

ZONOLITE
DIVISION W. R. GRACE & CO.
LIBBY, MONTANA
TELEPHONE 293-4131

06046485

January 25, 1966

F. W. Rupp

Home Office

R. A. Gleich

Libby

Maryland Casualty Company

Dear Frank:

We received no report on the October inspection made by William E. Walker of Maryland Casualty Company's Seattle office. His verbal report before leaving was that he had no recommendations to make and that everything appeared to be very good. As far as reports from them are concerned, if Chicago doesn't get them, Libby most certainly will not.

Mr. Walker and Mr. Schmidt did take three dust samples when they were here in March 1965. Personal opinion is that they were very ill-equipped to do any sampling. Their equipment was inadequate even if it had been complete, which it was not, and they were apparently unfamiliar with its operation. The samples were actually taken with our gear and personnel under their supervision. They had a laboratory in Spokane analyze the sample. The laboratory fouled up the analysis and the results meant nothing. I am enclosing a letter from Mr. Parks to Don Carkner regarding that visit. We purloined or rather conned Mr. Walker out of a copy on a later visit or we would never have known any results. The samples and analysis are worthless.

In Mr. Parks letter to you he mentions Threshold Limit Values (TLV) and Maximal Acceptable Concentrations adopted by the ACGIH (American Conference of Governmental Industrial Hygienists) and parts of his explanations are quoted from the Threshold Limit Value - 1963.

On page 3 of his letter to you in item 5, Mr. Parks wrote "The 1963 Threshold Limit Value for Mineral Dusts containing less than 1% Crystalline Silica and asbestos is 5,000,000 particles per cubic foot of air. This is the evaluation upon which Mr. Walker has made his recommendations." To our knowledge, Mr. Walker has not made such a recommendation. Most certainly he has not made it to Libby either verbally or otherwise. We are unaware of such a recommendation by anyone except in Mr. Park's letter to you. I am enclosing a copy of the 1963 TLV to which Mr. Parks refers. Also some information from Data sheet 531 published by the National Safety Council titled Dust, Fumes, and Mists in Industry. Paragraph 68 gives the origin of the Smopec suggested for asbestos

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dust. Note that this is for the asbestos textile industry where all the dust is asbestos and not just part tremolite as in our case. We have less than 1% Crystalline Silica.

We have two distinct differences from what Mr. Parks has indicated. Our dust contains tremolite, not the asbestos type referred to in the TLV and our dust is not all tremolite. In Mr. Ben Wake's report of May 23, 1963, Montana State Board of Health, the Maximum Allowable Concentration for us is 20 million particles per cubic foot of air total dust and 5 million particles per cubic foot of air for asbestos. He explains that the asbestos concentration is calculated on the basis of our air-borne dust being 40% asbestos. In April 1963, Mr. Wake had 6 samples analyzed by the U. S. Public Health Service which identified the mineral as Tremolite - Actinolite in concentration varying from 6.2% to 22.5%. Note the use of Tremolite instead of Asbestos and the high of 22.5% instead of 40%. However, this did not change the maximum allowable concentration of 20 mppcf and 5 mppcf.

The 20 mppcf total multiplied by 40% gives 8 mppcf instead of the allowable 5 mppcf for Tremolite. Mr. Wake explained that the 20 mppcf total was acceptable because the 5 mppcf for Tremolite was not an exact dividing line between a safe and unsafe condition but a range at which control should be set. (Report dated May 11, 1964). These limits were referred to in Mr. Wake's report of October 2, 1964 and to our knowledge are still valid as far as the Montana State Board of Health is concerned. We have not been inspected since that time. For our own purposes, we have voluntarily set our standards at 10 mppcf total dust. I am enclosing our record of monthly dust counts.

I can see no reason for further limitations on us. Mr. Parks recommendations are unreasonable and impossible and unnecessary.

I hope that the explanations, enclosures, etc., will answer some of your questions.

Sincerely,

RAB:elch/riv

c.c. O. F. Stewart
R. J. Kujawa
E. D. Lovick

enc.

