. Dickson
Location J. L. Myers
W. C. Thurber

Date July 18, 1975

Originating Dept. – TECHNOLOGY DEPARTMENT
"Calidria" Asbestos

Answering letter date

Copy to File

Subject Amchem Products, Inc.

Attached is a draft of a response to an asbestos-health inquiry from Amchem Products, Inc. I talked to Mr. Ellis by phone along the lines described in the draft and he seemed quite satisfied. He pushed very hard, however, to get it in writing. Your comments and suggestions are requested.

H. B. Rhodes

H. B. Rhodes ✓

HBR:pcr
Encl.

BC: JLM
WCT

Is it necessary to clear this with our Law Department? If so, it would be appreciated if WCT would send it in to RFXF.

Thanks.

H. B. R.

H. B. Rhodes

A 19484

HBR:pcr

GKD

HBR

AMCHEM PRODUCTS, Inc.

AMBLER, PENNA. 19002

PLEASE REPLY TO
P. O. BOX 9695
PHILADELPHIA, PA. 19131

June 30, 1975

Union Carbide Corp.
Metals Division
P. O. Box 579
4625 Royal Avenue
Niagara Falls, New York 14302

Gentlemen:

We would appreciate having comments on the potential health hazard of "Calidria" asbestos when incorporated as a thickener in adhesives and coatings. We believe the presence of minor quantities of Calidria in a compounded product would not present a hazard to the user of that product, but we would appreciate having your reasoning and opinion on this question.

Yours very truly,
AMCHEM PRODUCTS INC.
Foster Division

W. P. Ellis,
Director of Research

WPE:nfl

~~2F 626-1235~~
Foster Div. - Phila.

RECEIVED
JUL 03 1975
UCC-CALIDRIA
A19405

Chemicals for Industry and Agriculture

At about the same time, the National Academy of Sciences reviewed the problem more broadly in terms of potential environmental hazard and concluded that the general public is at present in no danger from the small amounts of asbestos fibers now in the air and water. Due to the uncertainties in the dose-response curve, however, they did recommend that regulations be promulgated to keep the levels from increasing.

Your particular inquiry was directed to possible hazards to the user from small quantities of "Calidria" asbestos incorporated as a thickener in adhesives and coatings. For this end use, the asbestos would be wetted with a substantial excess of long-lasting binder. Under these circumstances, it is reasonable to expect that any fiber release would be so slow that fiber concentration changes would be indistinguishable from the natural background.

There are two possible exceptions to this that should be noted, spraying and sanding. If your products are applied by spraying, it is possible to generate fiber levels above background but still within the 2 fibers limit during the actual spraying operation. The same is true when asbestos contained in a resin binder is sanded or abraded.

We hope that this will provide the information that you need. If there are any further questions, please let us know.

Very truly yours,

H. B. Rhodes

H. B. Rhodes
Technology Manager

HBR:pcr
typed 7/18/75

A 19407