PLAINTIFF'S EXHIBIT

UC-3011

UC 149-2

UNION CARBIDE

INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION • P. O. BOX 579, NIAGARA FALLS, NEW YORK 14302

To (Name) Mr. J. L. Myers - NF
Division Mr. W. C. Thurber - NYO
Location

Date July 1, 1974

Originating Dept. "Calidria" Asbestos

Answering letter date

Copy to Messrs. R. E. Byrne, Jr.
G. L. Dickson
B. L. Ingalls
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File

Subject U.S. Navy Asbestos Regulations

For Your Information.

The above noted regulations went into effect on April 9, 1974. They are largely lifted verbatum from the current OSHA standards with an occasional paragraph from the EPA regulations. Accordingly, they contain the same ambiguities and uncertainties as the OSHA standards. You should, however, be aware of two additional points that became relevant when selling to a supplier of materials for use by the Navy.

1. "e. Asbestos-free substitute materials shall be tested, under the technical management of NAVSEC, and, if acceptable to NAVSHIPS, shall be used in place of asbestos-containing materials."

2. "c. Measurement and monitoring shall be conducted under the supervision of an industrial hygienist."

The Navy has their own staff of industrial hygienists that must be used for testing and consultation at naval installations. This does not necessarily present a problem but should be kept in mind whenever our own data and services are involved.

"Calidria" RG-144 is used in some epoxy marine maintenance coatings. RG-244 is beginning to find a place in zinc-rich primers. The large RG-244 sales to Avco are for an intumescent bomb coating for one of the armed services. The "substitute materials" provision has not caused problems so far and its future impact depends on how strictly it is interpreted. It seems doubtful that the Navy would be receptive to making any changes now but could be more favorably inclined towards an updating when the new OSHA regulations are finalized. At that time, it may be appropriate for the AIA/NA and/or UCC to suggest some softening of this "substitute" provision. No action is recommended at the present time.

H. B. Rhodes

HBR:cjb

UCC 001205

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