

FILE NAME: Weyerhaeuser (WEY)

DATE: 1974 Apr 9

DOC#: WEY002

DOCUMENT DESCRIPTION: Memo – Quarterly Asbestos Situation Audit

Interoffice Communication

CONFIDENTIAL

Location Longview



Weyerhaeuser Company

Date April 9, 1974

From J. D. Wendlick

Subject QUARTERLY ASBESTOS SITUATION AUDIT - MARCH 1974

To R. S. Welch
Marshfield

As outlined in our initial discussion on March 22 and covered in some detail in our closing discussions on March 28, the objectives of my visit to Marshfield at this time were to: 1) conduct a quarterly audit of the asbestos situation in both the Mineral Core Plant and the Core Mill, 2) hold employee educational sessions similar to those given during the week of February 26 - March 2, 1973 and 3) with Norm Pacourek's assistance, collect comparative breathing zone samples of asbestos dust by simultaneously sampling according to our method and the Department of Labor's recommended method. The following report covers the various aspects and ramifications of each of these objectives in the order in which they are listed above.

QUARTERLY AUDIT:Mineral Core Plant

- A. Installation of the new sander immediately down the process stream from the old sander, which enables a single sanding pass to be made on cores out of the dryer, has some definite advantages for control of employee dust exposures and, coincidentally, minimization of overhead in this area.

Because each mineral core block arriving at the scissor lift adjacent to the sorting and grading area is now fully sized, asbestos dust levels entering the workroom air from the sequential stacking (and dropping) of cores onto the scissor lift can be expected to be drastically reduced from levels found by the OSHA Compliance Officer on January 9. The Department of Labor's samples were taken during the first pass (unsized) of the mineral core blocks through the sander. Elimination of the unilaterally-sanded mineral core block process will further reduce employee exposures to asbestos fibers since core block rotation and the additional handling required for the second pass through the sander are now unnecessary.

Produced to Anderson, O'Brien, Berk, Skovron & Goffe by Weyerhaeuser in Rogers v. Weyerhaeuser Company Case No. 01-CV-328, on 01/31/2003

WY02-000587

While accomplishing an obvious improvement in control of asbestos around the trim saw-sander area with the addition of the new sander, a coincidental reduction in overhead could also be realized. With the decrease in handling brought about by the addition of the new sander, two employees could perform the work tasks formerly requiring four employees. Two employees could unload and stack mineral core from the dryer, feed the trim saw/sanders and sort and grade the sized, sanded mineral core blocks. Because less handling is necessary, some reduction in the percentage of broken cores in this area is also likely.

*Do
Have Puts*

*New
Hood Here*

The planned modification of the trim saw area from saws to rotating "hogging" heads, as indicated by Jim Gallatin, should bring about another improvement in asbestos control by increasing the effectiveness of dust pickup at these positions.

As evidenced by the substantial dust accumulation immediately inside the access door on the new sander, further improvements in design of the internal dust pickup heads could be made. The relative importance of such a modification becomes apparent after isolating and studying significant sources of mineral core scrap and dust which ultimately lead to the accumulations of these materials in evidence under and alongside the process line in this area.

*clean
up-*

- B. Airborne asbestos levels at the sorting and grading work stations, as indicated by the February sampling tests on employees working in this area (Steve Cant's April 4 report on Norm's February tests is attached for your information), have finally dropped below the 1976 OSHA asbestos standard limits for two months in succession. These excellent results are reflective of several fine points in asbestos control in this work area: 1) a more consistent phenolic glue size application to the cores out of the sander, 2) sizing cores on the first pass through the sanders (thereby minimizing the "puffing" of mineral core dust during stacking of unsized cores on the receiving scissor lift), 3) better handling practices and 4) more frequent and thorough cleanup activities. An active ongoing control program is urged with respect to those contributory factors responsible for these results in order that the low exposure levels can be continuously maintained in this area.

*C.
Cleaned
down on
employee's
shift v. 3 down
if 1 when played*

Considerable buildup of mineral core dust and scrap was observed under the radial arm cut-off saw, especially on Saturday morning, March 23, which provided strong evidence of a continuing problem with the negative air pickup system serving that machine center. Further investigation revealed that the system deficiency centers in the sheet metal duct which captures dust and narrow strips of core block trim behind

and below the lower track in which the saw blade travels. Design of the short duct (2-3' long) undoubtedly plays a prominent role in its tendency to be obstructed with core block trim strips. Some serious consideration should be given to redesigning this particular leg of the cut-off saw negative air pickup system, since compliance with the 1976 OSHA asbestos standard has been demonstrated when this duct is "free" and the system is functioning properly. Please refer to Table I, my report to you of February 26, for the airborne asbestos fiber levels measured during Norm's monthly checks for December and January. February's monthly monitoring (attached to this report), by stark comparison, represents typical breathing zone asbestos fiber levels (13.50 fibers/cc) when the lower duct on the cut-off saw is plugged and salvage sawing continues to be performed. Whenever it becomes obvious to either the cut-off saw operators or cut-off saw offbearers that visible dust is being generated due to a system plug-up in the lower duct, sawing should be discontinued until the system has been unplugged and restored to proper working order. This procedure is necessary to effectively minimize the exposure to asbestos fibers for employees working in this area and to comply with the OSHA asbestos standard until system modifications have been put into effect which obviate the need for such work stoppage.

- Problems
For Review
Wed
May 2nd*
- D. Cleanup activities were performed by an employee with his 3M-8710 dust mask not in place. While this is certainly not a violation of the present OSHA asbestos standard (employee breathing zone levels have been measured at 1.5-3.5 fibers/cc for these activities) and quite plainly not contumacy on the employee's part, until more complete evidence indicating compliance with the 1976 OSHA limits is in hand, all employees performing cleanup activities should uniformly wear their protective dust masks. Evidence gathered to date appears to warrant discriminatory treatment of this rule, depending upon the form of cleanup (vacuuming, squeegees, wet rag wiping, etc.) in which an employee is engaged. However, because our avowed goal is compliance with 1976 OSHA asbestos standard (this is the key point) in all areas of the Mineral Core Plant and Core Mill, additional evidence is necessary before selective removal of masks can be recommended for cleanup activities, or more specifically, certain types of cleanup activities.

- E. With regard to breathing zone levels measured on the employee who weighs out the asbestos in the negative air system-protected weighing hoppers, the February results betoken an astounding 1.00 fiber/cc, which is equivalent to background levels in this area 6 months ago! In view of the modifications which have been made to the weighing hoppers (most notably, the panic bar setup) and the present results, a direct correlation is

- indicated. Albeit this airborne level is undeniably excellent, procedurally some improvements could be made in this area. Vacuuming of the floor area around the weighing hoppers should still be performed after each weighing.
- F. Throwing of mineral core scrap and blocks is still in effect in the Mineral Core Plant. This practice should be discouraged to minimize airborne asbestos fiber concentrations. *permy. 5/2/67 P-11-21*
- G. Although the lid over the drinking fountain is a good addition to our program to protect the health of our employees, its effectiveness in this regard is dubious when propped open (observed on several days). Not only should the lid be left down after use, but a foamed rubber strip around the bottom of the lid may provide a better seal to prevent asbestos contamination between uses. To dispel employee misgivings with respect to the potential aerobic microbial breeding place offered by this enclosure, a regular program should be instituted to sanitize the top of the drinking fountain and the underside of the lid.
- H. To reiterate a recommendation made in my December 17 report to K. E. Schommer, the basement area situated directly beneath the weighing room should be cleaned frequently by placing accumulations in labeled plastic bags and vacuuming up the residuals. This is of especial import now since a window has been provided through the floor (grating immediately under the asbestos weighing hopper ledge), making these accumulations visible to visiting state or federal inspectors, industrial hygienists, etc., whose visits are unannounced.
- I. To effect further diminution in airborne asbestos fiber levels within the Mineral Core Plant generally, a more active house-keeping program is recommended. As will be discussed later in this report under the section entitled "Employee Educational Sessions," each individual employee represents a vital part of our total program to achieve and maintain a clean and healthful workplace (paraphrasing Section 5a of the Act).

Core Mill

- A. Frequently throughout my quarterly audit in the Core Mill, observations of work practices and machine operation were made at the feeder position on the abrasive planer (Timesaver sander). The dustiest conditions arose at the feeder's position when railed mineral core from a load to be sanded required pry-bar persuasion to separate one from another. "Puffs" of mineral core dust produced by this activity dispersed rapidly into the work station air around the feeder's position and undoubtedly account for a major portion of the high airborne asbestos concentrations shown in the February monthly samples. Asbestos dust release to the work room air from this work station was seen to be particularly intense on Saturday morning, March 23.

Produced in accordance with the Protective Order in the case of *Asbestos Workers v. Raybestos-Manhattan, Inc.*, Case No. 01-CV-128, Dkt. 01/11/2003

Investigation of a probable cause for the more pronounced problem of March 23 revealed a coincidental situation involving partially-sized mineral core from last summer's inventory and some side stile adhesion requiring pry separation. Engineering is presently studying a hood system design for this position which would capture the dust released near the point of generation. Another suggestion was made to locate a slot hood on the outlet end of the electronics to remove surface dust and minimize potential release to the in-plant atmosphere at the abrasive planer feeder's position.

- D. A white film of dust on the face of the back sander juxtaposed with the abrasive planer feeder position provided ample evidence of periodic system malfunctions. To significantly lessen the magnitude and extent of work room air contamination with asbestos fibers during infrequent system plug-ups or baghouse overloads, it is recommended that a pressure-sensitive warning system be installed near the baghouse which would trigger buzzer/flashlight alarms situated at the feeder positions on the abrasive planer and double-end tenoners upon any sudden change in the negative air pressure system. Such a warning system would enable machine operators to take exigent steps to stop their machines and the product "feed" ahead of the time visible dust begins to spew out of their machines. Another desirable aspect of this system is that it will reduce markedly the asbestos exposures of those unprotected employees who work in areas contiguous to mineral core work areas.
- C. Fugitive dust clouds continue to escape from the inlet end of the main abrasive planer, especially immediately following entry of the trailing edge of a railed mineral core block into the abrasive planer. It appears that a marked drop in the efficacy of the sander negative air pickup system occurs at this time, resulting in the loss of mineral core dust to the work-room air.
- D. Removal of the negative air pickup system fans from the inside work room environment or enclosure of these fans is needed as evidenced by the sifting of dust buildup from around these fans down onto the floor or loads of rails stored immediately below the fans (S-1). So long as the fans occupy their present positions in the Core Mill, they will continue to act as sources of asbestos contamination for this work place.
- E. At the abrasive planer feeder position, another problem of significance which undoubtedly contributes to the high asbestos exposure in this employee's breathing zone is the makeup air system. One of the inlets of this system impinges directly down upon the railed mineral core blocks at the feeder position, blowing surface dust up into his face. A repositioning of this particular inlet is recommended.

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- F. During my discussions with Mr. Milan Racic, OSHA Compliance Officer/Industrial Hygienist, on March 18 and 19 in Milwaukee, it became apparent that OSHA has extended the depth of the asbestos standard, section 1910.93a, with the inclusion of the teachings contained in the NIOSH criteria document. This extension has touched on all areas listed in the OSHA asbestos standard and served to expand each of them considerably. According to their new definition - each employee "exposed to asbestos fibers" shall be covered by all applicable sections of the asbestos standard. To eliminate the probability of individual interpretation, "exposed to asbestos fibers" has now been defined as exposure to levels equal to or greater than 1 fiber/cc greater than 5 microns in length on a time-weighted average or 5 fibers/cc greater than 5 microns in length for a ceiling limit. Because of this interpretation, it is recommended that my previous recommendation indicating no showers would be necessary in the Core Mill (based upon our monitoring program which indicates near compliance with the 1976 OSHA asbestos standard) be disregarded and be superseded by a recommendation to install such facilities and make these available to the employees (wearing uniforms) in a manner consistent with the program in effect in the Mineral Core Plant.
- G. Since asbestos fibers were found in the dust accumulations on lunch tables in the Core Mill lunch room, each table should be wiped clean (with a damp cloth) at least once a day. The floor in the lunch room should also be attended to in a similar manner to minimize asbestos fiber contamination of lunch room air, etc.
- H. At least for the present, all employees working either in the north aisle (alongside the double-end tenoners) or against the north wall in the Core Mill mineral core area should wear masks just as operators and offbearers on the double-end tenoners now do. The justification for this recommendation is three-fold:
- 1) Some consideration is being given to modifying, hopefully improving, the negative air pickup system around the double-end tenoners. While these changes are being implemented, all employees in this area should be protected against those upset conditions which typically arise during system modifications.
 - 2) The peccant behavior of several employees working in the mineral core areas of the Core Mill; namely, the double-end tenoner and electronic areas, indicates the need now for a strong reminder (masks required) in the north aisle.

Produced in accordance with the Order of the Court in Rogers v. Weyerhaeuser Company, Case No. 01-CV-328, on 07/17/2003

3) Alleviate the cynicism which is boiling over the facetious magical boundary between support posts along the north aisle preventing airborne transport of asbestos fibers from the double-end tenoners across the north aisle to the work stations of the two rail sawyers.

- I. As in the case of the drinking fountain cover in the Mineral Core Plant, the drinking fountain cover in the Core Mill should be extended with a foam rubber strip around the periphery of the lid to restrict admission of asbestos fibers to the nozzle area between uses. Sanitization should also be conducted on a regular basis on the top of the drinking fountain and the underside of the lid to allay employee anxiety regarding unsanitary conditions. The lid on this drinking fountain should not be propped open, as observed in the Mineral Core Plant.
- J. A ventilation deficiency was noted on the dual saw CM-10 in a rather qualitative manner. When the switch activating a valve to close a gate is flipped from "wood" to "mineral," about one-half the pull in the main duct leading from the saw to the main system is in evidence vis-a-vis that obtained for wood. Investigation of this problem revealed a potential bottleneck at a manual gate approximately 2-3' from where the duct from CM-10 enters the main negative air system line. Opening the manual gate at this position more completely may resolve this discrepancy.
- K. Vacuum clean-up drop legs have now been installed around the two double-end tenoners (FD-9 & FD-10) operating on mineral core full-time and the CM-20 double-end tenoner, which handles mineral core block tongue and grooving only occasionally. These additions are excellent examples of a continuing asbestos control program which ultimately will bring the Marshfield complex into compliance with the 1976 OSHA asbestos standard. Volume and correspondingly, velocity, of air entering these drop legs was found to be somewhat reduced when mineral core is being handled on the double-end tenoners and the abrasive planer simultaneously versus when the double-end tenoners only are connected to the system. If some conveniently detachable handle could be used in conjunction with the present drop legs, it would greatly facilitate clean-up, especially in large open areas. Such a modification is recommended to make the employees' clean-up tasks easier, thereby encouraging continued employee cooperation.

Produced in Anderson, O'Brien, Berk, Shames & Golia by Weyerhaeuser in Rogers v. Weyerhaeuser Company Case No. 01-CV-328 on 07/27/2003

- L. In the patch and putty (inspection) area, one process still exists which occasionally produces higher than expected levels - 5.58 fibers/cc (ref.: S. M. Cant's attached report). The process which brings about unacceptable exposures is the drilling out of mineral core doors for insertion of a color-coded dowel peg. If the drills used for this purpose are equipped with stops, such that penetration could not be effected more than 3/4", no contact with mineral core would be made and exposures to asbestos fibers (from this source) would rapidly fall to zero.
- M. Commendation is certainly in order for those involved in changing the saw travel track on PM-5 through the use of lead. With the center groove now leaded in and the rip-saw during a typical cut producing no visible dust, it is doubtful that this machine center will become a significant health problem.
- N. Inspection of the washer and dryer for Core Mill employees' uniforms showed that the filter in the washing machine was very clogged and most certainly not functioning as it was intended. Frequent checks on the filter are appropriate to maximize efficiency of fiber removal from the contaminated uniforms.
- O. A recent problem with an ostensibly abrasion-type dermatitis among many of the Core Mill employees required to wear uniforms precipitated a study of present work practice and uniform cleaning procedures. As near as is possible to tell from story re-creation and direct investigation, the trichloroisocyanuric acid used in Davies Hi-Brite bleach is not being adequately removed from the uniforms and therefore may be causing a sensitization dermatitis. Restricting the size of the loads in the washing machine and/or washing uniforms without bleach may be the best ways to eliminate the problem.
- P. The new innovation which has been applied to the lite opening routers in the Detail Department very likely will bring these machine centers to within the 1976 OSHA asbestos standard. Continuing efforts on mineral dust control at the drilling stations and at the lockset mortising stations should eliminate asbestos concerns in this department within the year.

Employee Educational Sessions

As outlined in my December 17 report to K. E. Schommer, employee education sessions were held during the week of March 25 to 1) apprise the employees of engineering controls which have been implemented since my February 26-March 2, 1973 educational sessions, 2) relate those before (pre-February, 1973) and after (December, 1973-January, 1974) asbestos fiber levels which correspond to those engineering controls, 3) reiterate the health aspects of asbestos

Bentz, Skretnus & Golla by Meyerhauser in Rogers v. Meyerhauser Company Case No. 01-CV-328, on 01/31/2003

fiber inhalations, 4) address the problem of smoking and its co-carcinogenic effects with asbestos, and 5) describe those portions of our asbestos control program which are the responsibilities of each employee who works with mineral core. The following sessions were held:

<u>Monday, Mar. 25</u>	<u>Tuesday, Mar. 26</u>	<u>Wednesday, Mar. 27</u>
8:20 a.m. (CM)	12:30 p.m. (MCP)	12:30 p.m. (MCP)
11:00 a.m. (CM)	4:50 p.m. (CM)	
4:50 p.m. (CM)	10:30 p.m. (MCP)	
11:00 p.m. (CM)		

Employee comments and concerns elicited during the question and answer portions of the sessions are given below for your information.

- a) By far the most important comment received in any of the session held was that voiced by some of your maintenance people with regard to the types of respirators they are given to wear during baghouse cleanout or baghouse repair. Originally, a continuous flow supplied air respirator was employed for this purpose and, as far as they were concerned, this was acceptable. However, the air supply used for their excursions into the baghouses was secured from an oil-lubricated air compressor, which presented a potential carbon monoxide hazard. In accordance with OSHA Section 1910.134(d) Air Quality (2) (ii), if the compressor was oil-lubricated,

"it shall have a high-temperature or carbon monoxide alarm, or both. If only a high-temperature alarm is used, the air from the compressor shall be frequently tested for carbon monoxide to insure that it meets the specifications in subparagraph (1) of this paragraph."

Since the air compressors did not meet these criteria, air-pack and demand-type respirators were substituted.

The objection being voiced by these people with respect to air-pack or demand-type respirators is that they heavily tax the body during extended periods of use. Maintenance personnel have had to work 8-16 hours continuously to bring a baghouse back into normal function. For these long periods of time inside a confined space like a baghouse, half-hour air-pack or demand-type respirators are totally unacceptable. It is recommended that continuous flow air supplied respirators [OSHA 1910.93a(d)(2)(iii)] be made available to these maintenance personnel at the earliest possible date and that either a breathing air-type compressor or an oil-lubricated compressor equipped with a high-temperature alarm be used as the air supply source.

*Baghouse
cleanout
11-11-11*

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- b) Aside from concern over proper protective equipment entering the baghouses, the most noteworthy item from sessions was something that wasn't mentioned. No adverse comments were directed either by name or innuendo toward any management or production staff employee. This is in direct contrast to the sessions held one year ago when each group of employees offered up their venomous barbs with specific individuals on the receiving end. Each group of employees, except for the first group (time ran out before questions could be entertained), made constructive comments and voiced concerns relative to workplace conditions only.
- c) Session I (8:20 a.m. - 3/25) was problematic from the onset, primarily due to the incivility of two highly charged, cynical employees. This was most unfortunate because their behavior very likely suppressed comments from those in the group who were less outspoken. After wading through their collective acrimony, the following concerns surfaced:
- 1 - When routing out mineral core doors, mineral core dust frequently "hangs up" in the four corners of the lite opening and, not being caught by the negative air pickup system, it trickles out on the floor from the vibration along the roller conveyor line. Presumably, this loose material could be eliminated if the router operators were permitted to run the router around the opening a second time.
 - 2 - Considerable dust from the lite opening routers and the hinge slot and mortising routers is released to the workroom air, eventually causing buildup on overhead pipes and other horizontal surfaces. When the "doors" are opened, the incoming blast of air blows the dust off these surfaces into the air again. Employee's question - "when will these pipes be vacuumed off?" If the wood dust and mineral dust collection systems are extended to include the mortising work stations, the problem will have been solved.
 - 3 - "Why do they have a plastic catch basin for mineral dust from drilling when we need a vacuum?"
 - 4 - Dust from detail (mineral and/or wood) presently goes to the hog fuel boiler furnace. "Does this represent a hazard to the people of Marshfield?" I answered this question by discussing an article by Paul Gross, M.D., in last fall's Archives of Environmental Health, which pointed out that the polyfilamentous structure (thought to cause cancers) is altered (fused) substantially in the combustion zone of a fire. Heat treated asbestos fibers, for all intensive purposes, no longer present the carcinogenic character to the lung on inhalation. However, this is highly dependent on combustion zone temperatures and residence times in the combustion zone.

Kerz Skronos & Galle by Weyerhaeuser in Rogers v. Weyerhaeuser Company Case No. 01-CV-128, on 6/13/2003

- d) Concern was voiced in three sessions regarding the use of fans for ventilation in certain areas of the Core Mill. While this practice can not be overtly condoned owing to the potential of forced air movement adding to the airborne asbestos fiber loading, some acceptance of this practice is probably necessary to improve the heat stress conditions during hot weather. If the fans are to be used without materially aggravating the existing hazard, direct impingement of the fan breezes on any surface containing asbestos dust should be avoided. The speed of the fans should be maintained such that the dust carried airborne is not blown into areas where unprotected employees are working.
- e) Several employees wanted to know why the Core Mill did not have shower facilities, whereas the Mineral Core Plant has had these for some time. They wanted a place to shower, wash their hands, etc. This aspect of our compliance program is covered under the Quarterly Audit section of this report.
- f) A problem with dermatitis was pointed out in one of the sessions with Core Mill employees. Discussion of this problem was also covered under the Quarterly Audit section. Those employees who were perhaps the most vociferous on this point were also the most displeased when the supply of lotion dried up at the storeroom.
- g) Asbestos dust in the lungs was mentioned in connection with lung clearance mechanisms and the probability of developing cancer. Although this subject is delicate, the point was made that in all diseases, some people are more susceptible than others, with only a marginal correlation with magnitude of exposure. The type of questions asked by this employee reflects typical valetudinarian concerns.
- h) In the Core Mill, loads of mineral core block or railed mineral core are often stacked on 2"x4" stud sections situated vertically under the load. When the pallets are set down, the weight of the load resting on the 2"x4"s occasionally shifts, causing the entire load to drop approximately 2-1/2". This usually produces much dust, which contributes to the airborne asbestos exposures in the areas where this occurs. A better orientation for the support blocks on the pallets would be to use 2 - 2"x4"s under each side of a load (in the horizontal configuration) to eliminate load shifting and the attendant dropping.

5000.01.Bioph. Rept. Sciences & Coll. by Weyershaeuser in Rogers v. Weyershaeuser Company Case No 01-CV-328. on 01/31/2003

Comparative Asbestos Sampling

Miscellany

- WY02-000598

burning sensation in the nose, etc. Hopefully, the analysis of these materials will shed some light on the validity of their subjective responses.

Because most of the dust arriving in the veneer chip department can be traced to one small area immediately below the aggregate filling station, it is recommended that the filling box be enclosed, preferably with a plexiglas enclosure.

- B. On Tuesday, March 26 at approximately 10:20 a.m., arc welding was observed in an area adjacent to patch and putty (inspection) in the Core Mill. The welding was being performed on a steel track along which the glue spreader used for sized mineral core out of the abrasive planer slides. The real significance of this incident was that a portable protective shield was used around the welding area, effectively protecting employees in the immediate area against exposure to ultraviolet from the welding arc.

Conclusions

- I. In general, the Mineral Core Plant and Core Mill looked much better in this quarterly audit. Unlike safety problems which can be corrected with a guard, railing, rewiring, etc., however, the asbestos health problem is one which requires an ongoing and dynamic program. The very nature of this occupational health hazard requires a unified control program representing a cooperative effort between staff and employees, always seeking ways to reduce airborne asbestos concentrations at the source or point of generation.
- II. The employees who attended the educational sessions on Monday through Wednesday, March 25-27, seemed to be receptive toward assuming their responsibilities as discussed in these sessions. To ingeminate, those portions of our asbestos control program which are properly the responsibilities of the employees include:
- a) wearing their protective masks at all times in areas so designated,
 - b) handling mineral core blocks, railed mineral core and mineral core scrap in a manner so as to minimize the production of airborne dust,
 - c) vacuuming up their individual work areas during production breakdowns or stoppages to minimize the sources of asbestos fibers, and

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- d) warning other employees entering mineral core work areas who are not properly protected or who are not familiar with procedures in handling mineral core at the time of the incident, rather than complaining to their foreman several hours later.

Such employee responsibilities, administered in a positive, complimentary way as opposed to using them as a "stick," can go a long ways toward achieving our objective: total compliance with the 1976 OSHA asbestos standard workplace asbestos fiber concentrations.

- III. Although efforts directed toward good housekeeping were apparent in both the Mineral Core Plant and the Core Mill, the Core Mill's efforts in this area were particularly noteworthy.
- IV. Problem areas which show up in our monthly sampling program are almost always traceable to an employee whose work practices are poor, a plug-up or malfunction at a major machine center or employees working in areas containing considerable accumulations of dust and scrap. In only one case is there a problem area (feeder position - abrasive planer) which doesn't fall into one of these three categories and that should be taken care of within the next 3-4 months.


J. P. Wendlick

JDW:hc

cc: D. B. Ehke - CH 2-9
L. B. Roelscher - UHB-6
R. T. Jenkins - CH 1-18
J. E. LeRoux - CH 3

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