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May 26, 1972

Dr. Joseph K. Wagoner, ScD
 Director, Division of Field Studies & Clinical
 Investigations
 National Institute of Occupational Safety & Health
 550 Main Street
 Cincinnati, Ohio 45202

Dear Joe:

From the presentation made by you and Bill Johnson at the AIHA Conference last week, it appears to me that NIOSH is grasping at straws and will stoop to almost any level in its efforts to implicate Chrysotile as a major causative agent of asbestos related carcinogenic disease. While your representation of our Mannheim operation as a plant processing practically only Chrysotile is correct insofar as present and recent past conditions are concerned, it certainly is not the case in regard to exposures that occurred in this plant during the early 1940's, particularly during World War II.

Consumption of Amosite fibre at Mannheim from 1941 through 1944 averaged approximately 750,000 pounds per year almost all of which went into products that involved a major proportion of relatively dirty manual fabrication and handling. Much of this was done under high priority on defense contracts for the U. S. Navy. The product was a special woven Amosite heat insulating blanket or Mattress for high pressure steam equipment aboard Naval vessels. Amosite was used in spite of its greater dust producing potential because Chrysotile asbestos was in short supply and could not be obtained in the quantities needed for this high volume high priority requirement.

Operations involved blending and opening of the bulk Amosite fibre in our Preparing department, followed by carding into heavy roving or wick. The wick thus produced was then woven in combination with Chrysotile yarn on a special hand loom in our Tape Weaving department to produce a continuous blanket approximately 30 inches wide. This material then was manually handled and fabricated into custom shaped insulation Mattresses in which the Amosite was encased inside layers of regular Chrysotile cloth for mechanical protection. This was a very dusty job requiring a great deal of handwork, some of which was performed by women.

Due to its high bulk, the finished product required special packaging, which also had to be done manually. All the operations involved were considered to be significantly dustier than typical operations within our plant. Fortunately, all were terminated in 1945, although the equipment remained installed and was used to produce a few job lot orders in 1946 and 1947.

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Dr. Wagoner
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Since significant quantities of Amosite were processed in at least four major operating areas of the Manheim plant (Preparation, Carding, Weaving, and Packing) during the years 1941 through 1945, I must take severe exception to the statements made in Dr. Johnson's presentation to the effect that the mortality figures given represent results of exposure practically only to Chrysotile. It is entirely possible that most, if not all, of any excess mortality that appears in the records of Manheim employees from approximately 1950 on might be attributed to Amosite exposure that occurred in the aforementioned insulation blanket production operations.

In addition to this Amosite application, sometime prior to 1940 through 1970 Manheim produced a special Amosite insulating tape on an intermittent basis. While this product involved only about 1000 pounds of Amosite per year, the exposure while processing this material might be considered significant by some people. Most of the work involved was quieter than Manheim's normal operations are.

Cruciolite also has been processed. From 1939 through 1967 estimated production of blue asbestos packing averaged between 7500 and 8000 pounds per year and reached peak levels of up to 10,000 pounds per year. This, too, was considered to be an excessively dusty operation, and when efforts to control the dust were unsuccessful, Manheim management chose to discontinue the major part of this product line to eliminate worker complaints and reduce exposure.

I believe this sets the record straight, and I certainly hope that you and your associates will see fit to revise the NIOSH paper on mortality patterns among asbestos textile workers based on our Manheim plant so that these results are not represented as involving exposure only to Chrysotile in the future. I think it is deplorable that this implication already has been given such wide circulation as was afforded by presentation at the conference in San Francisco, but suppose it is too late to do much to amend that now.

Please be assured of our desire and intention to continue to cooperate in NIOSH's on-going studies regarding asbestos and related health hazards. We recognize the extreme need for prompt completion of this work and are anxious to do whatever we can in order to help expedite the program. However, at the same time we consider it absolutely essential that the studies include all facts and elements that might be of significance in arriving at the final conclusion. Otherwise, actions taken on the basis of these studies cannot accurately serve the best interests of the public.

Sincerely yours,

I. H. Weaver
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cc: Messrs. Gainer
Daly
Marsh