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Binder Development Program



This memo is a general discussion of some aspects of the Binder Development Program. It covers the areas of background, binder objectives, trials and testing.

I. Background

→ { The current OSHA Standard requires product labeling where a manufacturing plant is found to have employee exposures to airborne fiber concentrations in excess of the current tolerance level. Following an OSHA inspection in January 1976 of the Omaha expanding plant we are now under citation for not labeling our product. We have until December 30, 1976 to either bring the Omaha plant fiber concentrations below the tolerance level, show why we should not label product, or commence labeling of product.

→ { It is believed that product labeling would have a serious, adverse, and irreversible effect upon customer acceptance of our products. The current OSHA Standard specifies that OSHA will accept the addition of a binder as being one method of removing the product labeling requirement. It is understood that OSHA will also accept data from air sampling of representative product usage if that data shows user exposures below current tolerance levels. It is possible that binder modifications might be made part of the standard formula for some products, irrespective of OSHA labeling requirements.

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- g. Take one 15 minute air sample at remote pipe stand, (door closed).
- h. Terminating above sample, leave door open and activate exhaust fan until visible dust gone
- i. dispose of test material and vacuum test facility, retaining other half (5 bags) of trial material until after fiber counts have been taken.

RHLocke/cj

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