FILE NAME: DAP (DAP)

DATE: 1978 June 5

DOC#: DAP105

DOCUMENT DESCRIPTION: US Dept of Labor Letter to DAP with Summary of Analysis of RTV Talc Samples

U.S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
CINCINNATI AREA OFFICE REGION V
FEDERAL OFFICE BUILDING, ROOM 4028
550 MAIN STREET
CINCINNATI, OHIO 45202

June 5, 1978

Mr. Wayne Gramke
Plant Manager
D.A.P. Incorporated
5300 Huberville Road
Dayton, Ohio 45401

Dear Mr. Gramke:

Enclosed is a summary of the results of the air and bulk samples collected during the calk production operation by the Butyl-flex and 205 machines on April 4, 1978. In the process sampled, IT 3X Talc from R.T. Vanderbilt is used in a calk manufacturing process to keep rubber dry and to keep it from reuniting after rubber blocks are ground up in a hog in the initial stage of the process.

The talc bulk sample analyzed contained 0.6% asbestos, (including anthophyllits and tremolite asbestos), and the air samples contained from 0.1 to 0.6 fibers/cc (total fibers - asbestos, talc, and other fibers). The laboratory was able to confirm the presence of asbestos in the bulk and on each of the samples collected.

While the asbestos levels at the time of the inspection were considerably below the current federal standards, it should be noted that a standard of 2 fibers per cubic centimeter as an 8 hour average was written to protect workers from the long range development of asbestosis. It was not designed for protection from the carcinogenic effects of asbestosis.

Current studies indicate a definite relationship between exposure to airborne asbestos and an increased incidence of lung cancer, pleural mesothelioma, and peritoneal mesothelioma. "Safe levels of exposure" have not been established to prevent the occurence of such occupational diseases. The National Institute for Occupational Safety and Health has recommended that the eight hour asbestos average be reduced to 0.1 fibers/cc and that the peak concentrations not exceed 0.5 fibers/cc based on a 15-minute sample period. (DHEW Publication No. 77-169, "Revised Recommended Asbestos Standard") This recent recommendation

is intended to protect against the noncarcinogenic effects of asbestos, and to reduce the risk of asbestos-induced cancer. There is no assurance of protection against the carcinogenic effects of asbestos at these levels.

A better understanding of exposure to asbestos fibers in your plant be had when asbestos levels are considered in terms of the number of fibers being inhaled by workers rather than a number of fibers per unit of air. For example, a background level of 0.025 fibers/ cubic centimeter becomes 250,000 fibers breathed per day based on an average worker breathing 10 cubic meters of air per day. Extrapolating further, this would result in a yearly exposure of approximately 60 million fibers. Clearly, low fiber/cc levels result in significant asbestos exposure to employees.

Although the asbestos samples taken did not exceed the 8-hour time weighted average or ceiling concentration, every effort should be made to control excaping fibers at their sources so employee exposures can be kept to a minimum. This may require further study and modification of your environmental controls or changes in handling procedures.

Section 1910.1001 of the OSHA standards covers the use of asbestos in workplaces where asbestos fibers are released. There are also requirements for waste disposal, personal and area monitoring, caution signs and labels, and work practices that must be met when asbestos is used.

Having brought these items to your attention, we anticipate your fullest cooperation in improving conditions for all concerned. If you have any questions regarding the sample results or the asbestos standard, please feel free to call our office (684-2354).

Sincerely,

Stephen Messinger
Industrial Hygienist

SM:pmo
encl.