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Reichhold Chemicals, Inc.

Inter-Office Communication

To: Mr. R. K. Stensrud - Tacoma

From: White Plains

cc: G. H. Hicks - Azusa
R. H. Melinat - "
G. L. Arnette - "
J. E. Jared - "
S. E. Reich - "
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T. V. Morrow
C. S. Stryker
A. L. Wooten

Date: September 15, 1972

Subject: Use of Asbestos as an RCI Raw Material

Dear Bud:

You sent me a copy of the letter dated August 7, 1972, written by George Hicks to Sheldon Reich stating that "...until further notice Azusa will continue to use CALIDRIA asbestos (Union Carbide) in resin formulations where asbestos is required". You asked me if there is a corporate safety attitude toward asbestos or the Calidria grade.

Yes, there is an established corporate policy on the use of asbestos as a raw material. Also, there is an RCI attitude on Calidria in particular.

My Safety Bulletin No. 48-17 dated December 22, 1971, stated RCI corporate policy on the use of asbestos. At that time an emergency standard was released as part of Federal OSHA requirements and effective immediately. Since that time OSHA has been working to establish a complete asbestos standard in the Federal regulations; and the research arm of OSHA, the National Institute for Occupational Health and Safety (NIOSH), has recommended a final asbestos standard. The threshold limit remains at 5 fibers per milliliter for eight hour exposure until 1976; and at that time, it will be reduced to 2 fibers per milliliter.

Union Carbide's CALIDRIA asbestos is derived from the mineral chrysotile which is believed to be less prone to causing asbestosis and cancerous tumors than other mineral forms of asbestos derived from crocidolite. In any event CALIDRIA produces somewhat less asbestos dust in the atmosphere because of its physical form, and it makes good sense to continue using it in our operations as George Hicks has stated. Its properties are better in our manufacture, and it saves money.

However, the Federal OSHA standard as stated in my bulletin, or in its more recently recommended final form, does not make any distinction of asbestos from chrysotile versus asbestos from any other mineral; and therefore, the RCI plant must control the asbestos dust in the atmosphere where workmen are exposed in such a way that the threshold limit is not exceeded. Proper respirators must be worn in any momentary situations where a workman is exposed to dust in excess of the threshold limit.

If the RCI Azusa plant wishes to obtain an actual sampling and analysis of dust in the working atmosphere when using CALIDRIA in the normal manner, it can obtain assistance and possibly a testing of the atmosphere by contacting Mr. John Myers; sales of asbestos at Union Carbide Corporation; Niagara Falls, New York.

If anyone is in need of the new final asbestos standard as recommended by NIOSH, please contact my office.

Very truly yours,

"Chuck"

C. J. Windsor

/cb