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INTERNAL CORRESPONDENCE

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To (Name) / Division / Location: R. E. Byrne, G. L. Dickson, B. L. Ingalls, E. J. Kleber, T. P. Norris, H. B. Rhodes

Date: December 7, 1971

Originating Dept.: CALIDRIA Asbestos - Marketing
Research and Development Department

Answering letter date:

essrs.

Copy to: F. H. Larrison, P. W. McDaniel, E. A. Piersall, J. W. Rawlings

Subject: Toxicology Update

The following information is presented in an attempt to prepare you to answer customer questions with some degree of intelligence. There are still many gray areas but the government agencies involved are taking some action.

The Environmental Protection Agency (EPA) is responsible under the Clean Air Act for non-occupational exposure control. They have just issued proposed standards which include no TLV's for any plant, mine or mill emissions. They are proposing that facilities use fabric filters to prevent emissions to the atmosphere.

The Department of Labor through the Occupational Safety and Health Administration (OSHA) is responsible for occupational exposure. They "depend" on HEW and the ACGIH (American Conference of Government Industrial Hygienists) for guidance in establishing TLV's (Threshold Limit Values) and associated information.

The present TLV for asbestos is published in the Federal Register, Volume 36, No. 157 - Friday, August 13, 1971 as 2 mppcf (million particles per cubic foot) or 12 fibers greater than 5 microns per milliliter of air. The ACGIH has recommended the latter value be lowered to 5 fibers and this may become effective in May 1972. The AFL-CIO has just requested the Department of Labor to take emergency action and lower the value to 2 fibers greater than 5 microns per milliliter of air.

Based on our best available and current information, there are two respirators which we can suggest our customers use for asbestos dust. These are the Willson Model No. 1009 with R-520 filter and MSA No. 86432 with Type "H" Ultra-Filters, described in attached sheets. Both of these are approved by the Bureau of Mines for highly toxic dusts with TLV's less than 2.4 mppcf. These are on the Bureau of Mines Approval List 218 in their Information Circular 8436, dated 12/31/68. We should discontinue recommending the Willson No. 600A, which has been used at the plant. The plant will probably change to one of the above.

PLAINTIFF'S EXHIBIT
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We feel that the two suggested masks will readily conform to even the most stringent new regulations.

Attached is the latest issue we have of the Federal Register which lists TLV's. Asbestos is in Table G-3 along with amorphous silica (Cab-O-Sil) and other minerals. This list may be of value if your customers have questions about other materials.

There is general agreement on the following:

1. Asbestos is an important mineral necessary to the American economy. Its use will not be outlawed.
2. Asbestos is a controllable occupational hazard, not considered a serious hazard to the general public.
3. Asbestos bound in resin or similar compounds or systems does not constitute a hazard.
4. Asbestos can cause lung damage and may, especially in combination with some other substance, be associated with cancer.

We are proceeding as rapidly as possible to develop an action plan. At the request of many customers we are preparing a booklet or report for public dissemination. This will outline Corporate views on the general subject of asbestos toxicology.

None of the information in this letter should be considered as Corporate policy and you should treat it accordingly.

John L. Myers

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Attachments