



INTERNAL CORRESPONDENCE

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Location J. L. Myers

Date April 16, 1975
"Calidria" Asbestos
Originating Dept. - ~~XXXXXXXXXXXXXXXXXX~~

Answering letter date

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Subject NICA OSHA Commentary

The attached OSHA commentary prepared by the National Insulation Contractors Association is provided for your information. The comments may be all right for their industrial situation but they seem to have missed many of the subtilities.

There is one paragraph, however, which may be of particular interest to us, i.e. Article IX page 7. Here it is stated that OSHA has advised them that the "place of employment" definition allows a contractor to monitor by function rather than at all work locations. This could have a very significant application to our current problems in the drilling mud and tape joint contractor areas.

In my opinion, however, we need a more solid verification than this paragraph for the concept to be really useful. I discussed ways to obtain this with Bob Mereness. He knows of NICA but does not have any personal contacts there. He feels that the best way to go is to paraphrase this question and run it back by OSHA through Harry Gilbert. I agreed to this and he will move on it promptly.

I also talked by phone with Mr. John Pollock, the Executive Director of NICA. His recollection was somewhat vague but he took the position that this was not really a question of interpretation. They discussed the question with OSHA and were told by them that this was what the regulations said. He did not recall who they had talked with. This obviously is not very helpful.

H. B. Rhodes
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HBR:gt
Attachment

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