Δπ EXHIBIT 3
Deponent Martinez
Date 12/12 Rptr AS
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copy to Les 12-17-75

Scotts.

To: Dr. John Kilsheimer
cc: Those Listed Below

From: Dick Gruenbaum

Subject: ASBESTOS

Date: December 8, 1975

This memo is a follow-up of the meeting you called on December 3 to bring you to date on the present and proposed asbestos standards as well as how these standards may affect our future because of the large volumes of vermiculite used which contains the asbestos.

The OSHA Standards that were first printed on May 29, 1971 indicated that 12 fibers/ml was the TLV for asbestos. A new standard became effective on July 7, 1972 which indicated that the maximum 8-hour time-weighted average of asbestos fibers not exceed 5 fibers/cc. This same standard indicated that effective July 1, 1976, the 8-hour time-weighted average asbestos fibers concentrations will be lowered to 2 fibers/cc.

On September 30, 1975 a notice of proposed rule-making was published in the Federal Register proposing to lower the 8-hour time-weighted average exposure to asbestos of 0.5 fibers/cc. The permissible ceiling exposure now in effect is 10 fibers/cc. The new proposed standard is proposing a maximum of 5 fibers/cc ceiling. Persons interested in commenting on the proposed standard should have done this by December 8, 1975.

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EXHIBIT
CHAMBERLAIN
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FENGAD 800-631-6989

INTER-OFFICE COMMUNICATION

Scotts

To:
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Date:

Based on our limited information regarding the asbestos concentrations in our production facilities, I feel the July 1, 1976 standard can be met; however, the new proposed standard of 0.5 fibers/cc will be very difficult if not impossible to meet in our Trionized production area.

Following is a history of the asbestos fibers in our vermiculite as I know it -

I was first made aware of a possible asbestos problem in our vermiculite in late 1971 by Mr. Fred Eaton from W. R. Grace Co. My contact through Mr. Eaton was regarding some discussions concerning a dry dust collection system we were about to try on our vermiculite expanders. During early 1972, I was in contact with Mr. Eaton on several occasions, again regarding the dust collection. During each discussion, the possible asbestos problem was mentioned by Mr. Eaton and finally suggesting that W. R. Grace do some sampling in our plant.

continued

Scotts

To:
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Date:

Mr. Eaton, Mr. Eschenbach, Safety Administrator, and Mr. Kostic, Environmentalist from W. R. Grace, were granted permission to visit our facilities on May 30, 1972. During this visit, eight asbestos samples were taken in the Trionized plant area, primarily in the expander area. These samples were then analyzed by W. R. Grace. Results of these tests were 0 to 8.3 fibers/cc with a mean of >2. It should be noted that during this time four of the eight expanders were in operation using only W. R. Grace ore.

After receiving the results from W. R. Grace's analysis, it was felt that equipment should be purchased for performing our own samples. Proper sampling equipment was then purchased and again on March 8, 1973 eight samples were obtained and sent to W. R. Grace for analysis. Six expanders were in operation during these tests, results of which ranged from 0.2 to 8.8 fibers/cc with a mean of 2.5 fibers/cc.

These tests indicated that some extensive sampling should be done to see if any real problem areas could be identified.

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Scotts

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Subject:

Date:

Therefore, during the month of May 1973, 33 asbestos samples were obtained, all of which were sent to W. R. Grace for analysis. These tests were taken while running from one to seven expanders. Results indicated a low of 0.3 to a high of 59.3 fibers/cc with a mean of ≥ 4. It should be noted that some definite problem areas were identified during this sampling and operational changes were made where the excessively high count was obtained.

After the above results were analyzed and discussed, it was decided that one of our prime dusting areas was the stoner hoods which was due to inadequate dust collection. In follow-up, a new bag house dust collector has since been installed to vent the stoner hoods. In addition, a totally enclosed vibrating conveyor system was installed for conveying the expanded vermiculite from 5, 6, 7 and 8 expanders to the storage bins.

The first sampling done in the expander area since the new equipment has been installed was on November 12, 1975 when 14 samples were obtained. These 14 samples have been sent

continued

INTER-OFFICE COMMUNICATION

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to W. R.Grace for analysis, results of which are expected around December 20. It should be noted that approximately 50 percent of the vermiculite used during this sampling period was African with the remaining 50 percent being from Libby, Montana. Six expanders were being used during this testing.

Per your suggestion, I will be following-up on the following items:

1. Obtain additional asbestos samples for analysis by an independent laboratory. John Kilsheimer will be sending me a list of the laboratories suggested by III.

2. I will be checking with W. R. Grace in regard to what, if anything, they have done or are planning on doing about the recent proposed standards.

3. Locate a laboratory that could analyze the vermiculite ore from different sources in regard to fiber content as well as types of fibers. Will then follow-up by sending samples to the laboratories for analysis.

Our objective for completing the above is early January or sooner if possible.

Sg

cc: [illegible] Dick Enoch Hank Olson Bill Billegass & John Kennedy

DOJ WRG 02176

ASBESTOS FIBER SAMPLING TRIONIZED EXPANDER AREA (1)

Date	8 Hr. Time Wt. Aver. Exposure (2)	No. Of Samples Taken For Aver. Exp.	Maximum Ceiling Concentration (3)	Entire Expander Area Sample (4)	Area Samples, By Floor (5) Basement	1st Fl.	2nd Fl.	3rd Fl.	4th Fl.	5th Fl.	6th Fl.	7th Fl.	Name of Expander Operator
1-30-76	1.04	7	3.08							2.5 1.4	3.1		Doyle Poling
2-11-76				1.45									
2-18-76				1.36									
2-27-76				1.0									
3-10-76	2.39	8	10.53		8.5	1.3	3.4	2.0	2.0	4.4	5.4	2.8	Don Shanks
3-20-76				.18*									
3-29-76				2.9									
4-13-76	2.3	7	4.4		3.9		.68	.80	2.2	.62	1.8		Ron Nicol
4-28-76	.38	7	.81	.36									L. Atherton
5-5-76				1.76 & 3.08									
5-12-76	1.16	2 (6)	1.97	.36									L. Atherton
10-26-76	.80	3 (5)	1.58	1.65	5.3	.91	1.54	.91	1.48	1.37	1.85	3.19	Jeff Mouser

(1) All numbers expressed in "number fibers longer than 5 micrometer/CC of air."
(2) These are determined by obtaining at least five 15 minute samples in one eight hour working day by following expander operator doing his normal duties. Results of samples are then totaled and averaged, thus expressed as "8 hour time weighted average exposure."
(3) This is determined by the maximum number of fibers on any one 15 minute sample during this sampling period.
(4) At least one 15 minute sample per week is obtained in expander area. Approximately equal time is spent on each of the eight floors.
(5) Entire 15 minute sample is obtained in expander area on floor indicated.
Saturday: No Production - No Activity in area.
(6) These were one hour samples.

DOJ WRG 02177

ASBESTOS FIBER SAMPLING TRIONIZED EXPANDER AREA (1)

Date	8 Hr. Time (2) Wt. Aver. Exposure	No. of Samples Taken for Aver. Exp.	Maximum (3) Ceiling Concentration	Entire (4) Expander Area Sample	Area Samples, By Floor (5) Base-ment	1st Fl.	2nd Fl.	3rd Fl.	4th Fl.	5th Fl.	6th Fl.	7th Fl.	Name of Expander Operator
3-10-77	.75	3 (5)											Larry Smith & Frank Lee
3-11-77	.42	3 (5)											Delmar Cox
5-17-77	.98	3 (5)											Doyle [illegible]ng
9-19-77	.111	3 (5)											Jones
2-23-78	.15	3 (6)											Everman & Delhorster
2-24-78	.28	6 (6)											Jones & D. Gingrey
3-3-78	.99	3 (6)											Longberry
3-13-78	.89	3 (6)											Price & V. Reisinger

See preceeding page for comments.

DOJ WRG 02178