

DATE: November 4, 1961

TO: Mr. F. E. Wetherill
LOCATION: Director of Process Engineering

FROM: Charles F. Bien
LOCATION: Corporate Environmental Engineering
Linden, N. J.

SUBJECT: ENVIRONMENTAL HEALTH SURVEY PROGRAM

Attached is a copy of subject report dated November 4, 1969.

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In February 1969, we provided to the Corporate Personnel Relations Department a proposed "Program for Evaluation of Environmental Health Conditions Throughout GAF Corporation". Our proposal called for the Environmental Engineering Department to make a survey of the industrial pollutants (dust, noise, radiation, gases, vapors, fumes, and mists) throughout all of the domestic plants of the Corporation. We continue to favor some such survey, in order that our Corporation's status in these important areas is known, especially in the face of a profusion of new laws, regulations, and restrictions concerning these environmental factors. Failure to receive a response on our proposal, however, leads us to believe that the need for this program at this time has not been sufficiently demonstrated.

Meanwhile, there have been several occurrences which seem to place a new emphasis on the whole subject:

1. A revised Walsh-Healey amendment, covering all of these environmental conditions, was put into law on May 17, 1969. This regulation places Federal minimum standards for safety and health on all plants having government contracts of \$10,000 or more, in all states which do not already have specific laws covering these conditions.
2. The states of New York, New Jersey, Connecticut, Massachusetts, Rhode Island, and California have specific laws regarding noise which effect conditions in all plants. We have 21 plants in these states.
3. More states than those listed above have dust regulations and restrictions. We are in the process of obtaining and cataloging these state laws.
4. We have dust problems of some degree at all 15 plants of the Building Products Division, at the 5 Floor Products Division plants, and at 7 of the mines and mills of the Industrial Products Division. Some regulatory action has been taken at our plants at Baltimore, Dallas, Joliet (BP), Millis, South Bound Brook, Houston, Joliet (PP), Vails Gate, Annapolis, Chermian, Delta, and Hyde Park.
5. Many states and municipalities, currently without regulations, have restrictions and regulations pending, many of which are modeled closely after the limits imposed by the Walsh-Healey amendment, but effective against all plants.

In the face of the above we believe that action must be taken promptly at those plants where problem conditions exist. The picture is improved considerably by the significant effort that has been made at several of our plants to determine their own status with respect to one or more of these environmental conditions. Where there is need and for one reason or another the plants do not have the capability, we feel that the job of determining the extent and seriousness of the problem, in relation to the regulatory restrictions, is directly in our balltuck. We have, therefore, taken the following steps:

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1. We have equipped ourselves with the necessary sound analyzing equipment in order to carry out sound level surveys. We have acquired the knowledge necessary to carry out these surveys. We are surveying the problem areas in CAF plants, as requests come in from Division or Plant management, as rapidly as we can get to them.
2. We are equipping ourselves to carry out dust surveys on the same basis.
3. We are equipped to determine the presence and concentration of many gases, mists and vapors.
4. We are compiling a library of current and pending regulations, Federal and state (and, in some cases, county and local), covering all environmental health conditions.

We feel, however, that this modest approach to the Corporate needs in this regard cannot be accomplished without an addition to our staff. (A specific request is being forwarded to cover this need). Beyond this we plan to carry out the contemplated program without further additions to the staff and without deviation from the current budget or our 1970 budget forecast.

In summary, we are offering to provide the above services to all the domestic plants, on a priority basis, as determined by the need, the severity of the problem, and subject to our manpower availability.

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Charles F. Bien
Manager

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