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UNION CARBIDE

INTERNAL CORRESPONDENCE

PLAINTIFF'S EXHIBIT
UC-4472

METALS DIVISION • 270 PARK AVENUE, NEW YORK, NEW YORK 10017

To (Name) Dr. H. B. Rhodes
Division Metals Division
Location Niagara Falls, N. Y.
Floor Number

Copy to

Date December 28, 1976
Originating Dept.
Floor Number
Answering letter date
Subject Asbestos Exposure

Dear Harry:

Would you please write me a couple of paragraphs which I can transmit to Mr. Kroft regarding the attached. Something on both our marketplace and our operations would be appreciated.

Thanks.

Very truly yours,

Bob

R. L. Folkman

RLF:hk

Att.

C.C. JLM
RLS
W.C.T.
REA

{ John:
as you requested.
H.B.R
1/4/76

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RLF - Paragraph on UCC ? 12-22-78

Drastic Cut in Asbestos Exposure Urged By Federal Agency for 250,000 Workers

By GAIL BRONSON
Staff Reporter of THE WALL STREET JOURNAL

Federal researchers are urging a drastic reduction in the occupational exposure of more than 250,000 workers to asbestos, a known carcinogen, to one-tenth of the current federal standard. Carcinogens are cancer producing or inciting agents.

In an unpublished report, the National Institute for Occupational Safety and Health recommends that worker exposure to airborne asbestos be limited to 100,000 fibers per cubic meter of air in eight hours. In addition, the researchers want peak concentrations of exposure limited to 500,000 fibers per cubic meter of air based on 15-minute sampling periods.

Current federal standards limit asbestos to two million fibers per cubic meter of air. This standard was promulgated by the Occupational Safety and Health Administration in 1972, at which time industry was given four years to comply. Plants were required to set up improved ventilation systems. In the interim period, an "emergency" exposure standard remained in force after it was set by OSHA under pressure from the AFL-CIO.

The institute recommendations in 1972 to OSHA were well below those actually carried out. "Our 1972 recommendations were designed to protect workers from asbestosis, or chronic lung disease," says Verne Rose, institute director for criteria documentation, "but not necessarily from cancer. We are now suggesting the least detectable exposure level in the workplace. The reason is that we don't know what could possibly be a safe level of exposure over the working lifetime without adverse health effects."

Lethal Quality Documented

The lethal quality of tiny asbestos fibers that lodge in the lungs is well documented. If the exposure to asbetos dust in the workplace is slashed, industries that use the material such as construction and oil refining may come under increased pressure to substitute nontoxic materials. Asbestos is used in fireproof textiles, shingle insulation, and thermal piping, among other products.

"It's not possible to establish a safe exposure level for the carcinogenic activity of asbestos," says Dr. John F. Finklea, director of the institute. "Therefore, emphasis should be placed on prohibiting the occupational use of asbestos in other than completely closed operations, and on substituting other products whenever possible."

The 1972 institute recommendations on asbestor to OSHA were based in part on the research of the British Occupational Hygiene Society, which evaluated 200 workers in an asbestos factory. Based on that work, the institute concluded that a two-million-fibers limit would prevent asbestosis.

However, when the British plant was restudied in 1972, it was found that there was a greater incidence of asbestosis than the British standard warranted. In fact, 36% of the workers exposed for 10 years to 19 years had some kind of chest abnormality, and the rate of abnormalities increased with the rate of asbestos exposure.

Other studies show an increased mortality rate from cancer among workers exposed to asbestos, says John Dement, an institute industrial hygienist. A British study published this year showed that workers exposed to asbestos from 1933 to 1950 had 1.8 times as much chance of contracting lung cancer as the expected number of cancer cases in the general population. Mr. Dement adds that British scientists found that in workers employed up to 15 years beyond 1950, during a period when industry improved its engineering controls and technology for plant environment, the excess cancer case statistics continued to show up.

"Excess of Cancer Risk"

In a South Dakota gold-mine study published this year, researchers found that the 440 workers had three times as many cases of respiratory disease as expected, based on the state mortality rates. These workers were exposed to less than 250,000 fibers per cubic meter in eight hours.

"We're saying reduce exposures (to asbestos) to a bare minimum because we can't tell you how low you have to go to eliminate a cancer risk," says Mr. Dement. "All studies have shown an excess of cancer risk at all levels of exposure to asbestos."

The reason for OSHA reevaluating the asbestos standard stems from a 1974 suit by the AFL-CIO's industrial union department against the Department of Labor complaining about several points in the 1972 exposure standard. The AFL-CIO petitioned for changes to be made in the required medical records that employers maintain on workers, and it requested that the timetable for lowering asbestos exposure limits be stepped up.

The federal court of appeals in Washington, D.C., directed OSHA to reconsider those two provisions of the standard. At that time, the enforcement agency decided the standard possibly wasn't protective enough of asbestos workers' health and it decided to repropose the entire standard, beyond the court directive, says an OSHA spokesman.

OSHA enlisted the aid of the National Institute for Occupational Safety and Health in the re-evaluation to study new research developments and explore advances in protective technology as they related to asbestos exposure. The OSHA spokesman said the agency will hold public hearings early next year on proposed revised standards before promulgating the final rule.

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