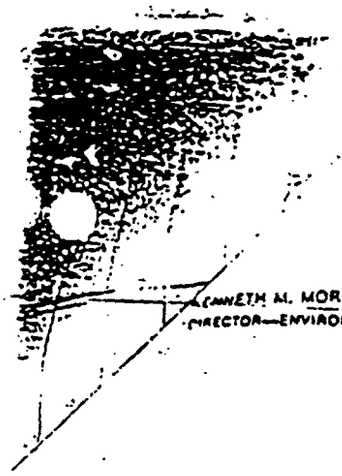

PLAINTIFF'S EXHIBIT
FOS-202

KENNETH M. MORSE
DIRECTOR—ENVIRONMENTAL HEALTH

United States Steel Corporation

600 GRANT STREET
PITTSBURGH, PENNSYLVANIA 15230

July 11, 1972

Mr. E. J. Jago
Commercial Development Manager
Steel Mill Products Division
Foseco, Inc.
P. O. Box 8728
Cleveland, Ohio 44135

Dear Mr. Jago:

This is to acknowledge with appreciation your letter of May 24 in which you have indicated the asbestos content of your Profax-31 and Proflex G-3 which are used as hot tops in several of our mills.

You indicate that after heating 2000° F., the residual asbestos fiber content will be below 2% in the case of Profax-31 and below 5% in the case of Proflex G-3 and that the former value is well within OSHA limits. As you are no doubt aware, OSHA promulgated a permanent health standard for asbestos dust which was published in the Federal Register of June 7, 1972. No mention is made in this standard, as far as I can observe, about any delineation between a safe and hazardous percentage of asbestos in a material. As a matter of fact, asbestos fibers are defined as any asbestos which is longer than 5 microns in size and under the section on Labeling, cautionary labels must be affixed to all raw materials and products containing asbestos fibers unless the fibers have been modified by a bonding agent, coating, binder or other material so that during any reasonable foreseeable use, airborne concentrations in each of the exposure limits will not be released. Therefore, the use of your two indicated hot tops will require that the dust exposure of the workers utilizing these must be periodically determined. This asbestos standard is in my opinion so restrictive that it will probably result in the substitution of asbestos in various products in which it is today used.

Again, thank you for your information.

FOSECO 1562

Sincerely yours,

Kenneth M. Morse

FOS-00-0000001277

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* C-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,

FOSECO, INC.

E. J. Jago
Commercial Development Manager

FOSECO 1563

FOS-00-0000003350