



INTERNAL CORRESPONDENCE

JAN 26 1979

UCC 009142

METALS DIVISION

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To (Name) Mr. S. Hoffman
Division UCC-Law Dept.
Location 46th Floor
270 Park Avenue
New York, NY 10017

Date January 24, 1979
Originating Dept. "Calidria" Asbestos
Answering letter date

Copy to Messrs. G. R. Adams
T. R. Alexander
R. E. Byrne, Jr.
R. F. X. Fusaro
W. G. Kahler
H. B. Rhodes
E. W. Shortridge
F. J. Shortsleeve

Subject DOT Docket HM-180

File

All of the addressees of this letter have received copies of Dr. Rhodes' letter to me dated 1/17/79. His letter describes why we did not individually respond to the DOT proposal of 3/2/78.

This letter will cover items 2 and 3 of Harry's letter. I understand that Mr. Shortridge will respond concerning item 4.

With regard to item 3, attached is a summary of packaging and shipping information and more detailed information about export packaging. The way we package our products is largely dependent on the type and form of asbestos we produce in our processing plant in King City, CA. Our chrysotile asbestos ore is mined from a deposit located about 55 road miles east of King City. The deposit is in a remote mountainous area at an elevation of 4000 feet. The plant elevation is about 400 feet above sea level. The deposit is a very unique one in that the asbestos ore is in flakes and chunks at 50-60% fiber, not found as veins in serpentine rock at 6-10% fiber as typified by Canadian deposits. We use conventional strip-mining techniques and screen the ore to 1" x Down prior to hauling it to the plant. The ore is also unique in that it is all short fiber asbestos, similar to Canadian Grade 7 which is a by-product or refuse from their production of higher priced longer fibers. Our products are not capable of being used in conventional applications such as insulation, cement products and brake linings.

The ore deposit is mined by one other asbestos producer, Atlas Asbestos Company of Coalinga, CA. Their plant is located on the mine site and uses conventional dry processing. They produce an essentially unrefined product used almost exclusively in vinyl asbestos floor tile. Atlas, as well as Canadian producers, can make "blocks" of their "open" asbestos fibers and slip the compacted asbestos into plastic or paper bags which can be heat-sealed, sewn, or closed in some other fashion to provide "non-rigid packagings that are dust and sift-proof."

At King City, we use hydraulic beneficiation to process the unique Coalinga ore into unique products, many of which are not used in typical asbestos applications. Our products vary widely in purity, price, and physical properties. They range from Standard Grade products in pellet form (Bulk price \$100/T) to Resin Grade products, such as RG-244 in open-fiber form at \$2200/T. SG-104 (Bulk pellets) is slightly more refined than Atlas products and has a bulk density of about 50 lbs./ft.³. RG-244 is a super-refined asbestos fiber with a surface coating of SiO₂ and a packaged bulk density of 5 lbs./ft.³. Prior to pressure packing, the bulk density of RG-244 is 1-2 lbs./ft.³.

Based on prior plant experience (about 10 years ago), we cannot make blocks of our open fiber products. This is because the wet process gives us a product which has high purity, highly liberated fibers and associated entrainment of air. We experimented with a home-made block-maker and have not tried the commercial variety. We would anticipate a marketing problem with blocks because, in many applications, the customer would have trouble "re-fluffing" the asbestos so that it would disperse in his system. This would create a dusting problem at user locations. Dispersion of the block would be a particular problem in our "non-asbestos" type applications.

I am confident that we can develop packaging for our pellets that would meet the DOT requirements of dust and sift proof. Similar packaging for open fiber products would be more difficult to achieve.

As discussed in our meeting in New York on 1/3/79, we need relief from the new DOT regulations in several areas, or revisions, as follows:

1. Include a paragraph to specifically permit the transport of asbestos pellets in covered hopper cars and trucks.
2. We cannot presently guarantee that all of our non-rigid packages are dust and sift proof, although the amount of sifting does not cause air contamination in excess of current OSHA limits. We would need at least 12-18 months to develop and install new packaging equipment.
3. Can existing bag supplies be used after 4/30/79 even though they are not marked "Asbestos" ORM-C? What are the exact specifications for this wording?
4. The requirement for unitized pallets should not apply to closed freight containers, motor vehicles or railcars that are loaded by the consignor and unloaded by the consignee. This is especially true for ocean freight containers which can be much more securely loaded with loose bags. It is our opinion that the bags in a loose-loaded vehicle will arrive in better condition than those that are palletized.

I would appreciate comments from all concerned on this letter and Harry's letter mentioned earlier.

Please let me know if you require additional information before preparing a draft petition to the DOT.


John L. Myers

JLM:da1

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"CALIDRIA" ASBESTOS SHIPPING SUMMARY

<u>Product</u>	<u>(O)pen or (P)allets</u>	<u>Packaging</u>	<u>Pall.</u>	<u>Mode of Transport</u>	<u>Ware- Housed</u>	<u>Approx. TPY</u>	<u>Remarks</u>
SG-100(E)	P	50# Paper Bag	No	Container	No	1800	For export
SG-102(E)	P	100# Paper Bag	2500#	Container	No	1100	For export
SG-103	P	50 & 70# Plastic Bag	Yes	Container Rail/Truck	No	1500 300/2200	
SG-104	P	----	--	Bulk Hopper Car	No	10000	
SG-130	O	40# Paper Bag	2000#	Truck	No	800	
SG-130(E)	O	40# Paper Bag	No	Container	No	100	For export
SG-144	O	40# Paper Bag	2000#	Rail	No	200	
AS-200	P	50# Paper Bag	No	Container	No	1300	For export
SG-200	P	50# Paper Bag	2000#	Rail	No	400	
SG-210	O	35# Paper Bag	1400#	Rail Truck	Yes	500 300	
SG-210(E)	O	35# Paper Bag	1400#	Truck	No	100	For export to Canada
HPP	P	50# Paper Bag	2000#	Rail Truck	Yes	50 50	
HPP(E)	P	50# Paper Bag	No	Container	No	2400	For export
HPO	O	35# Paper Bag	1575#	Rail Truck	Yes	1000 300	
HPO(E)	O	35# Paper Bag	No	Container	No	700	For export
T-135-P(E)	P	50# Paper Bag	No	Container	No	200	For export
T-135-O(E)	O	40# Paper Bag	1600#	Truck	No	100	For export to Mexico
CG-135-P	P	50# Paper Bag	2000#	Truck	No	200	
RG-100	P	50# Paper Bag	2000#	Rail	Yes	200	
RG-110	O	35# Paper Bag	1400#	Rail	Yes	400	
RG-110(E)	O	35# Paper Bag	1400#	Container	No	200	For export
RG-144	O	35# Paper Bag	1400#	Rail Truck	Yes	200 300	
RG-144(E)	O	35# Paper Bag	No	Container	No	300	For export
RG-244	O	10# Paper Bag	400#	Rail Truck	Yes	300 300	
RG-244(E)	O	10# Paper Bag	No	Container	No	300	For export
SX-24(E)	O	11# Paper Bag	No	Container	No	400	For export
SX-14(E)	O	33# Paper Bag	No	Container	No	100	For export
VISB	O	50# Paper Bag	No	Rail Truck	Yes	300 100	
CSV	O	50# Paper Bag	No	Rail Truck	Yes	2000 600	
SHUR	O	50# Paper Bag	No	Rail	Yes	1000	

Containers	10400 TPY
Rail-Bulk	10000
Rail-Box	6850
Truck	5350
TOTAL	32600 TPY

- Notes: 1. Rail shipments to warehouses would be trucked to customers.
2. Rail shipments to Distributors would be trucked to customers.
3. The last three products listed are warehoused by our Distributor.
4. Essentially all paper bags are shrink-filmed - some are not due to customer request.
5. Some palletized shipments are shrink-wrapped at customer request.

/dal
1/18/79

EXPORT PRODUCT/PACKAGING SUMMARY
(Effective 1/1/79)

PRODUCT Name	Code	Bag Wt., lbs.		Bag Dimen., Inches	Bag Volume, ft. ³	Density, ft. ³ /T	Bags/Container (Normal)		Net Wt./Cont. (Normal)	
		Net	Gross				20'	40'	20'	40'
SG-100-EX	653901	50	51.5	23x15x5	1.000	40	750	--	37500	--
SG-101-EX	653801	40	41.5	24x16x5	1.111	56	770	--	30800	--
SG-102-EX	654901	100	101.5	27x18x8	2.250	45	--	430	--	43000
SG-103-EX		70	71.5	26x17x6	1.535	44	536	--	37520	--
SG-130-EX	654601	40	41.5	28x19x6	1.847	92	460	920	18400	36800
AS-200	655101	50	51.5	23x15x5	1.000	40	750	--	37500	--
HPP-EX	651701	50	51.5	24x16x5	1.111	44	750	--	37500	--
HP0-EX	651301	35	36.5	28x17x7	1.928	110	520	1040	18200	36400
T-135-P-EX	656401	50	51.5	24x16x5	1.111	44	750	--	37500	--
T-135-O-EX	656101	40	41.5	28x18x7	2.042	102	460	920	18400	36800
RG-110-EX	652201	35	36.5	28x19x7	2.155	123	460	920	16100	32200
RG-144-EX	652601	35	36.5	28x17x7	1.928	110	500	1000	17500	35000
RG-244-EX	653101	10	11.5	27x17x7	1.859	372	500	1000	5000	10000
SX-14	652701	33	34.5	27x19x6	1.781	108	460	920	15180	30360
SX-24	653201	11	12.5	27x18x7	1.969	358	460	920	5060	10120

JLM:da1
1/19/79