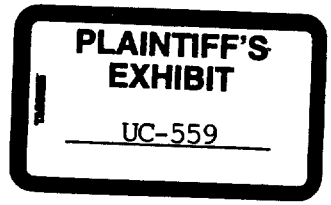
Union Carbide Corporation
Metals Division
Niagara Falls, NY 14302
November 12, 1976



M E M O R A N D U M

To: J. L. Myers

From: H. B. Rhodes

Copies: R. E. Byrne, Jr.
R. L. Schult
W. C. Thurber
File

Subject: Asbestos Health Discussions with W. R. Grace

As an adjunct to attendance at the International Asbestos Information Conference, the writer met with W. R. Grace in Worms and London. Both meetings were extremely helpful in understanding the regulatory and customer problems in the respective countries and hopefully will aid in future mutual efforts.

Visit with W. R. Grace, Worms, Germany

Personnel visited:

S. Algeri
R. Sobodka
P. Schunke

About a year ago W. R. Grace made an unsuccessful effort to have the insurance industry trade group the Berufsgenossenschaft, which currently makes the rules in Germany, state that the dust from sanding and grind polyester resin which used SX-24 as a thixotrope was not considered to contain asbestos. Although analysis of the dusts did not show any asbestos, the request was denied on the basis that the polyester resin would dissolve in the lung leaving small amounts of free asbestos. In view of their basic position that no safe level has been established for the carcinogen, asbestos, the dust could not be classified non-hazardous.

As a consequence, the principle customer at that time, BASF, felt obligated to notify any users of the resin that it fell under the regulations. The users, in turn, would be required also to report and to provide medical examinations for all exposed workers every three years. The interest faded out at that time and efforts to interest other large companies have largely been unsuccessful for the same reason. Most of the Grace customers, consequently, are medium to small companies who are not as concerned with theoretical hazards or in applications where no measurable subsequent release of fibers is likely.

The problem in Germany is remarkably similar to that in the U.S., i.e., the medical examination requirements for any exposure regardless of the level. Lacking any new medical evidence for this particular type of polyester dust or in the acceptance of a safe threshold level for asbestos, we were unable to come up with any action to alter the situation. Possibly when the new OSHA regulations are finalized in the U.S.A. a similar cut-off level can be advocated in Germany and other countries.

Visit with W. R. Grace, London, England

Personnel visited:

Mr. Eric Reynolds-Smith

This meeting consisted mainly of an extend visit with Alec Cross. Mr. Cross has been extremely prominent in representing industry in the asbestos problems in the U.K. and is the best source of help and information available. He filled us in in detail regarding the situation in the U.K. and should be very useful to Mr. Reynolds-Smith in the future.

There was also a potentially useful discussion on warning labels. Grace is seriously considering the use of an E.C.C. label that really does not fit asbestos. Mr. Cross urged that they move cautiously in this area to avoid premature commitments and confusion. It was also explained that the new voluntary U.K. labelling requirements were intended for finished products, not raw asbestos. The present OSHA label is acceptable in the U.K.

Regarding Grace Sylodex business in the U.K. specifically, Mr. Reynolds-Smith noted that they had suffered a severe setback during the massive anti-asbestos publicity compaigns in the early part of the year. Things seem to have quieted down somewhat with sporadic flareups. Business is beginning to move back up. They are very hopeful for a new marine coating application where they are using a custom compounder to wet the asbestos with xylene at weight ratios of 1.6 to 1 and 3/1 (xylene/asbestos). This eliminates the dust problem at the user's plant.

H. B. Rhodes

HBR:dal

UNION CARBIDE CORPORATION • MINING & METALS DIVISION • P.O. BOX 579 • NIAGARA FALLS, N.Y. 14302 • TEL: 716-285-3311

THE DISCOVERY COMPANY

October 5, 1972

Mr. I. A. R. Duthie
W. R. Grace & Company
Northdale House
North Circular Road
London NW10 7UH, England

Dear Ian:

The stock and reel samples which I brought back from the trial at Reed's International mill have been analyzed as planned. Unfortunately, the results are quite conflicting and of little practical value. I think I explained to you that our only method of quantitatively determining asbestos is to analyze for magnesium and, as the magnesium content of "Calidria" High Purity asbestos is about 25%, multiply that value by 4. This usually presents no problems as long as there are no other magnesium containing materials present. However, this is apparently what has happened with the samples which were obtained during the trial. As you will notice, one stock sample which theoretically contained no asbestos actually assayed higher in magnesium than one sample which contained asbestos. In addition to this, neither of the stock samples obtained during the trial contained even close to the 1% asbestos which should have been present. I have no explanation for this unless it was due to poor sampling on our part. I will discuss this with Jurgen Schneider next week, but at this time it appears that the data from these samples is worthless.

Table I

Stock Samples

Time Sampled	Asbestos Addition Level	Analyses		
		% Ash	% Mg	% Asbestos
1 - 1000 9/6/72	1% Asbestos	12.88	0.11	0.44
2 - 1000 9/7/72	None	9.45	0.06	--
3 - 1130 9/7/72	None	14.66	0.14	--
4 - 1000 9/8/72	1% Asbestos	8.29	0.17	0.68

TABLE II

Reel Samples

Time Sampled	Asbestos Addition Level	Analyses % Ash	% Mg	% Asbestos
1 - 0830 9/7/72	None	8.02	0.08	--
2 - 1910 9/7/72	1% Asbestos	9.08	0.18	0.72
3 - 0125 9/8/72	1% Asbestos	7.71	0.19	0.76
4 - 0600 9/8/72	1% Asbestos	9.04	0.17	0.68

Best personal regards,

Gordon L. Dickson
Section Manager
Pulp and Paper - Technical Services

GLD:cjb

CC: Mr. Jurgen Schneider

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