

sum ^Association

201 North Wells Street, Chicago, Illinois 60606 (312) 720-5675

**PLAINTIFF'S
EXHIBIT**

GP-249

July 6, 1973

**TO ALL MEMBERS OF THE
TECHNICAL COMMITTEE**

Re: Asbestos in Joint Treatment Compound

Gentlemen:

The Board of Directors of the Association approved an investigation of the problem of hazards resulting from asbestos released in sanding and mixing joint compound. As a result, a meeting was held in Washington, D. C. with representatives of OSHA, in which they encouraged the Association to pursue a testing and monitoring program to determine the extent of hazards occurring in the use of joint compound as well as other effects of gypsum dust.

To date, Directors have responded to my report of the OSHA meeting dated July 11, 1973, with support and concurrence that the Association undertake a program to assess asbestos hazards in the use of joint compound.

Therefore, it is requested that available data be sent to me, for collection and consolidation, of investigations of the asbestos problem undertaken within the member companies. Also, it is requested that each company nominate a candidate to serve on an Association subcommittee to appraise the data, analyze the problem, and develop a monitoring program for presentation to OSHA that would reflect the consensus position of the Association's membership. The candidate proposed should have good knowledge of appropriate testing, screening, field application procedures, and possibly OSHA and NIOSH requirements. A four man subcommittee would seem practical. It is recommended that this subcommittee meet in August to begin the work.

Please give this your early consideration.

Yours very truly,

GYPSUM ASSOCIATION



H. B. Carlsen, Secretary
Technical Committee

HBC:mj

cc: Board of Directors
Chairman of all Committees



PROPOSED PENALTY

<u>Citation No.</u>	<u>Proposed Penalty</u>
1.	\$800.00
2.	800.00
3.	800.00

OTHER VIOLATIONS

<u>Item No.</u>	<u>Proposed Penalty</u>
1.	\$ 90.00
2.	90.00
3.	None
4.	None
5.	None
6.	90.00
7.	90.00

Total for All Alleged Violations \$2760.00

CITATION FOR SERIOUS VIOLATION

Standard or Regulation Allegedly Violated	Description of Alleged Violation	Date on Which Alleged Violation Must be Corrected
29 CFR 1910.93a (b) Page 22142	Failure of the employer to maintain employee exposure to airborne concentrations of asbestos fibers below acceptable levels:	MULTI-STEP ABATEMENT
Citation No. 1	1) Concentrations below 5 fibers, longer than 5 microns, per CC, based on an 8 hour Time Weighted Average, 2) Concentrations, at any time, below 10 fibers, longer than 5 microns, per CC.	
29 CFR 1910.93a (d) (2) Page 22143	Failure of the employer to provide, and for the employees to use, U.S. Bureau of Mines approved respirators to prevent inhalation of airborne asbestos dust fibers (within the dry mixing and packout area).	MULTI-STEP ABATEMENT
Citation No. 2		
29 CFR 1910.93a (d) (2) (iv) Page 22143	Failure of employer to establish a respiratory program throughout the dry mixing area in accordance with the American National Standard Practice for Respiratory Protection Z88.2-1969, for employees who are exposed to excessive asbestos dust concentrations.	MULTI-STEP ABATEMENT
Citation No. 3		

CITATION

Item Number	Standard or Regulation Allegedly Violated	Description of Alleged Violation	Date on Which Alleged Violation Must Be Corrected
1.	29 CFR 1910.93a (d) (3) Page 22143	Failure of the employer to provide and require use of special clothing, such as coveralls or similar whole body coverings, gloves, and foot coverings to prevent skin contact with asbestos fibers, of employees within the dry mix and packout area.	Multi-Step Abatement
2.	29 CFR 1910.93a (d) (4) Page 22143	Failure of the employer to provide change rooms, two separate clothes lockers for work and street clothes, and the laundering and handling of work clothes for all employees exposed to airborne concentrations of asbestos fibers in excess of prescribed limits, within the joint compound mixing and packout area.	Multi-Step Abatement
3.	29 CFR 1910.93a (f) (2) (ii) Page 22143	Failure of the employer to establish a personal monitoring program at intervals not greater than 6 months within the joint compound mixing and packout areas where asbestos exposure may reasonably be foreseen to exceed prescribed limits.	Multi-Step Abatement
4.	29 CFR 1910.93a (g) (1) (i) Page 22143	Failure of employer to post "Caution" signs at all approaches to the joint compound mixing and packout area where airborne concentrations of asbestos fibers may be in excess of prescribed limits.	Multi-Step Abatement

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| 5. | 29 CFR 1910.93a
(g) (2) (i)
Page 22144 | Failure of the employer to affix a "Caution" label to all raw materials, mixtures, scrap, waste, debris and other products containing asbestos fiber to prevent exposure to concentrations above prescribed limits during any reasonably foreseeable use. | Multi-Step Abatement |
| 6. | 29 CFR 1910.93a
(h) (1) Page
22144 | Failure of the employer to maintain all external surfaces within the joint compound, dry mixing and packout area, free of accumulations of asbestos fibers (dry sweeping is to be discouraged, utilize vacuum sweeping methods). | Multi-Step Abatement |
| 7. | 29 CFR 1910.93a
(h) (2) Page
22144 | Failure of the employer to collect and dispose of all asbestos waste, scrap, debris, bags, containers, contaminated clothing in sealed impermeable bags to prevent any foreseeable airborne concentrations of asbestos fibers above the allowable limits. | Multi-Step Abatement |

MULTI-STEP ABATEMENT

I. Immediate Temporary Administrative Controls

Initiate immediate temporary administrative controls to prevent employee exposure to excessive asbestos dust concentrations by July 1, 1973. A Compliance Officer will determine if these temporary controls are preventing employee exposure.

- (1) Provide U. S. Bureau of Mines approved respirators for all employees working within the joint compound dry mixing and pack out areas of the main plant. Continue the use of respirators until the installation of permanent engineering controls.
- (2) Establish a complete respirator program in accordance with the provisions of the American National Standard Practices for Respiratory Protection Z88.2-1969.
- (3) Establish a program for maintaining the joint compound dry mixing and pack out areas of the main plant in a clean, orderly and sanitary condition to prevent asbestos dust contamination of the air. This program will include utilizing sealed impermeable bags for the storage of waste asbestos.
- (4) Provide employees with protective clothing that can be maintained in a sanitary and reliable condition from becoming contaminated with asbestos. In addition, provide employees with individual clothes lockers to prevent their personal clothing from becoming contaminated with asbestos dust.
- (5) Establish a personal monitoring program to determine, at six month intervals, the concentrations of asbestos dust.
- (6) Post asbestos "Caution" signs at all approaches to the work area to prevent unprotected persons from entering.
- (7) Affix asbestos "Caution" labels on all raw materials, mixtures, scrap, waste, debris and other products containing asbestos to prevent exposure to asbestos dust.

II. Permanent Engineering and Administrative Controls

- (1) By July 27, 1973, submit a plan for approval to the U. S. Department of Labor, Occupational Safety and Health Adminis-
showing
a timetable for the installation of engineering controls to prevent employee exposure to asbestos dust concentrations above allowable limits.
- (2) Incorporate items (3) through (7) (listed as temporary administrative controls in Part I) as permanent administrative controls to prevent employee asbestos dust exposure.