

GRACE

December 1, 1976

TO: H. A. Eschenbach

SUBJ: New Jersey Department of Environmental Protection

cc: O. M. Favorito
R. M. Vining
J. W. Wolter
H. A. Brown

This concerns the Manufacturing Chemists Association's recent mailing of a list of approximately 80 substances from the New Jersey Department of Environmental Protection.

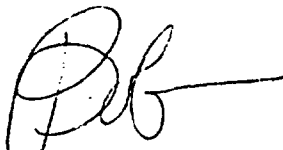
The intent of the New Jersey DEP is to establish a monitoring program for established carcinogens. There is no such program at this time.

During first quarter 1977, a survey questionnaire will be mailed to all known New Jersey industrial locations requesting whether or not such substances are used or present and in what quantities. Following compilation of results, the DEP will commence on-site monitoring against established standards for those substances, where such standards exist.

This program does not pertain in any way to monitoring in the work place, but rather, plant emissions. This does not tie in to any future Gregorio-act sort of compulsory reporting program. Thus far, 23 comments have been received and do not tend to focus on any particular substance or family of compounds. Comments of any kind are requested.

The above information was obtained in a telephone conversation November 30 with Dr. David Schrier, who reports to Dr. Peter Preuss, originator of the list and monitoring program.

This New Jersey project does not appear to present any particular problem at this time to BPD nor would it seem necessary to submit comments as far as the Trenton expanding plant is concerned. However, the same may not be the case with other Grace operations in the state.



R. H. Locke

RHL/cj

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Copies to V.K. Inv. C.E. Hurs NOV 22 1976
MANUFACTURING CHEMISTS ASSOCIATION

1825 CONNECTICUT AVENUE, N.W. WASHINGTON, D.C. 20009 (202) 483-6126

November 18, 1976

REC'D NOV 30 1976

WILLIAM J. DRIVER
PRESIDENT

To the Executive Contacts of MCA Member Firms

Dear Sirs:

The State of New Jersey Department of Environmental Protection wrote to me on October 26, 1976, about a list of approximately 80 substances indicated as carcinogenic. Comments were invited on the adequacy of the list leading to a possible chemical monitoring program in New Jersey.

A copy of the letter and the list of candidate substances are attached for your information. You will note a deadline of December 1 for receipt of comments. Dr. Paulson, a signer of the letter, has advised that he would be pleased to receive reactions until the middle of December, recognizing postal system delays. Dr. Paulson also indicated his desire to obtain data more national in scope than confined to New Jersey. Most MCA member companies with New Jersey operations also have plants in many other states, and in that respect, enjoy a national scope.

We understand that this same letter also went to other organizations. Despite possible duplication, we believe it appropriate to call this opportunity to your attention.

Sincerely,

W.J. Driver
W.J. Driver

Attachment

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*Dave
Schrier
Examiner
Specimen*

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

TRENTON 08625

OFFICE OF THE COMMISSIONER

October 26, 1976

Mr. William J. Driver, President
Manufacturing Chemists Association
1825 Connecticut Ave., N.W.
Washington, D.C. 20009

Dear Mr. Driver:

Attached is a draft list of approximately 80 carcinogenic substances compiled by the New Jersey Department of Environmental Protection. All substances on the list are carcinogens which are either widely used or highly potent. The list does not include carcinogens formed through secondary reactions in the environment, food additives and drugs, or substances produced as industrial by-products.

This list, after a review and comment period, will be used as a major element in New Jersey's cancer program. It will serve as the basis for an industrial carcinogen use survey as well as a chemical monitoring program. We hereby solicit your comments as to the adequacy and completeness of this list. Your reactions, along with the comments received from others, will be used to prepare a final version of the list. Please send any comments and suggested deletions or additions you may have to:

Peter W. Preuss, Ph.D.
Department of Environmental Protection
P.O. Box 1390
Trenton, New Jersey 08625

We would appreciate receiving your comments or reactions by December 1st. If you need any clarification, please contact us by phone at (609) 292-2906.

Sincerely,

Glenn Paulson
Glenn Paulson, Ph.D.
Assistant Commissioner
for Science

GP:PP:cs
Attachment

Peter W. Preuss
Peter W. Preuss, Ph.D.
Special Assistant to
the Commissioner

RECEIVED
OCT 27 1976

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GROUP I

Production or Usage Greater than 200,000 kg/year

AMITROLE
ARSENIC and COMPOUNDS
ASBESTOS
AURAMINE
BENZENE
*BENZIDINE
BERYLLIUM and COMPOUNDS
CADMIUM and COMPOUNDS
CARBON TETRACHLORIDE
CHLOROFORM
CHLOROPRENE
CHROMIUM and COMPOUNDS
CHRYSOIDINE
4,4'-DIAMINODIPHENYLMETHANE
ortho and para-DICHLOROBENZENE
*3,3'-DICHLOROBENZIDINE
3,3'-DIMETHOXYBENZIDINE
3,3'-DIMETHYLBENZIDINE
1,1-DIMETHYLHYDRAZINE
ETHYLENE DIBROMIDE
*ETHYLENEIMINE (AZIRIDINE)
HYDRAZINE
LEAD and COMPOUNDS
*4,4'-METHYLENE BIS (2-CHLOROANILINE)
4,4'-METHYLENE DIANILINE
*alpha-NAPHTHYLAMINE
*beta-NAPHTHYLAMINE
NICKEL and COMPOUNDS
POLYCHLORINATED BIPHENYLS (PCBs)
SUDAN I (Solvent Yellow 14)
THIOUREA
TRICHLOROETHYLENE
VINYL CHLORIDE MONOMER

*Regulated by OSHA as a carcinogen

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GROUP II

Low Usage or No Information on Usage

ACETAMIDE
*2-ACETYLAMINOFLUORENE
ortho-AMINOAZOTOLUENE
*4-AMINOBIIPHENYL
para-AMINOAZOBENZENE
AMINOTRIAZOLE
2-(1-AZIRIDINYL) ETHANOL
AZOBENZENE
Bis (2-CHLOROETHYL) ETHER
*Bis (CHLOROMETHYL) ETHER
*CHLOROMETHYL METHYL ETHER
DIETHYLSTILBESTROL
DIETHYL SULPHATE
*para-DIMETHYLAMINOAZOBENZENE
DIMETHYLCARBAMOYL CHLORIDE
DIMETHYL SULPHATE
DIOXANE
ETHYLENE THIOUREA
GLYCIDALDEHYDE
HEXAMETHYLPHOSPHORIC TRIAMIDE
ISONICOTINIC ACID HYDRAZIDE
MAGENTA
2-METHYLAZIRIDINE
*4-NITROBIIPHENYL
N-NITROSODIETHYLAMINE
*N-NITROSODIMETHYLAMINE
(para-NITROSODIMETHYLANILINE) ACCELERENE
NITROSOMETHYLUREA
OIL ORANGE SS
PONCEAU MX
PONCEAU 3R
1,3'-PROPANE SULTONE
*beta-PROPIOLACTONE
PROPYLENEIMINE
SUDAN II
2,4-TOLUENEDIAMINE
TRYPAN BLUE
URETHANE (ETHYL CARBAMATE)

*Regulated by OSHA as a carcinogen

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PESTICIDES

ARAMITE
BHC and LINDANE
CHLOROBENZILATE
DDT and associated substances
DIELDRIN
KEPONE (Chlordecone)
MIREX
QUINTOZENE (Pentachloronitrobenzene)
TERPENE POLYCHLORINATES (Strobane)

GRACE

November 30, 1976

TO: File

SUBJ: RTI Job Site Monitoring

cc: O. M. Favorito
H. A. Brown
H. A. Eschenbach
T. A. Hamilton

Current arrangements are for RTI to visit a ZIC job in the Raleigh-Durham-High Point area and witness (a) job practices and (b) monitoring of airborne fiber concentrations. After evaluation of the slides in Cambridge, the results will be made available to RTI for their OSHA study. In conjunction with submittal, if the sampling results appear to be at one or the other extreme of what would ordinarily be expressed, the approximate "expected" range will also be reported to RTI.



R. H. Locke

RHL/cj

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Mr. Ned V. Scott, Jr.
Filter Media Co.
P. O. Box 19156
Houston, TX 77024

Dear Mr. Scott:

I am writing with reference to your written allegations that
"...Vermiculite contains asbestos and is somewhat dangerous to handle."

Some people periodically make such claims, usually without citing a basis, as is the case with your statement. However, as you and we are in similar businesses, sometimes servicing the same customers, I thought you might be interested in the facts.

The sodic amphiboles which may be present in trace amounts in some ZONOLITE® vermiculite were not mentioned, either by the National Institutes of Occupational Safety & Health "Criteria Document for Occupations Exposure to Asbestos" (76 references), or by the Federal Occupational Safety & Health Administration in its (most recent) October 9, 1975 listing of new evidence on asbestos (42 references). No study, experiment, or report has been published containing evidence that those minerals are carcinogenic in man or animals.

You should also be aware that those minerals even when present in vermiculite, are present only in trace amounts as natural contaminants. They occur widely in the earth's crust. The very analytic methods used to detect their existence and measure their magnitude while very sophisticated, can and do confuse different minerals and have a margin of error greater than the concentration typical of these minerals, even when they are present in vermiculite.

11/17/76

However, we do not minimize the concern that we, our customers, or you should have about the potentially adverse health effects that any mineral dusts can have on man's respiratory system, especially when those dusts are present in high concentrations and/or combined with a history of cigarette smoking. At the same time, we do wish to draw your attention to the fact that perlite ore and expanded perlite can contain more than 1% of free silica, and some ores periodically do release free silica in excess of allowable concentrations. There is evidence associating free silica with Silicosis and pneumconiosis in man.

Notwithstanding the inconclusive findings of the Perlite Institute's epidemiological study of workers in the perlite industry, you are undoubtedly aware that, unlike vermiculite, perlite dust is a painful irritant for those working with it. Immediately apparent, there is sinus pain and eye irritation which frequently requires medical attention to flush out sharp, abrasive perlite particles which cannot be normally irrigated away by the eye's tear ducts. This is aside from perlite's potential long term health hazard by virtue of releasing mineral dust or by special association with specific occupational disease.

If you are not aware, you should note that the safety data made available to you by the ore suppliers states that perlite dust "may overload (the) lung clearance mechanism and make lungs more vulnerable to respiratory disease." They further warn to "Avoid excessive dust inhalation." There is also the admonition to use "...NIOSH approved respirators for protection against pneumoconiosis producing dust."

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Even if one were to set aside the Professional Ethics of Salesmanship (and I am loathe to set them aside), considering the "facts" of perlite and vermiculite, it would seem at least as ill-advised for a perlite producer to make "scare" claims about vermiculite as it would be for a vermiculite producer to make "scare" claims about perlite. Both materials have their place in the construction industry. Continued use of scare tactics (although I can imagine they may be effective with some accounts in the short term) will not preserve a viable business for anyone in the long term and always leave the user especially vulnerable.

Yours truly,

B. R. Williams

R. H. Locke/cj

11/17/76

DRAFT

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GRACE

C O N F I D E N T I A L

November 15, 1976

TO: B. R. Williams

SUBJ: RTI Job Site Monitoring and Contractor Labeling Interview

cc: H. A. Brown
H. A. Eschenbach
O. M. Favorito
W. K. Rogers/Zono-No. Brunswick

Last week we reviewed the meeting with Dr. LeSourd of Research Triangle Institute, Project Manager of the Economic Impact and Technological Feasibility Study for Federal OSHA's proposed Construction Industry Asbestos Standard. His group was handicapped by being budgetarily unable to do job site monitoring for airborne fiber concentrations. Also, Dr. LeSourd had been surprised that the labeling provision could itself have an economic impact independent of medical surveillance and monitoring requirements, etc.

On the former he was interested in obtaining job site monitoring results which indicated the actual hazard in a specific instance. On the latter, he was willing to interview a contractor for a second opinion on the unexpected aspect of labeling. The only problem was that both would have to be local to his area to minimize travel.

I spoke again with Dr. LeSourd on Friday. He indicated that just about any timing would be appropriate for either data-gathering trip but, again, RTI must cover their own expenses and thus travel must be minimized.

On the job monitoring I am working with Bill Rogers to locate a ZIC and/or MK job adjacent to RTI's North Carolina home base. We would have a qualified individual available to perform the sampling under RTI's observation and then we would subsequently report results to RTI. If the results of the one job were not squarely within the range of what would generally be expected, we would so advise RTI with submission of the specific data.

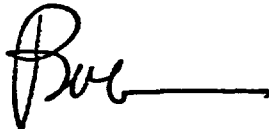
On the contractor interview, Dr. LeSourd said he could very likely mesh a Louisville, Atlanta, or D.C. appointment in with other travel. He did not positively rule out Pompano. However, Dr. LeSourd does wish to contact the individual and make his own appointment, preferably at one of the branch offices.

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B. R. Williams
November 15, 1976
Page 2

It would seem that Wayne Kispert would need to be briefed upon return from the West Coast on: (1) the background of the work RTI is doing; (2) the statements already made by us to RTI as to economic impact of labeling [over and beyond monitoring, medical surveillance, etc.]; and, (3) what we had anticipated that Kispert would say to LeSourd on the same subject.

If there is anything further I can do to facilitate the contractor interview, please advise. If you would please let me know when Kispert is ready, I will pass word to Dr. LeSourd. I think we will want to press these arrangements through because Dr. LeSourd may have to let "non-mandatory" excursions such as these slip by, the closer he gets to his deadline on mandatory project work.

A handwritten signature in dark ink, appearing to read 'R. H. Locke', with a long horizontal line extending to the right.

R. H. Locke

RHL/cj

P.S. I also need the data discussed in Rod's office concerning what percent of the time our contractors are working on-site with ZONOLITE systems and for that time on-site what portion they spend in contact with the material.

15186598

bcc: H. A. Brown
O. M. Favorito
B. R. Williams

GRACE

Construction Products Division

W.R. Grace & Co.
62 Whittemore Avenue
Cambridge, Mass. 02140

(617) 876-1400

November 15, 1976

Dr. David A. LeSourd
Senior Economist
Operations Analysis Division
Research Triangle Institute
P. O. Box 12194
Research Triangle Park, NC 27709

Dear Dr. LeSourd:

Flowing out of our November 5 meeting and subsequent telephone conversations, it seemed appropriate to report that progress is being made in locating a job site for monitoring by a Grace staff hygienist under the supervision of your RTI personnel. We are attempting to find one as close as possible to your location so as to minimize travel time and costs. As soon as we think we've identified the closest one or two that will be in process on specific dates, I'll be in touch.

I have also asked our people for a recommendation on an experienced large contractor for you to interview for his perspectives. I'll pass along the contractor's name and number as soon as I have it and, hopefully, he'll be "Southeast" and travel can either be minimized or synchronized with other RTI travel.

Back to our interview meeting, it seems appropriate to again indicate that, if you wish, we would be glad to assist or advise on the practical problems of developing usable primary market data on roof decks and structural steel fireproofing. We will also relay data by the end of the month on your questions concerning what percent of the time our contractors are working on-site with ZONOLITE® systems and, for that time on-site, what portion they spend in contact with the material.

I would also like to reemphasize the importance we associate with two aspects of the Construction Advisory Committee's Recommendation and of the October 5, 1975 OSHA proposal which haven't and won't receive much attention from the commercial asbestos fiber industry. These are, first, the adverse economic impact of mandatory labeling for unbound construction materials posing extremely low or undefined hazards in use and, second,

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Dr. David A. LeSourd
November 15, 1976
Page 2

the change from regulation of "fiber" to "particles" with the greatly expanded impact of the latter.

Expecting to be in touch within a week on the job site and contractor information, I am,

Yours truly,

A handwritten signature in dark ink, appearing to read 'R. H. Locke', with a long horizontal flourish extending to the right.

R. H. Locke

RHL/cj

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