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UNION CARBIDE

INTERNAL CORRESPONDENCE

METALS DIVISION

P.O. BOX 579 - 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 14302

To (Name) Mr. R. L. Folkman
Division UCC Metals
Location 38th Floor
New York, NY 10017

Date January 4, 1977

Originating Dept. "Calidria" Asbestos

Answering letter date

Subject Asbestos Exposure

Copy to Messrs. R. E. Byrne, Jr.
J. L. Myers
R. L. Schult
W. C. Thurber
File

Dear Bob:

This is in response to your letter of December 28, 1976 regarding the recent NIOSH statement on asbestos. It is a complex question to cover in brief and I leave it to your discretion as to whether you wish to transmit this entire letter or just the last two paragraphs to Mr. Kroft.

On October 9, 1975 OSHA published a proposed rulemaking on asbestos which recommended allowable exposure limits of 0.5 fibers/cc average and 5 fibers/cc ceiling. This recommendation was based on the hypothesis that asbestos is a carcinogen, that the only completely safe exposure to a carcinogen is no exposure at all, and that the 0.5 fiber level was the lowest level that was feasible to attain. (OSHA is constrained by statute to consider the feasibility of any standards they propose but this is not an overriding consideration when worker health may be in jeopardy.)

The NIOSH statement follows the same line of reasoning but goes even further in alleging that 0.1 fiber/cc is feasible and where it cannot be achieved asbestos should be phased out. It is important to realize that the NIOSH document is advisory and OSHA may accept or reject any part of it as they choose.

The "one-hit" or "no safe level" theory of carcinogenisis that serves as the basis for these proposals is new and very controversial. The industry position, supported by their medical consultants, is that the current 2 fibers/cc is an appropriate exposure level with a reasonable margin of safety. It had been hoped that some compromise between 0.5 and 2 could be achieved. The NIOSH position makes this more difficult. The industry is making a well organized presentation of their view, but it is impossible to guess what the final standard will be.

At the present time, our King City plant is generally meeting the 2 fiber level and with particular attention to housekeeping, can probably achieve levels down to about 1 fiber/cc. For levels significantly below 1 fiber/cc, it would probably be necessary to move the ore pile, install additional vacuum equipment, and make wider use of respirators to achieve compliance.

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The most critical impact of a very low standard would be on our customers who manufacture asbestos-containing products and most particularly on the great diversity of ultimate users of these products. A standard 0.1 fiber/cc could force many of them to turn to alternative products.

Very truly yours,

H. B. Rhodes

H. B. Rhodes

HBR:cjb

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UNION CARBIDE

INTERNAL CORRESPONDENCE

METALS DIVISION

270 PARK AVENUE, NEW YORK, NEW YORK 10017

To (Name) Dr. H. B. Rhodes
Division Metals Division
Location Niagara Falls, N. Y.
Floor Number

Copy to

Date December 28, 1976

Originating Dept.

Floor Number

Answering letter date

Subject Asbestos Exposure

Dear Harry:

Would you please write me a couple of paragraphs which I can transmit to Mr. Kroft regarding the attached. Something on both our marketplace and our operations would be appreciated.

Thanks.

Very truly yours,

Bob

R. L. Folkman

RLF:hk

Att.

C.C. JLM
RLS
W.C.T.
REM

{ ← John:
as you requested.
H.B.R
1/4/76

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