BC: K. Campbell
J. L. Myers
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File

UNION CARBIDE CORPORATION • METALS DIVISION • P. O. BOX 579 • NIAGARA FALLS, N.Y. 14302 • TEL: 716-278-3376

April 4, 1977

J-5

Mr. Jim Reese
Johns-Manville Corporation
Ken Caryl Ranch
Denver, CO 80217

Dear Jim:

Since our conversation yesterday, I have been looking into the fiber count data in the drilling operations. I suspect that the one you showed Drilling Specialties was AIA-4 where there was a high result due to an operating problem. Have you examined the later sequence of EEH tests designated AIA-9 through 14 which consistently show much lower concentrations?

As we discussed, UCC monitored parallel to EEH in the AIA 9-14 sequence with the object of getting a line on how their results compared with ours. Gerry Chase has seen the nine paired samples taken on opposite shoulders of nine operators and concluded that there was no significant difference in the results. I have the report on this set of tests partially drafted and will send you a copy in a few days.

Also enclosed is a copy of a dust count test we conducted where Flosal and Super Visbestos were dumped individually at the same rig. As you can see, the Flosal numbers during the dumping were not much different from the Super Visbestos. Yesterday we made up new slides from the Flosal filters B-67 and B-76. They both contain substantial numbers of long, curved, hairlike fibers typical of Canadian asbestos that are not found in Super Visbestos. At least part of the fibers on these filters originated with the Flosal.

This is only one test with possible complications from another asbestos that precludes reliable conclusions. It is provided to you, as written, to make you aware of a possible problem with the suggestion that you be very sure of the validity of any extremely low dust counts provided to OSHA. A loss of credibility would, obviously, be a major setback. In this connection, I would be most interested to see the Drilling Specialties' numbers and hope they will release them.

Our distributor, Montello, Inc. recently provided a packet of information to Mr. John Taff, a compliance officer at the OSHA regional office in Lubbock. I have asked Montello to send you a copy for reference. The information was provided to OSHA at their request after they had seen some of the data at users' locations in the field. We have not yet had any response from Mr. Taff.

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PLAINTIFF'S EXHIBIT
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I would also urge you to keep me informed of the specifics of any actions you and Drilling Specialties take in this matter at the Dallas office. We, too, are most interested in continuing to have asbestos used safely in this application and do not want to end up at cross-purposes in front of OSHA.

Very truly yours,

Harry

Harrison B. Rhodes
Technology Manager

HBR:cjb
Enclosures