DEC. 22 1971

December 21, 1971

Dr. C. U. Dernehl
Dr. E. Epremian
Mr. W. N. Johnson
Mr. R. J. Klotzbach
Mr. F. H. Larrison
Dr. P. W. McDaniel
Mr. P. J. Morgan
Mr. J. L. Myers
Mr. E. A. Piersall
Mr. W. G. Piper
Dr. M. Stern
Mr. L. P. Twichell

Gentlemen:

As a result of the December 17th asbestos meeting, it became apparent that a plan/action approach must be developed with respect to the following:

I. A test program to develop data pertaining to the use of asbestos by our customers.

Where our asbestos products are sold in competition with nonasbestos products, we must aid our Marketing personnel by being able to identify for our customers the regulations which they must comply with and provide them with information on compliance procedures. At the present, we lack the data necessary to perform this function. In this regard, it is apparent that most of our customers are reluctant to have us gather dust samples on their premises. This reluctance is due to their view that their hourly personnel will, by implication, believe that a problem exists. Therefore, the data we need must be developed by simulated tests, as follows:

A. Resin Grade 244 — parallel data on both RG-244 and amorphous silica should be developed with respect to the following:

1. Airborne asbestos and silica counts at the time the material is introduced into the customer's system.

PLAINTIFF'S EXHIBIT
UC-4227

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2. Airborne asbestos and silica counts at the time polyester resins containing the same are applied by spray gun.

3. Airborne asbestos and silica counts at the time polyester compounds containing the same are sanded.

4. Airborne asbestos and silica counts at the time polyester compounds containing the same are drilled or sawed.

B. Pigment Grade Product For The Paint Industry — data must be developed with respect to the following:

1. Dust counts when Major Paint latex paint or textured paint containing asbestos is sprayed on a surface.

2. Dust counts when a surface painted with a Major Paint product or a textured paint is sanded.

C. Confirm that asbestos remaining in empty bags is altered to a nontoxic form when the bags are incinerated at temperatures above 700°C.

D. Develop data which quantitatively indicates the advantage to the customer of using palletized as opposed to open fiber asbestos.

Mr. W. N. Johnson, in coordination with Division Research and Development, the Asbestos Sales Group and the Corporate Medical Group, will be responsible for developing a plan/action test program to develop the required data. This plan/action program is to be completed on or before January 28, 1972.

II. Develop a two year engineering and capital program to bring the King City operation into compliance with existing and anticipated regulations in a manner which will require minimal use of respirators.

The projects which should be considered, in order of priority, are as follows:

1. Improved dust control in the mill bagging and palletizing areas.

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2. The installation of fiber filters or a scrubbing system on the drier off-gas vents.

3. Enlargement of the mill ore stockpile water spraying system.

4. A water spraying system in the asbestos loading area.

5. A water spraying system in the tailings area.

6. A water spraying system at the mine site.

7. The capability to use plastic shrink film on all palletized shipments from King City.

The Division Engineering Group will investigate the need, feasibility and estimated cost of the above projects as the first step in developing the overall program.

III. In connection with the programs set forth under I and II above, it is obvious that we must either prepare an oral or written presentation to the EPA with respect to the recently proposed regulations under the Federal Clean Air Act.

We have ~~120~~ days following December 7, 1971 in which to make this presentation but obviously should do so as soon as possible. Two areas which necessarily must be covered in such a presentation are:

1. The apparent literal banning of the spraying of any substance containing asbestos; and

2. The Agency's interpretation of the zero visible dust requirement as it will apply to a remote mining location such as our Coalinga open pit asbestos mine.

Mr. W. N. Johnson will review the proposed EPA regulations with the Sales and Production Groups and will prepare the data to be presented to EPA. The presentation to EPA will be made on or before February 15th.

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IV. Preparation of a brochure to be distributed to our resin grade asbestos customers (and perhaps to other asbestos customers) pertaining to their use of our asbestos products in compliance with existing regulations.

A rough draft of this brochure has been prepared. However, additional data (including that to be developed under I and II above) is required.

Mr. W. N. Johnson will prepare, in coordination with the Engineering, Sales, Safety, Law, etc. Departments a plan/action program aimed at publication of the brochure by April 15, 1972.

V. A review of our King City personnel X-ray practices and procedures.

Drs. Dernehl and Lane will conduct this review during the first quarter of 1972 and make appropriate recommendations.

VI. Arrange for an information exchange with the Asbestos Information Association (funded by the major asbestos producers).

I shall make this arrangement before January 28, 1972.

Very truly yours,

James W. Rawlings.

JWR:mc

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Memorandum to Messrs. P. W. McDaniel
J. L. Myers
H. B. Rhodes
G. L. Dickson
C. M. Offenhauer
M. Peters

Subject: Test Program Airborne Asbestos

Date: January 17, 1972

From: W. N. Johnson

Copy to: Mr. J. W. Rawlings
Mr. R. G. Woolery

The need for data on the amount of airborne asbestos existing under certain conditions and operations has been previously noted. A program to obtain the data was discussed at a meeting in Niagara on January 12. The following is my understanding of the arrangements agreed upon. I will appreciate hearing, as soon as possible, should there be any differing understanding.

A. H. B. Rhodes will arrange for a survey to be made by Eugene Brown of employee exposure as experienced in customers' plants at or near Bartow, Florida. This survey will include samples representing conditions during:

1) Introduction of UCC asbestos into process.
2) Introduction of amorphous silica into process.
3) Spraying of polyester resins containing asbestos.
4) Spraying of polyester resins containing amorphous silica.
5) Spraying of polyester resins not containing either asbestos or amorphous silica.
6) Sanding of surfaces built up from polyester resins containing asbestos.
7) Sanding of surfaces built up from polyester resins containing amorphous silica.

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8) Drilling of polyester compounds containing asbestos.
9) Drilling of polyester compounds containing amorphous silica.

10) Other operations which could liberate fibers.

Sufficient background samples will be taken to allow analysis.

These samples will be evaluated by the Medical Dept. in New York and also will be examined by R&D in Niagara with the aim of developing an alternate technique including distinction of asbestos from other materials; e.g., atomic absorption.

Schedule — the samples will be taken the week of January 31 - February 4 and evaluated as soon as possible thereafter.

B. Tests on conditions during spraying and sanding of paint containing asbestos will be run at Niagara. John Myers will see what samples of weathered and/or aged painted surfaces may be available. Messrs. Offenhauer and Peters will set up the tests at Niagara for these and those described under D and will advise W. N. Johnson. Arrangements will then be made with P. W. McDaniels for assistance in sampling and analyses.

These tests will include samples representing conditions during:

1) Spraying of latex paint containing asbestos.
2) Spraying of textured paint containing asbestos.
3) Sanding relatively fresh painted surfaces by hand, power sander, power sander with dust collector.
4) Sanding of aged paint surfaces by hand, power sander, power sander with dust collector.
5) Sanding of texture painted surface.
6) Sanding of tape joints where plaster contained asbestos.

Schedule — the sanding tests should be set up as soon as the materials are available and Medical Dept. assistance can be arranged — hopefully the first or

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second week in February. The spraying tests should follow consideration of problems encountered in analysis of polyester resin spray samples.

C. Spraying of auto undercoat containing asbestos was discussed but tests deferred pending the other work. It is probable that the pitch material would not allow fiber/particle analysis by current techniques.

D. Tests of conditions encountered during dumping of asbestos into open tank will be set up at Niagara. Gordon Dickson will arrange for bags of UCC pellets, UCC open fiber, Canadian fiber and amorphous silica to be available. As noted under B above, Messrs. Offenhauer and Peters will make the physical arrangements needed at the laboratory and will advise W. N. Johnson. Arrangements will then be made with P. W. McDaniels for sampling and analysis assistance.

E. Previously obtained data on the structure of chrysotile as affected by temperature will be examined. W. N. Johnson will seek information on incinerator design and operation with the objective of determining usual conditions.

F. Copies of the following publications will be obtained by W. N. Johnson and forwarded to Niagara:

1) A summary of the data used by EPA in developing emission standards for asbestos as published in Federal Register, December 7, 1971.
2) A copy of the American National Standard Practice for Respiratory Protection, §88.2 - 1969.
3) A copy of the American National Standards Fundamentals Governing the Design and Operation of Local Exhaust Systems, ANSI 89.2 - 1971.
4) U.S. Bureau of Mines, 30 CFR, Part 12, Schedule 19B and Part 14, Schedule 21B.

G. More definitive interpretation of subparagraphs e), f) and g) of Part 1910.93a of Title 20, Code of Federal Regulations (36 FR 10466) as amended December 7, 1971 will be sought to determine what content of asbestos is meant by "asbestos cement" etc.

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OPH MAD

RECEIVED
OCT 21 1986
T. L. COLLINS

MEMORANDUM

TO: See Distribution List

COPY: F. L. Boggs
L. H. DuPuy
J. D. Kring
M. E. Tapp
L. W. Youngblood

FROM: E. A. Osby

DATE: October 17, 1986

SUBJECT: Institute Plant Landfill

Industrial Hygiene monitoring was performed recently to evaluate airborne asbestos fiber concentrations and asbestos exposures at the subject location. Based on the monitoring results and the requirements of the new OSHA asbestos standard, the active asbestos disposal area at the landfill soon will be designated as a regulated area (as defined in the asbestos standard). Consequently, anyone who needs to enter this area will be required to wear a half-mask high-efficiency dust respirator (or better).

The Institute Plant will supply respirators to its own truck drivers who must enter the regulated area to unload waste material. However, Institute Plant contractor, South Charleston Plant and Technical Center managements will be responsible for providing appropriate respirators to their truck drivers who must enter the Institute landfill regulated area. Those groups also will be responsible for respirator cleaning, inspection, repair, fit testing, training, etc. regarding their own truck drivers. These requirements are shown in 29 CFR 1910.134, Respiratory Protection.

The exact date that the regulated area will be established is not known but it will be soon. Therefore, please make the necessary preparations to insure that your truck drivers may continue to enter that portion of the landfill.

If you have any questions on this, please call me at extension 6105.

Erik A. Osby

E. A. Osby
Advanced Industrial Hygienist

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