

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

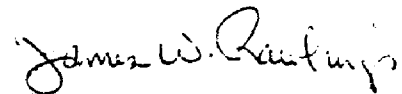
Mr. Arthur Goldberg

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March 23, 1972

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.

JWR:mc

Attachments (2)

cc.: Mr. P. P. Huffard  
Mr. J. L. Myers ✓  
Mr. M. M. Swetonic

A20130

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

| <u>APPLICATION</u>                   | <u>BINDER</u>                           | <u>APPROXIMATE<br/>ASBESTOS CONTENT, %</u> |
|--------------------------------------|-----------------------------------------|--------------------------------------------|
| Adhesives                            | Epoxy                                   | 1-10                                       |
|                                      | Polyester                               | 1-5                                        |
|                                      | Phenolic                                | 1-5                                        |
|                                      | Vinyl Latex                             | 1-5                                        |
|                                      | Casein                                  | 1-5                                        |
|                                      | Rubber                                  | 1-5                                        |
| Coatings<br>(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 | 1-5                                        |
|                                      | Rubber Latex                            |                                            |
| 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               | Polyester                               | 0.2-2.0                                    |
| Plastics Laminating                  |                                         |                                            |
| Resin                                |                                         |                                            |
| Latex Paint<br>(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<br>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<br>(Molded & Extruded<br>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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| APPLICATION                                 | BINDER                               | APPROXIMATE<br>ASBESTOS CONTENT, % |
|---------------------------------------------|--------------------------------------|------------------------------------|
| Sealants                                    | Polyvinyl Chloride or Copolymer      | 1-5                                |
|                                             | Butyl Rubber or Latex                | 3-5                                |
|                                             | Urethane                             | 1-5                                |
|                                             | Acrylic                              | 1-5                                |
| Tape Joint Compounds<br>(Redi-Mix)<br>(Dry) | Polyvinyl Chloride - Copolymer Latex | 3-8                                |
|                                             | Casein, Polyvinyl Alcohol            | 3-8                                |
| Terrazzo Flooring                           | Polyester                            | 2-5                                |
|                                             | Epoxy                                | 2-5                                |
|                                             | Urethane                             | 2-5                                |
| Vinyl Asbestos<br>Floor Tile                | Polyvinyl Chloride - Copolymer       | 5-15                               |

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