INTER-OFFICE MEMORANDUM

00151



00111b

To: L. P. Pasculli

From: F. M. Stumpf

Date: October 4, 1983

Subject: Variable Asbestos Contamination in Vermiculite

I think one of the most significant facts regarding the problem with vermiculite is that its asbestos content continually varies. It is known that in the ore body the asbestos content can vary from zero to significant amounts, and cleaning by all known normal and practical production methods will not remove all of the contaminant.

Therefore, examination for asbestos can range from none or insignificant amounts to very significant amounts, as we see by reports such as "a few fibers", "0.2 percent","1 percent", etc.

This hard fact must be brought to the attention of the officials and the genera public.

This fact would negate any claims made by the W. R. Grace Company when they pre spot test results. This should also leave a cloud over all our heads, because we will never know when the asbestos contamination will turn up.

FMS/ec

cc:
J. P. Verhalen
R. L. Felipe

FMS

CONCLUSIONS

Although counsel for Grace has informed us repeatedly that circulation or reference to the Mt. Sinai letter of June 22, (the "Goldstarb letter") is a misrepresentation and disparagement of their product, and demanded that we cease such activities, we have not. We will not. They know that we continue to circulate and refer to it; yet, they have not sought legal remedy, ~~and they can't~~

The reason they can't stop us is because we have dealt with the facts. As long as we are truthful and factual, we can continue to work with this information.

Therefore, you can say:

1). "MONOKOTE has been tested for asbestos content and shown to contain asbestos. This is because MONOKOTE is vermiculite based and virtually all vermiculite, ~~is often~~ contaminated with tremolite asbestos." (produced in this country is

2). "The Mt. Sinai letter report of June 22, 1983 is a valid report."

3). "We know ~~Our tests show~~ that CAFCO is absolutely asbestos free ~~is so strong~~ and ~~that~~ we certify to it. W.R. Grace won't certify that their product is absolutely asbestos free."

You cannot say:

1). "MONOKOTE contains a specific percentage of asbestos." The level seems to vary and this may be why Grace won't certify."

2). "MONOKOTE" presents a health hazard." We don't know this to be a fact. Grace says there is no hazard to health but we don't know if anyone at Grace has a mdeical degree.

3). "MONOKOTE is in violation of OSHA or EPA regulations concerning asbestos." We don't believe they are, although they may be violating similar statutes in certain states and we are looking into this. Additionally, there is considerable dialogue in Washington about changing the OSHA and EPA regulations. If this happens, Grace may have a problem, but, we'll have to wait and see.

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