PLAINTIFF'S EXHIBIT
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UNION CARBIDE

INTERNAL CORRESPONDENCE

METALS DIVISION

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

To (Name) Mr. Frank Twitty
Division UCC - Metals
Location Niagara Falls, NY

Date March 23, 1978

Originating Dept. "Calidria" Asbestos

Answering letter date

Subject TOSCA Registration

Copy to Messrs. C. R. Allenbach
R. E. Byrne, Jr.
L. A. Crisorio
J. L. Myers
E. W. Shortridge
W. C. Thurber
B. L. Ingalls
R. G. Woolery
File

This confirms our recent discussion of the registration of our asbestos products under TOSCA. Since failure to register a product can cause serious delays and may result in very large costs for animal testing while the penalties for registering a product that should not be included are minimal, it seems most appropriate to resolve all reasonable doubts in favor of registration.

A copy of paragraph 710.4 of the regulation showing the scope of the inventory is attached for reference. It seems quite clear that all of our regular asbestos products would fall under 710.4(b) and are automatically included in the inventory, i.e, we do not have to list them. Our several combined products, however, are not as clearly defined and present a series of judgment decisions of increasing complexity as follows:

1. T-135 is a coflocculated mixture of our asbestos and anatase or rutile titanium dioxide. The $TiO_2$ is either an exempt, naturally-occurring substance which we purchase in the United States or will be reported by its manufacturers. While there is clearly some sintering of the $TiO_2$ to the asbestos fibers during drying, this product is really a mixture of two substances and should not be reported by us.

2. The RG-244 product is the result of a chemical reaction when a purchased material, sodium silicate (reported by its manufacturer), interacts with asbestos as a result of the action of acetic acid (also purchased) as a pH neutralizer. This appears to fall under 710.4(c)(7) and the product should not be reported.

3. The RG-600 product results from a chemical reaction between asbestos and dimethylol-t-butyl phenol (DMBP). It is postulated that an acid-base reaction between the $Mg(OH)_2$ surface of the asbestos and the phenol group on the DMBP attaches it to the surface via a Mg-O-C bond. It is suggested that we make certain that the DMBP is included in the Bound Brook report and the RG-600 should be reported as a product by us.

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