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Pfizer MINERALS, PIGMENTS & METALS DIVISION

PFIZER INC., 235 E. 42ND ST NEW YORK, N. Y. 10017

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MAR 7 1977
D. E. D.

February 9, 1977

Mr. D.L. Engle
Plant Manager
Union Carbide Corp.
P.O. Box 471
Texas City, Texas 77590

Dear Mr. Engle:

In recent months there has been increasing interest in the subject of talc, particularly with regard to the nature and extent of its asbestos content. Since you are one of our many valued talc purchasers, we feel you should be aware of important information on this subject.

The Occupational Safety and Health Administration (OSHA) currently has in effect an asbestos standard which prescribes that employees may be exposed to no more than 2 asbestos fibers per cubic centimeter of air for an 8-hour time-weighted average, and to no more than 10 asbestos fibers per cubic centimeter at any time. In October, 1975, OSHA proposed to lower the 8-hour time-weighted limit to 0.5 asbestos fibers per cc. and 5 asbestos fibers per cc. for any period not exceeding 15 minutes. Very recently it has been reported that the National Institute for Occupational Safety and Health has recommended the respective permitted exposure levels be limited even further - to 0.1 asbestos fibers and 0.5 asbestos fibers per cc.

In its' October, 1975 proposal, OSHA defines asbestos to include chrysotile, amosite, crocidolite, tremolite, anthophyllite and actinolite, and every product containing any of these minerals. OSHA also defines an asbestos fiber as a particulate form of any of these minerals which is longer than 5 micrometers, and has a maximum diameter of 5 micrometers and a length to width ratio of at least 3 to 1.

PLAINTIFF'S EXHIBIT UC-1125

UCTC 17183

The reason for the proposed revision of the standard for occupational exposure to asbestos is that asbestos, in its several commercial forms, has been associated with the production of not only asbestosis but a variety of cancers and malignancies. Because of the many unknown factors, including the variability of individual response to carcinogens and the absence of data to establish a safe level, OSHA has concluded that employee exposure must be reduced as low as is feasible. OSHA proposes to hold hearings on the entire subject, but until those hearings and subsequent deliberations take place there will continue to be considerable uncertainty.

Nevertheless it is prudent for your workers, while using any talc which might contain asbestos fibers, to avoid creating dust to the extent possible. Monitoring procedures should be employed to determine dust concentrations under working conditions. Where appropriate, dust control equipment or use of respirators should also be considered, and worker training programs implemented. You will no doubt wish to review the various provisions of the OSHA standard for occupational exposure to asbestos (29 Code of Federal Regulations 1910.1001) and the proposed amendments which appeared in the October 9, 1975 issue of the Federal Register.

Since we have no control over the conditions of use of talc products in your plant, it is not possible for us to indicate the airborne fiber concentrations which could possibly result from your use of talc. However, we can provide information on the asbestiform mineral content of the talcs we supply.

Pfizer research has developed the most accurate and sensitive method available today of analyzing for asbestos and asbestiform minerals in talc. This method, based on step scanning x-ray diffraction, electron diffraction, and transmission electron microscopy, permits identification of true chrysotile asbestos at levels of 0.5% and fibrous amphiboles, such as tremolite, at levels as low as 0.1% in the talc. No other identification methods in use today, including optical microscopy and scanning electron microscopy, are as sensitive and as direct.

Pfizer routinely monitors its' talc production, using this sensitive methodology. Based on many months of evaluation, we can state that:

> The California CP talcs which you purchase normally contain between 1% and 5% total tremolite with a fiber content of less than 0.1% by weight (the practical detection limit of the analytical method).
>
> The Montana MP talcs which you purchase contain no detectable quantities of tremolite or any of the asbestiform minerals. Thus, you can employ these MP talcs with full assurance that you are fully in compliance with the OSHA asbestos worker exposure standard.

We believe that it is in your best interests and ours that information on this subject be brought to your attention. We trust you will find this letter useful, and that you will follow the OSHA hearings and other developments as they occur. We will continue to monitor these hearings and try to keep you aware of significant developments. If you have any questions, please do not hesitate to contact us.

Very truly yours,

J.P. Bartels
President

JPB:sp

UCTC 17185

UNION CARBIDE

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

P. O. BOX 471, TEXAS CITY, TEXAS 77590

TO (NAME) Mr. D. E. Deese
COMPANY
LOCATION TEXAS CITY PLANT

DATE August 13, 1976

J. W. Reesby is working w/ Do on studying this problem JLC 9/22

COPY TO E. W. Perry - 515
J. W. Reesby - 515
H. C. Reading - 515

SUBJECT Asbestos Material in Stores

Please find on the attached list the item code number, location, and description of the asbestos items presently carried in stores inventory. Also, please advise what procedures should be followed in receiving, storing, issuing, and packaging these items to meet all regulations pertaining to asbestos.

We have one estimated cost for placing spiral wound asbestos gaskets in polybags.

Your earliest reply will be appreciated.

J. L. Christensen
Plant Purchasing

JLC/dls

Attachment

Bldg 6 Main Store Room

UCTC 17186

ASBESTOS MATERIAL IN STORES

CODE NUMBER	LOCATION	DESCRIPTION
		UPSTAIRS
63330-175	SAC 477	Asbestos Mittens
28786-410	SAC 511	Asbestos Mittens 3/8" J.M. Packing
28786-177	SAC 507	Asbestos Mittens 1/8" Garlock #5077 Packing
28786-178	SAC 507	Asbestos Mittens 3/16" Garlock #5077 Packing
28786-192	SAC 507	Asbestos Mittens 5/8" Garlock #5077 Packing
28803-050	SAC 514	1/8" x 1" W. Braided Asbestos Tape
36198-045	SAC 584	1/16" Thick x 36" Asbestos Paper
36198-065	SAC 584	1/8" Thick x 36" Asbestos Paper
28786-290	SAC 584	1" Asbestos Rope
28786-022	SAC 584	1/2" Asbestos Rope
28786-020	SAC 584	3/8" Asbestos Rope
		DOWNSTAIRS
18423-068	SAC 017	.025" Thick Tape X 1" Wide
18423-065	SAC 017	.015" Thick Tape X 3/4" Wide
18424-017	SAC 017	1/8" Asbestos Tubing
28416-026	SAC 020A	16-3/4" x 19-5/8" Flex. Gasket
28416-027	SAC 020A	17" x 18-1/4" Flex. Gasket
28187-540	SAC 020B	
28416-140	SAC 020B	11-3/8" x 12-3/4" S. S. Flex. Gasket
28416-028	SAC 020B	19-1/4" x 20-1/4" S.S. Flex. Gasket
28416-155	SAC 020B	21-3/4" x 2-3/36" Flex. Gasket
28416-029	SAC 020B	24-1/4" x 26-1/4" Flex. Gasket
28360-126	SAC 020C	8-1/4" x 10-7/8" Asbestos Filled Corrugated Gasket
28416-025	SAC 020D	12" X 16-3/4" Asbestos Filled Manhole Gasket
28424-225	SAC 020E	3/4" Ser. 15 Asbestos Filled Gasket
28424-227	SAC 020E	1" Ser. 15 Asbestos Filled Gasket
28424-229	SAC 020E	1-1/2" Ser. 15 Asbestos Filled Gasket
28424-230	SAC 020E	2" Ser. 15 Asbestos Filled Gasket
28424-232	SAC 020E	3" Ser. 15 Asbestos Filled Gasket
28424-237	SAC 020E	6" Ser. 15 Asbestos Filled Gasket
28424-234	SAC 020E	4" Ser. 15 Asbestos Filled Gasket
28424-238	SAC 020E	8" Ser. 15 Asbestos Filled Gasket
28424-239	SAC 020E	10" Ser. 15 Asbestos Filled Gasket
28424-240	SAC 020E	12" Ser. 15 Asbestos Filled Gasket
24824-241	SAC 020E	14" Ser. 15 Asbestos Filled Gasket
28424-242	SAC 020E	16" Ser. 15 Asbestos Filled Gasket
28424-243	SAC 020E	18" Ser. 15 Asbestos Filled Gasket
28424-244	SAC 020E	20" Ser. 15 Asbestos Filled Gasket
28051-435	SAC 020E	25-3/4" X 27-1/2" Asbestos Filled Gasket
	SAC 020F	
28424-346	SAC 020 Top of Bin	24" 300# Asbestos Filled Gasket
28424-094	SAC 020 Top of Bin	24" 900# Asbestos Filled Gasket

CODE NUMBER	LOCATION	DESCRIPTION
		DOWNSTAIRS
28424-025	SAC 020F	1/2" 3-4-600# Asbestos Filled Gasket
28424-030	SAC 020F	3/4" 3-4-600# Asbestos Filled Gasket
28424-035	SAC 020F	1" 3-4-600# Asbestos Filled Gasket
28424-324	SAC 020F	1-1/4" 3-4-600# Asbestos Filled Gasket
28424-040	SAC 020F	1-1/2" 3-4-600# Asbestos Filled Gasket
28424-045	SAC 020F	2" 3-4-600# Asbestos Filled Gasket
28424-048	SAC 020F	2-1/2" 3-4-600# Asbestos Filled Gasket
28424-050	SAC 020F	3" 3-4-600# Asbestos Filled Gasket
28424-334	SAC 020F	4" Ser. 30 Asbestos Filled Gasket
28424-337	SAC 020F	6" Ser. 30 Asbestos Filled Gasket
28424-338	SAC 020F	8" Ser. 30 Asbestos Filled Gasket
28424-339	SAC 020F	10" Ser. 30 Asbestos Filled Gasket
28424-340	SAC 020F	12" Ser. 30 Asbestos Filled Gasket
28424-341	SAC 020F	14" Ser. 30 Asbestos Filled Gasket
28424-342	SAC 020F	16" Ser. 30 Asbestos Filled Gasket
28424-343	SAC 020F	18" Ser. 30 Asbestos Filled Gasket
28416-040	SAC 020F	19-5/8" x 21-1/8" Flex. Asbestos Filled Gasket
28424-055	SAC 020G	4" Ser. 60 Asbestos Filled Gasket
28424-060	SAC 020G	6" Ser. 60 Asbestos Filled Gasket
28424-064	SAC 020G	8" Ser. 60 Asbestos Filled Gasket
28424-066	SAC 020G	12" Ser. 60 Asbestos Filled Gasket
28424-071	SAC 020G	14" Ser. 60 Asbestos Filled Gasket
28424-076	SAC 020G	1/2" 9-1500 Asbestos Filled Gasket
28424-101	SAC 020G	3/4" 9-1500 Asbestos Filled Gasket
28424-102	SAC 020G	1" 9-1500 Asbestos Filled Gasket
28424-103	SAC 020G	1-1/2" 9-1500 Asbestos Filled Gasket
28424-104	SAC 020G	2" 9-1500 Asbestos Filled Gasket
28424-082	SAC 020G	3" Ser. 90 Asbestos Filled Gasket
28424-083	SAC 020G	4" Ser. 90 Asbestos Filled Gasket
28051-400	SAC 020G	W. R. 2-1/2 9-1500# Asbestos Filled Gasket
28424-084	SAC 020G	6" Ser. 90 Asbestos Filled Gasket
28424-085	SAC 020G	8" Ser. 90 Asbestos Filled Gasket
28424-125	SAC 020G	3" Ser. 1500 Asbestos Filled Gasket
28424-126	SAC 020G	4" Ser. 1500 Asbestos Filled Gasket
28424-128	SAC 020G	6" Ser. 1500 Asbestos Filled Gasket
28424-112	SAC 020G	10" Ser. 9-1500 Asbestos Filled Gasket
28424-089	SAC 020G	12" Ser. 90 Asbestos Filled Gasket
28424-091	SAC 020G	16" Ser. 90 Asbestos Filled Gasket
28424-090	SAC 020G	14" Ser. 90 Asbestos Filled Gasket
28424-092	SAC 020G	18" Ser. 90 Asbestos Filled Gasket
28424-093	SAC 020G	20" Ser. 90 Asbestos Filled Gasket
28424-065	SAC 020H	10" Ser. 60 Asbestos Filled Gasket
28424-130	SAC 020H	8" Ser. 1500 Asbestos Filled Gasket