FILE NAME: Union Carbide (UC)

DATE: 1972 Mar 23

DOC#: UC138

DOCUMENT DESCRIPTION: Letter from Union Carbide - Exhibits to be Placed on Record of the Hearings with Regard to Amendment of 29 CFR, Part 1910, March 14-17, 1972

UNION CARBIDE CORPORATION
MINING AND METALS DIVISION
270 PARK AVENUE, NEW YORK, N. Y. 10017

RECEIVED
MAR 27 1972
UCC-CALIDRIA
NIAGARA FALLS, N.Y.

JAMES W. RAWLINGS
VICE-PRESIDENT

REGISTERED MAIL
RETURN RECEIPT REQUESTED

March 23, 1972

Mr. Arthur Goldberg
Hearing Examiner
720 Vanguard Building
1111 20th Street N.W.
Washington, D.C. 20036

Subject: Exhibits to be Placed on Record of the Hearings with Regard to Amendment of 29 CFR, Part 1910, March 14 through 17, 1972.

Dear Mr. Goldberg:

During my statement at the above captioned hearing, I requested permission to submit for inclusion in the record:

(a) a listing of products having a relatively low asbestos content and in which the asbestos fibers are firmly bound; and

(b) a sample of polyester plastic containing 0.5% of our thixotropic chrysotile asbestos product.

Accordingly, I now submit, in duplicate, the attached list and, under separate cover directed to Mr. Gerard F. Scannell, OSHA Office of Standards, the sample, in duplicate, of polyester plastic marked "UCC POLYESTER RESIN CONTAINING 0.5% RG-244 IN EVIDENCE 29 CFR, 1910, AS DESCRIBED IN TESTIMONY OF J.W. RAWLINGS".

Once again, I state our strong conviction that the imposition of special regulations, alarmist labels and general waste disposal

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regulations to products containing firmly bound asbestos fibers will have a severe adverse economic impact on our asbestos business without furthering the objectives on which the exposure standards are based.

Very truly yours,

James W. Rawlings

James W. Rawlings.

JWR:mc
Attachments (2)

bc.: Mr. P. P. Huffard
Mr. J. L. Myers
Mr. M. M. Swetonic

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TYPICAL CHRYSOTILE ASBESTOS END USE APPLICATIONS WITH "BOUND IN" FIBER

APPLICATION	BINDER	APPROXIMATE ASBESTOS CONTENT, %
Adhesives	Epoxy	1-10
	Polyester	1-5
	Phenolic	1-5
	Vinyl Latex	1-5
	Casein	1-5
	Rubber	1-5
Coatings (Maintenance)	Urethane	0.5-2
	Epoxy	1-2
	Polyester	0.5-2
	Alkyd	1-2
	Acrylic Latex	0.5-2
	Polyvinyl Chloride or Copolymer	1-3
(Specialty)		
Concrete Block Paint	Polyvinyl Chloride or Styrene Butadiene Rubber Latex	1-5
Automotive Undercoat	Wax/Asphalt	3-6
Texture Paint	Starch/Latex/Casein	2-5
Valley Ink (Printing)	Polyvinyl Chloride or Copolymer	0.5-1.5
Fiber Glass Reinforced Plastics Laminating Resin	Polyester	0.2-2.0
Latex Paint (Interior & Exterior)	Polyvinyl Chloride Copolymer	0.2-5
Lubricants & Greases	Lubricating Oil	1-15

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Typical Chrysotile Asbestos End Use Applications With "Bound In" Fiber (Continued - Page 2)

APPLICATION	BINDER	APPROXIMATE ASBESTOS CONTENT, %
Mineral Board	Starch	1-3
Molded Furniture	Polyester	0.2-1
	Polyurethane	0.2-1
Paper Products	Starch & Rosin Size	0.5-5.0
Offset Bond	"	"
Newsprint	"	"
Magazine	"	"
Book Paper	"	"
Board	"	"
Patching Compounds	Polyester	0.5-5
	Epoxy	0.5-5
Reinforced Plastics (Molded & Extruded Products)	Polyvinyl Chloride or Copolymer	10-30
	Polysulfone	5-30
	Phenolic	5-30
	Nylon	5-30
	Polyester	5-25
	Polypropylene	5-40
	Acrylonitrile-Butadiene-Styrene	5-30
Reinforced Rubber	Natural or Styrene Butadiene Rubber	10-20
Roofing Compounds	Asphalt	3-8
	Epoxy-Coal Tar	3-8
	Hypalon or Latex	0.5-1

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Typical Chrysotile Asbestos End Use Applications With "Bound In" Fiber (Continued - Page 3)

APPLICATION	BINDER	APPROXIMATE ASBESTOS CONTENT, %
Sealants	Polyvinyl Chloride or Copolymer	1-5
	Butyl Rubber or Latex	3-5
	Urethane	1-5
	Acrylic	1-5
Tape Joint Compounds		
(Redi-Mix)	Polyvinyl Chloride - Copolymer Latex	3-8
(Dry)	Casein, Polyvinyl Alcohol	3-8
Terrazzo Flooring	Polyester	2-5
	Epoxy	2-5
	Urethane	2-5
Vinyl Asbestos Floor Tile	Polyvinyl Chloride - Copolymer	5-15

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