

MMYFILE

CC: REB
HBR
WCT

TOMOE ENGINEERING COMPANY, LTD.

(ANNEX OFFICE)
SHIN SHIN KAIKAN BUILDING
14-1, NIHONBASHI 3-CHOME, CHUO-KU
TOKYO, JAPAN

MAIN OFFICE:
DAINI MARUZEN BUILDING
9-2, NIHONBASHI 3-CHOME, CHUO-KU
TOKYO, JAPAN

CABLE ADDRESS: "EOMOT"
TELEX: 02223506 EOMOT J
TELEPHONE: TOKYO 274-0411

RECEIVED

August 2, 1978

AUG 8 1978

UCC-CALIDRIA
NIAGARA FALLS, N. Y.

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AUG 7 1978

UCC-CALIDRIA
NIAGARA FALLS, N. Y.

Mr. J. L. Myers
Marketing Manager
Union Carbide Corporation
Metals Division
P. O. Box 579
Niagara Falls, N. Y. 14302

Subject: T-135(P) Dust Problem, Stopped Use
Due Warning from Labor Standard Office

Company Visited: Soma Marusan Paper Co.

Date: July 28, 1978

Attendants: Mr. Saito, Section Head
Mr. Kikuchi
(Could not meet production manager, Mr. Hanasato
who was away on business)

Subject company was using T-135(P) together with rutile type TiO_2 in making outer liners for cold storage fish boxes, and due to lower price of T-135(P) as compared to TiO_2 , and for the retention efficiency based upon its adsorbent strength they were quite satisfied. The amount used varied seasonally but it averaged out to about 2 metric tons per month.

Last march they were inspected by the personnel of the Labor Standard Office and at that time although they were using asbestos (T-135), it was pointed out that they neglected to have the necessary facilities. Later a dust count was made with UCC's cooperation, and by installing a bulletin board at the site of work, (we provide them the board) and did our utmost. As for the actual dust count, and the controlled density, was far below the permissible tolerance, resulting in a very high degree of safety. However, according to the law it requires numerous complexities such as installation of ventilating system as deemed necessary, special physical examination of the workers, (once every 6 months) retaining of physical records, (30 years) etc. and a warning was received from the Labor Standard Office to comply to all above.

Furthermore, although a bit off from the subject matter, as the paper manufacturing plant also comes under the regulation for control of noise for the workers they are obligated to undertake the doctors check on ears, and upon complying with the test the other day they found one worker being hard of hearing. Upon checking of this persons past background, prior to being employed

UCC 007423 A20722

Mr. J. L. Myers

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August 2, 1978

here he worked in the coal mine operating a coal digging machine, and it was thought that this hard of hearing related to that time. Reason being that the degree of noise emitting from the machines in the paper making plant would not cause hard hearing, and also not much time had elapsed since his employment at this paper plant, however the subject plant must assume the responsibility of this worker's health. Perhaps the same situation could arise in the case of asbestos. For instance, to the worker who at time of employment had lung trouble but was not detected until a later date, due to the fact that with asbestos being used the subject company may have to assume the responsibility.

In consideration of the above indicated facts, and upon holding meetings at the various working sections concerned it was decided not to use asbestos (T-135(P)).

Right after the Meiko Company, for the same reason we have lost the business with the subject company, and the situation seems to be that conducting the asbestos business for the future is going to be very difficult. For the future we sincerely believe that a wet type, no dust asbestos will have to be developed.

Yours very truly,

TOMOE ENGINEERING CO., LTD.

for S. Sumioka

H. Fukuma
Inorganic Chemicals Section

S. Sumioka/ju

cc: Dr. M. W. Ranney
Mr. M. Kanno

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CC: JWC
WCT
5-1 DS



Chloria ASBESTOS

UNION CARBIDE CORPORATION • MINING & METALS DIVISION • P.O. BOX 379 • NIAGARA FALLS, N. Y. 14302 • TEL: 716-278-3376

April 30, 1973

Mr. P. C. Weeks
Union Carbide Australia Ltd.
167-187 Kent Street
Sydney, N.S.W., Australia

Jim - If at all possible,
please see Mr. Weeks per
his letter (rec'd 4/9/73) and
this reply. Thanks,

John
5/1/73

Dear Phil:

Mr. Porter's fears of asbestos are not unusual but a man of his stature would be expected to have an open mind in such matters. The following points and the enclosed information should assist you in allaying his fears.

Molten metal will burn you if you touch it, maleic anhydride will poison you if you swallow it, styrene fumes will suffocate you if you breathe too much, silica can cause silicosis if you inhale excess quantities.

Asbestos can cause lung damage if you inhale large quantities for many years. CHRYSOTILE asbestos can cause lung cancer after many years of exposure to high concentrations.

RG-244 is CHRYSOTILE asbestos and can be used safely without endangering the health of workers. Just as Degussa says that Aerosil is not a significant hazard, we say that RG-244 is not a significant hazard.

Since there has been so much published after the "New Yorker" article of 1968 I have chosen not to make specific comments on it. Most of the information is based on insulation workers exposed primarily to crocidolite and amosite asbestos in a period of poor housekeeping practices. This is just not relevant to the use of RG-244.

Enclosed is a packet containing several pieces of information which you can read for background and/or pass on to Hatrick or Monsanto. All of the information can be copied so I am sending only one copy. The paper I presented at the SPE meeting summarizes most of the information and is supplemented by the UK experience.

I am sure that most of the objections you receive are based on newspaper articles. Most of these are not written objectively and tend to sensationalize and

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April 30, 1973

unfairly extrapolate data and studies. The newspaper will not accept any "good" information about asbestos but we are slowly getting favorable coverage in some technical journals, per the attached items. "Plastics Technology", "The Northern Miner", "Journal of Commerce", "Machine Design". Silica is one of the five target health hazards announced by OSHA and the criteria for new standards are being prepared. The current U.S. threshold limit value (TLV) for amorphous silica is 20 million particles per cubic foot (Mppcf) or 80 mg/M³. If you can see silica dust the level is very near the TLV.

The Hatrick people should have a Reichhold R&D report No. 75 by G. Hicks on the use of RG-244. It was mailed out on March 9 and is very complimentary. This should indicate RCI's acceptance of RG-244 and we hope to get a further mailing from Mr. H. R. Helbig, Vice-President of RCI's International Division. We have monitored RCI's Azusa plant and found dust levels well below the 1976 OSHA Standards.

No material can "conform to OSHA Specifications" as they are not written in this manner or for this purpose. We have made numerous dust counts at various polyester producing plants and find no levels in excess of the OSHA Standards. When dust levels are not exceeded there are no extensive or expensive OSHA requirements.

With regard to laborers, we have found that most workers prefer to handle RG-244 because it is much less dusty and the bags are easier to handle.

The many advantages of RG-244 have caused our sales to increase very rapidly and steadily as noted in the attached chart. I have omitted the scale of sales value, for obvious reasons, so you can show this to your customers to demonstrate the acceptance of RG-244. The top of the scale, for your information, is over one million dollars. We are now planning a major expansion of our RG-244 production facility and have just recently gone to full seven days per week operation. How is your pricing compared to Aerosil? Do you have any problems competing on price or performance?

I have rambled quite a bit on RG-244, do you have any specific questions? Have you contacted Mr. McConchie of the Australian Paper Manufacturers?

Hope this information is valuable to you - please let me know if we can be of further assistance.

Very truly yours,


John L. Myers
Marketing Manager

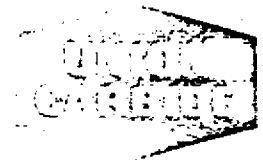
Enclosures: SPE-RETEC
CIBA/GEIGY-UK Health
WHO Report
Safe Use of RG-244
Dr. Wright Test and Dr. McDonald Test
NAS Summary
QAMA
Sampling Equipment List

Enclosures
/ds

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File



ASBESTOS
UNION CARBIDE CORPORATION • MINING & METALS DIVISION • P.O. BOX 579 • NIAGARA FALLS, N. Y. 14302 • TEL: 716-278-3376

January 4, 1973

Mr. P. C. Weeks
Union Carbide Australia Ltd.
167-187 Kent Street
Sydney, N.S.W.
Australia

Dear Mr. Weeks:

This is in response to your TWX of January 3, 1973 relative to information on asbestos toxicology. The pyrogenic silica suppliers have engaged in the same kind of down-grading approach in this country, Japan, and Europe with very limited success. Several of their customers have asked them to put their allegations in writing; which, so far, they have declined to do. This has not helped their credibility; and at least in a few instances has turned customers to us.

It is difficult to present the whole picture of the asbestos toxicology controversy in a letter of reasonable length. We also do not know which particular questions have been emphasized. We have, therefore, provided information on the main questions that have come up. This information has been attached as a separate package. It is suggested, however, that you select from it only the parts needed to satisfy the customer rather than hand it out as is. This avoids raising questions which may not come up. The response to a Wall Street Journal article is enclosed for general information.

It may also be useful for you to know that Dr. H. B. Rhodes and Mr. B. L. Ingalls of this office met Warwick Williams and Graham Porter of Polymer Corporation last year at the SPI meeting in Washington. They spent considerable time with them. This year's meeting is in early February. If you would like us to meet with either of these gentlemen or their representative please let me know.

Assuming that I visit Australia the week of March 5th or 12, I would like to visit all customers who have toxicology questions. I will probably have the equipment necessary to obtain a limited amount of dust samples. You may want to schedule customer visits for this purpose.

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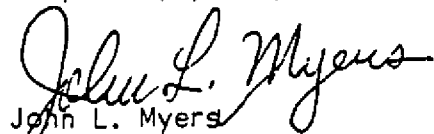
Mr. P. C. Weeks
Australia

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January 4, 1973

Look forward to seeing you in March.

Very truly yours,

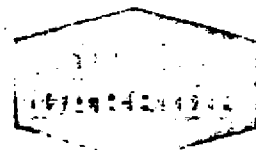
A handwritten signature in cursive script, reading "John L. Myers".

John L. Myers
Marketing Manager

/cvb
Attachments

A20737

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THE DISCOVERY COMPANY

UNION CARBIDE CORPORATION • MINING & METALS DIVISION • P.O. BOX 579 • NIAGARA FALLS, N. Y. 14302 • TEL: 716-278-3376

January 5, 1973

Mr. P. C. Weeks
Union Carbide Australia Limited
167-187 Kent Street
Sydney, N.S.W.
Australia

Dear Phil:

My apologies for not answering yours and Alan Etlinger's letters sooner. I have just returned to work after much travelling and vacation at the end of 1972.

A separate letter was sent yesterday to answer recent questions on asbestos toxicology. This letter should answer your other questions, or perhaps raise some more. Please be assured that my future replies will be more prompt.

From your letter -

Problem #3 - The lower viscosity build reported with RG-244 is not typical of our experience. Over-mixing is the most probable cause. We recommend about 1/2 the mixing cycle used for Aerosil.

Again, our normal experience shows that RG-244 tends to settle less than Aerosil at equivalent viscosities. Even though the 244-resin mixture is relatively clear, settling can be detected if it occurs.

Problem #4 - We do not have any data or experience on the replacement of Bentones in paint formulations. This restricts interest since most companies do not prefer to "try it and see".

We would not expect either RG-144 or RG-244 to be much better than a Bentone for "anti-flatting".

In general, either 144 or 244 can be used to replace any Bentone in epoxies and vinyl plastisols; 144 is, of course, the most economical. The greatest single advantage of 144 over Bentone is cost. We also believe it is incorporated easier, results in better stability and has less effect on adhesion.

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Mr. P. C. Weeks
Australia

-2-

January 5, 1973

Problem #5 - Tremco has purchased about 180M pounds split 50-50 of RG-244 and High Purity Open. We cannot discuss their formulations or applications except that they are generally in the sealant area.

In the "Calidria" Asbestos Manual enroute to you is an accumulation of "marketing information" concerning applications for RG-144 and RG-244. Our most important customers are polyester producers, sealant compounders and epoxy/coal tar compounders.

A copy of our sales report for October is enclosed so that you can see the customers we have for various products. The RG-144 and RG-244 literature sets are being sent to you. I would like to discuss other applications, such as waste treatment and rubber reinforcement, during my proposed visit in March.

Enclosed are copies of my correspondence with V. J. McConchie of the Australian Paper Manufacturers. Perhaps you could follow-up at your convenience.

We will copy you with pertinent call reports and other information to assist your marketing efforts. We appreciate your interest and cooperation and look forward to frequent correspondence.

Very truly yours,


John L. Myers
Marketing Manager

/cvb
Enclosures

A20739

UCC 007430



INTERNAL
CORRESPONDENCE

DAC/FILE

UNION CARBIDE CORPORATION P.O. BOX K, KING CITY, CA 93930
MINING AND METALS DIVISION

To (Name) R. E. Byrne, Jr.
Division Metals Division
Location Niagara Falls, NY
Area
Date October 11, 1982
Originating Dept.
Area
Copy to J. B. Rouse (w/o Regs.)
W. C. Thurber (w/o Regs.)
Subject EPA's Reporting Rule

Per our discussion in Atlanta, enclosed is a draft letter to notify your customers of the EPA's new reporting rule. Suggested enclosures are included.

You may want to confirm with Jim Rouse, but I think your distributors should send a similar letter to their customers. All "Calidria" users should then be covered. Except for the exemptions, persons who were primary or secondary processors in 1981 must report. I assume this excludes anyone whose initial use of asbestos was in 1982.

Jim & Bill - Please contact Bob by 10/22/82 if you have any comments, suggestions, etc.


John L. Myers
Product & Production Manager

/ljs

Encl:

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OCT 15 1982

UCC-CALIDRIA
MINING AND METALS DIVISION

A20730

UCC 007431

A S S I S T A N C E A L E R T ! — A S B E S T O S !

REPORTING COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS
UNDER THE TOXIC SUBSTANCES CONTROL ACT

DURING THE MONTH OF OCTOBER the Industry Assistance Office's toll-free telephone service will offer SAME DAY "WALK THROUGH" ASSISTANCE to help you complete the TSCA Asbestos reporting form.

This special "walk through" service will be available on TUESDAY AND THURSDAY in the AFTERNOON. It will operate in addition to our regular, continuing question-answering service. You may call anytime to ask for this special assistance. — you will be called back during Tuesday and Thursday afternoons. Or you may call direct on those afternoons. Anyone we don't get to on one day will be called back on the next day.

Reporting on the "short form" by secondary processors and importers of Asbestos mixtures and products is DUE OCTOBER 29th! Reporting on the "long form" by primary processors (who make Asbestos mixtures or repackage raw fiber), miners, millers and importers of bulk Asbestos is DUE NOVEMBER 29th!

The Industry Assistance TOLL-FREE TELEPHONE number is 800-424-9065. In Washington, call 554-1404.

September 14, 1982

A20701

A S S I S T A N C E A L E R T ! — A S B E S T O S !

REPORTING COMMERCIAL AND INDUSTRIAL USES OF ASBESTOS
UNDER THE TOXIC SUBSTANCES CONTROL ACT

SOME TIPS ON FILLING OUT THE REPORTING FORMS:

- #1 Please read the reporting instructions before trying to fill out the form.
- #2 Be sure and give the name of a technical contact and his telephone number.
- #3 Do NOT use trade names in place of generic names for Asbestos products and mixtures.
- #4 If you do not know the answer to an item, ONLY use the code UNK for "unknown". Do NOT use "0" or "?".
- #5 In giving quantities, ONLY use a NUMBER. Do NOT use any words. It is understood that some of your answers are estimates.
- #6 In reporting on products and mixtures, complete ALL the blanks in the line on the form, Put UNK, for unknown, where the information is not available.

September 14, 1982

IAO: 800-424-9065

A20702

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

Dear Miner, Miller, Importer or Processor of Asbestos:

On July 30, 1982, the Environmental Protection Agency (EPA) published a rule in the FEDERAL REGISTER (47 FR 33198-33225) requiring asbestos miners, millers, importers, and processors to report certain information on their industrial and commercial asbestos activities. EPA understands that you are engaged in some industrial or commercial activity involving asbestos. If that is not the case and you are not required to report under this rule, please notify EPA at the address below.

A description of who should report and what to report is found on page 33201 of the July 30, 1982 FEDERAL REGISTER; exemptions from reporting are described on page 33202. Note that all companies with 10 or fewer employees are exempt from reporting under this rule.

The rule requires that miners, millers, importers of bulk asbestos, or primary processors (processors of bulk or raw asbestos fiber) report all required information on EPA Form 7710-36 (4-page form) by November 29. Importers of asbestos-containing materials and articles and secondary processors (processors of asbestos-containing materials) are to report to EPA on Form 7710-37 (one-page form) by October 29. EPA will require a small number of importers and secondary processors of asbestos to file the more comprehensive form 7710-36 at a later date.

2.33213
FR Notice

To assist respondents in complying with the rule, we are enclosing a copy of the rule along with the appropriate forms and an instruction booklet for EPA Form 7710-36 entitled "Reporting Commercial and Industrial Uses of Asbestos." (Please note that on FEDERAL REGISTER page 33223 of the rule, the date "1980" on the instructions for EPA Form 7710-37 is incorrect; it should be "1981." A correction notice will be published shortly in the FEDERAL REGISTER.)

For further information or assistance, please contact the Industry Assistance Office (TS-799), Office of Toxic Substances, Environmental Protection Agency, Room E-511, 401 M Street, S.W., Washington, D.C. 20460. Phone toll free 800-424-9065. In Washington, D.C., call (202) 544-1404. Outside the Continental U.S., call operator 202-554-1404.

Sincerely yours,

RECEIVED

OCT 15 1982

UCC-CALIFORNIA
HIGHTS FALLS, N.Y.

A20793

Douglas G. Bannerman
Acting Director
Industry Assistance Office

UCC 007434