



INTERDEPARTMENTAL COMMUNICATION

DATE: August 3, 1973

TO: Mr. R. G. Tuttle

LOCATION: Portland

FROM: J. D. Rauch

LOCATION: Akron

SUBJECT: ASBESTOS - Akron, New York

PLAINTIFF'S EXHIBIT

GP-1435

I had a call yesterday afternoon from Mr. John Meyer, Sales Representative, Union Carbide Corp, Niagara Falls, New York, regarding our recent OSHA citations. The asbestos information association of North America, (A.I.A.) is somewhat upset because OSHA will not release their Akron test results to us unless we contest the citation.

It seems that this stand is not consistent with a discussion between A.I.A. and Mr. John O'Neill - OSHA, Washington, D.C. of August 1972. I am advised that at that time OSHA advised they would supply their test data to industry to assist in control measures.

They, A.I.A., further suggest that we should take exception to citation number 1, "Failure of employer to provide and require use of special clothing, such as coveralls or similar whole body clothing, gloves and foot coverings to prevent skin contact with asbestos fibers, of employees within the dry mix and pack out area." They advise that the phrase, "to prevent skin contact with asbestos fibers", makes this citation questionable.

A.I.A. contends that skin contact with asbestos fibers has never been proven to be harmful to humans. Further, A.I.A. contends that Multi-Step Abatement II.(2), should not require that items (3) through (7), listed as temporary administrative controls in Part I, become permanent administrative controls with the exception of the six month personal monitoring program. Their position being that if the monitoring program proves we have provided our employees a safe place to work, less than the prescribed number of asbestos fibers in the air, the other items are not required.

This brings up some good points for thought, if not for the Akron situation, perhaps for our other locations. We have our asbestos program pretty well under control here and we may not want to "make waves" at this time.

I have only copied you on this matter as I would like to get your reaction regarding the Akron Joint System operation. If you think this should be persuaded further, the contact for A.I.A. is, Mr. Matt Sevetonic, Executive Sec., Asbestos Information Association, (area 212) 689-3378, located in New York City. May I have your thoughts regarding this matter?


J. D. R.

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