

Scotts.

To: Le Herron
cc: John Kilsheimer

From: S. V. Chamberlain

Subject: Libby Vermiculite

Date: June 12, 1978

I now have Dick Gruenbaum's report on air sampling of our plant working environment for asbestos. This covers February 23 and 24, March 3 and 13, 1978.

Overall, we are below the present OSHA standard which allows for 2.0 fibers/cc as the maximum eight (8) hour time weighted average. The February 23 and 24, sampling was on South Carolina ore, March 3 was 100% Libby, and March 13 - 80% Libby, and 20% African. Results indicate that the Libby vermiculite definitely has more fibers than the South Carolina ore. Less fibers seem to be present in the 80% Libby, and 20% African test versus that of the 100% Libby.

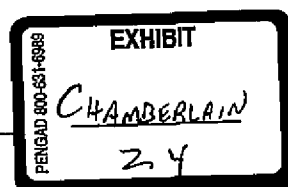
Grace indicated we should see improvement on air sampling of Libby ore, due to process improvements they have made at the mine since the first of year. Frankly, we have not seen any appreciable difference comparing last year to these recent tests. Dick's comment is as follows: "Results indicates a slight improvement over the average results of the last year, however, results are not as good as those indicate in the September 1977 sampling, I feel the equipment is showing more leaks now versus that of September 1977."

Consequently, our results are inconclusive at this point in time, as it relates to Grace process improvements.

The question of labeling (placarding) cars from Libby to Marysville has again been reviewed. Grace rational for putting labels on cars is legal. Reference "Federal Register #1910-1001, Page 513 Caution Label". Caution label should be affixed to all raw material mixtures, scrap waste, and debris, etc., containing asbestos fibres, etc. The only way they feel they can ship cars without labels is to have a written statement from Scotts, stating the material will be used in a total safe manner (written assurance the customer is meeting all requirements in safe handling). If we supply this written assurance, they will not have to placard the hopper cars.

Dick Fresh did a literature search EPA, DOT, and OSHA, and could find no reason why we could not respond to Grace to remove placards from cars. Dick Gruenbaum reports we are under OSHA standard in work environment. Therefore, if there are no objections, I will write Grace that we do meet all requirements in safe handling, and to remove the placards.

Sarge
6/14



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