

FILE NAME: Drilling Specialties (DRSP)

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PLAINTIFF'S EXHIBIT

DMA-3264

September 10, 1982

INTER-OFFICE CORRESPONDENCE / SUBJECT:

TO: G. N. Schooler

FROM: F. J. Shell *FJ*Why Flosa[®] DMA
FJS-69-82

File 1 Flosal

① Copy FLC info
② JCF/CAS 9/13/82

please give me your comments on Frank's letter

② return to GNS

The question has been raised, "Why do we still sell Flosal drilling mud asbestos?" That Flosal DMA is one of the most cost effective drilling mud additives is not questioned. Neither is our profit from Flosal questioned. The questions are "Is it safe? Are we likely to be sued?" The answer to the first is "yes" and the second is "no".

Flosal DMA is a uniquely processed, chrysotile asbestos fiber. It is made in a special piece of equipment. A grade seven fiber is blended with water and extruded through the machine where the extrusions are flaked. This process produces a fiber which contains about 12% water - an agent which renders the product dust-free. Water is recommended for controlling dusting according to 29CFR1910.1001, the present Occupational Safety and Health Administration (OSHA) Standard for asbestos.

We have monitored a number of drilling sites where Flosal DMA was being used. This is an ongoing procedure. We have now made over a hundred individual tests in five different States and in Norway. We have run tests both on-shore and off-shore. In every case, the eight hour time weighted average (TWA) has been less than 0.05 fibers per cc (f/cc).

During the early part of this testing, after we had made some 54 different tests during which we observed a work practices employed, we developed recommended work practices for using Flosal DMA. Subsequent tests have shown that when these practices are used fiber counts should be less than 0.05 f/cc on an eight hour TWA. This is one-half the triggering level defined by OSHA.

OSHA instruction CPL2-2.21A of February 18, 1981 states that medical examination requirements of the asbestos standard will be required where seven to eight hour TWA fiber concentration is 0.1 f/cc or greater. This has been interpreted that fiber counts less than 0.1 f/cc represent no asbestos exposure. This triggering level is 1/20th of the safe value of 2 f/cc in the OSHA standard.

The air around a drilling rig where Flosal DMA is being used contains less asbestos fiber than can be found in the air of a busy intersection in almost any city. Because of these low counts, the use of Flosal DMA is considered safe. Because it is a safe material which exceeds all government standards its use should cause no legal problem.

In any business there are always certain business risks. With the use of Flosal DMA we have minimized these business risks. The chances of getting



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cancer from Flosal DMA are very small as compared to the chances of getting cancer from the inhalation of tobacco smoke. Probably more pertinent to the present case is the use of benzene. One can certainly run the risk of cancer with over exposure to benzene. Benzene, however, has not been eliminated from our products. Rather, the proper use of benzene and the proper precautions when it is being used have been taught.

In summary, we use and sell Flosal because it is effective, it is profitable, it can be used safely and it does not present an undue liability risk.

FJS:mcj-RC

cc: J. C. Floyd
C. A. Sauber (r) EEC



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