FILE NAME: Kubota (KUB)

DATE: 0000

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January 5, 1960

Lybrand, Ross Bros. & Montgomery
60 Broad Street
New York, New York

Att: Mr. Robert H. Fischer

Re: Annual Audit

Dear Sirs:

In accordance with understandings reached with your Mr. Fischer, the attached list sets forth non-routine matters affecting the financial position of our domestic companies to a substantial extent in addition to those which have been discussed with Mr. Fischer. Those additional subjects have included the "validation" in 1959 by the Japanese fiscal authorities of certain agreements executed in 1957 with Kubota Kensai Kogyo K.K. and also the execution on December 30, 1959 of an agreement with New Materials, Inc. relating to Technical Assistance destined for Toko Perlite Kogyo K.K.

We will be glad to supply any additional information which you may require.

Very truly yours,

Herbert Horton Ball
Secretary and General Attorney

Att.

bcc: Robert M. Fischer
extra (2)

BD

ASBESTOS INFORMATION ASSOCIATION
NORTH AMERICA
1600 L Street, N.W. Washington, D.C. 20036 (202) 223-4885

January 2, 1975

Mr. Shigeru Nishiyama
Director, General Manager
Housing Architectural Materials Sub-Division
Kubota, Ltd.
22 Funade-Cho, 2-Chome
Naniwa-Ku, Osaka, Japan

Dear Mr. Nishiyama:

The Johns-Manville Corporation has asked me to reply to your question concerning interpretation of a portion of the Standard for Occupational Exposure to Asbestos as promulgated by the Occupational Safety and Health Administration of the U.S. Department of Labor.

I understand that your question relates specifically to Paragraph (2) Work Practices - (i) Wet Methods, from the Federal Register, Page 11320, Volume 37, No. 110, dated Wednesday, June 7, 1972.

The main purpose of the "Wet Methods" portion of the standard was to control field handling and application of dusty asbestos-containing materials. An example would be the field mixing of asbestos insulation cements, which if done dry, has a high potential for generation of airborne fiber.

The "Wet Methods" requirement has not been applied to dry process manufacturing operations such as asbestos-cement shingles, or to the shop and field fabrication of asbestos-containing sheet products.

I personally, within the last few years, have visited a number of shops that fabricate and cut asbestos-cement sheet products. With but one exception, all shops were cutting and fabricating dry. Of course, the machine tools used in these operations were equipped with dust control systems designed to maintain the airborne fiber concentration in the workplace below the OSHA maximum permissible level.

Please contact me directly at the address shown on the first page of this letter if you have further questions.

Very truly yours,

Edmund M. Fenner

Edmund M. Fennêr, Chairman
Standards & Technical Committee

EMF/emr

Johns-Manville

Internal Correspondence

To: W. B. Feltze - 4NZ

Date: January 9, 1976

From: G. L. Swallow - 4NC

Copies: To All Labs

Subject: OCCUPATIONAL ENVIRONMENTAL CONTROL
MONTHLY REPORT - DECEMBER 1975

The major work done by the Occupational Environmental Control Department in December is as follows:

Scheduled Industrial Hygiene Surveys

Field Work at Plants:

Dunn	Lompoc-Ken Otr.	Tilton
Jeffrey Mill 6	Waukegan-GP&D	Lewiston
Jeffrey Miscellaneous	Waukegan-RPD	Rockdale
Kingsey Falls Paper	Waterville-Pipe	Waterville-RPD

Industrial Hygiene, Housekeeping, Safety & Community Reports Issued:

Advocate	Manville-Pipe	Green Cove Springs
Butner	Marrero	Ft. Lauderdale
Denison	McNary	
Ft. Saskatchewan	North Bay	
Jackson	Parkersburg	
Jarratt	Rockdale	
Los Angeles Talc	Stockton	
Lewiston	Toronto	
Manville-IPD	Waukegan-GP&D	

Special Industrial Hygiene Surveys

Field Work at Plants:

Asbestos-Textile-Operating Conditions	Jeffrey - Tailing Operator tests
Jackson - VC	Los Angeles Talc-Millipore
Jeffrey - Filter bag tests	Lompoc - Mortar plant

Reports Issued:

Jackson - VC	Lompoc - Mortar plant
Los Angeles Roofing-follow-up	Long Beach - Asbestos
Los Angeles Talc - Millipore	Rockdale

Miscellaneous

Jim Burt was hired by the Eastern Area Laboratory and started work 12/15/75.

The Manville Laboratory completed the field work for the comparison study of asbestos fiber content in New Jersey ambient air and in the air down wind of the Manville Dump.

This laboratory also provided the initial set of asbestos samples to be counted by all laboratories and used in our statistical analysis of the membrane filter method.

The Central Area Laboratory made a special emergency survey at the Jackson, Tennessee plant to check occupational vinyl chloride levels occuring from the use of PVC resin which had excessive residual vinyl chloride monomer.

They did special sampling at Waukegan on maintenance men inspecting asbestos baghouses.

The Central Area Laboratory personnel also cooperated with Waukegan Pipe-plant personnel in observing and monitoring the work done by IITRI.

The Canadian and Western Laboratories cooperated in making a special emergency survey of the Los Angeles Talc plant at the special request of the Mining Division.

The Eastern Area Laboratory made a special customer survey at Mineral Ceramics Corporation in Los Angeles.

The Canadian Laboratory did additional special sampling of welders working on chrome steel.

A radiation questionnaire has been essentially completed by the Rocky Mountain Laboratory.

The Rocky Mountain Laboratory developed a Gas Chromatic Analytical Procedure for methyl ethyl ketone.

They established a quality control program for metals analysis.

They reported on the latest sampling done by the silver membrane method.

Word was received that the AIHA Accreditation Committee has approved our application for laboratory accreditation. The AIHA board of directors is expected to give their proforma approval at which time we will be notified formally.

Denver personnel participated in an all day briefing session for 6 members of Kubota Ltd.

They completed distribution of all available plant Raw Material Print Outs.

I attended the ACIGH meeting on Work Place Hazard Monitoring.

An executive bulletin covering maintenance requirements for environmental control equipment at plant and mine locations was completed and published.

G. L. Shallow
GLS/jln

Johns-Manville

Internal Correspondence

BD

To: P. Kotin, M.D.

Date: January 12, 1976

From: E. M. Fenner

Copies: File & C

Subject: MONTHLY ACTIVITIES REPORT - DECEMBER 1975

1. AFD Seminar

As part of the AFD Seminar for the Friction Materials Standards Institute, made a presentation on the OSHA and EPA standards relating to the use of asbestos.

2. Kubota, Ltd.

Participated in a discussion with representatives of Kubota, Ltd. on asbestos and health and government regulations relating to the use of asbestos. These discussions were held at Manville plant and our Denver offices.

3. Asbestos Information Association/North America

As a member of a four-man Ad Hoc Committee, met with representatives of Roy F. Weston, Inc., the AIA/NA consultant, to discuss their preparation of the AIA/NA comments on the technical feasibility and economic impact of the proposed revisions to the OSHA asbestos standard.

4. Toxicology Inquiries

Answered 31 written and 18 verbal inquiries relating to the toxicology and use of Johns-Manville products.

E. M. Fenner

EMF:jh

Johns-Manville Corporation

Greenwood Plaza
Denver, Colorado 80217

Health, Safety & Environment Department

March 5, 1976

Shigeru Hattori
Assistant Manager of Personnel Dept. II
Kubota, Ltd.
22, Funade-cho 2-chome,
Naniwa-ku, Osaka, Japan

Dear Mr. Hattori:

Thank you very much for your letter of February 4, 1976.

We are very pleased that we were able to help you with your concerns related to the potential health hazards of asbestos fiber.

We will keep you informed about future developments relating to asbestos fiber usage in the United States.

With best personal regards.

Very truly yours,

Edmund M Fenner

Edmund M. Fenner, Director
Environmental Services

EMF:jh

KUBOTA

OVERALL ITEMS (public hazards, etc.)

1. Predicted tendencies in the future of Asbestos Packaging. Current bags (of paper, jute, and polypropylen, etc.) have some problems such as spillings and dispersions of asbestos fibers when handling at the port, transportaion by the vehicles and opening bags.

1-1. Do you have any plan to change the packaging of asbestos in the future? If yes, how and when? Please advise us the current situations of other companies than J-M.

1-2. Does the transferring of the said packaged asbestos cause any problem when go through the public roads and ways?

KUBOTA

2. In regard with the waste disposals of the asbestos products manufactures.

2-1. How do you treat asbestos fibers in order to prevent the disposing the wastes? Do you pay any special considerations taking account of the characteristics of asbestos fibers? (product scraps, waste water used for cleaning of the production equipment, dust of collecting machines, asbestos bags, etc.)

2-2. Do you have any problems pertaining to the treatment?

2-3. What are you doing in regard with the slightly remained asbestos fibers in the discharged bags?

KUBOTA

4. Your countermeasures of handling of your products made of asbestos at the construction site (outside of the manufacturing plant).

4-1. the ways of cutting and processing works

4-2. What kind of devices and tools do you use?

4-3. How do you treat of the scraps when cutting and processing?

KUBOTA

130

3. We are advised of your law suit of about 190 cases and please enlighten us of the detailed contents of them and some of the findings of the law suit.

KUBOTA

EQUIPMENT

✓ 1. Asbestos Transferring.

1-1. What do you do against the dispersed asbestos fiber dust when transporting by the vehicles in the plant site?

1-2. What about regarding the forklift? What is your countermeasure against the asbestos fibers adherent to the pallets?

KUBOTA

2. Asbestos Handling

2-1. Do you use Asbestos Bag Opening Machines? If yes, what structure and what performance? If no, what is your countermeasure against the asbestos fiber dust?

2-2. What is your asbestos storing system? If you store discharged and drawn asbestos loose, please advise us the structures of Storing Equipments, and the ways of opening the bags.

2-3. What is your asbestos supplying systems? How do you transfer the discharged and drawn asbestos? If they are transferred other ways than screw-conveyers, bucket-elavators, belt-conveyers, please instruct your method in detail. How do you treat the discharged vacant bags? Do you regenerate them?

3. Cleaning inside the Plant.

3-1. How and how often clean the floors of the plant?

3-2. How and how often clean the machines and equipment? How is your cleaning especially of the high places (upper surface of silo within the plant or upper surface of collecting duct, etc.)?

3-3. How and how often clean the buildings, namely, outside walls, inside walls, upper surface of the beams and roofs involving the surrounding areas of ventilators.

KUBOTA

4. Collecting and Preventing of the Dust of the Equipment.

4-1. Which spots do you account as the arising points of asbestos fiber dust in your asbestos products manufacturing equipment, for example, in colorbestos colonial, wet sheets and A.C.E. production equipments?

4-2. How and what do you do against the dust arising at the above mentioned spots?

4-3. What is your dust collecting system and what dust collecting machine do you use at the above mentioned spots?
What is your piping system of the dust collecting duct?
Please explain us the ratio of the dust collecting wind volume at the above mentioned dust arising spots.

4-4. Dust collector of moist dust and what is your countermeasure against the clogging in the duct?

KUBOTA

5. Operation of the Equipments

5-1. How do you treat the mixtures containing asbestos fibers, still in the state as the raw materials, drawn out of the production equipment at the time of the start and end of the operation of the equipments? Where do you store the mixtures intended to be regenerated?

5-2. How do you treat the wet-return arising at the time of start and trouble?

wet suspension

KUBOTA

6. Maintenance of the equipment

6-1. What is your countermeasure against the asbestos fiber dust at the time of maintenance of the equipment during the normal operation of the equipment?

6-2. What do you do at the time of troubles of the equipments? What is your countermeasure against the asbestos fiber dust, especially at the spots of extremely much dust such spots as inside of the mixers and inside of bucket elevators?

KUBOTA

Health Controls

1. How do you explain about the effects or influences of asbestos fibers against the health of the employees who usually handle asbestos fibers? Or do you put information bulletin boards? In case the dust be classified as general dusts, dusts containing asbestos fibers, products and slags, how do you explain respective Do you have any special materials to explain to the newly employe

KUBOTA

2. How do the workers who usually handle asbestos consider the effects of asbestos against the health? Are there any differencies of the considerations of it between the workers of the polluted spots and other normal spots?

KUBOTA

3. Where do you pay special attentions and how do you excute health control, namely; how often do you execute physical check-up? How do you keep the records of the physical check-up results? How do you notice the physical check-up results to the employees? How do you make the workers' lists? Do you execute the follow-ups to the retired employees?

KUBOTA

4. What do you indicate to your employees to pay the attentions in regard with their health when working? Do you put the indication signs or instruction boards?

5 Do your physical check-up, precautions and indications differ according to difference of the asbestos handlings, namely, the direct handlings of asbestos, handling of semi-products in the production process and maintenance of machines at the time of troubles or normal operations? And do working uniforms or protection devices differ?

6. Does the U.S. goverment make guidance in regard with the problems of health pertaining to asbestos? Did J-M ever receive the guidance in the past?

KUBOTA

7. What kind of roll does your corporate physician play in the matter of employees' health pertaining to asbestos?

KUBOTA

8. What do you think of the effects of asbestos against the health?

KUBOTA

9. Do you have any smoking places or recess rooms or equipments inside the working places in order to safeguard the employees' health?

10. Do you do in any special way to the cleaning and changing of the working uniforms?

KUBOTA

11. Do you have any organizations of sanitary control inside the plant? Is the organization controlled by an responsible man?

KUBOTA

The Determination of the Atomospheric Concentration of Asbestos Fibers

1. Please show us various devices and equipments to collect the asbestos fiber dust.

KUBOTA

2. Please explain us the method how to count or determine the asbestos concentration of the collected samples.

a) the method to use optical microscope.
b) the method to use X-Ray diffraction.

In addition, please show us the measured data obtained through the two ways mentioned above.

3. Are the measuring or determination of asbestos fiber dust done by the experts? In case specific experts are elected, from which department and position are they elected?

KUBOTA

4. We think that the density of asbestos fiber dust fluctuate by workshops, heights from the floor, times of a day, days, and weeks. Do you have any records of the fluctuation? How did you gather the data?

KUBOTA

5. What is your standard count of judgement to determine the count to be normal count or to require the some actions, when asbestos fiber dust density is measured?

KUBOTA

6. As we wish to obtain the calibration standards for counting asbestos, please instruct us how to do.

7. As the counting of asbestos fiber dust by optical-microscope differ much among the measuring people, please advise us the way how to educate the technics of the measuring people.

8. Are you or any other specific institute studying to find out more simplified method regarding asbestos fiber dust measuring. If yes, please advise us the way.

9. We wish to do sampling the dust using both your devices and our devices brought from Japan and compare the results. And we wish to observe your collected sample piece through optical-microscope.

10. Have you made your own manuals of measuring for the daily measuring by your people? If so, please show us them.

KUBOTA

11. We would like to be given your measuring data recording paper.

93-2442 File

Johns-Manville

Internal Correspondence

To: A-C Pipe File

Date: July 17, 1980

From: G. F. Evans (2-19)

Copies: J. Green (2-18) B. Diemer (2-18)

Subject:

I have recently had the occasion to determine who our competitors were in the asbestos pipe field particularly with regard to the west coast. The following information was obtained as a result of this investigation. Currently, only Certanteed and Papco market asbestos pipe along with Johns-Manville. However, until very recently, there were a number of other competitors primarily from abroad. Especially on the west coast, the pipe market included those manufactured by two Japanese firms known as Kubota and Nipponite. Vos International was the distributor for Kubota and Groninger was the distributor for Nipponite. Additionally, pipe was marketed by Eternite of Belgium, Mexilet based out of Chihuahua, Mexico (and rumor has it it is owned by Certanteed) and Asbestolet which was manufactured by Asbestos DiMexico. This latter company, I believe, is partially owned by Johns-Manville, however. Some of the Johns-Manville employees who are knowledgeable about the competition in the pipe field are, Edward Spinzig, John Bogard, Hal Olson, and Dick Anklin.

GFE:dms

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