PLAINTIFF'S
EXHIBIT
WRG-1170A

0633834

GRACE

Construction Products Division

TO: M. Stoler
S. Ahern

DATE: August 8, 1985

FROM: S. Venuti

SUBJECT: Program Report #3 a Comparison of SCA (Standard Product) vs. SCA with Libby #2 Cyclone Fines added.

CC: R. J. Bettacchi
R. C. Ericson
H. A. Eschenbach
J. S. Hamilton
P. J. Walsh
R. C. Walsh
J. W. Wolter/H. T. Dudley

The attached report indicates fiber exposures above the 0.1f/cc action limit, and instantaneous total dust exposures (considered to be representative of dust levels throughout the shift) above the OSHA permissable exposure limits (15mg/m^3). A prior report for a different SCA job site indicated fiber exposures well below the action limit. The total dust exposures were also below the OSHA-PEL but above the ACGIH-TLV (10mg/m^3). We are actively pursuing additional SCA job sites to test. The additional data will enable use to determine what typical exposures are.

As discussed with Mark, the following questions need to be addressed:

1) What legal obligation do we have to our customers when total dust overexposures are found?

2) Does the asbestos standard Title 29 §1910.1001 and the 0.1f/cc action limit as stated in OSHA enforcement guideline (Instruction CPL 2-2.21A) apoly to these situations? If so, what legal obligation do we have to our customers when fiber exposures above 0.1f/cc are found?

S. Venuti

SV:td

Attachment

15176597

0633835

Construction Products Division

GRACE

TO: Vermiculite Hazard Evaluation File

DATE: July 24, 1985

FROM: S. Venuti

SUBJECT: Program Report #3 a Comparison of SCA (Standard Product) vs. SCA with Libby #2 Cyclone Fines added.

CC: R. J. Bettacchi/J. S. Hamilton
H. C. Duecker/J. C. Yang
R. C. Ericson
H. A. Eschenbach
R. C. Walsh
J. W. Wolter/W. R. Wright
P. J. Walsh/H. T. Dudley

Objective

Manufacturing requested that an evaluation of SCA with Libby #2 Cyclone Fines added, be included in the Vermiculite Hazard Evaluation Program. The objective of manufacturing is to find a use for Cyclone Fines which currently represents a costly disposal problem. The actual evaluation involved a comparison of a single lot of standard quality Libby #4 SCA vs. the same lot of product with ~8% (by weight) Libby #2 Cyclone Fines added at the furnace. All product was manufactured at Tampa. Dust exposures were measured at a Commercial Roof Decks job in Pasadena, Florida.

Results

Vermiculite Type	Exposures at job site 8-hour time wgtd. avgs.			Bulk Vermiculite Respirable Fiber Concentration (Procedure C-46)
		Fibers**	Total Dust	
Libby #4 SCA/ Standard Product	Mix Charger	0.406f/cc	50mg/m^3 (9 minute sample)	0.9ppm
	Mix Operator	0.050f/cc	———	
	*Material Handler	≤0.166f/cc	———	
Libby #4 SCA/ with ~8% Libby #2 Cyclone Fines added	Mix Charger	0.319f/cc	39.2mg/m^3 (12 minute sample)	7.5ppm
	Mix Operator	0.082f/cc	———	
	*Material Handler	≤0.062f/cc	———	

*NOTE: The Material Handler spent less time deep in the trailer when Material with Cyclone Fines was used. (See Appendix #1).

**NOTE: Dusty conditions made it necessary to change filters after only 2-36 minutes of sampling time. (See Appendix #3) OSHA Guidelines state that filters should be changed only after 1 hour minimum.

15176598

Exhibit 1170