PLAINTIFF'S EXHIBIT
UC-3899

UNION CARBIDE

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November 21, 1978

Mr. Ron Rinaldi
Executive Officer
CAL-OSHA Standards Board
1006 - Fourth Street
Sacramento, CA 95814

Dear Mr. Rinaldi:

Enclosed are two additional items to supplement the testimony submitted by Dr. Harrison B. Rhodes on behalf of Union Carbide Corporation for the November 8th Hearing of the Standards Board to consider changes in the Health and Safety Code, Section 25910.

One of the enclosures provides considerable additional data obtained by Union Carbide from the cooperative sandblasting test at Corona, California. This test was reported by DOSHA as Appendix B of Mr. Heacock's letter dated October 30, 1978 to the Standards Board.

The other enclosure is an abstract of a journal publication involving a study of asbestos fiber release during the grinding of thermoset resins. The resins contained up to 18% by weight chrysotile asbestos.

These enclosures provide further support for our position stated at the Hearing that:

1. Products containing asbestos fibers which are wetted and encapsulated by a suitable binder do not release quantities of airborne asbestos fibers in excess of current standards.

2. The amount of fibers released is not related to the asbestos content as long as the fibers are wetted and encapsulated.

3. Exterior and interior coatings and laminating resins containing encapsulated asbestos fibers bound within the finished product from manufacture through application, and asphalt roof coatings, should be exempted from the spraying prohibition.

With respect to the qualifications of Dr. Rhodes as an expert witness, you should be aware that his educational background is chemical engineering and that he holds the Doctor of Engineering Science degree from Columbia University. He has been involved with air monitoring for asbestos fibers for about five years and is considered somewhat of an expert in this field, both nationally and internationally. He has participated in international

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