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KENNETH M. MORSE
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United States Steel Corporation
600 GRANT STREET
PITTSBURGH, PENNSYLVANIA 15230

July 11, 1972

Mr. E. J. Jago
Commercial Development Manager
Steel Mill Products Division
Foseco, Inc.
P. O. Box 8728
Cleveland, Ohio 44135

Dear Mr. Jago:

This is to acknowledge with appreciation your letter of May 24 in which you have indicated the asbestos content of your Profax-31 and Proflex G-3 which are used as hot tops in several of our mills.

You indicate that after heating 2000° F., the residual asbestos fiber content will be below 2% in the case of Profax-31 and below 5% in the case of Proflex G-3 and that the former value is well within OSHA limits. As you are no doubt aware, OSHA promulgated a permanent health standard for asbestos dust which was published in the Federal Register of June 7, 1972. No mention is made in this standard, as far as I can observe, about any delineation between a safe and hazardous percentage of asbestos in a material. As a matter of fact, asbestos fibers are defined as any asbestos which is longer than 5 microns in size and under the section on Labeling, cautionary labels must be affixed to all raw materials and products containing asbestos fibers unless the fibers have been modified by a bonding agent, coating, binder or other material so that during any reasonable foreseeable use, airborne concentrations in each of the exposure limits will not be released. Therefore, the use of your two indicated hot tops will require that the dust exposure of the workers utilizing these must be periodically determined. This asbestos standard is in my opinion so restrictive that it will probably result in the substitution of asbestos in various products in which it is today used.

Again, thank you for your information.

Sincerely yours,

Kenneth M. Morse

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