PLAINTIFF'S EXHIBIT
ETCO-546

ETHYL CORPORATION

INTER-OFFICE CORRESPONDENCE

TO	Mr. T. C. Coerver	**ADDRESS**	Houston Plant
FROM	R. W. Maeser, Jr.	**ADDRESS**	Houston Plant
SUBJECT	OSHA Ruling on Asbestos With Binder	**DATE**	August 1, 1972

During a meeting with R. L. Guinn and R. N. Yates (representing the Allied Technical Workers) on July 19, 1972, Mr. Guinn stated that he had checked the local OSHA office concerning formed asbestos pieces. Mr. Guinn said that Mr. Davis Lane, an OSHA compliance officer, felt that all asbestos pieces must be kept sealed in cartons or wrapped in paper while in the warehouse or being transported to the job site.

On July 19, 1972, I phoned the local OSHA office and asked to speak to Mr. Davis Lane. Mr. Lane was reported to be out of the office for the day. I then requested to speak to any compliance officer and spoke to Mr. Vernon Bechtel. I explained to Mr. Bechtel that my interpretation of the regulations was that bonded asbestos pieces not being worked on would not be expected to cause a dust problem and need not be wrapped when in the warehouse or being transported to the job site. I also explained what I believed Mr. Guinn's position to be and that Mr. Guinn indicated that he had a ruling from Mr. Davis Lane. Mr. Bechtel said that he would check and get back in touch with me that day.

Mr. Bechtel called back that day and stated that my position was correct. He also mentioned that one could rub his hand on a formed piece of asbestos and get "white" on his hand but this was not significant. He stated that OSHA was interested in the breathing of asbestos dust and not in a skin condition on the hands from touching asbestos.

At a hazardous materials seminar in Houston on July 20, 1972, I met Mr. Bechtel who was one of the speakers. Mr. Bechtel stated that Mr. Guinn had talked to him by phone that morning. I asked if he had convinced Mr. Guinn that his ruling was right. He said that he was not sure he had convinced Mr. Guinn but he felt that his ruling was still correct.

R. W. Maeser, Jr.

RWM:HJ

c.c. - Mr. J. J. Bergin
Mr. H. R. Cunningham