

CONFIDENTIAL LEGAL MEMORANDUM
(Attorney's Work Product)

0624114
02300357

June 2, 1976

TO: B. R. Williams

cc: R. M. Vining

Re: MONO-KOTE



It is my understanding that from time to time the question is asked of CPD's regional managers or sales personnel as to whether Mono-Kote contains asbestos. It is my belief that the question is generally answered by stating that Mono-Kote is formulated without the addition of asbestos as a specific ingredient. Although this is a factual statement it can give the impression that there is in fact no asbestos in Mono-Kote.

As you know, tremolite fibers are categorized by OSHA and EPA under the general heading of asbestos. Mono-Kote contains some tremolite fibers of a trace amount, i.e., less than .02%. I understand that at this level any tremolite fibers which could be liberated by use of Mono-Kote would be well below the OSHA TLV for asbestos. Nevertheless, it seems to me that it would be appropriate for you to consider whether it would not be better to answer in response to questions concerning the asbestos content of Mono-Kote that it is formulated from naturally occurring minerals and in such circumstances trace amounts of tramp minerals such as those categorized as asbestos may be found in the product but that use of Mono-Kote will not expose workers to exposure levels in excess of those prescribed by OSHA. I understand we have data which supports such facts.


O. N. Favorito

OMF/MS