



WHITTAKER, CLARK & DANIELS, INC.

1000 COOLIDGE STREET

SOUTH PLAINFIELD, N.J. 07080

(201) 561-6100

July 20, 1971

Mr. Frank S. Bilton
Director of Purchases
Foseco, Inc.
P. O. Box 8728
Cleveland, Ohio 44135

Dear Mr. Bilton:

This will acknowledge receipt of your letter to us of July 7, 1971, concerning the Occupational Safety and Health Act, we have reviewed this with our Washington attorney and he advises as follows.

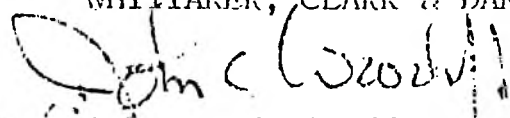
There is no provision in the O.S.H.A. or its implementing regulations which requires labels such as you described.

The O.S.H.A. was passed December 29, 1970 and became effective April 28, 1971. It empowers the Secretary of Labor to promulgate safety and health standards for all industries in the United States. These standards, when promulgated, are applicable to every employer in the industry, if his output "affects commerce." We are advised this is aimed mainly at, what we call, "hazardous materials." There are not, at this time, specific standards for the chemical manufacturers.

In that our products do not come under the general heading of "hazardous materials", we feel this regulation does not apply to our area of commerce. We are in touch with these things as they develop and should there be any significant changes, we will certainly advise you of same.

Sincerely yours,

WHITTAKER, CLARK & DANIELS, INC.


John C. Woodruff
National Sales Manager

JCW:jr
cc: Palmer Supplies Company
Cleveland, Ohio

PLAINTIFF'S
EXHIBIT
WCD-235