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PLAINTIFF'S EXHIBIT GP 22

GEORGIA-PACIFIC

INTERDEPARTMENTAL COMMUNICATION

DATE: April 26, 1973

TO: Mr. E. B. Hollingsworth

LOCATION: Wilmington

FROM: J. D. Rauch

LOCATION: Akron

SUBJECT: ASBESTOS HAZARD CONTROL
Akron Joint System Plant

At this writing we have not been advised of the results of the two OSHA asbestos dust tests conducted in February 1973. All of our other tests, conducted by New York State and Union Carbide Corp. indicate that we have an asbestos problem, they just disagree on the areas and the degree of dust.

Our program of asbestos dust collection, using additional dust collecting stations will improve our position with OSHA but will not provide the total answer to all of the asbestos related problems. The only complete answer will be the total removal of asbestos from our product line. This is of course being pursued by the Tigard R & D Group. Since we do not know how far away this solution is, or what our customer acceptance will be, I believe we should establish an asbestos control program at the Akron Plant. This should improve our position with OSHA and give us some sort of outline to follow so everyone knows where we are and where we are going. At this time a good many people seem to be involved and suggestions and directives are coming in at a confusing rate. The sum total of the whole thing is that not enough is being done to protect our operation.

Using an outline furnished by Mr. Fink, I would like to outline our asbestos control program along with some proposals.

1. Establishment of a respirator program to reduce exposures until other control measures can be developed.

   This program is well established at Akron. It was conceded by the OSHA inspection team on 2-7-73 that we had issued and were using proper and approved respirators in the Department. We must keep in mind that page 11320 of the Federal Register Vol. 37, No. 110, 6-7-72, states " (1) compliance with the exposure limits prescribed by paragraph (b) of this section may not be achieved by the use of respirators or shift rotation of employees, ..." The section then goes on to explain that respirators can be used during the period necessary to install engineering controls. So we must not rely on our respirator program on a long term basis.

2. Identify obvious dusty operations, or potential sources of asbestos dust.

   This has been completed by a total of six tests, each test being run on different days by three different agencies. Three tests, on three different days by New York State, two tests, on two different days by OSHA, and one test on a different day again by Union Carbide Corp., one of our asbestos suppliers. The New York State tests differ in asbestos consentration from Union Carbides tests, and we do not have OSHA's tests at this time. However taking the highest readings from the tests we do have we must conclude that the following are danger areas and must be controlled.

a. Fork lift operator unloading car of asbestos
b. Warehouse storage area
c. Operator dumping asbestos into raw material hopper
d. Bag Packer operator
e. Bag Stacker

The areas not identified by an official agency or other tests, but that appear to be excessively dusty are:

f. Ready Mix mixer operator
g. Pail filling area (due to dust from F)
h. Pail lid placer & pail stacker area (due to dust from F)
i. Any employee in cleanup operation, sweeping etc.
j. Warehouse man while rail car of asbestos is being unloaded

3. Develop capabilities for both personnel and environmental monitoring.

As stated, this has been completed and is scheduled for follow-up on completion of dust collection system and on a 6 month basis after that.

4. Examine work practices to identify those causing dust production and eliminate, modify, or explore alternate ways.

a. Work practices have been studied. No apparent change of method possible until dust collection equipment is installed.

b. Modification of work practices will follow equipment changes and dust collector installation.

c. Alternate ways of production are under study at this time. One batch of asbestos free Bestex has been made and is waiting for field trial. Raw materials on order for asbestos free joint compound also. *All materials here 5/10/73*

5. Initiate engineering controls that will have a sustained effect, such as, substitution of materials, new methods, ventilation control, isolation, enclosure, and dust collection as stated, all of above in various stages of progress.

6. An educational program is necessary to explain program directives, changes of work practices, techniques, and medical requirements.

We have made no progress in this area, perhaps Mr. Peele could work up such a presentation for Akron, Marietta, and Milford.

7. Medical programs are now required. Each asbestos worker must be medically and enviromentally monitored. Record keeping and availability of the records to both the worker, his physician and to OSHA as NIOSH are embodied in the requirement.

This program is partly underway at Akron. Some of the workers have been monitored and X-rayed. A schedule of re-examination has been set up. We should provide 100% coverage for all workers in Joint System however to meet complete compliance. Again, I would suggest a uniform record keeping system could be set up for all Joint System Plants.

There are several things that I think we should do to protect our Joint System operation from OSHA violations that could result in fines and still have to be done.

1. All of our bags should have an approved caution label on them.

   This is in progress. However, it should be pointed out that we use in excess of 3000 bags per day. This would require a full time man just to stamp bags. At this time we have requested our future bag shipments be preprinted with the proper caution label. This would make our present bag supply all that we would have to hand stamp. I understand there is some opposition to the preprinted caution label from Tigard. stamp Rec'd 5/8/7

2. Asbestos debris should not be cleaned up with a hand broom. This tends to stir up dust and increases the concentration of asbestos fibers in the air. We are also charged with keeping asbestos dust off of all of the over head support beams, storage tank tops, etc. that may fall through the air at a later date.

   In order to accomplish this we would have to purchase a power floor sweeper to clean the whole floor area in the warehouse and manufacturing work area. This would have to be run daily to control the dust. We would also require a portable industrial sweeper to clean the areas off of the floor level where a power floor sweeper cannot reach.

3. Waste disposal. Asbestos waste, such as floor sweepings, asbestos bags, asbestos - contaminated clothing, etc., must be disposed of in such a manner that they will not endanger others at a later date.

   This presents a very serious problem with no ready solution. Debris such as empty bags can be collected in Plastic bags, marked sealed, and disposed of by storage underground at Clarence Center. But, debris such as the dust collector waste and floor sweeping have no ready disposal method. I have no ready answer to this problem.

4. We are supposed to provide our employees working in the area with the following:

   A. Special clothing, such as coveralls, head coverings, gloves, and foot coverings.
   B. Provide seperate change rooms for these employees and two seperate clothes lockers. One for their work clothes that we provide and one for their street clothes. This is to isolate contaminated clothing from the employees street clothing so he does not carry asbestos fibers home to his family.
   C. We are to provide proper shower for clean-up before changing into street clothes and provide laundering of their work clothes.

In addition to all of this we have ordered six signs to post at all entrances to the Joint System building. These signs will be posted so that an employee may read the signs and take necessary protective steps before entering the area.

I don't know what effect all of this activity will have on our employees'. I am sure that the overall effect will not be good. But, as I said at the start we are getting a lot of confusing information. The latest from Mr. Fink indicates that we should "take no action until further notice." I discussed our dust collector installation plans with George Turner on 4/25. He indicated that this project was not going to progress until OSHA advised their results. This is not too comfortable a position to be in when discussing the problem with N.Y. State officials. They have already issued an order to correct the situation over 6 months ago.

This is very lengthy, but I thought it was adviseable to put our problems and solutions down on paper is some sort of order so you can see the overall problem.

J. D. R.

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