UC 149-2

ATTACH. II

INTERNAL CORRESPONDENCE

METALS DIVISION

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To (Name) Mr. J. L. Myers
Division UCC - Metals Division
Location Niagara Falls, NY

Date July 8, 1976

Originating Dept. "Calidria" Asbestos

Answering letter date

Copy to File

Subject Packaging & Transportation Problems with Asbestos Dust

This confirms our recent discussion of certain packaging problems with Super Visbestos. Recently we ran dust counts at three warehouses in Wyoming during the loading of 20-30 bags of Super Visbestos onto a truck. The counts ranged from 0.7 to 1.7 fibers/cc for shrink wrapped bags and showed 2.5 fibers/cc for some older product which had not been shrink wrapped. A similar test in Oklahoma made shortly after the shrink-filming was initiated gave levels of only 0.2-0.5 fibers/cc in a warehouse that was dusty and not particularly well maintained.

These levels are consistent with reports that we have been receiving from Montello, i.e. these are generally small but noticeable amounts of fiber on the bags, on the floor of the railcar, and in any area where the bags have been handled. The amounts evident are considerably more extensive in the shipments received in the past few months than was the case with initial shipments.

The measured fiber counts are well below the allowable ceiling and TWA levels. As you are well aware, however, the medical examination, initial monitoring, and to some extent the warning sign requirements are not triggered by the allowable limits but by the presence of any loose asbestos fiber at all. More important, the sight of loose fiber has been found to set-off a "view with alarm" reaction among OSHA inspectors who lecture on the dangers of asbestos and feel that some sort of citation must be handed out. It is thus very important to ascertain why the loose fiber is present and what can be done to reduce it.

In order to define the problem, Montello was asked to provide specific details of their observations. The following comments were received:

1. The principle problem area is along the edge where the heat seal takes place.

2. This edge is characterized by areas where the film is doubled, quadrupled or just wrinkled and wadded.

PLAINTIFF'S EXHIBIT
UC-2381

UCC 015288

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3. The integrity of the seal depends on the configuration of the ~~fiber~~ film at the time it is sealed, i.e.

   a. Two single layers - well sealed.

   b. Lumpy, 2-6 layers crimped - burns through and leaves holes. Also some areas where wads occur - not sealed at all.

   c. Where asbestos dust is on film it does not seal.

4. In the early shipments something less than 5% of the bags showed sealing problems. Recent shipments show 20-25% have faulty seals.

5. Superficially the bags with the faulty seals look satisfactory. The leakage results from vibrations during shipping and from handling.

These observations appear to pinpoint the source of the problem quite well. It is suggested that we ask the plant personnel to look into the problem and advise what can be done to reduce the number of bad seals. Perhaps a regular inspection procedure or quality control specification should be instituted.

While on the subject of shipment, it is relevent to report on a recent call from Mr. Roach at the Amsco warehouse in Kansas City seeking information on how to handle a damaged shipment. Their last car leaked asbestos out on the ground when the door was opened about 3". Unloading was then done from the other side. It was found that the load had shifted in transit and the center post in the door had torn 9 bags of RG-144 about the full length of the bag. The entire car was permeated with asbestos fiber. There was a spacer between the pallets but the door had not been lined with cardboard. Mr. Roach also mentioned that this was an unusual case and the cars usually arrive undamaged and clean. I do not know whether this case represents an oversight when the car was loaded, the need to improve our loading and dunnage procedure, or one of those difficult-to-avoid accidents that occur occasionally in rail shipments. It is reported for information and appropriate action by those directly involved.

H. B. Rhodes

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