

FILE NAME: Reichhold (REI)

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DOCUMENT DESCRIPTION: Memo RE Asbestos & Reichhold Requirements in Order to
Use it in Polyesters

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Reichhold Chemicals, Inc.
Inter-Office Communication

To: Mr. T. V. Morrow

From: White Plains

cc: Messrs. H. H. Reichhold

Date: November 1, 1974

E. E. Shea

P. J. Fass

C. S. Stryker

C. B. Breedlove - Detroit

P. S. Hewett - "

J. E. Maass - Azusa

R. H. Melinat - "

T. F. Shumaker - Tuscaloosa

R. K. Stenerud - Tacoma

R. B. Walker - "

D. L. Wasson - Azusa

J. G. Weinmann - Elizabeth

Subject: Use of Asbestos in
Polyesters

Dear Vinny:

Due to the dramatic increase in the price of thixotropic agents used in polyesters, you are again considering the use of asbestos. As you know, there has been extensive correspondence on this subject throughout the corporation. This correspondence was initiated by a letter addressed to me from Ed Jansen dated March 15 to which I replied with my now famous March 28 memorandum. This memorandum was written without the benefit of knowledge of any testing that was done within RCI relating to the use of asbestos in polyesters. The memorandum to which you have repeatedly referred giving the results of testing done in Azusa is dated May 7, six weeks after my memorandum.

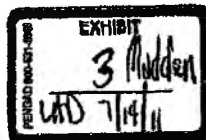
The form of asbestos which you contemplate using in your polyesters is a pelletized material supplied by the Union Carbide Corporation, known as Calidria®. Because of the pelletized form of this material, it is promoted as a non-dusting material. It is claimed that through the use of Calidria few, if any, free asbestos fibers are released into the atmosphere thus negating to a large degree an employer's responsibility under the current OSHA asbestos standards.

My letter of March 28 is correct and is the corporate guideline for the use of all asbestos products regardless of form. However, this memorandum must be read in view of the specific circumstances (testing results) at any given location.

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REICHOLD CHEMICAL, INC.
AZUSA, CALIF.



RI-00152



Union Carbide conducted tests at Azusa on November 7, 1972 wherein they measured a ceiling concentration fiber count of 1.6 or a TWA of .27 for the preparation of four batches in an 8 hour shift. This is considerably below the 5 fiber permissible 8 hour TWA. If you make the assumption that the TWA in any work or storage location is in this range, then according to my letter of March 28, Reichhold will be required to do the following:

1. Respirators - Respirators are not required as long as the 8 hour TWA and ceiling limits are observed. Employees, however, should be required to wear respirators when (a) dumping asbestos containers in the work area, (b) disposing of empty asbestos containers, i.e., placing them in a sealed drum and covering them, (c) cleaning up asbestos waste and spills and (e) unloading any box, car or trailer in which loose asbestos is apparent. A respirator program complying with OSHA Regulation 1910.134 as outlined in your RCI Safety Manual must be instituted and observed.
2. Clothing - No special clothing or change rooms and/or clothes lockers are required. However, RCI should provide each employee who routinely handles asbestos with at least one clean work uniform each work week. Dirty uniforms will be placed in a plastic bag bearing a caution label for laundering at the expense of RCI. The laundry must be notified in writing of the asbestos and a standard form letter is attached.
3. Monitoring - Monitoring of both the breathing zone of the employee and the representative work areas are required at least every six months. Records must be maintained for at least three years. Employees normally working in areas subject to sampling and/or their designated representatives shall have access to the records.
4. Caution Signs - Caution signs are not required providing airborne concentrations of asbestos fibers are less than the prescribed exposure limits. However, scrap asbestos and other materials which may contain free asbestos must be placed in sealed containers and labeled. Any outside waste disposal contractor handling any of the above must be notified that the waste may contain asbestos. A standard form letter is attached.

5. Medical Examinations - We must provide, or make available, to each employee routinely handling or exposed to airborne concentrations of asbestos fibers, at our expense, a comprehensive medical examination as specified in the regulations, i.e., 1910.93a (J). These examinations will be conducted or made available to the employee at the following times:

(a) Prior to or within 30 calendar days of his first employment in an area where he is exposed to airborne asbestos.

(b) Every year during his employment, as described above, within 30 calendar days of the anniversary of his last examination.

(c) Upon the employee's termination of employment with RCI or upon his transfer to another work area where he is not exposed to airborne concentrations of asbestos fibers.

All medical records shall be retained for at least 20 years. These records must be made available upon the request of an employee or former employee to his physician.

Those employees who decline to take any medical examination provided by RCI, at its expense, will be required to sign a waiver form to be provided by White Plains.

Each employee who has been exposed to a concentration in excess of the ceiling limit must be notified in writing within five days. Employees or their representatives (i.e., the union) must be given access to the records.

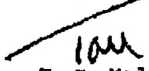
Union Carbide has advised that the state of California has adopted a new rule regarding the medical examinations. Their interpretation is that if the TWA is half of the standard, then medical examinations are waived. I am currently verifying this and will advise as soon as this is confirmed.

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Attached is a copy of the OSHA Standard 1910.93a
"Asbestos".

Please do not hesitate to contact me if any of my comments
appear to conflict with the information provided to you by your
supplier.

Very truly yours,


T. R. Madden

TRM:cb

Attachments

RI-00155