Georgia-Pacific

intracompany memo

PLAINTIFF'S EXHIBIT
tabbies
GP-217

to Mr. G. E. Wilson

from K. W. Brown

location Portland

location Acme

subject OSHA Regulations - Joint Cement

date May 29, 1974

cc: Messrs. T. W. Richards - Tigard
J. R. Hurd - Portland
M. F. Fink - Tigard

We have reviewed our situation relative to the requirements of the OSHA Act concerning the handling of asbestos. Listed below are the requirements of the Act and our situation in their regard.

Item	Acme Status
1. Establish a continuous monitoring system to determine amounts of fibers in air in work area.	1. (a) State has run tests and will report results within three weeks. (b) Have plans to train two of our people to run the required tests in this area.
2. Establish a system for safe handling and storage of bag asbestos.	2. (a) Cover pallet load with plastic cover as removed from box cars before storing. (b) Loose material and broken bags cleaned up immediately. (c) Empty bags placed in plastic bag, sealed and carried to dump and covered. (d) Mixing area where bags are opened has suction ventilation.
3. Medical examinations for employees exposed to asbestos.	3. (a) Annual medical examination for all bid employees of Jt.System Dept. and Lab. (b) Special examination for employees bidding into our out of this dept. (c) Appropriate records are kept of the above to which employees have access as needed.
4. Placement of warning signs in hazardous level areas.	4. Appropriate signs are posted.
5. Placement of warning labels on finished products containing asbestos.	5. Warning with suggested wording from Tigard Lab is stamped or labeled on all items containing asbestos.

GP 09

Item	Acme Status
6. Furnish and require use of individual protective equipment for personnel exposed to asbestos.	6. (a) All personnel in hazard areas are wearing approved respirators. (b) We are awaiting the results of the tests in item one before instituting any other measures such as protective clothing and change rooms.

K. W. B.

KWB/om

Georgia-Pacific

intracompany memo

to	Messrs. E. B. Hollingsworth T. W. Richards	location	Wilmington, Del. - Gypsum Tigard Lab
from	G. E. Wilson	location	Portland
subject	OSHA Regulations - Joint Cement	date	May 20, 1974

COPY

In the spring of 1973, we had an OSHA inspection at the Akron joint cement operation which resulted in numerous citations concerning our handling of asbestos and consummated in fines of some $1,300 for these violations. On June 19 of last year, I wrote Jack Rauch at Akron, asking him to send a copy of the citation to the other joint cement operations so that we could proceed with corrective measures prior to an OSHA inspection at our other joint cement plants. You received a copy of this letter to Mr. Rauch.

I have just received a copy of an OSHA inspection conducted at our Chicago plant where we have received numerous citations almost identical to those we received at Akron one year ago, where we apparently did not take corrective action that is required under the law. I can understand where we might have a difference of opinion with the inspector concerning the measurement of the concentration of asbestos fibers, but it is most difficult to understand why we did not take the necessary action to provide signs, establish a respirator program and a protective clothing program which are mandatory under the regulations.

I would ask that we once again review our situation at each of the joint system plants to make certain that we are complying with the requirements under the OSHA act concerning the handling of asbestos fibers. I would also like assurance from each of the plants that they understand these requirements and that we have the necessary program and procedures instituted so that we will not have another occurrence of citations from an OSHA inspection at a joint system operation.

G. E. W.

GEW:jb

cc: Messrs. J. R. Burd
M. F. Fink - Tigard Lab
H. W. Peele - Wilmington
J. D. Rauch - Akron, N. Y.
M. A. Palmowski - Chicago
M. W. Scharf - Milford
R. V. Favero - Marietta
K. W. Brown - Acme

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intracompany memo

to	Mr. C. W. Lehnert	location	Tigard
from	Ed Sing	location	Acme
subject	Asbestos Caution Labels	date	May 29, 1974

COPY

Refer to Mr. E. O. Burch's memo dated May 24, 1974. Our label does not contain the last line which reads "Use approved respirator when sanding". We are sending two labels we now use. Please compare and advise.

E. D. S.

EDS/om

GP 09

Georgia-Pacific

intracompany memo

to ALL GYPSUM SALES MANAGERS location

from O. E. Burch location Portland

subject JOINT CEMENT PRODUCTS date May 24, 1974

CC Messrs:

G. E. Wilson	Portland
S. S. Dennison	Portland
G. F. Baitinger	Portland
D. C. Corkill	Portland
C. W. Lehnert	Tigard Lab
James Hurd	Portland
Matt Fink	Tigard Lab
T. W. Richards	Tigard Lab
E. B. Hollingsworth	Wilm Del Gyp
M. A. Palmowski	Chgo Jt Sys Plant
Bob Favero	Marietta Plant
H. W. Scharf	Milford Plant
J. D. Rauch	Akron Plant
K. W. Brown	Acme Plant ← THIS COPY FOR

There may be questions from our Branches and customers concerning the caution label we are currently placing on many of our joint system products. The label reads: -

CAUTION
Contains Asbestos Fibers
Avoid Creating Dust
Breathing asbestos dust may cause serious bodily harm
Use approved respirator when sanding

The Occupational Safety and Health Administration (OSHA) requires that all products containing asbestos fiber be identified in this manner. The concern is the breathing of air which contains asbestos fiber. The degree of hazard is dependent upon the concentration of fiber in the air and the duration of exposure. The health problems associated with exposure to asbestos fiber have occurred in industries where workers have been exposed to high concentrations of the fiber over a period of years.

All joint compound manufacturers use asbestos fiber as an essential ingredient in their products. These compounds, however, contain relatively small amounts of asbestos (2-8%). We are not aware of any health problems in our industry but we are nevertheless required to comply with the OSHA requirements. The standards imposed on our plants are very stringent. There are severe limitations on allowable concentrations of asbestos in the air; strict procedures for handling the asbestos; a mandatory program for wearing protective devices (respirators); periodic medical examinations; the labeling already described and many other very restrictive measures.

It is recognized that there is some exposure to asbestos fiber during the mixing of the dry powder products and in the sanding of the joints. It is not presently known whether the concentrations of asbestos fiber at these times is in the hazardous range established by OSHA. However, we do know that the dust level in the mixing or sanding of joint compounds is sufficiently high that respirators should be worn. Once joint compounds are wetted or mixed, the fiber is not subject to becoming airborne. Ready mix, for example, presents no hazard for the user, other than in the sanding operation. Respirators should be worn while sanding.

We regard the development of non-asbestos products as a necessary step to continued success of our joint system program, and these are the steps we have already taken in furtherance of this goal: -

1. We have eliminated asbestos from all of our texture products.

2. We are market testing, in limited markets, a dry asbestos free powder product.

3. We are working on a means to eliminate asbestos from our ready mix products.

The development of these new products will require a substantial amount of field testing and we will be seeking your assistance in this.

This is not to be taken lightly, but at the same time we do not want to unnecessarily alarm you or our customers. The purpose of this memo is to make you aware of what we are doing and why we are doing it, so that you will be equipped to handle the questions that are bound to arise.

OEB/mf

O.E.B.

Georgia-Pacific

intracompany memo

	Mr. R. S. Schifferle	location	Akron
from	H. W. Peele	location	Wilmington
subject	PULMONARY FUNCTION TESTS	date	May 29, 1974

COPY

This will confirm our phone conversation of this date in regard the pulmonary function tests that have been done twice on joint system employees, with some questionable results.

Bob McCallister of Portland and Lance Ryder of Stamford had previously advised they were studying these tests but no answers were forthcoming.

Jim Hurd has requested a copy of the letter from Dr. Amdur, who gave us his opinions of these tests. Jim advised Bob Schifferle that he, and the above mentioned, would study this problem and advise us of their proposed recommendations in regard these test results.

H. W. P.

HWP/mab

cc: Messrs. E. B. Hollingsworth - Wilm.
J. D. Rauch - Akron ← THIS COPY FOR