

GRACE

Construction Products Division

W.R. Grace & Co.
6300 Button Gwinnett Drive
P. O. Box 620009
Atlanta, GA 30362
Tel. 404-448-5880



November 18, 1988

Mr. Russell Dukes
UGA
Public Safety Building
Athens, GA 30602

Dear Mr. Dukes:

Thank you for the opportunity to clarify the issue you raised concerning MONOKOTE Fireproofing.

MONOKOTE-5 should be considered asbestos free. When tested according to the United States Environmental Protection Agency (EPA) Interim Method for the Determination of Asbestos in Bulk Insulation Samples, no asbestos has been found in MONOKOTE.

One of the components of MONOKOTE-5 is vermiculite, a naturally occurring mineral that may contain tremolite in the ore body. Except for minute amounts, the tremolite is removed from the vermiculite during processing. It is this purified vermiculite which is used in the manufacturing of all of Grace's vermiculite containing products, including MONOKOTE-5.

Using sophisticated state of the art electron microscopy analysis, it may be possible to detect fibrous tremolite in MONOKOTE at levels below .001% (10 parts per million) by weight. These extremely low levels are characterized by experts as "totally insignificant". Attached are copies of independent laboratory test results by Arthur D. Little, Inc. and Mt. Sinai Medical Center.

The EPA and some individual states such as California and New Jersey, have stringent standards concerning the spray application of fireproofing materials. With levels below .001% (10 parts per million), MONOKOTE is more than 1,000 times below the EPA standard, and more than 250 times below the more stringent state requirements.

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The United States Occupational Safety and Health Administration (OSHA) regulates occupational exposure to airborne asbestos fiber and has already established a Permissible Exposure Level (PEL) of 0.2 fibers/cc (8 hour time weighted average) and an action level of 0.1 fibers/cc. Grace frequently monitors job site exposure levels for workers applying MONOKOTE and all tests performed show exposure levels consistently below the OSHA action level and, in fact, below levels which can be quantified with statistical reliability.

OSHA has further officially informed Grace that its asbestos regulations are not meant to be enforced for any products which contain de minimus levels of naturally occurring tremolite where exposure levels to employees can be demonstrated to not exceed the OSHA action level.

I trust that the information provided in this letter will enable you to use Grace products with the same confidence in their safety and performance as you have in the past.

Sincerely,



Joel C. Hortenstine
District Manager - Fireproofing

/pf
Attachment

cc: J. J. Adams---W. R. Grace & Co.
T. W. Beers--W. R. Grace & Co.
R. D. Dratnol--W. R. Grace & Co.

1982 -- LIBBY (172 employees evaluated)

- I. 21 (12.2% of total population) *all go back to old mine.* 12 (57.0%) of category I inhabitants also in V
- II. 12 (7.0%) 1 (8.3%) also in III
- III. 13 (7.6%) 1 (7.7%) also in II, 4 (30.8%) also in V
- IV. 24 (14.0%) 6 (25.0%) also in V
- V. 55 (32.0%) 12 (21.8%) also in I, 4 (7.3%) also in III, 6 (10.9%) also in IV
0. 70 (40.7%)

830 Employees $\pm$ 1+ yrs Exp.
109 are dead
16 $\in$ Lung Cancer
2 $\in$ Mesothelioma