

August 1, 1972

Mr. Kenneth M. Morse
Director-Environmental Health
UNITED STATES STEEL CORPORATION
600 Grant Street
Pittsburgh, Pennsylvania 15230

RE: Profax® 31 and Proflex* G-3

Dear Mr. Morse:

I thank you for your letter of July 11th in which you discussed the revised regulations, dated June 7, 1972, concerning asbestos.

This regulation as published did differ from the draft which we had been privileged to see. The differences were somewhat of a shock to us as we fully expected bonded products containing less than 5% to be exempt from the "caution" statement.

We believe that Profax® 31 will not constitute a problem as the material is low in asbestos and sufficient binder is present to restrict dusting during handling. Exposure to molten steel will modify the crystal structure sufficiently to eliminate problems at later stages in your operation. This product will not therefore require labeling.

Proflex* currently has a higher asbestos content than does Profax® and the resin level is lower. This product will be labled if tests now being conducted indicate that the resin level is insufficient to encapsulate the fiber.

We are continuing our efforts to eliminate asbestos from the products but at present have not been able to reproduce the very important properties imparted by this mineral when using less innocuous materials. As we make progress, I will see that you are kept informed.

Sincerely yours,

POSECO, INC.

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E. J. Jago
Commercial Development Manager