Monsanto

MONSANTO CHEMICAL COMPANY
P. O. Box 711
Alvin, Texas 77512-9888
Phone: (713) 581-2161

December 1, 1987

Mr. David Brown
Vinson & Elkins
3300 First City Tower
1001 Fannin
Houston, Texas 77002-6760

Dear David:

Attached are some miscellaneous letters I found--they basically just establish that Monsanto was responding to the new asbestos concerns in 1972.

The brochure establishes the new OSHA Standard in 1971 to 1973.

Sincerely,

Don L. Meade

DLM/bg

Enclosures

Attic (Ch 2 - Asbestos file

August 8, 1972

Mr. E. Hinds
Alvin Cleaners
415 W. House
Alvin, Texas 77511

Dear Mr. Hinds:

Re Blanket Order
Number CB-45329

This will confirm our telephone conversation of today, during which we discussed coveralls being cleaned by you under the above referenced blanket order, which will be contaminated with asbestos dust.

As per our discussion, Monsanto will seal these coveralls in a plastic bag prior to shipment to you, and this plastic bag will serve as a means of your identifying the contaminated clothing.

We also discussed the fact that wetting the coveralls ends any hazard that may exist from the asbestos. You indicated that your method of handling will be to completely submerge each pair of coveralls, while still in the plastic bag in the machine, filled with water, in which they are to be washed. The bag will be opened underwater, thereby keeping to an absolute minimum any chance of the asbestos dust getting into the air. We agreed that this should be a safe way to handle this clothing.

We wish to thank you for your cooperation in this matter, and ask that you feel free to contact us, at your convenience, with any questions you may have.

Yours very truly,

B. R. Bradshaw
Senior Buyer

BRB:sh

bcc: CB-45239
J. M. Harris
C. H. McComb

Monsanto

Blanc/Joyce - Asbestos file

FROM (NAME & LOCATION) J. M. Harris - Chocolate Bayou Plant

DATE August 8, 1972

SUBJECT O.M.C. Coverall Requirements

REFERENCE

TO : R. L. Miller

cc R. E. Belden
J. E. Buckner
F. B. Burns
H. C. Clark
R. A. Dorsten
F. H. Dupre
R. L. Harris
C. H. McComb
Night Supervisors

In order to be in compliance with the O.S.H.A. Standard on protective clothing for asbestos, the following practices will become effective immediately:

1. The fabrication shop man will be issued coveralls daily as per standing approval of H. C. Clark.

2. Major field fabrication or dismantling will require coveralls. An example of this would be stripping or fabrication of an exchanger head or shell, or an Ethylene transfer line. Approval will be given by the Maintenance Services Superintendent.

3. It is felt that jobs like removing insulation from flanges and stripping for tie-ins, etc. will not warrant the use of protective clothing if the individual takes advantage of the wind direction.

Any comments or suggestions would be appreciated.

Jerry
J. M. Harris

JMH:lm

C 000150

"Mabe / Lojce = Asbestos file

Monsanto

FROM (NAME & LOCATION) J. M. Harris - Chocolate Bayou Plant

DATE August 8, 1972

SUBJECT Use of Asbestos at Chocolate Bayou

REFERENCE

TO : E. N. Brasfield.

cc A. W. Adams
R. E. Belden
B. R. Bradshaw
H. C. Clark
F. H. Dupre
C. H. McComb
R. L. Miller - O.M.C.

Since the O.S.H.A. has been enacted, the following activities and plans are in progress at Chocolate Bayou concerning insulation.

1. A study has been completed on what types we use. It is estimated that approximately 60% of all insulation used in the plant contains asbestos. (See attached memo.)

2. A request has been issued to Engineering Services to determine the feasibility of eliminating the use of asbestos at Chocolate Bayou. In turn, Engineering Services referred the study to R. L. Miller of St. Louis. Information received indicates St. Louis is to issue a standard bulletin describing suitable alternates.

3. O.S.H.A. approved respirators have been purchased for the insulators and are in use.

4. The fabrication saws in our insulation shop have vacuum exhausts in operation now. A dust collection system for these saws outside the buildings is in the planning stage, with completion expected September 1, 1972. The feasibility of installing a vacuum system above the saws is also being evaluated by our group.

5. A vacuum cleaner suitable for clean-up in the fabricating shop is being sought.

6. Special clothing (coveralls) requirements are to be dealt with as follows:

   a) Fabricating man in the shop would require clothing.

   b) Only major removal jobs in the field would require coveralls, such as: stripping of an exchanger head or shell. Removal of insulation on flanges or for a tie-in would not warrant the use of special clothing.

c) Any large fabrication in the field where sawing and fitting is required would apply.

7. Caution signs and labels, as required by the standard, have been purchased and installed.

I feel that any mechanical item or facility revision required should be provided by Monsanto. Other items required in the standard should be complied with by the contractor. Some of these are:

1. Monitoring for exposure to asbestos every six months.

2. Medical examinations at the beginning and end of employment.

3. Setting up program for maintaining respirators as per A.N.S.P.R.P. #288.2-1969.

4. Enforcing work habits as per requirements outlined in the standard.

The Safety Department would appear to be the most likely source for monitoring the asbestos concentrations in our operation.

Through our Purchasing Department, we have received information from the Owens-Corning sales representative (manufacturer of KayLo) that by the end of 1972 they will have an insulation on the market that will exceed KayLo in every respect. It will be asbestos free. B. R. Bradshaw is working with our Texas City plant on securing a sample of this material.

Based upon corporate and Federal Government guidelines to date, I feel the approach would be as outlined. To rush into a program that would cost great sums of money to revise our facilities and methods of fabrication at this time, is not considered necessary in order to comply with the intent or spirit of the new law.

Any comments or suggestions would be appreciated.

Jerry

J. M. Harris

JMH:lm

Monsanto

MEC / Poyce - Asbestos file

FROM (NAME & LOCATION) Robert E. Belden - Chocolate Bayou Plant

DATE August 8, 1972

SUBJECT Contractor Responsibilities

REFERENCE

TO : B. R. Bradshaw

cc: H. C. Clark
G. E. Davenport
P. D. Griffin
J. M. Harris
C. H. McComb
J. E. Buckner

The O.S.H.A. standards require many specific actions not being done at this time. Although our contracts with all contractors specify a clear distinction between the responsibilities of each party, I believe it will be worthwhile to restate points relative to the safety and health of their employees. A major point to be restated is that all medical records, medical examinations, and any other testing to determine physical condition of employees will be the responsibility of the contractor.

The letter should request a written reply. Suggested contractors to include are:

1) O.M.C.
2) Crescent Electric
3) Natkin
4) T.M.I.
5) Bayou Enterprises
6) Cameron Company
7) Norvell-Wilder

Robert E. Belden

REB:lm

C 000153

IN-10 REV. 11-69

Monsanto

FROM (NAME & LOCATION) J. M. Harris - Chocolate Bayou Plant

DATE June 26, 1972

SUBJECT Use of Asbestos at Chocolate Bayou

REFERENCE

TO : Clint Britt

cc: A. W. Adams
R. E. Belden
H. C. Clark
F. H. Dupre
C. H. McComb
R. L. Miller - O.M.C.

Please find attached a copy of the article highlighting the hazards of exposure to asbestos. I would like to request an Engineering study to determine the feasibility of eliminating the use of asbestos at Chocolate Bayou. The most frequent use of this material in our plant is:

1. Ethylene Furnaces - Weber #48 - contains asbestos used between brick and roof of Ethylene furnaces. Mixed up like mortar and sets up hard. Installed by J. W. Leavesley.

2. Insulation used in the plant

    1. Thermo-Bestos .... Contains asbestos
    2. Kaylo ..... Contains asbestos
    3. Mono-block ..... Does not contain asbestos
    4. Carey-temp ..... Does not contain asbestos

    The Thermo and Kaylo are used for hot service (high temperatures) and all fittings no matter if temperature is hot or ambient, due to the crumbling characteristics of the Mono and Carey. It is also used on straight runs sometimes due to the same problem.

If there is any assistance our group can furnish, please let me know.

J. M. Harris

JMH:lm

attachment

IN-10 REV 11-65

C 000154

Perilous Particles: Tiny Fibers Of Asbestos Pose a Health Threat

Oil refineries are by no means the only places where asbestos turns up. The versatile substance is a fireproof binder and insulator in thousands of products, including such things as plastics, shingles, paper and pipes. In most of these, the asbestos is harmless to users. But, depending on how it's added to the products, asbestos can pose a threat to workers in the factories where the products are made.

Until six months ago, for instance, asbestos was being used as an antileak ingredient in Prestone antifreeze, made by Union Carbide Corp. At a Carteret, N.J., plant, run for Union Carbide by General American Transportation, the asbestos would arrive in paper sacks. Workers would cut the bags open with knives and feed the powdery white asbestos into tanks of antifreeze, says James Irving, a fire and safety engineer who has worked in the plant for 22 years.

"They'd wear face masks, but no protective clothing," Mr. Irving says, "and the blowers in the room where they worked would send the dust out to where others were working. Then they'd pile up the bags outside the building and a crew would pick them up and throw them onto the truck, raising a big cloud of dust."

Asbestos was removed from the Prestone formula late last year. Mr. Irving says the change took place after the Oil, Chemical and Atomic workers made an issue of it. Union Carbide denies that. The decision, says Herbert J. Hannigan, the company's technical manager of auto products, was based on marketing considerations and "had nothing to do with health."

Asbestos also can pose hazards to the ultimate consumers of certain products. Bits of asbestos used in filters for beverage making have been found in wine and beer, for instance, and could be dangerous if swallowed. The use of such filters in beverage making seems to have been curtailed, but knowledge of the hazard appears to have had little effect elsewhere, even in medical circles. Asbestos, says a soon-to-be-published study, is being used in some hospitals as a filter for intravenously-fed liquids, giving the particles an entry into the blood stream.

The use of asbestos in fireproof textiles is common. Once in a while, asbestos fiber even finds its way into ordinary fabrics. Dr. William Nicholson, an associate of Dr. Selikoff at Mount Sinai, has a girl's charcoal-colored winter coat with red trim hanging in one of his laboratories. It's one of more than 200,000 imported coats made with 8% asbestos fiber sold two years ago. Some of them are presumably still being worn. "Give that coat a shake," says Dr. Nicholson, "and you get dust levels as high as in an asbestos factory."

Asbestos workers in the construction industry are perhaps the most sensitive of all workers to the asbestos hazard. It was the construction industry, which uses two-thirds of all asbestos products, that was the target of the first wave of antiasbestos publicity more than four years ago. [illegible] New York, Boston, Chicago [illegible]

[illegible] Substitute materials are being developed, though there's some question being raised about their safety, too.

Afraid of a Checkup

Among construction workers outside the asbestos trades—virtually all of whom are exposed to asbestos whether they work with it directly or not—concern remains relatively low. Jacob Novak, business manager of the Asbestos Workers Union local in New York, says he has tried without success, for instance, to induce a group of plasterers to have checkups. "Some of these people don't want to face a free X ray because they're afraid of what they might hear," says Mr. Novak, a 43-year veteran of the asbestos trades, who had a nonmalignant tumor removed from a lung last winter.

Anxiety in the demolition industry also seems minimal. "We don't have a dust problem in demolition," says Leonard Kapy, vice president of Wrecking Corp. of America, one of the largest demolition companies in the country. "Some people think you can take down a building without dust," he says with a laugh. As for asbestos, Mr. Kapy isn't worried: "I know fellas who have laid asbestos pipe for years, and there's nothing wrong with them." When working in closed quarters, he says, his men use drop cloths and fans, but they don't wear respirators because "they're too hot and they don't work."

Nevertheless, the federal Environmental Protection Agency is preparing regulations expected to be announced this summer that would attempt to impose controls on air pollution from demolition operations. These could include requirements for wetting down the work areas or the removal of all asbestos before a building is toppled. The technical problem of measuring dust levels, however, "could toss out the demolition regulation entirely," says James Krowder, an engineer with the EPA's hazardous pollutants branch.

Setting a standard for asbestos concentrations at work sites has been similarly difficult for the fledgling Occupation Safety and Health Administration, a year-old Department of Labor unit. The reason: nobody knows how much asbestos is dangerous. The asbestos industry, led by Johns-Manville Corp., the largest in the field, has fought for a standard allowing five asbestos fibers per cubic centimeter of air in the factories. But the doctors at Mount Sinai and elsewhere argue that the only true safe level of asbestos pollution would be zero.

A Four-Year Delay

The government's decision yesterday was to impose a five-fiber average, with a maximum concentration in the work area of 10 fibers per cubic centimenter at any time. In 1976, the new regulations call for a more stringent two-fiber limit, with the four-year delay intended to give the industry a chance to control the problem.

The industry says even a two-fiber limit could hurt it economically. J. B. Jobe, Johns-Manville's executive vice president, said at hearings in March that it would be "socially irresponsible" to adopt such stringent regulations.

The company operates the largest asbestos factory in the country at Manville, N.J., where, according to a recent Mount Sinai study, 40% of the workers die of asbestos-related cancer. Corrective steps being taken already, Johns-

THE WALL STREET JOURNAL,
Thursday, June 6, 1972

VOL. LII NO. 168

Perilous Particles

Tiny Asbestos Fibers Pose a Health Threat To Workers and Public

Long Exposure Can Result In Lung Disease, Cancer; Industry Seeks Solutions

'The Bodies Are in the Street'

By BARRY NEWMAN
Staff Reporter of THE WALL STREET JOURNAL

NEW YORK—At Joseph Marino's gas station on the fringe on Manhattan's Spanish Harlem, the proven method of cleaning an old brake assembly goes like this: Pull off the wheel, aim an air hose at the exposed parts and blow the dust out.

A cloud of brown dust invariably flies right into the mechanics' faces, says Mr. Marino. But it doesn't bother them. "We got masks and everything," Mr. Marino shrugs. "The guys don't use them. What the hell."

What the mechanics don't seem to know—like thousands of other mechanics—is that the brown dust is dangerous. Brake linings are made of asbestos. And if a mechanic breathes in enough dust from the worn-out linings it could eventually kill him.

The lethal quality of tiny, indestructible asbestos fibers that lodge in the lung is well known. Widely publicized studies by Dr. Irving Selikoff of the Mount Sinai School of Medicine lead him to predict that of the roughly 250,000 asbestos industry workers today, about 95,000 will die unnecessarily of occupational cancer. "In the next 10 to 15 years we will enter the asbestos cancer era," says Dr. Selikoff. "This is one of the great disasters of our time."

Hazards for Others, Too

The asbestos industry is well aware of the problem and is taking action to combat it, though critics say the steps aren't as drastic as the situation demands. But asbestos industry workers aren't the only ones who might fall prey to the lung cancers and other diseases caused by the mineral's irritating fibers. It's likely that millions of workers in other industries using asbestos fibers could be affected, as well as ordinary people who have come into contact with asbestos in the atmosphere.

Perhaps the most tragic fact is that for those who have already been sufficiently exposed, changes in procedures and standards of asbestos use—including a new set announced yesterday by the Department of Labor—are meaningless. It takes as many as [illegible] after the first [illegible] will indeed have an effect, but not for decades.

Harry Bailey is one man who isn't likely to find much solace in the new standards. Mr. Bailey isn't an asbestos worker. He's a bricklayer in a Mobil Oil Corp. refinery alongside the Delaware River in Paulsboro, N.J. He has been working at the plant for 33 years, and every year he has gone to the company medical department for a chest X ray.

"They never said there was anything wrong with me," says 54-year-old Mr. Bailey, and indeed he has thus far developed no outward symptoms. But a few months ago he and 18 other workers from the refinery went to Mount Sinai for an examination, and every one of them proved to have scarred lungs—a sign of asbestosis, a nonmalignant lung disease. (Mobil has refused to release his medical records to the New York doctors, Mr. Bailey says. The company declines to comment on the matter.)

First Scarring, Then Complications

Asbestosis begins with X-ray evidence of scarring like that found in Mr. Bailey's lungs. As the disease progresses, the lungs stiffen and breathing becomes difficult. The heart has to work harder and can become enlarged. Ultimately, death may be caused by heart attack or suffocation.

The mineral can also cause lung cancer—in fact asbestos can cause cancer just about anyplace in the body if particles are somehow ingested. The ability of the sharp, tiny particles to penetrate the lung once breathed in has produced a high incidence of cancer in the membrane surrounding the lung, a disease called mesothelioma. In the general populace, it causes one in 10,000 deaths. Of 632 asbestos workers being studied by Dr. [illegible]

The Mobil refinery, where Mr. Bailey works, like all high-heat factories in the oil and chemical industries, uses asbestos for insulation. Mr. Bailey works with insulation workers inside the furnaces, ripping out soft brick. "There's asbestos and brick dust and a lot of sulphur, too," he says. "We complained about the dust and dirt. Nothing is done to keep it down. The fans make it worse, and you can't wet it because of the heat in the bricks. The company bought new respirators, but under the conditions they clog in 15 minutes."

In the asbestos cutting rooms, he adds, there aren't any [illegible] And when the insulation workers saw asbestos sheets outside the room, or mix cement in a wheelbarrow, "anybody can get the dust."

Company Disagrees

Mobil disagrees with the description of working conditions. In response to a query, the company issued this statement: "We have no problems at the Paulsboro refinery concerning the use of materials containing asbestos. We use very little of such material, and what we do use is used under strictly controlled conditions. Recently the Occupational Safety and Health Administration carried out an extensive and thorough inspection of the entire Paulsboro refinery. No violations were found in the plant's handling of asbestos materials."

Mr. Bailey's union, the Oil, Chemical and Atomic Workers, is protesting that inspection. Steven Wodka, a union health and safety specialist, says little attention was paid to health violations. And he complains that after a week of accompanying the inspectors, the company inexplicably "had me kicked out of the plant." Mobil declines comment on Mr. Wodka's charge.

Manville maintains, are adequate to deal with the problem without causing a cutback in the plant's production, the lifeblood of the New Jersey town of 15,000. At least one asbestos factory, run by a PPG Industries and Corning Glass Works joint venture in Tyler, Texas, closed last February because of "profitability and concern over safety," a spokesman says.

Actually, the curbing of asbestos contamination is more an approach in good housekeeping than capital expenditure. While the cost of stopping pollution at a power plant or smelter might run into the hundreds of millions, the cost of cleaning up an asbestos operation would be closer to a 10th of that magnitude, according to doctors, engineers and union officials.

Some of the staples of such an operation, already in use in many plants, are comparatively inexpensive closed plastic bags for mixing cement, vacuum attachments on power saws, drop cloths, dust-suppressant chemicals and battery-powered respirators that blow filtered air into the user's face to ease discomfort.

The new Labor Department standards do, indeed, call for many of these work-practice rules. But while they are unquestionably a needed step toward strict controls, Dr. Selikoff says, he also says he remains pessimistic. "The potential for surveillance is remote," he says, because of the small, underfinanced staffs of federal and state inspectors. A survey recently completed at Mount Sinai of 9,400 asbestos workers around the country, for instance, showed that in 1970 and 1971 there was only one dust count taken in asbestos plants for every 20,000 man-days worked.

And while he says he appreciates the asbestos industry's expressed interest in solving the problem, Dr. Selikoff is hard-pressed to explain the continuing apathy among many workers and managers. "This isn't just another scare," he says. "Some people want to see the bodies in the street before they become concerned. Unfortunately, in this case, the bodies *are* in the street."