PLAINTIFF'S EXHIBIT

UC-3843

UC 1?9-?

UNION CARBIDE

INTERNAL CORRESPONDENCE

METALS DIVISION

P. O. BOX 579 · 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 14302

To (Name) Dr. W. B. DeAtley
Division Dr. T. J. Kagetsu
Location Mr. R. W. Rebholz

Date April 5, 1979

Originating Dept. "Calidria" Asbestos

Answering letter date

Copy to Messrs. G. R. Adams
R. E. Byrne, Jr.
H. B. Rhodes
F. J. Shortsleeve
File

Subject Packaging

RECEIVED
APR 9 1979
J.R. LOUGHLIN

As previously discussed with all of you, I suggest that we meet at the King City plant on Wednesday, April 25, 1979 to discuss packaging of our asbestos products. Although our packaging "deficiencies" are not new, (see my letter dated 7/9/76 and HBR's dated 7/8/76, Attachments I and II) we are now being forced by the DOT regulations to take some action. To "kick-off" our discussions, I offer the following comments:

1. All pellets (except bulk) should be packaged in non-breathing paper or plastic bags with stitched, pasted or otherwise sealed fill openings. This would require auger or gravity packers, new bags and the "sealing" equipment. As an interim measure to minimize spout leakage, we should consider the use of a "band-aid" over the fill spout opening, the major source of leakage.

2. The optimum method to package open fiber would probably be to make blocks of no higher packaged density than current and package the blocks in paper or plastic bags or film , which would be pasted or heat-sealed to effect a dust and sift proof bag. An alternate possibility is to use vacuum filling rather than the current air pressure packing. This would eliminate the need for breathing bags and I understand this method is used for Cabosil. An interim method to approach the dust and sift proof bag is our current one of using shrink-film; however, we all recognize this is not a 100% seal and improvements are needed. The fill spout is the real source of excess leakage (see enclosed letter from Tomoe, Attachment III) and we should continue to evaluate an extended sleeve which can be sealed in some manner.

Work done in 1977 on a vacuum packer is described in the enclosed report (Attachment IV), but I have seen no further information.

Special packaging, such as that described for RG-244 and SG-100 in the enclosed correspondence (Attachment V), should also be discussed. It is very possible that we could enjoy increased RG-244/SX-24 sales if we had a package which could be added without opening to a compounding tank. Floor tile companies now do this

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with our plastic bagged pellets and a Japanese paper company requires repulpable bags which are added unopened into the papermaking system.

It should be decided if a Chemicals & Plastics or Corporate "packaging expert" should be invited to the meeting. Also, someone should be "in charge" of the packaging program as I do not have the time or the expertise to continue, except to advise what is needed from a marketing standpoint.

I plan to arrive Monterey on UA-567 at 7:17 p.m. on 4/24/79, drive a rental car to King City and stay at Keefer's Inn. If United is not flying I will drive to King City from San Francisco (I arrive there at 5:08 p.m. from Pittsburgh/ Chicago on AA-257). I'd be glad to take anyone from Monterey or San Francisco. I will be leaving King City for Fresno at about 4:00 p.m. on 4/25. I will meet Harry Rhodes in Fresno to testify at the Standards Board hearing on asbestos regulations on 4/26.

John L. Myers

JLM:dal
Attachments

A 14020
UCC 013071

UC 149-2

ATTACH. 1

INTERNAL CORRESPONDENCE

METALS DIVISION

P.O. BOX 579 - 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 1430

To (Name) Mr. W. C. Thurber
Division UCC - Metals Division
Location 38th Floor
270 Park Avenue
New York, NY 10017

Date July 9, 1976

Originating Dept. "Calidria" Asbestos

Answering letter date

Copy to Messrs. R. E. Byrne, Jr.
R. H. Larrison
R. D. Malin
H. B. Rhodes
R. L. Schult
File

Subject Packaging & Transportation Problems with Asbestos Dust

Please reference the attached copy of Harry's letter to me on the same Subject.

With increasing awareness of dust problems, especially asbestos, we are getting an increasing number of customer complaints about our packaging. The principle problems are dust on the external surfaces of bags or shrink-filmed pallets, dust between the paper bag and shrinkwrap, and dust released from pallets when the shrink-film is removed. Almost all competitive products are "block-packs" which are completely sealed in plastic or heavy paper bags. They have no leakage or dusty bag problem except when the bags are punctured in an occasional accident.

I am fully aware that we have different packaging problems than our competitors; e.g., hot pellets and fluffy open-fiber products. However, different problems should have different solutions; and I think it is time to engage the services of Engineering or the Corporate packaging experts from Bound Brook. I am concerned about an OSHA confrontation on our packaging and transportation practices, which may "shut us down" or force us into hasty and expensive solutions which may be avoided by doing something now. Basically, barring accidents, we need to be able to move the product from our plant to the place where the bag is opened for use without any visible leakage or discharge of fiber.

Unless the costs are entirely prohibitive, I think we should start shrink-wrapping all bagged products immediately, and make sure that the shrink-wrap has adequate integrity for shipment on pallets or for loose-loading in containers or railcars. If, as Harry suggests, we must have an inspector at the plant, then this cost should be part of the consideration. If bag vacuum cleaning has not been instituted, then this should also be done as soon as possible.

By no means am I being critical of the plant. Although carloading practices might be reviewed and shrink-wrapping equipment checked, the basic problem is one of unique package development and is beyond the scope of plant expertise and its responsibilities.

A 14021

UCC 013072

Equipment for densifying "UCAR" silica fume is being evaluated by Jim Downing and NF Engineering. Preliminary results with a vibrating ball mill and corrugated rulls look encouraging and may work on RG-244 and other open fiber products.

I think "us layman" have failed to solve the packaging problem and it should now be turned over to the experts.

John L. Myers

JLM:dal
Attachment

A 14022
UCC 013073

UC 149-2

ATTACH. II

INTERNAL CORRESPONDENCE

METALS DIVISION • P.O. BOX 579 - 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 14302

To (Name)	Mr. J. L. Myers	Date	July 8, 1976
Division	UCC - Metals Division		
Location	Niagara Falls, NY	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.

A 14023

UCC 013074

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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

H. B. Rhodes

HBR:dal

A 14024

UCC 013075

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