

DEC. 22 1971

December 21, 1971

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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

WV-08252

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EXHIBIT

43869.00

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. *82102*

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

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

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. *Tests*
4. A water spraying system in the asbestos loading area. *mine*
5. A water spraying system in the tailings area. *Tests needed*
6. A water spraying system at the mine site. *Tests needed into from EPA*
7. The capability to use plastic shrink film on all palletized shipments from King City. *have thought of other bags other packing systems* *relatively expensive 875,000*

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.

*Riddle Niagara
Marathon - King City*

*{ prelim report nearly done
Tests needed on Drier
Sample equip needed*

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.

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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.

- 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. X
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

James W. Rawlings.

JWR:mc