



March 15, 1979

Mr. D. K. Rennie, V.P.
New York Office

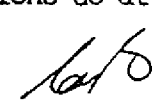
Dear Don:

After our telephone conversation yesterday, I discussed the Winchester employee notification question with Ed Miller. He allowed me to review the letter he sent you on that subject. I have comments on the letter and attachments, all of which were discussed with Ed.

1. At this time regulations only require us to notify employees of over-exposure to asbestos, not lead since the stay placed by the D.C. Court.
2. The "Notice to the Employee", if intended to satisfy the lead regulation, then too much information is being provided and the required information not supplied. The lead regulation (now stayed) stated that the employee be notified "within five working days after receipt of monitoring results, the employer shall notify each employee in writing of the results which represent that employee exposure.....".
 - A. This notice does not contain the employee exposure level. Note that this regulation states employee exposure, not only on an over-exposure.
 - B. A statement must be provided if an overexposure existed and corrective measures taken to prevent future overexposure. This notice does not speak to these points.
3. The second "notice" apparently intended to be posted, is not required as far as I can see.
 - A. The second paragraph indicates that items 1, 2, and 3 are only temporary. However, these are specifics which we have advocated for many years as a permanent measure of protection for the worker.
 - B. Item 3 makes mention of safety glasses with attached cup-type side shields. I thought this item of side shields was deleted during the last negotiation.

The foregoing are my immediate thoughts on the subject of worker notification relative to airborne exposures after discussing the subject with Ed Miller. However, I have more additional thoughts which can be shared.

We should bear in mind the fact that the asbestos regulations do at this time require worker notification on worker overexposure.


C. H. Borcharding

CHB:EJ
CC: F. W. Knoch, M.D. ✓ E. L. Miller

SPNY 003711