

FILE NAME: Reichhold (REI)

DATE: 1973-1974

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DOCUMENT DESCRIPTION: Memos RE Use of Asbestos in Polyesters

Reichhold Chemicals, Inc.
Inter-Office Communication

To: Mr. E. W. Jansen (E.W.P.)
cc: Mr. H. H. Reichhold
Mr. C. B. Bredlow - Detroit ✓
Mr. P. J. Fass
Mr. C. R. Holzen
Mr. T. V. Morrow
Dr. H. E. Muller - Sterling Forest
Mr. E. W. Schroeder - Elizabeth ✓
Mr. E. E. Shea
Mr. T. P. Shumaker - Tuscaloosa
Mr. R. K. Stensrud - Tacoma
Mr. C. S. Stryker
Mr. G. C. Sweet

From: White Plains
Date: March 28, 1973
Subject: Use of Asbestos
in Polyesters

*Josephine
Hinton
Augusta
S.S.F.*

Dear Ed:

I understand from your memo of March 15 that the Plastics Division has evaluated the use of asbestos in our polyester resins and decided that it offers some economies and good physical properties as a thixotropic agent.

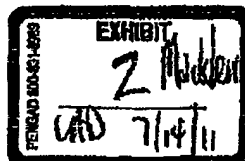
This memo summarizes the health and safety requirements contained in Regulation 1910.93(a) of the Occupational Safety and Health Administration (OSHA) of the U.S. Department of Labor. (Copy attached).

At first impression, the regulations seem quite complicated. However, I will review and discuss those sections which affect RCI. The standards are as follows:

1. The maximum level of airborne asbestos for an 8-hour time-weighted average (TWA) period must not exceed 5 fibers longer than 5 mm. per cc. of air.
2. The ceiling concentration of airborne fibers must not exceed at any time 10 fibers longer than 5 mm. per cc. of air.

The ceiling concentration means that an employee may work in an atmosphere containing between 5 and 10 fibers longer than

*Wickler & Rhoads
run dust counts
at Elizabeth Plant
on 7/1/73.
76 counts below 1 fiber peak.*



RI-00074



0011 T120

FOR INDUSTRIAL USE ONLY

SYNTHETIC RESIN COMPOUND

**CAUTION: DUST OR VAPORS MAY CAUSE IRRITATION OF SKIN, EYES,
NOSE AND THROAT.**

Avoid breathing dust or vapors. Avoid contact with skin and eyes. Use only with adequate ventilation. Use protective equipment and clothing for continued handling and to avoid breathing dust or vapors.

FIRST AID: On contact, wash skin with soap and water. Wash eyes with plenty of water. Wash contaminated clothing before reuse. If swallowed, induce vomiting and call physician.

READ MATERIAL SAFETY DATA SHEET BEFORE USING.

KEEP OUT OF REACH OF CHILDREN

RICHOLD CHEMICALS, INC.
525 North Broadway
WHITE PLAINS, N.Y. 10603

*This information herein is to assist customers in determining whether our products are suitable for their applications. Our products are intended for sale to industrial and commercial customers. We request that customers inspect and test our products before use and apply themselves as to contents and suitability. Nothing herein shall constitute a warranty, express or implied, including any warranty of merchantability or fitness, nor a protection from any law or regulation in the United States. All patent rights are reserved. The exclusive remedy for all proven claims is replacement of our materials and in no event shall we be liable for special, incidental or consequential damages.

RI-000014

Mr. E. W. Jansen

- 2 -

March 28, 1973

5 mm. per cc. but only for short periods of time. It has been suggested by NIOSH that exposure to concentrations ranging between 5 and 10 fibers longer than 5 mm. per cc. be limited to 15 minutes per hour. At no time should an employee be allowed to work in an area having a concentration greater than 10 fibers unless he is wearing adequate personal protective equipment.

Engineering methods such as isolation, enclosure, exhaust ventilation and dust collection can be used to achieve the exposure limits. Local exhaust ventilation must be in accordance with American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems, ANSI Z9.2-1971.

Use of respirators or shift rotation of employees to comply with the limits is not permitted except under unusual circumstances. Respirators are not required as long as the 8-hour TWA and ceiling limits are observed. Employees should be required to wear respirators when:

1. handling and unloading asbestos containers in the work area.
2. disposing of empty asbestos containers.
3. cleaning up asbestos waste and spills.
4. performing routine housekeeping duties in work areas in which asbestos has been used.

An employee respirator program must be established in accordance with ANSI Z88.2-1969 and all respirators shall be of a type approved by the Bureau of Mines, Department of Interior or NIOSH. An air purifying type respirator may be used under the above guidelines.

No special clothing or change rooms and clothes lockers are required unless the airborne concentration of fibers exceeds the 10 fiber ceiling limit. However, RCI should provide each employee who routinely handles asbestos with at least one clean work uniform each work week. Dirty uniforms will be placed into a plastic bag bearing a caution label for laundering at the expense of RCI. The laundry must be notified in writing of the asbestos

RI-00075

Mr. E. W. Jansen

- 2 -

March 28, 1973

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RI-00075

Reichhold Chemicals, Inc.
Inter-Office Communication

To: Mr. T. V. Morrow

From: White Plains

cc: Messrs. H. H. Reichhold

Date: November 1, 1974

E. E. Shea
P. J. Fass
C. B. Stryker
C. B. Breedlove - Detroit
P. S. Hewett - "
J. E. Maass - Azusa
R. H. Melinat - "
T. F. Shumaker - Tuscaloosa
R. K. Stensrud - Tacoma
R. B. Walker - "
D. L. Wasson - Azusa
J. G. Weinmann - Elizabeth

Subject: Use of Asbestos in
Polyesters

Dear Vinny:

Due to the dramatic increase in the price of thixotropic agents used in polyesters, you are again considering the use of asbestos. As you know, there has been extensive correspondence on this subject throughout the corporation. This correspondence was initiated by a letter addressed to me from Ed Jansen dated March 15 to which I replied with my now famous March 28 memorandum. This memorandum was written without the benefit of knowledge of any testing that was done within RCI relating to the use of asbestos in polyesters. The memorandum to which you have repeatedly referred giving the results of testing done in Azusa is dated May 7, six weeks after my memorandum.

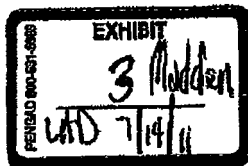
The form of asbestos which you contemplate using in your polyesters is a pelletized material supplied by the Union Carbide Corporation, known as Calidria®. Because of the pelletized form of this material, it is promoted as a non-dusting material. It is claimed that through the use of Calidria few, if any, free asbestos fibers are released into the atmosphere thus negating to a large degree an employer's responsibility under the current OSHA asbestos standards.

My letter of March 28 is correct and is the corporate guideline for the use of all asbestos products regardless of form. However, this memorandum must be read in view of the specific circumstances (testing results) at any given location.

RECEIVED

NOV 5 1974

REICHOLD CHEMICAL, INC.
AZUSA, CALIF.



RI-00152



Mr. E. W. Jansen

- 4 -

March 28, 1973

Those employees who decline to take any medical examination provided by RCI, at its expense, will be required to sign a waiver form to be provided by White Plains.

Finally, one regulation must be given special thought before going ahead. Each employee who has been exposed to a concentration in excess of the ceiling limit must be notified in writing within 5 days. Employees or their representatives (i.e., the union) must be given access to the records. This offers potential for harassment.

Redacted Under Attorney Client Privilege

All questions regarding Paragraph 1910.93(a) and its interpretation and of the foregoing should be directed to the undersigned.

Very truly yours,


T. R. Madden

TRM:xt
Attachment

RI-00077