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October 29, 1976

Mr. J. W. Austin
Director, Safety Department
California Chamber of Commerce
455 Capitol Mall
Sacramento, California 95814

Re: CAL-OSHA, Asbestos Standards

Dear Jim:

I enjoyed meeting you yesterday at the CAL-OSHA Standards Board meeting on asbestos, and I look forward to receiving a copy of the Asbestos Information Association presentation to the Board, which you so kindly offered to furnish to me.

As I indicated to you yesterday, our client is very concerned with the present and proposed health and safety laws and regulations as they affect products with trace amounts of noncommercial asbestos contamination. In the case of our client's products, there is no likelihood that airborne asbestos concentrations will exceed or even approach the maximum amounts permitted during the entire life cycle of the product, from application and use through disposal. Further, even to the extent that minimal airborne concentrations of asbestos fiber appear, they are tremolite and/or actinolite, on which there is no evidence of harmful effect, even in fibrous forms. We believe that no labelling, reporting, or other regulatory requirements should apply to such products.

I am sure that our view is shared by many California businesses who are aware of asbestos contamination of their products, and probably would be shared by many, many more, who are presently unaware of the trace elements of asbestos minerals in their products, or are unaware of the applicability of the CAL-OSHA regulations to them. In this connection, I recommend to you the enclosed copy of "Asbestos in Your Future" by Dr. C. S. Thompson of the Research and Development Division of the R. T. Vanderbilt Company, Inc. (a talc producer) which provides a dramatic

H.E.W. & M&A.TO Mr. J. W. Austin

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description of the breadth and effect of current and proposed asbestos regulations.

I look forward to working with you in connection with these matters.

Very truly yours,

GEORGE H. CLYDE, JR.

George H. Clyde
of Heller, Ehrman, White & McAuliffe

Bcc: Mr. Robert H. Locke ✓