FILE NAME: Montello (MNT)

DATE: 1975 Oct 2

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DOCUMENT DESCRIPTION: Letter RE Information of Super Visbestos in the Drilling Industry

October 2, 1975



Mr. Tom Littrell
Magcobar Oilfield Products Division
Dresser Industries, Inc.
2601 Northwest Expressway
Suite 601
Oklahoma City, Oklahoma 73112

Dear Mr. Littrell:

Thanks for your time by telephone yesterday. The purpose of this letter is to offer information which we hope will be useful to you, regarding the application of our Super Visbestos in the drilling industry.

COPY

A file folder is enclosed which includes double copies of the following:

1. A resume of the monitoring tests performed during the fall of 1972.
2. A one sheet flyer which recaps the major points concerning those tests.
3. Three separate sets of monitoring test results run in March of this year out of Woodward, Okla. (A representative from Dresser-Safety in Houston participated.)
4. A citation form covering monitoring tests in Utah, where no excess fiber counts were detected.

The problem you describe apparently stems from a flurry of inspections during November, 1974, in West Texas and the Panhandle. The compliance officers were operating out of the Lubbock area OSHA office. Small citations were levied for non-posting of caution signs, however no monitoring was performed. Our feeling was that the citations were improper, since signs are only required in areas "containing excessive airborne concentrations of asbestos fibers". We do not believe it is possible to ascertain whether such an excess exists, without monitoring tests. Further, our years of experience in such testing have failed to produce evidence of such excesses in drilling operations.

Following the incidents in November, 1974, we pursued the matter through the Oklahoma Area office in Tulsa to the Regional office in Dallas. The result was indecisive, with the exception of two points:

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1. In their response to us, OSHA stated that the compliance officer's judgement must be backed up with documentation, in such cases. (No documentation of any kind was produced in the November citations, as far as we are aware.)

2. The inspectors have, to our knowledge, issued no further citations to users of Super Visbestos in that area since the November flurry.

As to the question of citations when using Super Visbestos, we know of no instance in the U.S. where any have been issued on the basis of excess fiber counts documented by monitoring as specified in the regulations. These regulations have now been in effect for over three years. (The form from Utah is an example of monitoring which failed to reveal any excess fiber counts.)

As to the question of the health hazard when using Super Visbestos, our field monitoring data indicates a safety margin of approximately 5 to 1 in complying with the regulations. This safety margin, the sporadic and short time exposures of personnel, the relatively open air work place, and the small poundages required, are all plusses for the safe use of Super Visbestos. We believe there is no reasonable expectation of exceeding the regulations when using Super Visbestos.

Please let us know if you have further questions, or whenever we can be of service in any way. We appreciate your business and will look forward to supplying you again soon.

Sincerely,

MONTELLO, INC.

Kenneth N. Campbell

KNC/wj

Encl (folder)

cc: Mr. H. R. Moseley, Jr.

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