

FILE NAME: Reichhold (REI)

DATE: 1976 Oct 1

DOC#: REI037

DOCUMENT DESCRIPTION: Letter

REICHHOLD CHEMICALS, INC.

Creative Chemistry... Your Partner in Progress



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October 1, 1976

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Gentlemen:

At the University of Wisconsin at the Madison, Wisconsin Thermojet Conference which was held September 23 and 24, one of our spokesmen commented briefly on the Occupational Safety and Health Act work place regulation concerning asbestos as it related to the molders of asbestos filled phenolic molding compounds. During the discussion our spokesman commented that the prescribed limited for airborne concentrations of asbestos fibers was currently 5 fibers per cubic centimeters of air as a time weighted average (TWA). It was pointed out during the meeting that this was possibly in error and that the current limit was, in fact, 2 fibers per cubic centimeters of air, effective July 1, 1976. We wish to confirm that, indeed, the current limit for airborne concentrations of free asbestos fibers is 2 fibers per cubic centimeters of air for an 8 hour time weighted average (TWA).

Summarizing some of the other points which were made during the discussion, we wish to point out that with asbestos filled phenolic molding compounds in which the asbestos fibers are completely encapsulated by the phenolic resin, there is almost no possibility for the presence of free asbestos fibers. The handling and storage of such a molding compound in line with good standard industrial hygiene practices should not result in the release of any asbestos fibers in excess of the 2 fibers limit.

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During the use of asbestos filled phenolic molding compounds there are two possibilities for releasing fibers; (1) during the transfer of the compound from the bag into the feed hopper and (2) when subjecting the finished article made from the phenolic molding compound to a grinding, drilling or pulverizing procedure or to any other operation(s) which could possibly result in the formation of dust.

Discussing point (2) first, Reichhold's past experience and the experience of some of its customers who have conducted air monitoring indicate that it is extremely unlikely that this type of operation would result in the freeing of asbestos fibers in excess of the 2 fibers limit. However, it is one area where extra caution should be taken. We urge that employee monitoring be conducted in these areas and analyzed for free asbestos fibers.

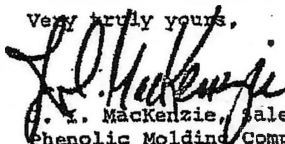
Asbestos filled phenolic molding compounds, wherein the phenolic resin surrounds and encapsulates the asbestos fibers such as the types supplied by Reichhold, should not typically contain free asbestos fibers sufficient to cause airborne concentrations of asbestos fibers in excess of the 2 fibers limit. Wise business practice would indicate that the bag unloading area is another place which should be monitored in order to make certain that this is indeed the case. Our spokesman made a point during the discussion that the two chemicals used to opacify the membrane filter; namely, dimethyl phthalate and diethyl oxalate will liberate the bonded asbestos fibers in an uncured compound, thus, producing a falsely high count. The membrane filter test method, then, is not completely satisfactory in this instance.

In summation, once you have established, through a simple monitoring procedure, that you do not have airborne concentrations of asbestos fibers exceeding 2 fibers longer than 5 micrometers per cubic centimeters of air for an 8 hour time weighted average, you are not required to implement all of the work practices, labeling, housekeeping, record keeping and medical examination requirements of the Occupational Safety and Health Act asbestos regulation.

We would also like to reiterate Reichhold's position as a secondary processor of asbestos fillers in supplying asbestos filled phenolic molding compounds. Because Reichhold is able to meet the 2 fibers limit, we will continue to supply either asbestos-filled or asbestos-free heat resistant compounds. We will not initiate any reduction of currently available products based on their asbestos content. We feel that molders, as a tertiary processor of asbestos, will not be unreasonably affected by the new limit, and we will continue to develop and market products for their expressed needs.

We appreciated the opportunity to participate in this conference and welcome your individual inquiries on the subject.

Very truly yours,



J. I. MacKenzie, Sales Manager
Phenolic Molding Compounds

JIM:cb