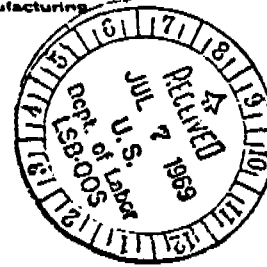


J. H. ...
Pittsburgh Corning Corporation
One Gateway Center
Pittsburgh, Pennsylvania 15222
BYRL STOUT
Vice President of Manufacturing

July 2, 1969



Mr. Wendell R. Blair
Regional Director
U. S. Department of Labor
Bureau of Labor Standards
601 Mayflower Building
Dallas, Texas 75201

Dear Mr. Blair:

Dr. Morton Corn, Professor of Industrial Hygiene, Graduate School of Public Health, University of Pittsburgh, performed an industrial hygiene survey of our Tyler, Texas plant recently. A copy of his report which you requested in your June 16 letter is attached.

All persons working in areas where the report shows dust levels in excess of the threshold limit values have been required to wear a dust respirator approved by the U. S. Bureau of Mines for Pneumoconiosis producing and for nuisance dusts. They will continue to wear such respirators until the dust exposure has been reduced to safe levels.

The Central Engineering Department of our company, with the assistance of Dr. Corn, has initiated a design program for complete dust control and collection in this plant. The total program including installation is scheduled for completion by mid-February, 1970.

If you need additional information, please advise.

Yours very truly,

PITTSBURGH CORNING CORPORATION

Byrl M. Stout
Byrl M. Stout
Vice President of Manufacturing

BMS/rb
Attch.

cc: Dr. L. B. Grant, M.D.
Mr. H. C. Underwood (attch.)
Mr. J. H. Bierer
Mr. E. W. Holman
Mr. C. E. van Horne

P I T T S B U R G H  C O R N I N G

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REPORT ON

INDUSTRIAL HYGIENE SURVEY OF SELECTED PLANT OPERATIONS
Tyler Plant, Pittsburgh-Corning Corporation
Tyler, Texas

May 7, 1969

by

Morton Corn, Ph.D.

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TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. SUMMARY AND RECOMMENDATIONS	3
III. THRESHOLD LIMIT VALUE FOR ASBESTOS	5
IV. DESCRIPTION OF SAMPLING AND ANALYTICAL METHODS	8
V. RESULTS AND DISCUSSION	11
VI. ACKNOWLEDGEMENT	21

APPENDICES

APPENDIX A: 1. Letter from W. R. Blair, Regional
Director, U. S. Department of
Labor, Dallas, Texas, to J. H.
Bierer.

2. Letter from B. M. Stout to W. R.
Blair.

3. Letter from . Corn to W. R. Blair

APPENDIX B: Duct Velocity Determinations (Primary
Data and Calculations)

APPENDIX C: Photographs of Selected Plant Oper-
ations

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I. INTRODUCTION

A survey to determine the adequacy of the existing ventilation system and associated dust collection equipment to control airborne dust was performed in the production area of the Pittsburgh-Corning Tyler, Texas plant on May 7, 1969 by Dr. Morton Corn. Dr. Corn was accompanied and assisted by Mr. John L. Hyde, of the Engineering Section, Pittsburgh-Corning Research Center, 800 Presque Isle Drive, Pittsburgh, Pennsylvania 15239. The survey was performed at the request of Mr. Byrl M. Stout, Vice President of Manufacturing, Pittsburgh-Corning Corporation. The request was made on April 28, 1969 at the Pittsburgh-Corning Research Center during a meeting called to discuss the enclosed citation of the Tyler plant by the Department of Labor (see Appendix A). The survey was concentrated exclusively on assessment of hygienic risk to airborne amosite asbestos dust and evaluation of plant facilities to reduce this risk.

During the period of the survey outdoor weather conditions were clear, sunny and warm, with temperatures in the 70-80°F range. Humidity was high. (Relative humidity in plant approximately 75%).*

The author is unaware of any special precautions taken to ensure that the ventilation system was operating in anything but the "normal" mode during this survey. Therefore, results of measurements made in this survey must be considered representative of conditions in the plant during summer months when doors and windows are open. In general, winter conditions impose more

*Measured at 11:45 AM in plant.

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(stringent requirements on plant dust control systems because windows and doors are closed to preserve heat. There is no benefit of "dilution ventilation" from outdoor air. With the same facilities for dust removal by a ventilation system, in-plant dust in air concentrations during winter months will usually exceed those present during summer months.

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II. SUMMARY AND RECOMMENDATIONS

An industrial hygiene and ventilation survey of this plant performed on May 7, 1969 suggests that asbestos fiber concentrations are high in worker breathing zones (Builder and Feeder Operators) and at breathing level in certain other plant locations. There are no hygienic guidelines for concentration of Amosite fibers in air and the judgment of excessive dustiness in this plant is referred to guidelines for Chrysotile dust. Utilization of hygienic guidelines for Chrysotile asbestos concentration in air for Amosite asbestos fibers in air is an accepted procedure in the U. S. at this time. The finding of excessive dustiness at "spot" sampling locations in the plant is consistent with survey measurements which revealed inadequate quantities of air at local exhaust hoods. Insufficient air at local sites of dust emission was reflected in low air velocities at hood faces and low air conveying velocities in branch lines and ducts. The ventilation system was estimated for Builder and Feeder areas to move approximately one sixth of the air required to ventilate these processes.

In addition to the inadequacies of the ventilation system and the resultant excessive dustiness, it was found that general housekeeping is poor in the plant. Also, during the entire day of the survey not one employee in the production area was observed to wear a respirator.

In the opinion of the author, this short survey strongly suggests that employees at this plant are being exposed, on a

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daily basis, to excessive concentrations of Amosite asbestos dust. It is recommended that efforts be immediately focussed on design of a complete ventilation and dust collection system at this plant. The system is rudimentary in concept and is underdesigned. Efforts to "doctor up" this system would probably lead to a less than satisfactory system and would involve expenditures in time and equipment equivalent to those associated with design of a new system.

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III. THRESHOLD LIMIT VALUE OF ASBESTOS DUST

"The threshold limit values refer to airborne concentrations of substances and represent conditions under which it is believed that nearly all workers may be repeatedly exposed, day after day, without adverse effect. Because of wide variation in individual susceptibility exposures of an occasional individual at or even below the threshold limit may not prevent discomfort, aggravation of a pre-existing condition, or occupational illness.

"Threshold limits should be used as guides in the control of health hazards and should not be regarded as fine lines between safe and dangerous conditions."*

The American Conference of Governmental Industrial Hygienists had, in 1967, a T.L.V. for asbestos of 5 million particles per cubic foot, as determined by impinger sampling and counting by light-field techniques. In a considered revision (1968), the Conference endorsed the retention of this T.L.V. for "most forms of asbestos". However, for crocidolite, because of the production of mesotheliomas, it was recommended that workers be equipped with air-supplied helmets because "no safe limit can be established for this form of asbestos at this time."

The British Occupational Hygiene society recently issued hygienic standards for chrysotile asbestos dust.** The standards are based on the objective that the risk of contracting asbestos

* Extracted from the Preface, Threshold Limit Values for 1968. American Conference of Governmental Industrial Hygienists, 1014 Broadway, Cincinnati, Ohio 45202.

** Ann. Occup. Hyg. 11, 47-69 (1968).

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be reduced to 1 per cent of those who have a lifetime's exposure to the dust. By "asbestosis" the committee meant the earliest demonstrable effects on the lung due to asbestos. These standards are cited here because they are more stringent than the U. S. guideline referred to above. The exposure guidelines are:

TABLE 1
BRITISH HYGIENIC GUIDELINES FOR ASBESTOS DUST

DUST CATEGORY	CONCENTRATION AVERAGED OVER 3 MONTHS	
	Fibers/cm ³	MPPCF*
Negligible	0 - 0.4	0.011
Low	0.5 - 1.9	0.014 - 0.054
Medium	2.0 - 10	0.054 - 0.28
High	Over 10	Over 0.28

The concentrations refer to fibers greater than 5 microns in length as determined by the membrane filter method.

The problem faced today with respect to Amosite asbestos is that there simply is insufficient data for dosage-response prediction of exposed populations.** The guidelines for Chrysotile will undoubtedly continue to be the threshold limit value guideline for exposure to other forms of asbestos dust for years to come.

In a survey of dust concentrations in the Unibestos facility, Port Allegheny Plant of Pittsburgh-Corning, simultaneous impinger

* Million particles per cubic foot (as fibers).

** Stokinger, H. E. "Development of TLV's for Fibrous Materials." Paper presented at Special Session on Fibers, Annual Meeting of American Industrial Hygiene Association, Denver, Colorado, May, 1969.

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and membrane filter sampling was performed. The conversion of values obtained by one method to those of the other method was not possible. At each location, the numbers of the fibers and particles varied. The impinger method is based on particles while the membrane filter method assesses only fibers. For the purposes of this preliminary survey, either method would yield data suggesting that airborne dust concentrations were acceptable or unacceptable. Therefore, the membrane filter technique was used and the British guideline is applicable (Table I).

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IV. DESCRIPTION OF SAMPLING AND ANALYTICAL METHODS

A. Assessment of Airborne Dust

Samples were obtained at either worker breathing zones as they performed their routine tasks, or at breathing level to represent "background air". Samples were obtained during a five or ten minute period at a flow rate of 21 lpm by utilizing a vacuum pump in conjunction with a filter holder and sample filter. The system was precalibrated in terms of pump inlet pressure and air flow with all sampling line components, including filter, in place.

A membrane filter (Type HA Millipore) was used to obtain samples for microscopic evaluation of fiber and dust particle concentrations. This paper is composed of pores 0.45 microns in size and has been shown to retain, with 100% efficiency, particles down to 0.05 micron diameter.¹ *impossible*

The filter was first visually examined to detect any loose dust or uneven dust deposition. In the few cases where the filter deposit did not pass this examination, it was necessary to resuspend the collected dust in distilled water and refilter this suspension on VF grade Millipore filter to assure an even dust distribution over the entire filter area. A pie shaped segment of the filter was then placed on a microscope slide and rendered completely transparent with Cargille certified index of refraction liquids. Cargille liquid of index of refraction 1.500 was usually most suitable. The counting of the dust particles and the counting and sizing of asbestos fibers was performed with the aid of a

¹ Megaw, W. J. and Wiffen, R. D.: Int. J. Air Water Poll. 1, 501 (1963).

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Zeiss Photomicroscope using Phase Contrast Illumination. The objective lens was a Zeiss Neofluor Ph 63x with a numerical aperture of 0.90. The eyepiece had a magnification of 20x and contained a calibrated Porton graticule. The optovar feature of the Zeiss scope contributed to the total magnification of 2016x. Resolution was approximately 0.35 microns. Particles and fibers of size 0.30 microns could be detected.

In the evaluation procedure, all particles and fibers in the Porton field of view were counted and the fibers were grouped by fiber length into three categories (less than five microns, five to ten microns, and larger than ten microns). This procedure was repeated for a number of randomly selected fields on the face of the filter. Because only a portion of the total filter area was evaluated by this method, it was necessary to correct the count by the ratio of the total filter area to the evaluated area. The resultant particle or fiber number was divided by the volume of the air sample to obtain dust or fiber concentration expressed as millions of particles per cubic foot (MPPCF).

The statistical reliability of the evaluation was expressed as the standard deviation, calculated as $N^{1/2}$, where N is the particle or fiber count.

The procedure outlined follows, in its essential points, that recommended by J. R. Lynch and H. E. Ayer in their article "Measurement of Asbestos Exposure" which appeared in the Journal of Occupational Medicine, Volume 10, January, 1968.

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B. Measurement of Air Velocities at Hoods

A calibrated velometer was used to measure face velocities of hoods and room air velocities.*

C. Air Velocities in Ventilation Ducts

A standard 1/4" diameter pitot tube was used in conjunction with a Dwyer 1:10 inclined manometer to determine velocity pressures in ducts. Ten point traverses were taken in larger ducts (>6" diameter); centerline readings only were obtained in smaller ducts. All measurements are considered to be approximate (estimated reliability $\pm 10\%$) because of the conditions imposed by the system. For example, there were few locations where measurements could be made 10 diameters from entries or elbows. Also, the standard pitot tube should not be used in lines smaller than 8" diameter. However, the reliability of measurements achieved is perfectly adequate for a preliminary survey of the type undertaken here.

*Alnor Velometer, Illinois Testing Laboratory, Chicago, Illinois.

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V. RESULTS AND DISCUSSION

A. Airborne Dust Concentrations

Measured concentrations of dust particles and asbestos fibers are summarized in Table 2. In order to facilitate comparison with the guidelines from Table 1, the last two columns (5 and 6) of Table 2 for fiber concentrations have been added to yield Column 7, which should be compared with Column 3 of Table 1. On this basis, operators at the feeders are receiving High exposures. Builder operators are also receiving High exposures. Although much dust is present at the cutting operation the single sample obtained suggests that particles and not fibers are the major contributors to the dispersion. Table 2 suggests that outdoor air is Negligible in terms of fiber content, as is the dust collector effluent. However, the aisle of the warehouse opposite the Feeders is High, suggesting the large zone of influence of the dust sources in the Feeder areas. It cannot be too strongly stressed that these are "spot" samples and must be viewed as suggestive results only. However, they do convey a picture of high dust exposures in Feeder and Builder areas, as well as in adjacent zones. The author must state, based on previous experience, that dust concentrations in plant air would almost certainly increase during winter months.

B. Local Exhaust Hood Face Velocities

There are design guidelines for face velocities of air at local exhaust hoods*. In general, a face velocity of 100 fpm is

*See Chapter 5, Industrial Ventilation, 10th Ed. American Conference of Governmental Industrial Hygienists, 1014 Broadway, Cincinnati, Ohio.

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BRITISH STANDARDS

H = High
M = Medium
L = Low

ASBESTOS FIBER CONCENTRATIONS AT SELECTED PLANT LOCATIONS

TABLE 2

Date and Time of Sample		Description of Sampling Site	Dust Particle or Fiber Counts, Expressed as Millions of Particles Per Cubic Foot + Standard Deviation				
			Particles	Fibers			Total (Cols. 5 + 6)
				<5 μ	5-10 μ	>10 μ	
(1)	5/7 2:30 PM-2:35 PM	(2) Breathing zone of Feeder Operator, Lines 1 and 2 during sweeping, feeding. (Note: cooling fan at dust collector on.)	(3) 12.3 $\pm$ 0.6	(4) 3.60 $\pm$ 0.28	(5) 0.64 $\pm$ 0.12	(6) 0.14 $\pm$ 0.04	(7) 0.78 0.92 228 Fibers/ml
(1)	5/7 2:36 PM-2:46 PM	(2) Breathing level in Walkway adjacent to Feeder No. 3.	(3) 10.5 $\pm$ 0.5	(4) 3.40 $\pm$ 0.19	(5) 0.34 $\pm$ 0.06	(6) 0.14 $\pm$ 0.04	(7) 0.48 17 Fibers/ml
(1)	5/7 2:50 PM-	(2) Effluent from Dust Collector Bags approx. 1" from Bag. Dust collector for Lines 1 and 2.	(3) 2.9 $\pm$ 0.2	(4) 0.71 $\pm$ 0.09	(5) 0.06 $\pm$ 0.03	(6) 0.02 $\pm$ 0.02	(7) 0.08 2.84 Fibers/ml
(1)	5/7 3:05 PM-3:15 PM	(2) Outdoor air sample at breathing level on loading dock near Oil House.	(3) 1.5 $\pm$ 0.2	(4) 0.16 $\pm$ 0.04	(5) 0.03 $\pm$ 0.02	(6) 0.05 $\pm$ 0.02	(7) 0.08 2.84 Fibers/ml
(1)	5/7 3:15 PM-3:25 PM	(2) Breathing level in aisle, Unibestos Warehouse opposite Feeder Lines 1 and 2.	(3) 35.0 $\pm$ 1.7	(4) 1.26 $\pm$ 0.12	(5) 0.18 $\pm$ 0.03	(6) 0.10 $\pm$ 0.02	(7) 0.28 10 Fibers/ml
(1)	5/7 3:30 PM-3:40 PM	(2) Breathing zone of Builder Operator, Line No. 3 (3/4 x 1 Unibestos). Cycle of loading, building, spraying, etc. Note: Fans on over Lines 2 and 3.	(3) 3.2 $\pm$ 0.2	(4) 1.48 $\pm$ 0.09	(5) 0.18 $\pm$ 0.03	(6) 0.10 $\pm$ 0.02	(7) 0.28 10 Fibers/ml
(1)	5/7 3:45 PM-3:56 PM	(2) Breathing zone of Builder Operator, Line No. 3. Cycle of loading, building, spraying, etc.	(3) 12.5 $\pm$ 0.6	(4) 4.02 $\pm$ 0.20	(5) 0.20 $\pm$ 0.04	(6) 0.21 $\pm$ 0.05	(7) 0.41 145 Fibers/ml

(1)

(2)

(3)

(4)

(5)

(6)

(7)

Circled samples 11 & 12 Fibers/ml which exceeds Dept of labor stds

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TABLE 2 (continued)

5/7	4:05 pm- 4:15 pm	Breathing zone of Operator, Large Cutting Saw. Note: Door adjacent to cutting operation open to outdoor air.	37.4 $\pm$ 1.8	1.11 $\pm$ 0.11	0.07 $\pm$ 0.03	0.05 $\pm$ 0.024	0.12 <i>4.24 Fibers ml</i>
(1)		(2)	(3)	(4)	(5)	(6)	(7)

Federal Register Volume 34 No 12 Dated 1/17/69 Part II Department
of Labor Safety & Health Standards.

Table II states: asbestos - 12 fibers/ml greater than 5 μ in
length* or a TLV = 2 MPPCF.

* $\rightarrow$ as determined by the membrane filter method
at 430 X phase contrast magnification.

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recommended for control of fume and vapors, while higher velocities are not uncommon for control of materials emitted with great force. At the Port Allegheny Plant, Mr. John Hyde, of Pittsburgh-Corning, and the author are designing for 200 fpm face velocity at hoods which interface with plant air: internal process hoods are designed for 100 fpm.

Table 3 is a summary of measured air velocities at selected hoods in the Tyler Plant. With the exceptions of the Builder hoods and the Scrap Grinder hood, face velocities at hoods are inadequate. Smoke tube tests performed at each hood offered visual confirmation of this conclusion based on velocity measurements. Although the hood on the Intermediate Saw was satisfactory, it would not be so if two or more saws were used simultaneously.

C. Air Flow Associated with Local Exhaust Hoods and Dust Collectors

Figure 1 is a line diagram of the ventilation ducts in the Feeder and Builder Areas. The duct locations for Pitot tube traverses are denoted by numbers. Table 4 is a summary of volume of air flowing at these points as determined on the day of this survey. The values listed in Table 4 are probably overestimates because certain of the ducts were partially clogged with settled fibers. All data and calculations for the Table 4 summary are included in Appendix B.

Table 4 and data in Appendix B indicate the following:

1. Air is very poorly distributed in the ventilation system. As an example, hoods 2, 3 and 4 for similar operations were allocated 63, 391 and 202 cfm respectively.

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TABLE 3

UNIBESTOS LINES: SUMMARY OF HOOD AIR VELOCITIES

Location		Site of Measurement* and Average Air Velocity, fpm**			
Line No. 1	40" Fiber Feeder†	Left Side	Top	0	
			Middle	0	
			Bottom	0	
		Center	Top	50	
			Bottom	50	
		Right Side	Top	0	
			Bottom	0	
		Note: Smoke tube test revealed poor control.			
Line No. 1	30" Fiber Feeder†	Left Side	Top	20	
			Bottom	20-30	
		Center	Top	60	
			Bottom	60	
		Right Side	Top	60	
			Bottom	50	
Line No. 1	30" Fiber Feeder†	Left Side	Top	20	
			Middle	0	
			Bottom	0	
		Center	Top	20	
			Middle	0-10	
			Bottom	0-10	
		Right Side	Top	20-30	
			Middle	30	
Line No. 1	40" Fiber Feeder	Left Side	Top	0	
			Middle	0	
			Bottom	0	
		Center	Top	10	
			Middle	10-30	
			Bottom	10-30	
		Right Side	Top	0	
			Middle	20	
Bottom	20				
Line No. 2	40" Fiber Feeder (Note: Approx. 75% of hood face blocked by fiber)	Left Side	Top	50-100	
			Middle	75-100	
			Bottom	75-100	
		Center	Top	30-40	
			Right Side	Top	30
				Bottom	50

*Room air in vicinity of feeders measured to be 30-40 fpm, South to North (fans off). Room air in vicinity of feeders measured to be 300 fpm, South to North (fans on).

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TABLE 3 (continued)

Line No. 2	30" Fiber Feeder	Stand by (not in use)		
Line No. 2	30" Scrap Feeder	Left Side	Top	10-50
			Middle	30
			Bottom	20
		Center	Top	20
			Middle	40
			Bottom	30
		Right Side	Top	0
			Middle	40
			Bottom	20
		Left Side	Top	75-100
			Bottom	100
		Center	Top	100
			Middle	100
		Right Side	Bottom	75-100
			Top	125
			Bottom	75-100
Line No. 3	20" Scrap Feeder	Left Side	Top	0
			Bottom	20-30
		Right Side	Top	0
			Bottom	30-40
Builder Hoods		Line No. 2		125-150
		Line No. 3		150
		Line No. 1	Invalid measurements because instrument could not be properly placed. Smoke tube revealed good control.	
Scrap Grinder Hood		Left Side	Top	75-100
			Middle	100-150
			Bottom	150
		Center	Top	75
			Middle	75-100
			Bottom	100
		Right Side	Top	50-75
			Middle	50-75
			Bottom	50-75
Saw Area: Intermediate Saw ⁺				200-300

⁺Large Rip Saw Off.

*All measurements in vertical plane at hood face, unless otherwise specified.

**Feet per minute.

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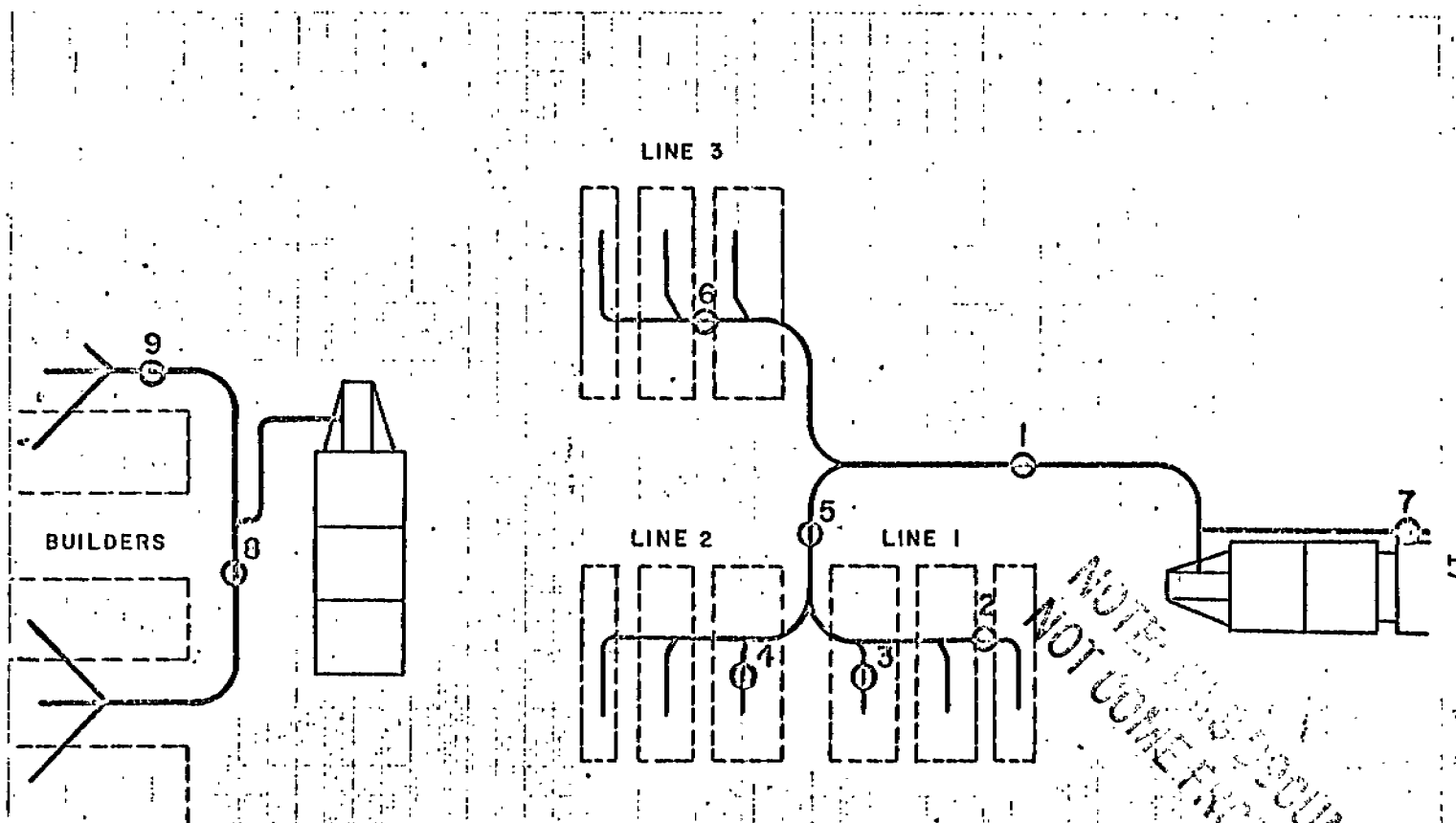


Figure 1. Schematic of Unibestos Lines Showing Ventilation System and Pitot Traverso Points
Tyler Plant, Pittsburgh-Corning Corporation

Scale: 1" = 8'-0"

Source: Dwg. No. 56-2002-0 (6-12-56).

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TABLE 4

SUMMARY OF VOLUMETRIC AIR FLOWRATES IN DUCTS
IN FEEDER AND BUILDER AREAS

Duct Number (Figure 4)	Air Flow, Cubic Feet Per Minute
<u>Feeder Area:</u>	
1	2,769
2	63
3	391
4	202
5	1,940
6	183
7	877
<u>Builder Area:</u>	
8	1,724
9	810

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2. Conveying velocities within ducts are generally very low for handling asbestos dust. A minimum design velocity of 4000 fpm is being used for the new ventilation system.* Duct 7 (Scrap Grinder Hood) and the 10" diameter duct into the Block Dust Collector were the only ducts with adequate air velocities for conveying asbestos dust.

3. Total air volume for the Builder and Feeder areas is very low (2769 + 1724 + 877 cfm). Estimates for Port Allegheny place the air requirements for adequate control for three lines at approximately 6.5x times this amount of air.

In summary, as judged by three different parameters, i.e. dust concentrations, face velocities at hoods, and duct air volumes, the ventilation system, and hence dust control at this plant, are unsatisfactory.

D. General Housekeeping

In general, housekeeping is judged to be poor at this plant. Appendix C is a selection of photographs taken during this survey. Asbestos dust is on all surfaces as well as in the air. It was noted that with the exception of Mr. Hyde and the author not a single person in the plant wore a respirator. It can only be concluded that Amosite fiber at this plant is not being handled with the care and respect that any substance with this toxic potential deserves.

The practice of exhausting bag dust collectors to plant air would not be permitted in the states of Pennsylvania and New York. Air cannot be recirculated when toxic substances are

*Port Allegheny Plant.

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involved. In the case of nuisance substances, recirculation is permitted if the recirculated air contains the toxic agent in concentrations less than 20% of the Threshold Limit Value.

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VI. ACKNOWLEDGEMENT

The author wishes to express his appreciation to Mr. John L. Hyde, of Pittsburgh Corning Corporation. Mr. Hyde provided invaluable assistance with survey measurements.

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APPENDIX A

1. Letter from W.R. Blair, Regional Director, U. S. Department of Labor, Dallas, Texas, to J. H. Bierer, President, Pittsburgh-Corning.
2. Letter from B. M. Stout, Vice-President, Pittsburgh-Corning to W. R. Blair.
3. Letters from M. Corn to W. R. Blair.

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Pittsburgh Corning Corporation
One Gateway Center
Pittsburgh, Pennsylvania 15222
BYRL STOUT
Vice President of Manufacturing

July 9, 1969

Mr. Wendell R. Blair
Regional Director
U. S. Department of Labor
Bureau of Labor Standards
601 Mayflower Building
Dallas, Texas 75201

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Dear Mr. Blair:

Enclosed are copies of First Aid Certificates presented by the American Red Cross to members of the supervisory staff at our Tyler, Texas plant.

The training given these supervisors should satisfy the requirements of 50-204.264 of your notice sent to our President, Mr. J. H. Bierer, with your letter dated April 8, 1969.

Yours very truly,

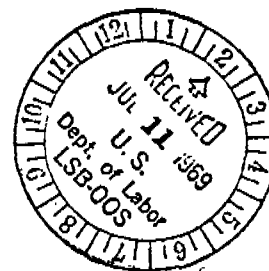
PITTSBURGH CORNING CORPORATION

Byrl M. Stout
Byrl M. Stout

Vice President of Manufacturing

BMS/rb
Encl.

cc: Mr. J. H. Bierer
Mr. C. E. van Horne
Mr. H. C. Underwood
Dr. L. B. Grant, M.D.



P I T T S B U R G H **PC** C O R N I N G

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THE AMERICAN NATIONAL RED CROSS

This certifies that
Nove L. Lindley
has completed the STANDARD course
of instruction in
FIRST AID TO THE INJURED
at Smith County Chapter
Tyler, Texas

April 1969

AB Murphy
National Director
Safety Services

THE AMERICAN NATIONAL RED CROSS

This certifies that
Everett Revill
has completed the STANDARD course
of instruction in
FIRST AID TO THE INJURED
at Smith County Chapter
Tyler, Texas

April 1969

AB Murphy
National Director
Safety Services

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THE AMERICAN NATIONAL RED CROSS

This certifies that
Charles E. Van Horne
has completed the STANDARD course
of instruction in
FIRST AID TO THE INJURED
at Smith County Chapter
Tyler, Texas

April 1969

AB Murphy
National Director
Safety Services

THE AMERICAN NATIONAL RED CROSS

This certifies that
Billy C. Williamson
has completed the STANDARD course
of instruction in
FIRST AID TO THE INJURED
at Smith County Chapter
Tyler, Texas

April 1969

AB Murphy
National Director
Safety Services

THE AMERICAN NATIONAL RED CROSS

This certifies that
William E. Jenkins
has completed the STANDARD course
of instruction in
FIRST AID TO THE INJURED
at Smith County Chapter
Tyler, Texas

April 1969

AB Murphy
National Director
Safety Services

GG 20013

1 BB 0009071 1

Notes Plant Was
Sent Down From
July 12, 1971 - Aug 2, 1971

BULLETIN

No. 254

7-26-71

NOTE: THIS DOCUMENT DID
NOT COME FROM THE FILES

TO ALL EMPLOYEES

EFFECTIVE AUGUST 2, 1971 ALL PERSONNEL WILL BE REQUIRED
TO WEAR ON THEIR FACE, AT ALL TIMES IN THE PLANT A DUST-
FACE #77 OR OTHER EFFECTIVE TYPE OF RESPIRATOR.

THE ONLY AREAS WHERE RESPIRATORS WILL NOT BE REQUIRED
ARE IN THE (1) LUNCH ROOM, (2) SUPERVISORS' OFFICES,
(3) LATRINES AND (4) PLANT OFFICE.

THE WORKERS' COMMITTEE HAS BEEN ADVISED OF THE COMPANY'S
OBLIGATION. THE NEW OCCUPATIONAL, SAFETY AND HEALTH ACT
CLEARLY DEFINES BOTH THE EMPLOYERS AND EMPLOYEES OBLIGATIONS.

P. E. van der Linde
W. B. Jordan

GG 20014

1 BB 0009072 1

November 16, 1971

George A. Hurst, M.D.
Superintendent
East Texas Chest Hospital
Box 2003
Tyler, Texas 75701

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

Dear Doctor Hurst:

I am sorry that I cannot meet with you until after the first of the year. I would like to suggest January 5th or 6th. At that time we can discuss the question of making the results of your study available to Dr. William Johnson.

Your examination of the Tyler employees of Pittsburgh Corning Corporation will have the added significance of establishing the employee's health status at approximately the termination of their work-related asbestos exposure, inasmuch as the plant will be closing shortly after the first of the year.

Hopefully by the time of our meeting we will have available to us the in-plant dust studies performed by M.I.O.S.H. a week or so ago. This will supplement earlier dust studies that have been performed.

Looking forward to meeting with you in January.

Sincerely,

Lee B. Crent, M.D.
Medical Director

LEG:lc
cc: C. E. Van Horn
E. W. Holman
Dr. W. Johnson

GG 20015

BB 0009073

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
7th Floor - 1512 Commerce Street
Dallas, Texas 75201

NARRATIVE

1. CSNO NO. H-7734	2. OSHA-1 NO. 1
3. AREA #1730	4. REGION 6

EMPLOYER Pittsburg Corning Corp.

ADDRESS P. O. Box 3057

Tyler, Texas 75701

DATE 12/2/71

OSHA-1C

Page 1 of

1. Coverage Information: Manufacturer unibestos pipe insulation affecting commerce obtaining raw materials and distributing finished products.

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

3. Closing Conference Summary: Date 12/1/71, Mr. C. E. van Horne, Works Manager, C. R. Holder, ARA Compliance, and John P. Boyle, I. H., present. ARA informed Mr. van Horne alleged violations had been noted and that citation of alleged violations and proposed assessment of penalties would be issued. Mr. Boyle covered alleged violations noted and this portion of closing conference is covered in the I. H. narrative report. Mr. van Horne admitted knowledge of excessive concentrations of asbestos and stated company had requested variance. Copy of this variance request was furnished by van Horne and is in the file. Mr. van Horne did not object to proposed abatement dates or violations. No legal action expected.

GG 20016

BB 0009074

3. In your opinion, is a followup inspection necessary? ☐ Yes ☐ No

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

NARRATIVE

This inspection was made by C. R. Holder and John P. Boyle for the purpose of the Industrial Hygienist performing a survey to determine if employees were being exposed to excessive amounts of asbestos fines. A team from NIOCH had visited the plant at the request of the Texas State Department of Health and passed on to Regional Administrator John K. Barto the information that they felt extremely serious health hazard conditions existed at this plant due to employees being exposed to excessive amounts of asbestos fines.

The entrance interview was with Mr. Edmond Snavley, Works Accountant, and Mr. C. E. van Horne, Works Manager. The ARA and Industrial Hygienist properly identified themselves by presenting their identification credentials and the ARA explained that the purpose of the inspection was for Mr. Boyle to perform an industrial hygiene survey to determine if employees were being exposed to excessive amounts of asbestos fines. Copies of the Occupational Safety and Health Act of 1970, 29 CFR Part 1910, Handy Reference Guide, and Safety Standards magazine, dated May-June, 1971, were presented to them. Both of these employer representatives were familiar with the Act and when we informed them it would be necessary for an employee representative to accompany us on the inspection Mr. Ray Barron, Maintenance Man and Union Workman Committee member, who resides at 109 E. Grandville, Tyler, Texas, and is a member of O.C.A.W., Local 4-202, the authorized representative of the employees, was called to the office and he was briefed on the purpose of our visit.

Prior to starting the inspection a review of the accident reports was made and no serious injuries have resulted in this plant during the current calendar year. Prior to the employees' representative being called to the office Mr. van Horne was informed that if conditions were noted during the inspection that constituted alleged violations of the rules and regulations, that it could cause the company to be issued a citation of alleged violations and proposed assessment of penalties. Additional information as to other employees contacted can be found in the Industrial Hygienist's narrative report.

Mr. van Horne was informed that we would be taking pictures of the equipment and people at each test site and he voiced no objection.

GG 20017

1 BB 0009075 1

To: Mr. D. A. Warren

January 13, 1972

MAINTENANCE OF PLANT VENTILATION SYSTEM

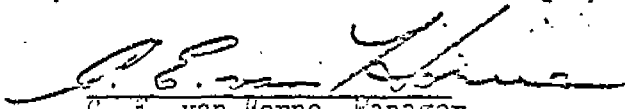
PRODUCTION Department (Batch & Forming)

Each building line will be inspected at least once every three weeks. This includes scrap grinder, feeding machines, and building machines.

FINISHING Department

The entire dust collection system will be inspected on a regular weekly basis.

CEvH:sab


C. E. van Horne, Manager

CG 20018

BB 0009076

NARRATIVE

1. CSHO NO.	2. OSHA-1 NO.
B7501	1
3. AREA	4. REGION
* 1730	6

EMPLOYER Pittsburg Corning Corporation

ADDRESS Owentown Texas Plant. P. O. Box 3057
Tyler, Texas 75701

DATE January 14, 1972

OSHA-1C

Page _____ of _____

1. Coverage Information:

NOT COVERED BY LAW

3. Closing Conference Summary:

A followup was made by John P. Boyle to confirm compliance on January 13, 1972, for all items which called for immediate correction in citations issued by C. R. Holder on December 16, 1971. The subject citations were received by the Owentown Plant on December 17, 1971, and by the Pittsburgh Corning Corporate office on December 21, 1971.

CITATION STATUS:

Item	Description	Corrective Action
1	Personnel assigned to tasks requiring respirators without medical exams. (Immediate correction required).	Not complete Reviewing records and scheduling employees for physicals per C. E. Van Horne on 1-13-72.
2	Air vents discharging into base of large saw	Corrected on same day
	Air vent discharging into large saw exhaust hood	Corrected
	Open doors disturb exhaust ventilation	Corrected; controlled by supervision; signs ordered.
	Blowing of dust on small saw outside of hood.	Corrected
	Air used at small saw to blow off equipment	Corrected, exhaust drop installed.
	Replace solid back up block on block saw (Immediate correction required)	Not complete, saw has been shut down until corrected.
	Feeder enclosure (Immediate correction required)	Not complete Material on hand, some pre-cut installation schedule 1-15-72.

3. In your opinion, is a followup inspection necessary? ☒ Yes ☐ No

CG 20019

(Continued on attached sheets)

BB 0009077

CITATION STATUS (continued)

NOTED: NO ONE YET DID
NOT COME FROM PPG FILES

<u>Item</u>	<u>Description</u>	<u>Corrective Action</u>
2	Ventilation system maintenance schedule	Complete.
	Bag filter discharge inside building (3/31/72)	Referred to Pittsburgh.
	Block saw enclosure (3/31/72)	Referred to Pittsburgh.
	Feed and Builder exhaust system duct velocities. (3/31/72)	Referred to Pittsburgh.
3	Housekeeping	Complete in finishing area. (Three vacuum drops installed; area appearance acceptable) No corrective action other than immediate clean up after use, has been taken in feed and builder areas.
4	Respirator usage	Complete; Acceptable.

The citation status of all listed items was reviewed with Mr. Van Horne on January 13, 1972.

There was considerable discussion on item one, where new personnel have been assigned to tasks requiring respirators without a preliminary physical examination. Mr. Van Horne made the following statement, "My secretary is still reviewing the records to determine which employees require medical exams. The job has not been completed. We would like to send all of the employees in together for medical exams on a weekend where it won't interfere with the production schedule. I think we will have to pay them."

Mr. Van Horne suggested that he would prefer to give new employees physicals after a two-week period since many new men have quit during the initial training period. These men know that the company is considering shutting down the plant and many quit after they draw their first check. Such a procedure of physical exams for new employees would be acceptable to J. P. Boyle. No commitment was made regarding this point.

Mr. Van Horne further indicated that this medical-physical requirement is being worked with E. B. Grant, M. D., who is the company medical doctor on corporate staff. He indicated that Doctor Grant believes the company employee questionnaire is adequate to assure that an employee can wear a respirator while working. A copy of the questionnaire was shown to Mr. Boyle. The questionnaire is comprehensive regarding past medical history.

(more)

GG 20020

BB 0009078

CITATION STATUS (continued)

Mr. Van Horne stated on item three that he did not know that housekeeping applied to areas other than the finishing area where exhaust drops have been installed to vacuum up dust after equipment usage.

This subject was covered during the closing interview with Mr. Van Horne, Mr. Boyle, and Mr. Holder. The clean up problem in back of the feeder drives, in back of the builder units, in the builder work areas and also in storage areas was stressed. He was told of extensive upper surface contamination which could not be blown off where pictures were taken to define the problem. It was pointed out that the existing vacuum cleaner used for floor sweeping could not be used to handle these problems. Mr. Van Horne asked if this meant that the plant would have to be kept as clean as a dairy. Mr. Holder stated that in his judgment, equivalent house cleaning would be necessary to keep levels within the established standards.

Purchase orders agreed to by the Pittsburgh Corning Corporate office, include a sufficient volume of orders to keep the plant operating to the middle of March as stated by Mr. Van Horne. Apparently, there is no plan to shut down the plant until all orders are filled. No statement was made by Mr. Van Horne regarding whether the Pittsburgh Corning Corporate office is still accepting product purchase orders for the plant.

We are not aware of any firm agreement to sell the plant. Mr. Van Horne indicated that two different persons were interested during the past few weeks.

NOTED
NOT CORNELL FILES

GG 20021

BB 0009079

7th Floor, Texaco Bldg.
1512 Commerce Street
Dallas, Texas 75201

1. CSNO NO. B7501	2. REPORT NO. 1FU
3. AREA *1730	4. REGION 6

OSHA-1

SAFETY AND HEALTH REPORT

5. STATE 48	6. CITY 7070	7. EMPLOYER	8. INSPECTION DATE 1-13-72	9. SECONDARY COVERAGE				
				PCA X	SCA	CSA	MAR	OTHER
NAME OF EMPLOYER, TYPE OF LEGAL ENTITY, AND ADDRESS OF PRINCIPAL OFFICE Pittsburgh Corning Corporation, 3 Gateway Center 16th Floor, Pittsburgh, Pennsylvania 15222								11. TELEPHONE NO. (214) 877-3411
STREET OR BUILDING (Place of Performance) Owentown Texas Plant, P. O. Box 3057								13. ZIP CODE 75701
15. CITY Tyler			15. STATE Texas	16. COUNTY AND CODE Smith 423				
17. TYPE OF BUSINESS Manufacture of asbestos pipe insulation				18. NUMBER EMPLOYED	18. ALL SHIFTS	19. LARGEST SHIFT		
CLASSIFIED CONTRACTS ☐ YES ☒ NO				21. SIC	MALE	67	39	
2. MAIN PLANT ☐ BRANCH PLANT ☒ ONLY PLANT ☐				FEMALE	3	3		
23. TYPE		24. COMPLAINT		25. INSPECTION BY		TOTAL		
INITIAL	FOLLOWUP	YES	NO					
	X							
6. MANAGEMENT OFFICIALS CONTACTED C. E. Van Horne			TITLE Works Manager		27. EMPLOYEE INSPECTION REPRESENTATIVE(S)			TITLE
8. MANAGEMENT INSPECTION REPRESENTATIVE(S) C. E. Van Horne			Works Manager		29. OTHER EMPLOYEES CONTACTED (If no authorized employee representative) H. L. Yandle			Shipper
10. CLOSING CONFERENCE CONTACTS (Use the OSHA-1C for details) C. E. Van Horne			Works Manager					

(A) DESCRIPTION OF WORKSITE
31. (1) CONSTRUCTION OF BUILDINGS OR TYPE OF WORK AREA (Including size)

See OSHA 1, dated 11/23/71.

32. (2) TYPE OF FIRE PROTECTION

Same as for 31

33. (3) DESCRIPTION OF PROCESSES (Raw materials, major processes, and products, etc.)

Same as for 31

34. (C) SECONDARY COVERAGE-LIST FEDERAL CONTACT NUMBER, AND PREFIX (Details in OSHA-1C)

35. (D) DID YOU OBSERVE AN INJURY OR HEALTH HAZARD NOT COVERED BY A STANDARD? ☐ YES ☒ NO
IF "YES," SUBMIT AN OSHA-9 FORM.

36. (E) (1) WAS ADVANCE NOTICE OF INSPECTION GIVEN? ☐ YES ☒ NO TO WHOM? WHEN?

(2) IN YOUR JUDGMENT DID THE ADVANCE NOTICE ADVERSELY AFFECT THE INSPECTION? ☐ YES ☒ NO

IF "YES," EXPLAIN ON REVERSE OF THIS FORM.

37. (F) (1) DOES EMPLOYER MAINTAIN INJURY AND ILLNESS RECORDS AS REQUIRED? ☒ YES ☐ NO

38. (2) WERE FORMS AND INSTRUCTIONS PROVIDED? ☐ YES ☒ NO

39. (3) DOES EMPLOYER COMPLY WITH THE POSTING REQUIREMENTS? ☒ YES ☐ NO

IF "NO," LIST AS A VIOLATION ON OSHA-1A.

TIME INVOLVED - TO NEAREST (0.5) HOUR						46. John P. Boyle	
41. PREPARATION	41. TRAVEL	42. CONFERENCE	43. INSPECTION	44. REPORT PREPARATION	45. TOTAL	CSNO'S SIGNATURE	
						DATE 1-14-72	
						47. John P. Boyle	
						DATE 1-14-72	

Assistant Regional Administrator
C. R. Holder

NOTE: THIS DOCUMENT DID NOT COME FROM PPG FILES

GG 20022

BB 0009080

O.C. A W
Local 4-252
Union Committee member
Ray Burton.

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

1. CSHO NO.	2. REPORT NO.
B7501	IFL
3. AREA	4. REGION
*1730	6

OSHA-1

SAFETY AND HEALTH REPORT

5. STATE	6. CITY	7. EMPLOYER	8. INSPECTION DATE	9. SECONDARY COVERAGE				
4A	7070		2-9-72	PCA	SCA	CSA	MAR	OTHER
10. NAME OF EMPLOYER, TYPE OF LEGAL ENTITY, AND ADDRESS OF PRINCIPAL OFFICE Pittsburgh Corning Corporation, 3 Gateway Center 16th Floor, Pittsburgh, PA 15221								11. TELEPHONE NO. (214) 977-3411
12. STREET OR BUILDING (Place of Performance) Owentown Texas Plant, PO Box 3057								13. ZIP CODE 75701
14. CITY Tyler			15. STATE Texas	16. COUNTY AND CODE Smith 423				
17. TYPE OF BUSINESS Manufacture of asbestos pipe insulation				18. NUMBER EMPLOYED	19. ALL SHIFTS	20. LARGEST SHIFT		
21. CLASSIFIED CONTRACTS ☐ YES ☒ NO				21. SIC	MALE	67	39	
22. MAIN PLANT ☐ BRANCH PLANT ☒ ONLY PLANT ☐					FEMALE	3	3	
23. TYPE		24. COMPLAINT		25. INSPECTION BY		TOTAL		
INITIAL	FOLLOWUP	YES	NO	FEDERAL		70 42		
26. MANAGEMENT OFFICIALS CONTACTED C. E. Van Horne			TITLE Works Manager		27. EMPLOYEE INSPECTION REPRESENTATIVE(S) Mr. Ray Burton			TITLE Maintenance
28. MANAGEMENT INSPECTION REPRESENTATIVE(S) C. E. Van Horne			TITLE Works Manager		29. OTHER EMPLOYEES CONTACTED (If no authorized employee representative)			
30. CLOSING CONFERENCE CONTACTS (Use the OSHA-1C for details) C. E. Van Horne			TITLE Works Manager					

(A) DESCRIPTION OF WORKSITE

31. (1) CONSTRUCTION OF BUILDINGS OR TYPE OF WORK AREA (Including plans)

See OSHA 1, dated 11/23/71

32. (2) TYPE OF FIRE PROTECTION

Same as for 31

33. (3) DESCRIPTION OF PROCESSES (Raw materials, major processes, and products, etc.)

Same as for 31

34. (C) SECONDARY COVERAGE-LIST FEDERAL CONTACT NUMBER, AND PREFIX (Details in OSHA-1C)

35. (D) DID YOU OBSERVE AN INJURY OR HEALTH HAZARD NOT COVERED BY A STANDARD? ☐ YES ☐ NO

IF "YES," SUBMIT AN OSHA-9 FORM.

36. (E) (1) WAS ADVANCE NOTICE OF INSPECTION GIVEN? ☐ YES ☒ NO TO WHOM? WHEN?

(2) IN YOUR JUDGMENT DID THE ADVANCE NOTICE ADVERSELY AFFECT THE INSPECTION? ☐ YES ☐ NO

IF "YES," EXPLAIN ON REVERSE OF THIS FORM.

37. (F) (1) DOES EMPLOYER MAINTAIN INJURY AND ILLNESS RECORDS AS REQUIRED? ☒ YES ☐ NO

38. (2) WERE FORMS AND INSTRUCTIONS PROVIDED? ☐ YES ☐ NO

39. (3) DOES EMPLOYER COMPLY WITH THE POSTING REQUIREMENTS? ☒ YES ☐ NO

IF "NO," LIST AS A VIOLATION ON OSHA-1A.

TIME INVESTED - TO NEAREST (0.5) HOUR

40. PREPARATION	41. TRAVEL	42. CONFERENCE	43. INSPECTION	44. REPORT PREPARATION	45. TOTAL	46. CSHO'S SIGNATURE O. L. N. Burton	DATE
						47. AREA DIRECTOR'S SIGNATURE	DATE

NOTIFICATION

OF FAILURE TO CORRECT VIOLATION
AND OF PROPOSED ADDITIONAL PENALTY

OSHA-3A

AREA

REGION

*1730

6

Page (1)

TO: E. W. Holman, V. P., Technology and Manufacturing
Pittsburgh Corning Corporation
3 Gateway Center
16th Floor
Pittsburgh, Pennsylvania 15222

On the Sixteenth day of December, 1971,
a Citation(s) was (was) issued to you in accordance with the provisions of section 9(a) of the Occupational
Safety and Health Act of 1970 (84 Stat. 1601; 29 U.S.C. 651, et seq.), hereinafter referred to as the Act, noti-
fying you of certain alleged violations of the Act and of the time periods in which they were to be corrected or
abated.

Based upon reinspection conducted on January 13, 1972, it is alleged that you
have failed to correct or abate the violations specified below within the times prescribed:

SERIOUS VIOLATIONS:

<u>Citation No.</u>	<u>Proposed Daily Additional Penalty</u>	<u>Proposed Total Additional Penalty For Failure To Abate</u>
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NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

OTHER VIOLATIONS:

<u>Citation No. and Item No.</u>	<u>50 Percent Adjustment Factor</u>	<u>Proposed Daily Additional Penalty</u>	<u>Proposed Total Additional Penalty For Failure To Abate</u>
1-1 Physically able to use respirators	\$27.00	\$100.00	\$2,327.00
1-2 Insufficient Dust Control	37.00	100.00	2,337.00
1-3 Housekeeping	27.00	100.00	2,327.00

Total for Alleged Violations: \$6,990.00

GG 20024

BB 0009082 1

The above proposed penalties ~~are~~ computed on the basis of the loss of ~~50~~ percent adjustment for timely abatement and on the basis of a proposed assessment as shown for each day of your failure to abate, counting from the abatement date(s) prescribed in the appropriate Citation, to the date of the reinspection. These proposed penalties result from your failure to correct the violations and are additional to the initial penalties proposed.

Additional penalties will be proposed, on a daily basis, for each violation that is allowed to continue unabated. You are to notify the official named below of the date and nature of any abatement action which you have taken.

The payment of penalties is to be made by certified check or money order, payable to the order of "Occupational Safety and Health-Labor." Remit to the ~~Area Director whose address appears below~~ Assistant Regional Administrator whose address appears below.

YOU ARE FURTHER NOTIFIED that this Notification and the proposed assessment shall be deemed to be the final order of the Occupational Safety and Health Review Commission and not subject to review by any court or agency unless, within 15 days from the date of receipt of this Notification, you notify the official named above in writing that you intend to contest this Notification or the proposed assessment of penalty before the Review Commission. The Review Commission is an independent quasi-judicial agency with authority to issue decisions respecting Citations and proposed penalties.

There is no requirement that this Notification be posted.

Dated at Dallas, Texas, this 17th day of January, 19 72.

C. R. Holder

C. R. Holder

~~Area Director~~ Assistant Regional Administrator
Occupational Safety and Health Administration
U.S. Department of Labor
7th Floor, Texaco Building
1512 Commerce Street
Dallas, Texas 75201

cc: C. E. van Horne, Works Manager
Owentown Plant, Tyler, Texas

NOTICE
NOT COME FROM THE FILES

GG 20025

BB 0009083

OSHA-10
 EMPLOYER Pittsburgh Corning Corp
 ADDRESS 3 Gateway Center
16th Floor
Pittsburgh, Pennsylvania 15222

U.S. DEPARTMENT OF LABOR
 Occupational Safety and Health Administration
PENALTY ASSESSMENT WORKSHEET - OTHER VIOLATIONS
 (Use for Determining Proposed Penalties Under Section 17(c) and 17(d) of the Act)

OSHA NO. 17704
 OSHA-1 NO. 1
 AREA *1730 REGION 6

(1)	(2)	(3)	(4)				(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
CITA- TION ITEM NUMBER (OSHA- 2)	STANDARDS VIOLATED USE SUBPART AND SUBDIVISION (FROM OSHA-2)	NUMBER OF IN- STANCES	GRAVITY OF VIOLATION BY SYSTEM OR TYPE				UNAD- JUSTED PENALTY	ADJUSTED PENALTY FOR EACH VIOLATION (COLUMN 5 LESS ITEM 7 x COLUMN 5)	PROPOSED PENALTY TO BE ASSESSED FOR EACH VIOLATION UNDER 17(c) (ITEM 10 x COLUMN 8)	ABATEMENT DATE	DATE OF FOLLOW UP INSPECTION	[USE ONLY ON FOLLOWUP INSPECTIONS]								
			A	B	C	X						NUMBER OF DAYS OVER ABATEMENT DATE	ADDITIONAL PEN- ALTY UNDER 17(d) FOR FAILURE TO ABATE (COLUMN 5 x COLUMN 15)	ADD 50 PERCENT FOR LOSS OF ABATEMENT CREDIT (50% x COLUMN 8)	PROPOSED TOTAL ADDITIONAL PEN- ALTY FOR FAIL- URE TO ABATE (COLUMN 16 + COLUMN 17)					
			0-50	\$1-200	201-500	501-1,000														
1	1910.134(b)10			✓			100 ⁰⁰	55 ⁰⁰	25.00	immediate	1/13/72	23	2300 ⁰⁰			17 ⁰⁰	2320 ⁰⁰			
2	1910.134(a)(1)				✓		505 ⁰⁰	275 ⁰⁰	135.00	immediate 3/31/72	1/13/72	23	2300 ⁰⁰			37 ⁰⁰	2337 ⁰⁰			
3	1910.141(a)(3)(i)			✓			100 ⁰⁰	55 ⁰⁰	25.00	12/21/71 immediate	1/13/72	23	2300 ⁰⁰			27 ⁰⁰	2327 ⁰⁰			
4	1910.134(a)(3)			✓			110 ⁰⁰	55 ⁰⁰	25.00	12/1/71										

NOTE: THIS DOCUMENT DID
 NOT COME FROM PPG FILES

USE FOR DETERMINING
 PENALTY ADJUSTMENT

(7) PENALTY ADJUSTMENT FACTORS (IN PERCENT)									
GOOD FAITH	SIZE	HISTORY	TOTAL						
20	10	0	10	5	0	20	10	0	
1			1	1	1	1	1	1	45%

10. 50 PERCENT
 ABATEMENT CREDIT 220⁰⁰

8. TOTAL \$ 900⁰⁰
 9. TOTAL \$ 440.20

12. TOTAL PROPOSED PENALTY TO BE
 ASSESSED TO EMPLOYER UNDER 17(c) \$ 210.00

DATE CITATION SENT 1/1/72
 DATE NOTICE OF PROPOSED PENALTY SENT 1/1/72
 DATE EMPLOYER RECEIVED NOTICE 1/1/72
 DATE AND AMOUNT OF PENALTIES REMITTED 1/1/72

DATE NOTICE OF ADDITIONAL PROPOSED
 PENALTIES SENT 1/1/72
 DATE EMPLOYER RECEIVED NOTICE
 PENALTIES REMITTED AND DATE

PREPARED BY CLM/CLM DATE 1/1/72
 REVIEWED BY JS/Kon DATE 1/1/72

92027 59

1 BB 0009084 1

Pittsburgh Corning Corporation
P. O. Box 3057
Tyler, Texas 75701

JANUARY 17, 1972

ASST. REGIONAL ADMINISTRATOR - COMPLIANCE
U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION
SUITE 600, TEXACO BUILDING
1512 COMMERCE STREET
DALLAS, TEXAS 75201

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

PROGRESS REPORT - CITATION OF ALLEGED OSHA VIOLATIONS

ITEM 1 - 29 CFR, 1910 134 (b) (10)

NEW PERSONNEL WILL BE GIVEN A PHYSICAL WITHIN 30 DAYS OF HIRING.

NOTE: DUE TO THE RAPID TURNOVER OF NEW EMPLOYEES, THE COMPANY
IS NOT GIVING PRE-EMPLOYMENT PHYSICALS UNTIL AN EMPLOYEE HAS BEEN
EMPLOYED FROM TWO TO FOUR WEEKS.

ITEM 2 - 29 CFR, 1910 134 (A) (1)

THREE OPEN AIR DISCHARGE VENTS ON AIR CYLINDERS OF LARGE SAW HAVE
BEEN PIPED INTO CEILING AREA. CORRECTED ON DAY AFTER INSPECTION,
DECEMBER 10, 1971. A FOURTH AIR DISCHARGE VENT FROM AN AIR CYLINDER
ON THE LARGE SAW HAS BEEN PIPED INTO THE ATTIC AREA, CORRECTED
DECEMBER 10, 1971.

ALL OPEN DOORS ON EAST SIDE OF PLANT BUILDING ARE KEPT CLOSED AND
SIGNS ARE ON ORDER TO BE POSTED IN THE AREAS AS SOON AS RECEIVED,
CORRECTED DECEMBER 10, 1971.

USE OF COMPRESSED AIR TO BLOW OFF CUT INSULATION PIPE SECTIONS
AT END OF CONVEYOR HAS BEEN DISCONTINUED AND THE PIPING HAS BEEN
DISCONNECTED. CORRECTED DECEMBER 10, 1971.

COMPRESSED AIR IS NO LONGER BEING USED TO BLOW OFF EQUIPMENT.
SUCTION TUBES HAVE BEEN INSTALLED OVERHEAD AND FLEXIBLE HOSES NOW
"VACUUM" THE EQUIPMENT. INSTALLED JANUARY 9, 1972.

SOLID BACK UP BLOCK FOR BLOCK SAW HAS BEEN REDESIGNED AND WILL BE
INSTALLED AS SOON AS IT IS COMPLETED. UNTIL THE NEW BACK UP BLOCK
IS RECEIVED FROM THE SHOP, THE EQUIPMENT WILL NOT BE USED.

P I T T S B U R G H  C O R N I N G

GG 20027

1 BB 0009085 1

ITEM 2 - 29 CFR 1910 154 (A) (1) - CONT.

ALL FEEDERS IN USE HAVE BEEN SEALED ON THE BACK SIDE. DATE COMPLETED JANUARY 15, 1972. OPEN INSPECTION PLATES ARE BEING KEPT CLOSED AND FEEDER OPERATORS HAVE BEEN SO INSTRUCTED. ALL MISCELLANEOUS OPENINGS ON SIDES ARE BEING SEALED. THIS WILL BE COMPLETED JANUARY 29, 1972.

A REGULAR SET SCHEDULE HAS BEEN DESIGNATED AND WILL BE FOLLOWED FOR INSPECTION OF VENTILATION SYSTEM TO PREVENT PLUGGING. JANUARY 13, 1972.

ITEM 3 - 29 CFR 1910 141 (A) (3) (ii)

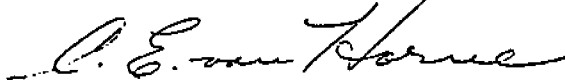
HOUSEKEEPING PRACTICES HAVE BEEN CHANGED.

- A. WORK AREAS ARE CLEARED IMMEDIATELY AFTER USE.
- B. FIBER AND DUST IS NOW "VACUUMED" UP INTO THE MAIN DUST COLLECTOR.
- C. THREE SUCTION DOWNSPOUTS HAVE BEEN INSTALLED IN THE FINISHING DEPARTMENT FOR USE WITH FLEXIBLE HOSES. JANUARY 9, 1972.

OTHER DOWNSPOUTS ARE SCHEDULED FOR THE BATCH AND PRODUCTION AREAS AS SOON AS THEY CAN BE INSTALLED - THUS NO COMPRESSED AIR WILL BE USED (IN-PLANT) TO CLEAN OFF MACHINERY AND EQUIPMENT. PROPOSED DATE OF COMPLETION JANUARY 23, 1972.

THE SUBJECT OF PROPERLY WORN RESPIRATORS IN THE PLANT HAS BEEN DISCUSSED WITH THE CHAIRMAN OF THE WORKMENS' COMMITTEE. THE UNION (OCAW) HAS ALSO BEEN ADVISED THAT EACH EMPLOYEE HAS A RESPONSIBILITY TO CONFORM TO AND OBEY PLANT SAFETY RULES AND REQUIREMENTS UNDER OSHA AND THAT FAILURE TO DO SO COULD RESULT IN DISCIPLINARY ACTION INCLUDING THE PENALTY OF SUSPENSION OR DISCHARGE. JANUARY 10, 1972.

PITTSBURGH CORNING CORPORATION



C. E. VAN HORNE
WORKS MANAGER
PLANT 7, TYLER, TEXAS

CEVH/EM

CG 20028

BB 0009086

Pittsburgh Corning Corporation
P. O. Box 3037
Tyler, Texas 75701

January 21, 1972

Asst. Regional Administrator - Compliance
U. S. Department of Labor
Occupational Safety & Health Administration
Suite 600, Texaco Building
1512 Commerce Street
Dallas, Texas 75201

AMENDED PROGRESS REPORT - Citation of Alleged OSHA Violations

- Item 1. New personnel will be given physicals as soon as they have been employed two weeks.
- Item 2. 29CFR 1910.134 (a) (1) with abatement dates of 3/31/72. No plans are under consideration for these items due to the fact that the Tyler Plant is to cease all operations early in March, possibly by March 1, 1972.
- Item 2. 29CFR 1910.134 (a) (1) "Inadequate enclosures of feeder units"

All feeders in use have been closed in as of January 15 as indicated in Progress Report (page 2) dated January 17, 1972.

- Item 3. "Housekeeping inadequate for dust control"
As indicated in Progress Report, dated January 17, 1972 (Page 2) Suction downspouts have been designed and contracted for installation by January 23, 1972 in the Batch & Feeding Departments and in the Forming Department.

PITTSBURGH CORNING CORPORATION

C. E. van Horne

C. E. van Horne
Works Manager
Plant 7, Tyler, Texas

CEvH/sab

GG 20029

BB 0009087

NOT CONTAINED IN PP FILES

PITTSBURGH CORNING CORPORATION
TYLER, TEXAS

NOTICE

January 21, 1972

The following employees are scheduled to report to Dr. Hurst at the Out Patient Clinic at the East Texas Chest Hospital for consultation on the dates and times indicated below:

February 2, 1972

1:30 P.M.	J. J. Fitzgerald	2:00 P.M.	T. E. Belcher
1:30 P.M.	R. F. Thomas	2:00 P.M.	J. R. Lee
2:30 P.M.	M. G. Walker	3:00 P.M.	H. L. Yandle
2:30 P.M.	H. D. Spencer	3:00 P.M.	A. B. Bearden

February 4, 1972

1:30 P.M.	L. G. Brooks	2:00 P.M.	O. L. Thorn
1:30 P.M.	M. W. McKee	2:00 P.M.	N. L. Lindley
2:30 P.M.	E. M. Snavely	3:00 P.M.	W. D. Bass
2:30 P.M.	H. L. Stevenson	3:00 P.M.	J. C. Yandle
2:30 P.M.	D. A. Warren		

February 9, 1972

1:30 P.M.	L. G. Brooks	2:00 P.M.	L. Kay
1:30 P.M.	M. W. McKee	2:00 P.M.	I. L. Cooks
2:30 P.M.	R. Stephenson	3:00 P.M.	W. M. Morris
2:30 P.M.	L. J. Arterberry		
2:30 P.M.	J. W. Ridgway		

All employees who are on duty during their scheduled appointment time will be paid allowed time up to 42 minutes. Each employee will clock out before departing from the plant. If an employee clocks back in for duty within the 42 minutes allowed, his pay will be continued as usual for his regular 8 hour shift.

Please be advised that all employees who are scheduled for appointments are charged with the obligation of meeting the appointment times on schedule.

C. E. van Horne
C. E. van Horne

Completed per Van Horne's Secretary
/sab

GG 20030

1 BB 0009088 1

Pittsburgh Corning Corporation
P. O. Box 3057
Tyler, Texas 75701

FEBRUARY 21, 1972

MR. C. R. HOLDER
ASSISTANT REGIONAL ADMINISTRATOR
U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
7TH FLOOR
1512 COMMERCE STREET
DALLAS, TEXAS 75201

RECEIVED
MAR 1 1972
DALLAS REGIONAL OFFICE
U.S. DEPARTMENT OF LABOR-OSHA

SUBJECT: MONTHLY REPORT

DEAR SIR:

NOT COME FROM PPG FILES

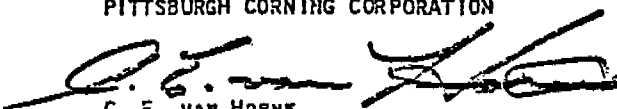
AS OF 4:30 P. M., FEBRUARY 3, 1972 ALL PRODUCTION ACTIVITIES AT THE TYLER PLANT CEASED PERMANENTLY, AND PREPARATIONS ARE UNDER WAY FOR THE FOLLOWING:

1. COMPLETE DISMANTLING OF ALL PRODUCTION, FINISHING AND AFFILIATED MACHINERY.
2. A LARGE PIT IS BEING PREPARED TO BURY ALL EQUIPMENT EXCEPT ELECTRIC MOTORS AND PALLET SKIDS.
3. ALL CARTONED PIPE INSULATION WILL BE SHIPPED OUT AS SOON AS POSSIBLE.
4. ALL BAGGED AND/OR CARTONED RAW MATERIALS WILL BE SHIPPED OUT.
5. WHEN THE PLANT IS COMPLETELY EMPTIED, HIGH PRESSURE WATER WILL BE UTILIZED TO CLEAN THE PLANT FROM THE ATTIC TO THE FLOOR - THEN VACUUMED OUT AND THE ENTIRE PROCESS REPEATED TO INSURE A COMPLETELY CLEAN PLANT AREA.
6. AFTER ALL THE ABOVE ITEMS ARE COMPLETED, DR. MART. CORN WILL EVALUATE PLANT CONDITIONS AND, IF HE APPROVES, ANY REMAINING EQUIPMENT WILL BE SOLD AND THE PLANT AREA WILL BE SOLD.

IF THERE ARE ANY QUESTIONS, PLEASE FEEL FREE TO CONTACT ME.

SINCERELY,

PITTSBURGH CORNING CORPORATION


C. E. VAN HORNE
WORKS MANAGER

CEVH:DM

CG 20031

BB 0009089

1. CSHO NO. B-7561 H-7734	2. REPORT NO. 1 FLI
3. AREA *1730	4. REGION 6

OSHA-1

SAFETY AND HEALTH REPORT

5. STATE 48	6. CITY 7070	7. EMPLOYER	8. INSPECTION DATE 2/29/72	9. SECONDARY COVERAGE PCA SCA CSA MAR OTHER				
10. NAME OF EMPLOYER, TYPE OF LEGAL ENTITY, AND ADDRESS OF PRINCIPAL OFFICE Pittsburg Casting Corp. 11th East Pitts., Penn 15222				11. TELEPHONE NO. 214-877-3411				
12. STREET OR BUILDING (Place of Performance) Owensboro, Texas Plant, PO Box 3057				13. ZIP CODE 75701				
14. CITY Tyler			15. STATE Texas	16. COUNTY AND CODE Smith 453				
17. TYPE OF BUSINESS				18. ALL SHIFTS	19. LARGEST SHIFT			
20. CLASSIFIED CONTRACTS ☐ YES ☒ NO				21. SIC 3242	22. MAIN PLANT ☐ BRANCH PLANT ☒ ONLY PLANT ☐			
23. TYPE		24. COMPLAINT		25. INSPECTION BY		26. MANAGEMENT OFFICIALS CONTACTED		
INITIAL	FOLLOWUP	YES	NO					
	X							
27. EMPLOYEE INSPECTION REPRESENTATIVE(S)		28. MANAGEMENT INSPECTION REPRESENTATIVE(S)		29. OTHER EMPLOYEES CONTACTED (If no authorized employee representative)		30. CLOSING CONFERENCE CONTACTS (Use the OSHA-1C for details)		
Ray		C E Van Horne		Ray Barton		C E Van Horne		
		Works Manager				Works Manager		

(A) DESCRIPTION OF WORKSITE

31. (1) CONSTRUCTION OF BUILDINGS OR TYPE OF WORK AREA (Including size)
See OSHA 1 dates 11/23/71

32. (2) TYPE OF FIRE PROTECTION
Same as For 31

33. (3) DESCRIPTION OF PROCESSES (Raw materials, major processes, and products, etc)
Same as For 31

NOTE: THIS DOCUMENT DID NOT COME FROM PPG FILES

GG 20032

34. (C) SECONDARY COVERAGE-LIST FEDERAL CONTACT NUMBER, AND PREFIX (Details in OSHA-1C)

35. (D) DID YOU OBSERVE AN INJURY OR HEALTH HAZARD NOT COVERED BY A STANDARD? ☐ YES ☒ NO

IF "YES," SUBMIT AN OSHA-9 FORM.

36. (E) (1) WAS ADVANCE NOTICE OF INSPECTION GIVEN? ☐ YES ☒ NO TO WHOM? WHEN?

(2) IN YOUR JUDGMENT DID THE ADVANCE NOTICE ADVERSELY AFFECT THE INSPECTION? ☐ YES ☒ NO

IF "YES," EXPLAIN ON REVERSE OF THIS FORM.

37. (F) (1) DOES EMPLOYER MAINTAIN INJURY AND ILLNESS RECORDS AS REQUIRED? ☒ YES ☐ NO

(2) WERE FORMS AND INSTRUCTIONS PROVIDED? ☐ YES ☒ NO

38. (3) DOES EMPLOYER COMPLY WITH THE POSTING REQUIREMENTS? ☒ YES ☐ NO

IF "NO," LIST AS A VIOLATION ON OSHA-1A.

TIME INVESTED - TO NEAREST (0.5) HOUR

40. PREPARATION	41. TRAVEL	42. CONFERENCE	43. INSPECTION	44. REPORT PREPARATION	45. TOTAL

46. CSHO'S SIGNATURE
John D. Boyle
DATE

47. AREA DIRECTOR'S SIGNATURE
DATE

NARRATIVE

1. CSHO NO. B-7501	2. OSHA-1 NO. 1F4
3. AREA 1730	4. REGION 6

EMPLOYER Pittsburg Corning
ADDRESS Owens Corning Fibers

DATE February 29, 1972
OSHA-1C

Page _____ of _____

1. Coverage Information:

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

3. Closing Conference Summary:

As follows inspection was made
on February 29, 1972 by CR Holder
+ J.P. Bagley

The work force has been cut to 12 employees
including (1) manager, (1) guard, (2) security,
Mr. Smalley, (4) maintenance men, and
2 shipping personnel. GG 2000

1. The maintenance crew was dismantling their
2. The shippers were buying new waste
3. The feed area has been stopped out
4. Most of the machinery is gone
5. The block saw is gone
6. No further operation is possible.

BB 0009091

3. In your opinion, is a followup in _____ necessary? ☐ Yes ☐ No

(over)

Summary Continued:

Contaminated equipment from
the oven will be buried.
Motors and reclaimable equipment
will be sold as well as
the manufacturing building
and the three acres it
is on. Property on the far
side of the Railroad
track & about 13 acres will
be retained by Pittsburg
Coaling.

?
have
never
seen
original

All cleanup procedures
were considered to be
in good practice.
Pictures were taken.

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

CC 20034

BB 0009092

Jack D. Torrey
Industrial Hygienist

February 24, 1969

Thru: M. Padilla
Wendell R. Blair

Sample for analysis collected 2/13/69.

Pittsburg-Corning Corporation
Owntown, Texas

- a. Sample taken at grinder for asbestos dust (respirable) Rate: 3' @ 240 lpm.
- b. Sample taken at feeders for asbestos dust (respirable) Rate: 10' @ 240 lpm.
- c. Sample taken at Building Platform where rolls of Amosite are made.
Rate: 10' @ 240 lpm.
- d. Sample taken at scrap feeder for asbestos dust (respirable). Rate 10' @
240 lpm.
- e. Sample taken at saw for asbestos dust (respirable). Rate 10' @ 240 lpm.
- f. Sample taken at Packing area for asbestos dust (respirable). Rate 10'
@ 240 lpm.

I realize that we are not set for asbestos dust analysis, but I made an attempt to find some hint about the existing condition; for instance, if more than 5 mg. per m^3 are found, then we know they have a bad condition. I just took a chance to see if we can get some sort of indication while we wait to get set for the other method.

NOTE: THIS REPORT DID
NOT COME FROM PPG FILES

CG 20035

BB 0009093

UNITED STATES GOVERNMENT

Memorandum

TO : M. Padilla
Through: W. R. Blair

DATE: June 2, 1969

FROM : J. D. Torrey *JDT*

SUBJECT: Laboratory results, Pittsburg-Corning Corporation, Owentown, Texas

The following results were obtained on the samples of airborne dust:

Sample	Volume	Net Weight	Concentration
a	720 l	9.9 mg	13.8 mg/m ³
b	2400 l	10.3 mg	4.3 "
c	2400 l	21.7 mg	9.0 "
d	2400 l	13.3 mg	5.5 "
e	2400 l	12.9 mg	5.4 "
f	2400 l	11.0 mg	4.6 "

*This is respirable
airborne dust!*

As you stated these values can only be used as an estimate of the dustiness of the operations.

cc: McClure
Schulte

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES



Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

GG 20034
BB 0009094

12 May 1969

MORTON CORN, PH.D., B. CH. E.
CONSULTING ENGINEER
310 BOWER HILL ROAD
PITTSBURGH, PENNSYLVANIA 15228

INDUSTRIAL HYGIENE
AIR POLLUTION

TELEPHONE
412 - 561-4237

May 1, 1969

Mr. Wendell R. Blair, Regional Director
U. S. Department of Labor
Bureau of Labor Standards
Office of Occupational Safety
Room 601
411 North Akard Street
Dallas, Texas 75201

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

Subject: Letter of 4/8/69 to Mr. J. H. Bierer, President,
Pittsburgh Corning Corporation.
Re: Survey Plant - Tyler, Texas - 2/13/69

Dear Mr. Blair:

I am writing to clarify the letter from Byrl M. Stout,
Vice President of Manufacturing, Pittsburgh Corning Corporation
to you dated April 11, 1969.

I have been working with Pittsburgh Corning Central
Engineering engineers on dust control in their Port Allegheny,
Pennsylvania Works. The manufacturing operation in this plant
is similar to that in the Tyler, Texas Plant. We are installing
an entire ventilation system and dust collectors at Port
Allegheny.

However, it should be noted that I have never visited or
surveyed the Tyler, Texas Plant of this Corporation. I first
saw the letter from Mr. Stout to you on April 28, 1969. At that
time, Mr. Stout suggested that I visit the Tyler Plant and I
have scheduled to do so on May 7, 1969. You may rest assured
that all the engineering skills which have been brought to bear
on the Port Allegheny Plant dust control system will be focused
on the Tyler Plant.

Sincerely yours,

Morton Corn

Morton Corn, Ph.D.

cc: Lee B. Grant, M.D.
Byrl Stout

GG 20037

BB 0009095

100-100000-100
Blair

MORTON CORN. PH.D., B. CH. E.
CONSULTING ENGINEER
310 BOWER HILL ROAD
PITTSBURGH, PENNSYLVANIA 15228

INDUSTRIAL HYGIENE
AIR POLLUTION

TELEPHONE
412 - 861-6237

June 6, 1969

Mr. Wendell R. Blair, Regional Director
U. S. Department of Labor
Bureau of Labor Standards
Office of Occupational Safety
Room 601
411 North Akard Street
Dallas, Texas 75201

NOT A REPORT THAT DID
NOT COME FROM PPG FILES

Dear Mr. Blair:

I am writing to indicate that I performed an industrial hygiene and ventilation survey of the Pittsburgh Corning, Tyler, Texas, Unibestos Plant on May 7, 1969. The report was submitted to the Corporation on May 29, 1969. Mr. John Hyde, engineer with the Corporation in the Central Engineering Office, informed me yesterday that he has been authorized to start engineering design to modify the existing ventilation system.

Sincerely yours,

Morton Corn

Morton Corn, Ph.D.

MC/pfh

GG 20038

1 BB 0009096 1

U.S. DEPARTMENT OF LABOR
BUREAU OF LABOR STANDARDS
Office of Occupational Safety
Room 601, 411 N. Akard Street
Dallas, Texas 75201

April 8, 1969

Mr. James E. Bierer, President
Pittsburg Corning Corporation
1 Gateway
Pittsburg, Pennsylvania

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES.

Dear Mr. Bierer:

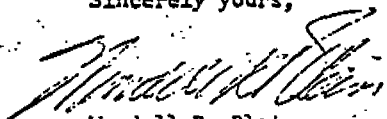
A recent survey of your establishment revealed that certain conditions did not meet the Safety and Health Requirements of the Walsh-Healey Public Contracts Act.

The Act stipulates that "No part of such contract will be performed nor will any of the materials, supplies, articles or equipment to be manufactured or furnished under said contract, be manufactured or fabricated in any plants, buildings or surroundings or under working conditions which are unsanitary or hazardous or dangerous to the health and safety of the employees engaged in the performance of the contract."

Enclosed is a notice listing those unsatisfactory conditions found, and you should take corrective action immediately.

You are requested to notify me on or before the compliance date on the notice concerning action taken to correct the unsatisfactory conditions.

Sincerely yours,



Wendell R. Blair
Regional Director

Enclosure

cc: Mr. Charles Van Horne, Mks. Manager, Udon town, Texas

CG 20039

1 BB 0009097 1

U.S. DEPARTMENT OF LABOR
BUREAU OF LABOR STANDARDS

NOT CORRESPONDING FILES

NOTICE OF

SAFETY AND HEALTH VIOLATIONS

NAME OF FIRM Pittsburg Corning Corporation		CONTRACTOR NUMBER	
STREET ADDRESS Box 3057 - Tyler, Texas	CITY Owensboro	COUNTY Smith	STATE Texas
		ZIP 75701	
OFFICIALS CONTACTED - NAME AND TITLE Charles E. Van Horne, Wks. Manager		PLANT SURVEY MADE WITH Mr. Van Horne	COMPLIANCE DATE May 8, 1969
		REPORT FURNISHED TO James H. Bierer, President	
		USDL SAFETY ENGINEER M. Padilla, Industrial Hygienist	DATE OF SURVEY 12/13/68
A SURVEY OF YOUR FACILITIES HAS REVEALED CONDITIONS WHICH DO NOT COMPLY WITH USDL SAFETY AND HEALTH REQUIREMENTS UNDER THE PUBLIC LAW CHECKED.		PUBLIC LAW 74-046 WALSH-HEALEY PUBLIC CONTRACTS ACT	X
THE CONDITIONS ARE LISTED BELOW WITH REFERENCE TO CODES AND STANDARDS WHICH HAVE BEEN ADOPTED AS THE DEPARTMENT'S SAFETY AND HEALTH REQUIREMENTS.		PUBLIC LAW 80-233 MCCNAMARA-O'HARA SERVICE CONTRACTS ACT	
THESE UNSATISFACTORY CONDITIONS MUST BE CORRECTED. PLEASE ADVISE REGIONAL DIRECTOR <u>Wendell R. Blair</u> ON OR BEFORE <u>May 8, 1969</u> AS TO THE CORRECTIVE ACTION TAKEN.		PUBLIC LAW 79-209 ARTS AND HUMANITIES ACT	
		PUBLIC LAW 80-233 VOCATIONAL REHABILITATION ACT	
NO.	CODE-STANDARD REFERENCE	CORRECTIONS REQUIRED	
		UNSATISFACTORY CONDITIONS NOTED ON INDUSTRIAL HYGIENE SURVEY OF 2/13/69	
1	50-204.264	<u>Process Area</u> No certified first aiders. Ex: Recommend that several employees be trained so that each shift will have qualified personnel to take care of emergencies.	
2	50-204.275, Ind. Vent. ACGIE 5-98	Local exhaust ventilation not according to standards. <u>WHAT ARE THE STANDARDS?</u> Ex: Local exhaust ventilation system was tested with the following findings: a. Grinder hood, 25-50 fpm at face. b. Feeder at material point of entry, 50 fpm. c. Scrap feeder at material point of entry, 50 fpm. d. Sowing ducts 500 fpm at face. Recommend that employer make a study of present local exhaust ventilation with professional advice, to come up to standard. <u>It is believed that present system is below the required capacity.</u> <u>(1) ACCORDING TO PAR. 50-204.275, IF AN EMPLOYEE IS WEARING AN APPROVED RESPIRATOR IN AN EXHAUSTED AREA, THE CO. IS NOT IN VIOLATION. OUR EMPLOYEES USE RESPIRATORS IN ALL DUST AREAS.</u> <u>(2) I HAVE NO REFERENCE IN MY COPY OF THE WALSH-HEALEY PUBLIC CONTRACTS ACT (SECTION 1) OF SUGGESTED SUCTION VELOCITIES OR RATES.</u> <u>(3) ARRANGEMENTS WERE MADE OVER 3 WEEKS AGO WITH LOCAL RED CROSS CHAPTER - 1 CLASS TO BE HELD APR. 10, 1969.</u>	

CG 20040

1 BB 0009098 1

FILE COPY.

PITTSBURGH CORNING CORPORATION

April 11, 1969

Mr. Wendell R. Blair, Regional Director
U. S. Department of Labor
Bureau of Labor Standards
Office of Occupational Safety
Room 651
411 North Akard Street
Dallas, Texas 75201

NOTE: DO NOT
NOT COME FROM PPG FILES

Subject: Letter of 4/3/69 to Mr. J. E. Blarer, President,
Pittsburgh Corning Corporation.
Re: Survey Plant - Tyler, Texas - 2/13/69

Dear Mr. Blair:

The following action is being taken to correct the unsatisfactory conditions noted in the report dated February 13, 1969.

1. Code Standard - Ref. 50-204.264.

All supervisory employees were enrolled in a first aid course given by the American Red Cross with the first session given 4-10-69. The course is to consist of three sessions and by 5-26-69 there will be fully qualified personnel on all shifts.

2. Code Standard - Ref. 50-204.275.

Pittsburgh Corning Corporation uses the services of Lee B. Grant, M.D., Medical Director, PPG Industries, and his staff, to monitor its production facilities for compliance with A.C.G.I.H. threshold limits for dust concentrations. (See attachments II and III). In addition, the Industrial Hygiene Foundation conducts periodic dust measurements to ascertain the dust concentrations present. (See attachment I).

For those areas in which dust concentrations exceed the threshold limits, it is required, as a condition of employment, that each employee wear a Dust Free 655 Respirator 628-73020 approved by the U. S. Bureau of Mines.

Copy for Dr. M. Grant

GG 20041

1 BB 0009099 1

Mr. W. B. Blair

- 2 -

April 11, 1939

NOTE: THIS DOCUMENT DID

2. Code Standard (continued)

In reference to the sentence of your report where you state, "It is believed that the present system is below the required capacity", the dust measurements do not support this belief. Pittsburgh Corning Corporation retains the services of Dr. Morten Corn, a consulting engineer and authority in the field of industrial hygiene and air pollution. Dr. Corn approves all new installations as well as any modifications of our dust collecting systems.

If you should need any additional information or there is need for additional surveys, please advise.

Yours very truly,

PITTSBURGH CORNING CORPORATION

Daryl M. Stout
Daryl M. Stout
Vice President of Manufacturing

Attns.
DMS/ch

cc: Mr. James H. Hierer
Mr. L. B. Grant
Mr. H. Clark Underwood
Mr. C. E. van Horna

GG 20042

BB 0009100 1

MORTON CORN, PH.D., B. CH. E.
CONSULTING ENGINEER
310 DOWER HILL ROAD
PITTSBURGH, PENNSYLVANIA 15228

INDUSTRIAL HYGIENE
AIR POLLUTION

TELEPHONE
412 - 561-6237

May 1, 1969

Mr. Wendell R. Blair, Regional Director
U. S. Department of Labor
Bureau of Labor Standards
Office of Occupational Safety
Room 601
411 North Akard Street
Dallas, Texas 75201

NOTE: THIS LETTER
NOT COME FROM THE FILES

Subject: Letter of 4/8/69 to Mr. J. H. Bierer, President,
Pittsburgh Corning Corporation.
Re: Survey Plant - Tyler, Texas - 2/13/69

Dear Mr. Blair:

I am writing to clarify the letter from Byrl M. Stout,
Vice President of Manufacturing, Pittsburgh Corning Corporation
to you dated April 11, 1969.

I have been working with Pittsburgh Corning Central
Engineering engineers on dust control in their Port Allegheny,
Pennsylvania Works. The manufacturing operation in this plant
is similar to that in the Tyler, Texas Plant. We are installing
an entire ventilation system and dust collectors at Port
Allegheny.

However, it should be noted that I have never visited or
surveyed the Tyler, Texas Plant of this Corporation. I first
saw the letter from Mr. Stout to you on April 28, 1969. At that
time, Mr. Stout suggested that I visit the Tyler Plant and I
have scheduled to do so on May 7, 1969. You may rest assured
that all the engineering skills which have been brought to bear
on the Port Allegheny Plant dust control system will be focused
on the Tyler Plant.

Sincerely yours,

Morton Corn, Ph.D.

cc: Lee B. Grant, M.D.
Byrl Stout

GG 20043

BB 0009101

APPENDIX B

DUCT VELOCITY DETERMINATIONS
(Primary Data and Calculations)

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

GG 20044

BB 0009102

27
NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

PITOT TUBE TRAVERSE
Duct 1 (17" Line)

In front of 40" feeder, Line #1, feeds from Lines 1, 2, 3 before blower.

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/2	0.00	0.000	0
2	1 3/8	-0.04	-0.200	-801
3	2 1/2	0.16	0.400	1602
4	3 7/8	0.32	0.566	2267
5	5 3/4	0.44	0.663	2655
6	11 1/4	0.60	0.774	3100
7	13 1/8	0.58	0.762	3052
8	14 1/2	0.48	0.693	2775
9	15 3/8	0.20	0.447	1790
10	16 1/2	0.08	0.283	1133
		Totals	4.388	17573
		Averages	0.439	1757

$$Q = 2769 \text{ cfm}$$

PITOT TUBE TRAVERSE
Duct 2 (5" Line)

VP Centerline = 0.02 "H₂O; V = 566 fpm

$$Q = 63 \text{ cfm}$$

CG 20045

BB 0009103

28
NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

PITOT TUBE TRAVERSE
Duct 3 (6" Line)

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/8	1.20	1.095	4385
2	1/2	1.15	1.072	4293
3	7/8	1.10	1.049	4201
4	1 3/8	0.80	0.894	3580
5	2	0.52	0.721	2888
6	4	0.00	0.000	0000
7	4 5/8	0.02	0.141	565
8	5 1/8	0.00	0.000	0000
9	5 1/2	0.00	0.000	0000
10	5 7/8	0.00	0.000	0000
Totals			4.974	19913
Averages			0.497	1991

Q = 391 cfm

PITOT TUBE TRAVERSE
Duct 4 (4" Diam)

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/8	0.2	0.447	1790
2	1/2	0.2	0.447	1790
3	2	0.7	0.837	3352
Totals			1.731	6932
Averages			0.577	2311

Q = 202 cfm

GG 20046

BB 0009104

NOTE: THIS DOCUMENT DID
NOT

PITOT TUBE TRAVERSE
Duct 5 (12" Diam)

12" Duct, Line 1 + 2 main leading to 17" main

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	VP	Air Velocity (fpm)
1	3/8	0.28	0.529	2119
2	1	0.34	0.583	2335
3	1 3/4	0.36	0.600	2403
4	2 3/4	0.36	0.600	2403
5	4 1/8	0.38	0.616	2467
6	7 7/8	0.40	0.632	2531
7	9 1/4	0.42	0.648	2595
8	10 1/4	0.44	0.663	2655
9	11	0.44	0.663	2655
10	11 5/8	0.40	0.632	2531
		Totals	6.168	24695
		Averages	0.617	2470

Q = 1940 cfm

GG 20047

I BB 0009105 I

PITOT TUBE TRAVERSE
Duct 6 (6" Diam)

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/8	0.04	0.200	801
2	1/2	0.06	0.245	981
3	7/8	0.08	0.283	1133
4	1 3/8	0.10	0.316	1266
5	2	0.10	0.316	1266
6	4	0.06	0.245	981
7	4 5/8	0.06	0.245	981
8	5 1/8	0.04	0.200	801
9	5 1/2	0.02	0.141	565
10	5 7/8	0.02	0.141	565
		Totals	2.333	9339
		Averages	0.233	934

Q = 183 cfm

NOTE: THIS DOCUMENT DID
NOT BE REPRODUCED

GG 20048

BB 0009106

NOTE: THIS DOCUMENT DID
NOT COME FROM AFG FILES

PITOT TUBE TRAVERSE
Duct 7 (6" Diam)

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/8	1.12	1.058	4237
2	1/2	1.26	1.122	4494
3	7/8	1.26	1.122	4494
4	1 3/8	1.28	1.131	4530
5	2	1.26	1.122	4494
6	4	1.32	1.149	4602
7	4 5/8	1.34	1.158	4638
8	5 1/8	1.30	1.140	4566
9	5 1/2	1.22	1.105	4426
10	5 7/8	1.08	1.039	4161
		Totals	11.148	44640
		Averages	1.115	4464

$$Q = 877 \text{ cfm}$$

GG 20049

BB 0009107

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

PITOT TUBE TRAVERSE
Duct 8 (11" Diam)

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/4	0.24	0.490	1962
2	7/8	0.28	0.529	2119
3	1 5/8	0.32	0.566	2267
4	2 1/2	0.34	0.583	2335
5	3 3/4	0.38	0.616	2467
6	7 1/4	0.42	0.648	2595
7	8 1/2	0.42	0.648	2595
8	9 3/8	0.40	0.632	2531
9	10 1/8	0.86	0.927	3713
10	10 3/4	0.78	0.883	3536
		Totals	6.523	26121
		Averages	0.652	2612

$$Q = 1724 \text{ cfm}$$

CG 26950

BB 0009108

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

PITOT TUBE TRAVERSE
Duct 9 (11" Diam)

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/4	0.36	0.600	2403
2	7/8	0.38	0.616	2467
3	1 5/8	0.38	0.616	2467
4	2 1/2	0.38	0.616	2467
5	3 3/4	0.38	0.616	2467
		Totals	3.066	12271
		Averages	0.613	2454

Assumption: 1/2 duct area is blocked by fiber

$$\therefore Q = 810 \text{ cfm}$$

GG 20051

BB 0009109

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

PITOT TUBE TRAVERSE

17" Duct in Saw Area: Main Duct into Dust Collector

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/2	0.44	0.663	2655
2	1 3/8	0.46	0.678	2715
3	2 1/2	0.68	0.825	3304
4	3 7/8	0.74	0.860	3444
5	5 3/4	0.80	0.894	3580
6	11 1/4	0.82	0.906	3629
7	13 1/8	0.70	0.837	3352
8	14 1/2	0.66	0.812	3252
9	15 5/8	0.72	0.849	3400
10	16 1/2	0.48	0.693	2775
		Totals	8.017	32108
		Averages	0.802	3211

$$Q = 5061 \text{ cfm}$$

GG 20052

BB 0009110

NOTE: THIS DOCUMENT DID
NOT COME FROM AFB FILES

PITOT TUBE TRAVERSE

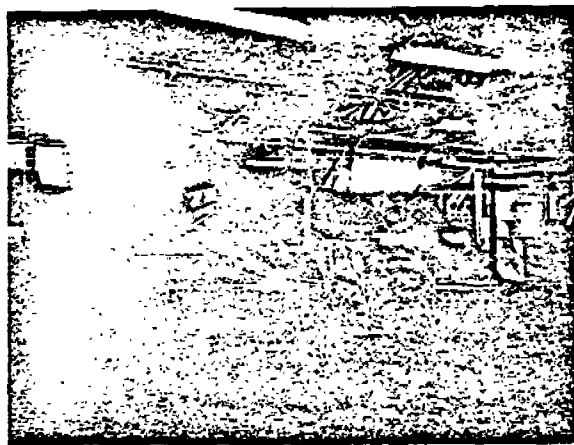
10" Duct into Block Dust Collector

Point	Position (inches from wall)	Velocity Pressure (VP) ("H ₂ O)	$\sqrt{VP}$	Air Velocity (fpm)
1	1/4	1.66	1.288	5158
2	7/8	1.66	1.288	5158
3	1 1/2	1.50	1.225	4906
4	2 1/4	1.40	1.183	4738
5	3 3/8	1.26	1.122	4494
6	6 5/8	0.74	0.860	3444
7	7 3/4	0.70	0.837	3352
8	8 1/2	0.70	0.837	3352
9	9 1/8	0.82	0.906	3629
10	9 3/4	0.84	0.917	3673
		Totals	10.463	41904
		Averages	1.046	4190

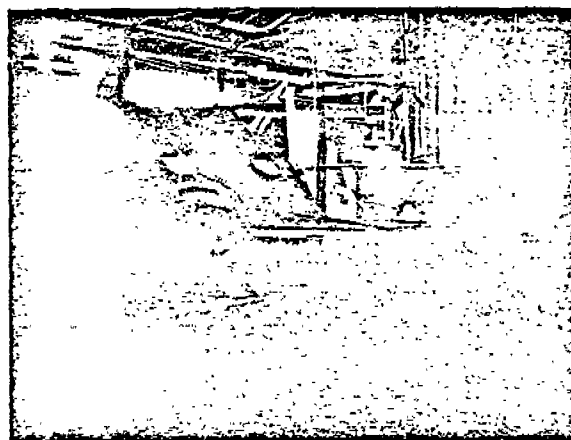
Q = 2285 cfm

GG 20053

BB 0009111



Lines 1 and 2 Feeders Showing Method
of Emptying Bag



Line 2 Feeders and Bag Collector (Note
Cart for Scrap Feed)

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

GG 20054

BB 0009112



Close up of scrap feed and bag collector
(Line 2) note axial fans directed at carts
and feeder hoods.



Scrap cutter hood and dust collector.

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

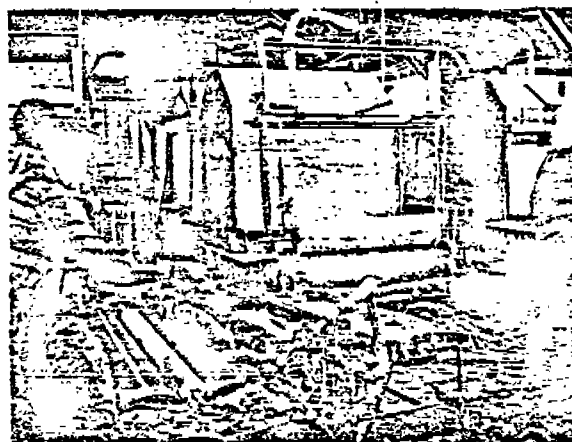
GG 20955

BB 0009113



Dust collector for scrap hood and
feeders (Line 1-3), showing scrap
hood entry closest to blower intake.

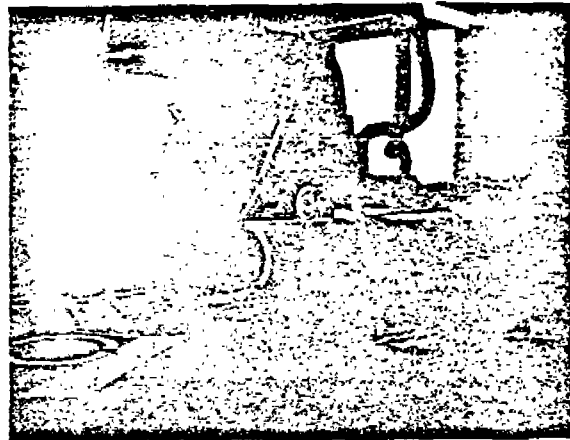
NOTE: FILE DOCUMENT DID
NOT COME FROM PPG FILES



Builder on Line No. 2

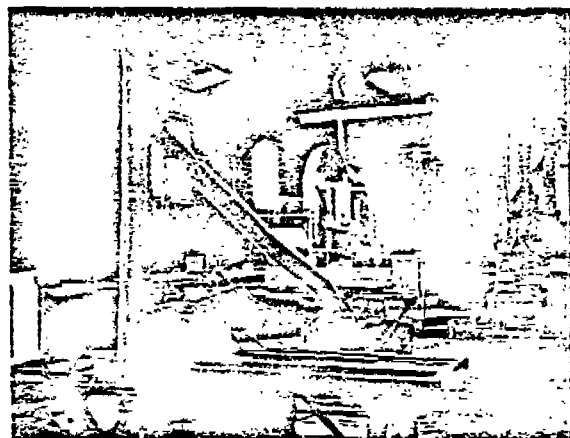
GG 26655

| BB 0009114 |



Large cutting saw showing hoods

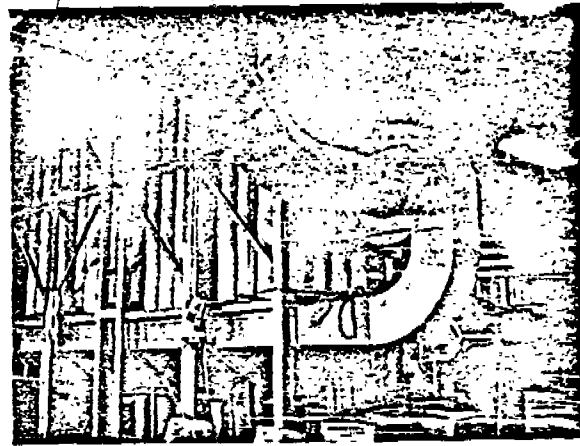
NOTE: THIS DOCUMENT DID
NOT COME FROM FPG FILES



Cutting area dust collector and
two saws with attached hoods

CG 20057

| BB 0009115 |



Cutting saw, dust collector
and blower (close up)

NOTE: THIS DOCUMENT DID
NOT COME FROM THE FILES

CG 20058

BB 0009116

copy to Blair

Pittsburgh Corning Corporation
On Gateway Center
Pittsburgh, Pennsylvania 15222

E. W. HOLMAN
Vice President
Technology and Manufacturing

March 19, 1970

Mr. Wendell R. Blair, Regional Director
U. S. Department of Labor
Bureau of Labor Standards
Office of Occupational Safety
Room 601
411 North Akard Street
Dallas, Texas 75201

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

Dear Mr. Blair:

On April 8, 1969, you wrote a letter informing us that a recent Labor Department Survey of our Tyler, Texas, facility revealed several violations of the Safety and Health Requirements of the Walsh-Healey Public Contracts Act. Mr. B. M. Stout, formerly Vice President, Manufacturing, for Pittsburgh Corning Corporation, wrote to you on July 2, 1969 and outlined the action our company would take to bring the Tyler plant into compliance with the provisions of the aforementioned act. This letter will serve to update your information as to our activities in this area.

Pittsburgh Corning Corporation's Central Engineering Department, with consulting assistance from Dr. Morton Corn, has completed detailed plans for a ventilation system to control asbestos dust at this plant. However, purchase and installation of the required equipment have been delayed for the following reasons:

1. Engineering estimates for purchase and installation of the fabric filters, ducting, etc. are quite high when considered against the very real possibility that such equipment may prove to be obsolete in the near future. As you know, a reduction of the Threshold Limit Value of asbestos from twelve to five fibers/cc is scheduled for May 1970. This new level will require a thorough review of the proposed ventilation system by Dr. Corn in order to assure its adequacy in meeting the new TLV, or possible further reductions in the TLV that may occur at a later date. Further reductions may make it impossible to control dust with the proposed equipment.

P I T T S B U R G H **PC** C O R N I N G

GG 20059

BB 0009117

March 19, 1970

2. The equipment, on the other hand, may prove to be unnecessary. Pittsburgh Corning Corporation is vigorously pursuing development of a substitute material for use in its pipe insulation. Initial results appear favorable and we are optimistic over the possibility of marketing the new pipe insulation by mid 1972. Success in this area will completely eliminate asbestos from our product and greatly reduce the need for extensive ventilation equipment. (Note: Please treat the above information in a confidential manner).

For the above reasons, we request a temporary variance to the health requirements of the Walsh-Healey Act. During the variance period, we will take the following steps to insure health protection for personnel exposed to asbestos dust:

1. Continue the respiratory protection program in all manufacturing areas showing excessive exposure until such areas are brought under control.
2. Initiate a health education program that will fully explain to the employees the health hazards associated with asbestos exposure and how they can protect themselves.
3. Expand the periodic medical examination program for our employees to include not only chest X-rays as performed to date but also, on all employees with more than five years seniority, an extensive medical history and physical examination, and pulmonary function tests performed biannually. We have discussed such a program with Dr. George Hurst, Clinical Director of the East Texas Tuberculosis Hospital, who is interested in providing these examinations.

We would appreciate the opportunity of going over in detail the aforementioned points. If you think this is desirable we will be happy to meet with you in your Dallas office at your convenience. In the interim, if you require additional information or if I can be of further help, please contact me.

Very truly yours,

PITTSBURGH CORNING CORPORATION

Eugene W. Holman
E. W. Holman

EWH/rb

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

GG 20060

BB 0009119

NOTE--DO NOT USE THIS ROUTE SLIP TO
SHOW FORMAL CLEARANCES OR APPROVALS

9-1-71

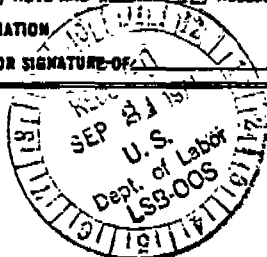
TO:

AGENCY BLDG. ROOM

John Barto, Regional Administrator, OSHA

- ☐ APPROVAL ☐ REVIEW ☒ PER CONVERSATION
☐ SIGNATURE ☐ NOTE AND SEE ME ☐ AS REQUESTED
☐ COMMENT ☐ NOTE AND RETURN ☐ NECESSARY ACTION
☐ FOR YOUR INFORMATION
☐ PREPARE REPLY FOR SIGNATURE OF

REMARKS:



(Fold here for return)

To George Pettigrew

From

PHONE

BUILDING

ROOM

FORM MHW-30 Rev. 11/58 ROUTE SLIP GPO:1970-O-428008

NOTE: THIS DOCUMENT DID
NOT GO INTO THE FILES

GG 20061

BB 0009119

BB 0009120

Assistant Secretary For
Occupational Safety and Health,
U. S. Department of Labor
Washington, D. C. 20210

Re: Application of Pittsburgh Corning Corporation
For a Variance From Occupational Safety and
Health Standards

Gentleman:

Pittsburgh Corning Corporation (the "Applicant")
hereby makes application for a variance from the provisions
of the Williams-Stieger Occupational Safety and Health Act
of 1970 pursuant to the rules of practice of Subpart E §1905.10
under Section 6(b)(6)(a) of such Act.

The Applicant's principal office is located at

One Gateway Center
Pittsburgh, Pennsylvania 15222

and hereby applies for a variance from Part 50-204 of the Safety
and Health Standards for Federal Supply Contracts, Subpart D
Section 50-204.50 as it applies to the Applicant's facilities at
the following locations;

Port Allegany Works
Main Street
P. O. Box 37
Port Allegany, Pennsylvania 16743

Tyler Works
Owentown Industrial District
P. O. Box 3057
Tyler, Texas 75705

CG 20063

1 BB 0009121 1

The Applicant, at Port Allegany, Pennsylvania and Tyler, Texas, manufactures an insulation material known commercially as UNIBESTOS which is composed primarily of asbestos. In some areas of Applicant's Port Allegany Works and Tyler Works, during the production process, the Threshold Limit Value for asbestos required by Section 50-205.50 is exceeded.

To protect its employees at the aforementioned locations, the Applicant has;

- (1) Supplied, and will continue to supply, respirators approved by the Bureau of Mines and require the use of said respirators;
- (2) Provided and will continue to provide dust collection and ventilation apparatus;
- (3) Provided and will continue to provide health education programs that fully explain to its employees the health hazards associated with asbestos exposure and how they can protect themselves;
- (4) Expanded the periodic medical examination program for employees to include not only X-rays but also, on all employees with more than five years exposure, an extensive medical history and physical examination and pulmonary function tests performed biennially;

-2- NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

CG 20004

BB 0009122

(5) Purchased and is experimenting with the use of new and approved respirators with ultra filters; and

(6) Improved housekeeping procedures by the more frequent use of industrial vacuum cleaners.

The Applicant has been unable to attain the Threshold Limit Value required for asbestos at its Port Allegany and Tyler Works because of the unavailability of effective ventilation equipment. The ineffectiveness of such equipment has become particularly significant since the reduction of the TLV for asbestos from twelve to five fibers per milliliter greater than five microns in length. This drastic reduction has rendered previously used equipment inadequate and any replacement equipment only experimental.

The Applicant, as of June, 1971, has spent nearly \$200,000 in the research and development of a mineral wool substance to replace asbestos. Presently, the applicant is examining the production feasibility of the new product according to the following schedule:

-Mineral wool to be utilized in production, in place of asbestos, by one shift per day during the first two weeks of August, 1971. (Traw)

-Mineral wool to be utilized, in place of asbestos, by three shifts per day during the last two weeks of August, 1971. (Traw)

GG 20005

BB 0009123 1

NOT RECORDED
FILED

-A decision concerning complete conversion to the use of mineral wool in the production process beginning in September, 1971.

The Applicant is optimistic with the results of research and development thus far and hopes to completely substitute mineral wool for asbestos at both the Tyler Works and Port Allegany Works by mid 1972.

The employees at Port Allegany and Tyler have been informed of this Application for Variance and of their right to petition the Assistant Secretary for a hearing by;

- (1) Delivery of a copy of the Application to both Mr. Charles Croop, President of the American Flint Glass Workers Union of North America, the employee representative at the Port Allegany Works, and Mr. Herman L. Yandle, Chairman, Oil, Chemical and Atomic Workers Local 4202, the employee representative at the Tyler Works.
- (2) Posting a summary of the application; including notice that the employees have a right to petition the Assistant Secretary of Labor for Occupational Safety and Health, on the in-plant employee bulletin board at both Port Allegany and Tyler.

CG 20066

1 BB 0009124 1

Therefore, the applicant requests that it be granted
a variance from Section 50-204.50 of the Safety and Health
Standards for Federal Supply Contracts for a period of one
year.

Respectfully submitted,
PITTSBURGH CORNING CORPORATION

By

E. N. Holman

E. N. Holman
Vice President
Technology and Manufacturing

Paul Martha
Reed Smith Shaw & McClay
Attorneys For Applicant

NOTED
ACT 6009125

CG 20067

BB 0009125

A F F I D A V I T

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY

SS:

NOTED FOR FILING
NOT COMPLETED

Before me, the undersigned authority, a Notary Public in and for said Commonwealth and County, personally appeared Ice B. Grant, M.D., who, being duly sworn according to law, deposes and says that he is Medical Director, for PPG Industries and Consultant to Pittsburgh Corning Corporation; that he has knowledge of the matters set forth in the foregoing application for variance, so far as said application states that the applicant has provided for its employees health education programs that explain to said employees the health hazards associated with asbestos exposure and how they can protect themselves; that the same are true to the best of his knowledge, information and belief; and that he is authorized as Medical Consultant to applicant to make, sign, verify and file said representation.

Ice B. Grant, M.D.

Sworn to and subscribed before me this 3rd day of

December, 1971.

Wanda J. Vickery
Notary Public

My Commission Expires:

WANDA J. VICKERY, Notary Public
Pittsburgh, Allegheny County, Pa.
My commission expires Oct. 14, 1974

CG 20068

BB 0009126

Assistant Secretary For
Occupational Safety and Health,
U. S. Department of Labor
Washington, D. C.

NOTE: THIS DOCUMENT DID
NOT COME FROM PRG FILES

Re: Application of Pittsburgh Corning Corporation
For An Interim Order Pending Final Disposition
Of Its Application For Variance.

Gentlemen:

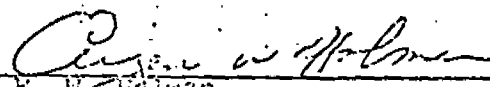
Pittsburgh Corning Corporation hereby makes application for an Interim Order pursuant to Section 6(b)(5)(a) of the Occupational Safety and Health Act of 1970 requesting relief from the enforcement of the Safety and Health Standards for Federal Supply Contracts, Subpart D, Section 50-204.50 pending the final disposition of its Application for a Variance from said standard.

Pittsburgh Corning is unable to reach immediate compliance with the aforementioned standard for the reasons stated in the Application for Variance attached hereto. Therefore, Pittsburgh Corning is applying for the appropriate interlocutory relief so as to avoid the imposition of unwarranted civil and/or criminal liability.

Respectfully submitted,

PITTSBURGH CORNING CORPORATION

By



E. W. Holman
Vice President
Technology and Manufacturing

Paul Martha
Essex Smith Shaw & McClay
Attorneys For Applicant

CG 20069

BB 0009127

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

A F F I D A V I T

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY

} SS:

Before me, the undersigned authority, a Notary Public
in and for said Commonwealth and County, personally appeared
E. W. Holman, who, being duly sworn according to law, deposes
and says that he is Vice President, Technology and Manufacturing
for Pittsburgh Corning Corporation; that he has knowledge of the
matters set forth in the foregoing application for an interim
order and application for variance; that the same are true to
the best of his knowledge information and belief; and that he is
authorized as Vice President, Technology and Manufacturing, of
applicant to make, sign, verify and file said applications.

E. W. Holman

Sworn to and subscribed before me this 2nd day of

August, 1971.

Walter J. Vickrey
Notary Public

My Commission Expires:

WALTER J. VICKREY, Notary Public
Pittsburgh, Allegheny County, Pa.
My commission expires Oct. 14, 1974

CG 20070

BB 0009128

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY

SS:

Before me, the undersigned authority, a Notary Public in and for said Commonwealth and County, personally appeared Morton Corn, PH.D., who, being duly sworn according to law, deposes and says that he is Engineering Consultant to Pittsburgh Corning Corporation; that he has knowledge of the matters set forth in the foregoing application for variance, so far as said application pertains to the inability of the applicant to presently attain the revised Threshold Limit Value for asbestos of five fibers per milliliter greater than five microns in length with existing dust collection systems in some areas of its Port Allegany Works and Tyler Works; that the same are true to the best of his knowledge, information and belief; and that he is authorized as Engineering Consultant to applicant to make, sign, verify and file said representation.

Morton Corn

Sworn to and subscribed before me this 2nd day of

December, 1971.

!!

Wanda J. Wickert
Notary Public

My Commission Expires:

WANDA J. WICKERT, Notary Public
Pittsburgh, Allegheny County, Pa.
My commission expires Oct. 14, 1974

CG 20071

BB 0009129

David Smith Shaw & McClay

Union Trust Building

Pittsburgh, PA 15230

JOHN J. SHAW

JOHN J. SHAW

JOHN J. SHAW

112 238-3131

MAILING ADDRESS

P. O. BOX 2001
PITTSBURGH, PA 15230

WASHINGTON OFFICE
SUITE 404 400 7TH BUILDING
WASHINGTON, D. C. 20004
202 637-3363

MARY SHAW OFFICE
404 6TH 7TH BUILDING
HARRISBURG, PA 17101
717 234-4333

August 3, 1971

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

Mr. George Gregory
Pittsburgh Corning Corporation
P. O. Box 27
Port Allegany, Pennsylvania 16803

Dear George:

Please find a copy of the Application for Variance filed with the Department of Labor on behalf of Pittsburgh Corning Corporation on August 3, 1971.

If you recall, according to the regulations it is incumbent upon you to supply to the employees of Port Allegany a summary of the Application for Variance, information to the effect that they have a right to petition the Assistant Secretary of Labor for a hearing on such application, and information as to where they can review a final copy of said application.

If you have any question concerning the above, please contact me, but I am sure you realize that your duty under Section 1905.10 (9) must be fulfilled with reasonable dispatch.

Yours truly,



Paul Harris

JS: [unclear]

[unclear]

GG 20072

BB 0009130

September 7, 1971

60SBA

Application of Pittsburgh Corning Corporation for Variance
from OSHA Standards

Mr. George C. Guenther, Assistant Secretary for
Occupational Safety and Health

Attach: Documents Relative to Subject Application

Mr. George Pettigrew, Regional Director of NIOSH-HRW, has been approached by Mr. Walter G. Martin, Director, Division of Occupational Safety, Texas State Department of Health, to survey the Pittsburgh Corning Corporation Tyler Works operation at Tyler, Texas, to evaluate the situation as outlined in the attached application for variance. Mr. Pettigrew is anxious to know the status of request for variation prior to making any survey.

Please advise as to what action has been taken on this matter.

JOHN K. BARTO
Regional Administrator

Attachments

cc: Mr. George L. Pettigrew

- Official file ✓
- Reading file
- Action copy

JKBarto/umb
9/7/71

NOT TO BE USED FOR FILES

CG 20073

1 BB 0009131 1

(U.S. DEPARTMENT OF LABOR)
Occupational Safety and Health Administration

WASHINGTON, D.C. 20310

Date: September 14, 1971

Reply to
Attn of: OHM

Subject: Application for Variance, File VAR-15 Pittsburgh Corning Corporation, Pittsburgh, Pa.

To: John K. Barto, Regional Administrator

Ref: Your memorandum dated September 7, 1971 requesting information on subject



In reviewing subject application we have been notified by the Medical Investigation Branch, NIOSH, Cincinnati, Ohio that this Company at both their Port Allegany, Pa. and Tyler, Texas plants have been investigated by the State Department's of Labor, and, in addition by the HEW Office for air burdens of asbestos. We are presently requesting these records in order to determine what light they may shed on the application, and to the appropriateness of granting their request for an Interim Order.

On September 10, 1971 Mr. Paul Martha, Attorney with Reed, Smith, Shaw, and McClay, Pittsburgh, Pa., representing Pittsburgh Corning Corporation was informed that we are investigating the appropriateness of granting the Interim Order.

Joseph J. La Rocca

Joseph J. La Rocca
Chief, Office of Project
Management and Support

RECEIVED
SEP 15 1971
U.S. DEPARTMENT OF LABOR
OFFICE OF PROJECT MANAGEMENT AND SUPPORT

NOTE: THIS DOCUMENT DID
NOT COME FROM PPG FILES

GG 2007A

BB 0009132

November 19, 1971

Telephone conversation between C. R. Holder, John Boyle, Don Shay
and Charles McClure

First, I want to correct one thing I told you earlier. The MSA
pumps were sent yesterday at noon instead of day before yesterday.
The filters were shipped today. The recommendation about samplings
are as follows:

1. Take breathing zone samples on the workmen. I would not use
use general area samples. Use an open face vinyl metrical type filter.
Attach the sampler to the workmen if there is no objection from the workers
or from management.
2. I recommend that whoever goes from the Department of Labor -
take and use a Bureau of Mines dust respirator.
3. Try to get the names of workmen that you take breath zone
samples on.
4. Try to establish an 8-hour time-weighted average.
5. The next point and the most important one: The period of
sampling may be varied and the guidance on that is as follows: The
amount of dust on the filter is very important, that it not be excessive
(I think you know). In a heavy dust area (200 particles per ml.) the
time may be as short as two to five minutes. You will have to visibly
compare the open face filter with a clean filter in order to determine
there is just a slight disposition on the filter. Heavy deposits may
fall off and will be difficult or impossible to count. It will be
necessary for Boyle to use his judgment about the amount of deposit on
the filter; a light deposit is preferred. Use as a limit 12 fibers per
ml. longer than 5 microns counted by Phase Contracts methods.

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Page 2.

The dust counting would be done in the Salt Lake City laboratories of the Public Health Service.

6. It is our recommendation that this inspection be confined solely to asbestos dust evaluation and that other items, such as noise and safety, not be cited because of the importance of the issue in this particular case hearing. Except for an imminent danger or serious violation you inspect and cite for those items on safety.

Holder: Who said that?

~~McClure: Shay, you are not to do that.~~
McClure: Shay.

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Holder: Put him on the line.

Shay: Except for an imminent danger or serious violation, in other words, in case of imminent danger or serious violation, you would inspect and cite for those items on safety.

7. Take pictures of settled dust or broken vents, poor vents, poor housekeeping or any other item that you feel is pertinent to this case.

8. Look at the records of the plant on investigation of injuries or reports required by OSHA.

9. Document precisely everything you can, especially the 8-hour time-weighted averages, even if this is done on just a few people.

10. If we are establishing an 8-hour operation better not interpolate the data in this case. This case is going to be in the public eye and my recommendation is to establish an 8-hour sample on 15 minutes out of each hour on each man, or a half hour on each, but do not take one or two samples on each man. Take as many breathing zone samples as you can per day per man in order to establish time-weighted averages and excursions. Stay as many days as you need to in order to do the job properly.

11. Note any breakdowns, slow downs or abnormalities in operation.

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Page 3'

12. Note carefully the extent to respirator useage, percent of time used, percent of workers using, and when on and when off the face.

13. Be sure to include an employee walk-around or an employee interview.

14. Document sampling time, sample location, and length of sample carefully. Avoid general area samples. Now that is the end of my recommendation for one or both of you.

McClure: Have you made any arrangements saying you should or shouldn't use local analysis of these filter samples?

Holder: We have not. I thought your recommendation or instruction was it should be counted at the laboratory in Salt Lake City.

McClure: Did Barto tell you you should?

Holder: Do you feel we would get better results if it were done locally?

McClure: I feel it is better to send it to Salt Lake City.

Holder: Let's see if Mr. Boyle has anything to say as to the sampling procedure which is concerned.

Boyle: No. This is fine. It is comparable to silica sampling where you may sample a short period of time. If it is dark, I x may get too much. We can visually compare it with a clean filter. It will be a big job. We should check the ventilation system carefully.

McClure: Yes.

Holder: I have a question for Mr. McClure. At the present time we have two MSA monitair pumps and 20 filters. Do you feel that we should delay this survey until the equipment arrives from Cincinnati, that is until we receive our 15 pumps and filters?

McClure: I would recommend that.

Holder: I have no further questions. Do you have any further questions Mr. Boyle?

CG 20077

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Page 4

Boyle: No

McClure: There is an additional item that you can record. If you are faced with a situation of going on out and using the two pumps, that they be sent to Cincinnati for calibration after the job is completed. Let's stay on the one thing and not get involved in a general inspection unless a serious hazard or imminent danger exists.

Shay: You're right. If in the course of your work you come upon an imminent danger or serious hazard we would be remiss in our duties if we did not discuss it.

Holder: Mr. Johnson did call back; he did not wait for me to call him. Their report was incomplete. They did not designate any time or anything. Dr. Johnson made a point that he considered this a very serious situation and a cease and desist will be in order. He asked if we were going to visit the plant and take air samples. He wanted to know if we were going to use NIOSH (or HEW) results and I told him we had them and we would give them every consideration; in fact we have to determine the conditions at the time of our survey. We had to investigate ourselves. Brief Dr. Farrish on this. ^{McClure} I think you told him exactly right. Do you think this is a one man job or in your opinion would it take more than one hygienist?

McClure: More than one.

Holder: We thank you for that opinion. ?

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U. S. DEPARTMENT OF LABOR
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
SUITE 600, TEXACO BUILDING
1512 COMMERCE STREET

DALLAS, TEXAS 75201

DATE: November 22, 1971
REPLY TO:
ATTN OF: 60SHA

SUBJECT: Pittsburg Corning

TO: John K. Barto, Regional Administrator

On November 19, 1971, I talked to Mr. John Boyle and asked if he felt he needed help on Pittsburg Corning Asbestos' Survey. He stated he needed advice on time of air sampling. He was informed Mr. Ray McClure would be contacted and he could ask any questions he wished. He said if Ray gave answers, he could handle the survey.

Attached approximate context on phone conversations held with Mr. McClure on November 19 and November 22, 1971.

CRHolder

C. R. HOLDER
Assistant Regional Administrator
Compliance

cc: Ray McClure
John Boyle

CRHolder:mac

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November 22, 1971

GOSEA

Pittsburg Corning

John K. Barto, Regional Administrator

On November 19, 1971, I talked to Mr. John Boyle and asked if he felt he needed help on Pittsburg Corning Asbestos Survey. He stated he needed advice on time of air sampling. He was informed Mr. Ray McClure would be contacted and he could ask any questions he wished. He said if Ray gave answers, he could handle the survey.

Attached approximate content on phone conversations held with Mr. McClure on November 19 and November 22, 1971.

C. R. HOLDER
Assistant Regional Administrator
Compliance

cc: Ray McClure
John Boyle

CRHolder:mac

Official File
✓ Reading File

Note: During the same conversation, Mr. Holder ask me if there were any reason why a second Industrial Hygienist would be require. I said, This is a big job. It may be necessary to have a second ~~men~~ Industrial Hygienist in order to complete the job in a reasonable length of time.

J. Boyle

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John Boyle

Telephone Conversation November 22, 1971, between Ray McClure, Washington, John Boyle and C. R. Holder, Dallas.

C. R. Holder:

Mrs. Campbell will take the notes, and Mary if you do not understand, please stop and have them repeat.

Ray McClure:

I called David Hubner of NIOSH about calibration. There is no calibration curve furnished with the meter. However, there is a setting given on the side of the meter which will give a flow rate of 2 LPM with a VM-1 open-faced filter. It will be necessary to split the tape on the filter holder in order to make it open-faced. You split the tape with a knife or razor blade and remove the top half in order to make it open-faced. It will be necessary to try and maintain a flow rate of about 2 LPM by frequently checking the flow rate and resetting. Disregard the previous recommendation to sample at as fast a rate as readable.

John Boyle:

The information is OK, fully understood. Ray, we received a shipment of cameras, no pumps this morning.

Ray:

Ah huh, cameras, oh heck, I don't know what to tell you, just keep looking for them. We may be fouled up by the mail service.

John:

OK, no further details required here.

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McClure: I called Dave Hubner. He is with NIOSH labs in Cincinnati. He is the engineer in charge of mailing equipment out to OSHA offices. According to Hubner they mailed samples Thursday afternoon and the filter papers Friday morning by U.S. Mail, air freight.

Holder: Is it registered?

McClure: Yes, registered- return receipt requested. They mailed it to OSHA, USDL, Suite 600 Texaco Building, 1512 Commerce Street, Dallas, Texas 75201. I would suggest that you might want to check with that substation, 75201..

Holder: Here in Dallas?

McClure: Yes, in Dallas. Also you might want to check with RAO mail room.

Holder: We have already done that. They said they didn't have it.

McClure: That is the only thing I know.

Holder: Now maybe you can enlighten us some more on this exposure business. John, feel free to interrupt.

McClure: O.K. (1) You don't necessarily have to take as many samples as Public Health Services did. You can use their data as a guide to plan your sampling strategy. It will be better to establish 8-hour time weighted averages, or TWA's, on a few heavily exposed workers than to take a grab sample on every worker. Off the record, John, do you understand that?

Boyle: I understand it but there are two points here and I would say it is on the record. The data we got back from NIOSH indicated high level exposure from many different types of operations like feeders and those operating the saws. I don't know how many others, there were high level exposures on packaging, even on inspection, and I would anticipate there would be high levels even on the janitor.

McClure: You don't have an obligation to sample and cover every worker that is under exposure. We are only trying to establish a violation of our standards and

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It is not like a complete health survey where you are trying to find out what every man's exposure is, good or bad.

Boyle: Whether they had control in an area...

McClure: But not with area samples. For instance, on a mixer if there are 5 men working on mixers, I would sample the one man that appears to have the greatest exposure and that would cut down on the total number of samples.

Boyle: For that one sample you are talking in terms of a weighted sample based on 15 minutes out of each hour during a working day so that we do not have to extrapolate data that we do not have. If the operation is the same for 8 hours you want to take a look at it each hour during the day rather than say we sampled for one or two hours.

McClure: I want to sample 15 minutes out of each hour but the sample period per sample paper is limited to visual judgment of the loading of the paper.

Holder: Am I clear that we are talking about 15 minutes out of the hour on each individual that we choose at the feeder? We might come with 15 minutes depending on the concentration.

Boyle: You still want to cover him during the 8 hours so we can establish an average exposure for him by making an 8-hour TWA.

So for this one individual, the total sample time would be 15 x 8, or 2 hours?

McClure: Right. You will get 15 minutes out of every hour. You have the leeway of 5 minutes or 30..

We have this leeway if we are getting heavy enough samples so we have sufficient sample.

Holder: Leaving it to Boyle, if we should take 5 or 30 minutes exposure on each employee chosen to sample. Is the reason for this choice that if we are in a heavy concentration area it is possible that we would acquire at least as good samples in 5 minutes as might appear to be in a concentration not so heavy. We might only get 2 or 3 good samples in 30 minutes. Is this the reasoning behind that statement?

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McClure: That is true. The other part is that the company might claim the man was assigned to some other position for half a day that we were there and that is why we want to look at them every hour.

I was trying to clear up why it might be 5 minutes out of each hour up to 30 minutes for each individual that Mr. Boyle might choose.

The reason why it might range from 5 to 30 is because of the heaviness or lightness of the exposure. With a heavy exposure only 5 minutes would be necessary. With a very light exposure to dust you might have to sample 30 minutes to get a countable sample. Does that make sense C.R.?

Holder: O.K.

Boyle: I have a question or two regarding the instrument shipment.

(1) Did Hubner precalibrate the pump?

McClure: Yes

Boyle: This would be acceptable since they have not been used.

(2) Are these all MSA Monitors or are there other types?

McClure: They are all MSA. 15 units plus charges. They are capable of sampling for 8-hour periods.

B - I am aware of that.

Holder: No you are not

Boyle: That was the old type. This is a different type which will operate for 8 hours.

McClure: That is true.

Boyle: What sampling rate is proposed for asbestos? They will calibrate it at 2 lpm. Is this acceptable?

McClure: 2 liters per minute is an acceptable rate but I would recommend that you sample it at as fast a rate as you can conveniently read on the flow meter.

Boyle: If we can sample it at a faster rate than the pump calibration can we then post calibrate and use this calibration?

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McClure: Do you have facilities for calibrating?

Boyle: No, it would have to be sent to Cincinnati.

McClure: Cincinnati has furnished a calibrated curve for each instrument.

Holder: I am going to show my ignorance but if the pumps have been calibrated, what has the rate of flow got to do with it? They either are or are not in calibration.

Boyle: On the last calibration from Cincinnati only specific data was given for individual readings. No curve was furnished. It is not a case of ignorance, it is a difference on how it was handled.

Holder: Can you get in touch with Cincinnati and see that they give us the curve? This is the only way to give us the data.

McClure: All right, but it is easy enough to make a curve.

Boyle: Not when they give us only one point of data.

Holder: If they only furnish one point per pump I am not going. Have they done this in the past? Has the Cincinnati Lab of NIOSH given us a calibration on a pump of only one point? Boyle said yes.

Boyle: One point per condition.

Holder: You guys can talk on as long as you want to I am going to hang up.

Boyle: They have several different conditions where they have to submit calibration data open face and closed face for three different filters also the use of cyclone separators prior to filter. The calibration involves a number of calibration readings. We have been given specific data but no curve. It does not allow us to use a pump at the higher rate of flow without post calibration.

McClure: John, I don't understand the problem. Why don't you use the pump at the rate at which they calibrate it? They asked us to use this..

John: You asked us to use the pump at the highest rate possible. This would be at the calibrated rate unless we use post calibration. D.K?

McClure: You are complicating it too much John. We don't need to bother the

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g I taking shorthand (h all of this prefilter, cycles, and all this. It doesn't enter into it. The nly thing we need t know is the sampling rate and how that ties in with calibration.

Boyle: What you are really saying is they have a curve. If this is true, this is fine.

McClure: Well, I think you can take the pump as supplied and sample with it at the recommended rate and you will be o.k.

Boyle: I am for that.

McClure: Now in regard to sampling at the highest rate possible you apparently did not hear me when I said 2 liters per minute would be o.k. or sample at the highest rate readable on the flow meter. Either/or.

Boyle: O.K.

McClure. Anything else? I will call Cincinnati and find out more particulars about the calibration data and I will call you back.

Boyle: O.K. I have received a delivery record of a government shipment on my desk. 109 lbs., 6 cartons. I will have to look to see what it is.

McClure: O.K.

Boyle: I think you have covered it.

McClure. O.K. I will call you back.

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NOTE.—DO NOT USE THIS ROUTE SLIP TO
SHOW FORMAL CLEARANCES OR APPROVALS

DATE 11/23/71

TO:

AGENCY BLDG. ROOM

John K. Barto, Regional
Administrator, Region VI
Occupational Safety and Health
Administration
U.S. Department of Labor
1512 Commerce Street, Rm. 600
Dallas, Texas 75201

- ☐ APPROVAL ☐ REVIEW ☐ PER CONVERSATION
☐ SIGNATURE ☐ NOTE AND SEE ME ☐ AS REQUESTED
☐ COMMENT ☐ NOTE AND RETURN ☐ NECESSARY ACTION
☐ FOR YOUR INFORMATION
☐ PREPARE REPLY FOR SIGNATURE OF _____

REMARKS:

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NOV 26 1971

DALLAS REGIONAL OFFICE
U.S. DEPARTMENT OF LABOR-OSHA
(Fold here for return)

To William M. Johnson, M.D.

From Acting Deputy Director, DESCT.

PHONE BUILDING ROOM NIOSH
513-684-3255-6-8 FOB 7033

FORM HSW-30 REV. 11/70 ROUTE SLIP 9-670-1 1240 0-320-119

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CG 20087



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
PUBLIC HEALTH SERVICE
HEALTH SERVICES AND MENTAL HEALTH ADMINISTRATION
Cincinnati, Ohio 45202

December 21, 1971

National Institute for Occupational
Safety and Health

James E. Peavy, M.D.
Commissioner of Health
Texas State Department of Health
1100 West 49th Street
Austin, Texas 78756

NOTE: THIS DOCUMENT DID
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Attention: Mr. Martin C. Wukasch, P.E., Director
Division of Occupational Health and Radiation Control

Dear Dr. Peavy:

Enclosed is a report of an industrial hygiene and medical survey of the Pittsburgh-Corning Corporation plant in Tyler, Texas. This study was conducted on October 26 - 29 by the National Institute for Occupational Safety and Health at the request of the Texas State Department of Health, and Local 4202, Oil, Chemical, and Atomic Workers International Union.

The principal objectives of the study were to determine the levels of asbestos dust in the working environment, to evaluate the existing environmental controls for asbestos, and to perform medical examinations of the workers.

The results of the study revealed exposures to asbestos considerably in excess of present standards, which, coupled with the medical findings, represent an extremely serious occupational health problem. The report contains recommendations for correction of the situation which we feel should be implemented immediately in order to assure that the health of the workers in this plant is adequately protected.

Your cooperation in this study is greatly appreciated. If we can be of further assistance, please feel free to call.

Sincerely yours,

Bobby F. Craft
Bobby F. Craft, Ph.D.

Acting Director, Division of Technical Services

William M. Johnson
William M. Johnson, M.D.

Acting Deputy Director, Division of Field
Studies and Clinical Investigations

Enclosure

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ASBESTOS SURVEY
PITTSBURGH-CORNING CORPORATION
TYLER, TEXAS

PROJECT NO: 71-45
DATE: 12/7/71

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Project 71-45

N.I.O.S.H. SURVEY
PITTSBURGH-CORNING CORPORATION
TYLER, TEXAS
OCTOBER 26 - 29, 1971

Study requested by:

Martin C. Wukasch, P.E., Director
Division of Occupational Health and Radiation Control
Texas State Health Department
Austin, Texas

Local 4202
Oil, Chemical, and Atomic International Workers

Study conducted by:

National Institute for Occupational Safety and Health
Cincinnati, Ohio 45202

Division of Technical Services
Thomas L. Anania, Acting Chief
Industrial Hygiene Services Branch
Steven F. Alder, Engineer
Francis J. LaPallo, Engineer

Harry Markel, Industrial Hygienist
Region VI

Division of Field Studies and Clinical Investigations
William M. Johnson, M.D., Acting Deputy Director
Richard Spiegel, M.D.
Richard Lemon, Epidemiologist

Other persons present:

Charles E. Van Horne, Plant Manager
Pittsburgh-Corning Corporation
Tyler, Texas

Horace Adrian, Chief
Industrial Hygiene Program
Texas State Department of Health

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SUMMARY OF REPORT

During the week of October 26 - 29, 1971, the National Institute for Occupational Safety and Health conducted a comprehensive industrial hygiene and medical survey of the Pittsburgh-Corning Corporation amosite asbestos thermal pipe insulation plant in Tyler, Texas.

The survey pointed out major industrial hygiene deficiencies which included a grossly inadequate ventilation system and poor housekeeping practices. Personal air samples yielded grossly excessive fiber concentrations. One hundred seventeen of 138 samples exceeded 5 fibers/ml for fibers $>5\mu$ in length.

The National Institute for Occupational Safety and Health medical questionnaires and examinations for rales and clubbing were conducted on 63 male employees in order to complement the X-rays and pulmonary function tests performed by Dr. George Hurst at the East Texas Chest Hospital in August 1971. Even without benefit of interpretation of the X-rays, 7 of 18 workers with 10 or more years employment met at least 3 of 4 criteria for asbestosis, and reduced pulmonary function was observed in a few workers with less than 5 years employment.

In conclusion, an extremely serious and critical occupational health situation exists at this plant. Immediate corrective action is necessary to reduce asbestos exposures to conform to existing standards.

Appropriate recommendations are presented in this report. In all areas and operations except the office area, average and maximum concentrations of dust greatly exceeded the presently existing Threshold Limit Value of the American Conference of Governmental Industrial Hygienists and the Emergency Standards of the U. S. Department of Labor (see Table I).

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INTRODUCTION AND PURPOSE

On October 26 - 29, 1971, at the request of Mr. Martin C. Wukasch of the Texas State Health Department and Local 4202, Oil, Chemical, and Atomic Workers International Union, an environmental and medical survey was made of the Pittsburgh-Corning Corporation plant in Tyler, Texas. The survey was made to determine the level of asbestos dust in the working environment, to evaluate the existing environmental controls for asbestos and to conduct medical questionnaires and examinations for rales and finger clubbing. The study was conducted by the Division of Technical Services and the Division of Field Studies and Clinical Investigations of the National Institute for Occupational Safety and Health (NIOSH).

Previous industrial hygiene surveys for asbestos dust were made of this plant in March 1937 and January 1970. On both occasions the levels for asbestos dust greatly exceeded the threshold limit value (TLV) for asbestos dust as set forth by the American Conference of Governmental Industrial Hygienists (ACGIH). In this study the asbestos dust was also grossly in excess of the existing TLV's (see Table I).

DESCRIPTION OF PLANT AND MANUFACTURING OPERATIONS

The plant occupies two large buildings approximately 1000 ft. long and 50 ft. wide and covers approximately 100,000 sq. ft. The buildings are approximately 30 ft. high with corrugated metal roofs, a wooden shell, and concrete floors.

The plant employs 74 persons, including 62 hourly and 12 salaried employees. There are four major departments:

1. Production
2. Finishing
3. Shipping, Receiving and Warehouse
4. Maintenance

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With the exception of the production department which operates three full shifts, the plant operates only one shift. In this plant asbestos insulation for pipe is manufactured from a variable mixture of asbestos (approximately 90%) and varying amounts of natural diatomaceous earth, sodium silicate and mineral wool.

The amosite asbestos used by Pittsburgh-Corning is mined in East Africa. It arrives at the Tyler plant by railroad cars packaged in polyethylene lined hisspan bags with each bag weighing 110 lbs. After the materials are received they are stored and used as needed.

There is also a large inventory of "governmental surplus" amosite asbestos in the warehouse. This material is stored in burlap bags without the polyethylene liners. All types of used asbestos bags are sold to nursery companies to wrap trees or they are disposed of in the local dump.

When the materials are ready for processing they are placed in material feeders. There are 3 feeder lines with each line having 3 stations. Each station contains different materials. The first station contains the virgin amosite; the second contains mineral wool (at times the final formulation contains approximately 5% mineral wool). The third station contains scrap. (Scrap is regenerated asbestos and is approximately 25% of the formula.) The new bags of asbestos are placed on top of the feeder and cut with a knife and allowed to fall into the feed hopper. The scrap is removed from metal containers using a large fork and placed in the feeder hopper. Both systems generate excessive amounts of dust. The diatomaceous earth used in the formula (7%) is placed in large hoppers and fed by auger to the conveyor system.

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After the material is placed in the feeder hoppers it is transported by conveyor belts to the attrition mill which opens the amosite fibers and blends all the ingredients together. From the attrition mill the material is transported through ducts to the cyclone where the heavy material is separated out and the light material is recycled to the attrition mill. From the cyclone the heavy material goes to the building machines.

In the building machine, through a system of spiked belts and lay belts, a lap is formed. The lap is a dry mass of the total blend of the raw materials. Controlling the speed of the spike belt determines the thickness of the lap. The material then goes through a mechanical rake to smooth the lap; it is then sprayed with sodium silicate. After the lap is sprayed it exits the building machine and is rolled on a mandrel to desired size. Sand or Perlite is applied at the beginning of the roll to ease the mandrel from the finished roll. It then goes to the finishing mill. From the finishing machine it goes to the coating machine where a clay coating is applied.

At the building machine in the roll-up process, small amounts of the material cling to the lap belt and are scraped off the bottom side of the turn around drum. This material is gathered up, loaded on a truck and dumped in a large field adjacent to the plant as waste. At the present time no provisions have been made to bury this material. This practice has been carried out for at least 15 years. This produces a serious air pollution problem.

After the rolls have been clay coated they are removed from the mandrel and put into a drying room. From the drying oven the rolls go to the finishing department where the ends are sawed off, split down the middle, bound together with string, packaged and then removed to the warehouse for storage.

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ENVIRONMENTAL STUDY PROCEDURES AND INSTRUMENTATION

Atmospheric samples for fiber count were collected on Millipore filters, Type AA*, encased in three-piece plastic Millipore aerosol field monitor with face cap removed and filter completely exposed. The samples were taken at the operators' breathing zone using battery powered Mine Safety Appliance (MSA) gravimetric pumps, Type G. The pumps and samplers were worn by the employees. The pumps were calibrated to operate at 1.7 liters/minute with each sample being taken for one hour. Each employee on each shift was sampled at least twice, with some employees on the first shift being samples three times.

Ventilation measurements were made using pitot static tubes and a magnehelic gauge. A ten-point traverse was attempted on the larger ducts with a six-point traverse on ducts six inches or smaller. A more detailed report of the ventilation system will appear later in this report. Face velocity measurements were made on hoods using a thermal anemometer.

Noise measurements were also made of the plant using a General Radio sound level meter, Type 1665-A, calibrated at the time of this study. No readings were found to be above 85 dBA.

TOXICOLOGY AND HYGIENIC STANDARDS

Asbestos is a general name given to a variety of fibrous minerals. The major asbestos minerals are chrysotile, crocidolite, amosite and anthophyllite. Asbestosis, lung cancer, pleural and peritoneal mesotheliomas may follow exposure to asbestos. The risk is related to the length of exposure and the dust concentration.

*Registered trade name of the Millipore Corp., Bedford, Massachusetts

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The Threshold Limit Value (TLV)* for asbestos dust, as listed in the Threshold Limit Values for 1971 of the ACGIH is 5 million particles per cubic foot of air. In 1968, the U.S. Department of Labor (Walsh-Healey Act) promulgated a standard limit of 12 fibers per ml of asbestos, for fibers $>5\mu$ in length. On December 7, 1971, the U.S. Department of Labor established an "Emergency Standard for Asbestos Dust Exposure of 5 fibers per milliliter, $>5\mu$ in length for an eight-hour weighted exposure. The ceiling exposure conditions shall not exceed 10 fibers per milliliter $>5\mu$ in length."

RESULTS OF STUDY

A total of 138 personal samples were taken of the various operations at the Tyler plant. These samples were analyzed in the Cincinnati laboratory of NIOSH. Each of the membrane filters were rendered transparent using a 50:50 mixture of dimethyl phthalate and diethyl ozalate and counted using a 4 mm (43X) phase contrast objective 400X magnification and phase contrast illumination. Counts were recorded for all fibers $>5\mu$.

Of the total of 138 samples taken, 117 exceed the presently accepted Hygienic Standards of 5 fibers/ml of air and $>5\mu$ in length. In all areas and operations, except the office area, average and maximum concentrations of dust greatly exceeded the presently existing TLV of the ACGIH and the Emergency Standard of the U.S. Department of Labor. (see Table I.)

The plant was in very poor condition including housekeeping, health hazards, ventilation, and storage and disposal methods. Each aspect will be discussed below.

*TLV Booklet. Threshold limit values refer to airborne concentrations of substances and represent conditions under which it is believed that nearly all workers may be repeatedly exposed, day after day, without adverse effect. Because of wide variation in individual susceptibility, however, a small percentage of workers may experience discomfort from some substances at concentrations at or below the threshold limit, a smaller percentage may be affected more seriously by aggravation of a pre-existing condition or by development of an occupational illness.

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HOUSEKEEPING

The housekeeping was very poor. At the time of our arrival, when a walk-through survey was made, the floors, ceilings and rafters had an excessive amount of dust on them. The drinking fountains and eye bubblers were very dirty as were the rest rooms. There were also small piles of dust around the machines that had been swept there by the operators using push brooms. Thus, asbestos dust was re-dispersed into the work atmosphere.

VENTILATION

The ventilation system, as a whole, was found to be grossly inadequate. Some of the deficiencies are listed below.

1. Blast gates were closed.
2. Small ducts on all three feeder stations were plugged.
3. Large holes in main and auxiliary ducts and in the bag collectors.
4. Conveyor system from feeders to attrition mills have large separations in the facility.
5. Many of the ducts are disfigured, probably caused by bumping by machinery.
6. Holes in ducts were repaired by applying Permagum, a putty like substance.
7. Too many 90° entries were attached to the main ducts, which can cause excessive air turbulence and static pressure losses.

An attempt was made to do a pitot traverse of the ventilation system. This was impossible since the ducts on each of the three feeder stations were plugged. Static pressure reading could not be made due to holes in the blower housing and the bag collectors.

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SCRAP GRINDER

The scrap grinder is located north of the feeder stations. Scrap from various operations are ground as it is passed in the process. The operator must lift the pieces of scrap above his head to feed the grinder. After the scrap is ground up it is deposited in a metal container approximately 4' x 4' with wheels. After the container is full it is removed and then taken to the feeder stations where it is reintroduced into the process. The grinding operation was very dusty and the vent which was insufficient. Velocity across the face of the opening was only 20-30 ft./minute (fpm). A slot at the floor level was pulling approximately 200 fpm but is incorrectly placed; it should be located above and close to the metal container.

MATERIAL FEEDERS

The material feeders consist of three lines with each line having three stations. The ducts used to ventilate these stations are located approximately 2 ft. from the opening of the feeders with each having a 90° entry. The ducts are 4", 5", and 6" in diameter, depending on the location to the main duct. Face velocities across each station ranged from 0-15 fpm. A fan located in the area contributed to the turbulence and redispersion of dust in the work atmosphere at the feeder stations. There were openings on the feeder stations that allowed the operator to see into the feeder. Although they were equipped with plexiglass they were left open. This also contributed to the dust buildup in the area. The scrap grinder and the feeder stations are on the same collection system. This collecting system, consisting of three units of canvas bags with 16 bags in each unit, is located inside the plant. These bags are cleaned by mechanical shaking with the contents falling into 55 gallon drums located beneath the bags. There is a large opening between the bags and the drums and when the bags are shaken a large portion of the dust is released to the work area. The spillage, like the spillage from the scrap grinder and the feeders,

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is swept up by using a push broom. Although the plant has a vacuum cleaner it was not used in these areas.

BLOCK SAW OPERATION

The exhaust on this operation was in the best condition of any in terms of removing the dust at the source. However, the blower assembly and the collector bags had holes in them and the dust exhausted from the operation was released into the work area.

LARGE SAW OPERATION

In this operation the larger sections of pipe insulation are trimmed. The pipe is put on a conveyor and both sides are trimmed simultaneously using a band saw. At the base on each side of the saw there is a 6" duct to exhaust the dust. The face velocity at these ducts was measured at 200 fpm. This does a good job at the bottom but the dust generated at the top of the cut is released to the work area. When the ends are trimmed, the pipe then goes to a splitter which makes a cut along the length of the pipe. For exhausting the dust from this operation there is a side draft or suspended hood arrangement. It does a good job of exhausting the dust around the outside and along the cut, but the dust is not removed from the inside of the pipe. When it is removed it is inverted and the dust is released to the work area. There is a considerable amount of dust in this part of the operation. This was the only operation in which the dust collector was located on the outside of the building.

RESPIRATORS

In 1971, the wearing of respirators was made mandatory in all areas of the plant. Respirators used in the plant were MSA Comfo Mask with BM21B-90 filters. Although they have a definite application, respirators should not be worn as a regular means of protection. Respirators should be used only as an

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emergency or for backup protection. This does not seem to be the intent at this plant. Unless properly fitted, correctly used, and properly maintained, a respirator may become a hazard because it gives the wearer a false sense of security and permits him to become careless and may add to his exposure. If respirators must be used they should be controlled through a company operated program providing for proper selection, fitting, maintenance and cleaning. This part of the program is lacking since many workers were seen with straps too loose, and straps not connected. There is no maintenance and standardization program for the respirators.

HEALTH HAZARDS

In addition to the health hazard from the amosite asbestos, the following potential hazards were noted:

1. The lunch room is located too close (approximately 40-50 ft.) to the dustiest operation in the plant.
2. Workers are allowed to go into the lunch room wearing clothes contaminated with asbestos.
3. There is a potential health hazard from the diatomaceous earth handling operation.
4. The scrap material that is dumped into the open field may cause a serious community health problem.
5. The sand, used on the floor to enable cartons to be moved more easily, may present a silica dust problem.

ADDITIONAL COMMENTS

Some additional potential hazards were observed as follows:

1. There are 6 homemade natural gas heaters located throughout the plant. Since they are vented into the plant this may cause carbon monoxide or fire and explosion hazard.

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2. Compressed air outlets operating at 90 psi are located throughout the plant for the purpose of blowing excess dust off employees. This is not only a hazard to the employees but it reintroduces the asbestos dust to the working environment.

MEDICAL PROGRAM

The company has no in-plant medical facilities or first aid room. Two first aid cabinets were stocked inadequately, and one first aid cabinet had a door with broken glass.

Occupational health consultation is available from corporate headquarters in Pittsburgh, Pennsylvania. Dr. Lee Grant, Medical Director of PPG Industries, Inc., is Medical Consultant to the Pittsburgh-Corning Corporation.

Employees are sent to the Tyler Medical and Surgical Clinic for X-rays, physical examinations, and emergency care. Pulmonary function and X-rays were performed on all male employees in August 1971, at the nearby East Texas Chesi Hospital by Dr. George Hurst, an internist and specialist in chest diseases.

Diffusion studies and arterial blood gases were obtained on those male employees with greater than 5 years employment. At the present time the workers do not receive pre-employment X-rays due to the high turnover of new personnel; however, after 60 days employment chest X-rays are taken.

In August 1971, U.S. Bureau of Mines approved respirators were made mandatory throughout the plant concomitant with an application to the Occupational Safety and Health Administration, U.S. Department of Labor, for variance from the asbestos standard. In the finishing and batching area of production (feeders and scrap grinders), the use of respirators has been mandatory since 1965. Safety glasses are required. No protective clothing is issued to employees, and there are 5 air hoses operating at 90 lbs/sq. in. and located throughout the plant to blow off excessive dust.

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Also, the variance request sets forth the requirement: "Continuing health education program on asbestos will be provided." However, during the present survey, many employees apparently were unaware of the serious implications of asbestos exposure.

MEDICAL DATA AND RECOMMENDATIONS

Asbestos is a general name given to a variety of fibrous minerals. The major asbestos minerals are chrysotile, crocidolite, amosite, and anthrophyllite. Amosite is used exclusively at this plant in the production of thermal pipe insulation.

Asbestos-related diseases have been well documented in the medical and occupational health literature. The risk of developing asbestosis or pulmonary fibrosis varies directly with length of exposure and concentration of exposure. The association between occupational exposure to asbestos and lung cancer, pleural mesothelioma, and peritoneal mesothelioma is recognized.

NIOSH industrial hygiene surveys in 1967 and 1970 yielded grossly excessive fiber concentrations compared to current and proposed standards. Again, the present survey yielded grossly excessive fiber concentrations in all production, finishing, and shipping areas.

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NIOSH medical questionnaires and examinations for rales and finger clubbing were conducted by our survey team on 63 male employees in order to complement the X-rays and pulmonary function tests performed by Dr. George Hurst of the East Texas Chest Hospital in August 1971, at the request of the Pittsburgh-Corning Corporation. Several films were read as possible pulmonary fibrosis. Dr. Lee Grant, Medical Consultant to Pittsburgh-Corning Corporation, has delayed release of these films to NIOSH and its expert panel of radiologists pending his personal review of the X-rays. Even without benefit of X-rays, 7 of 18 workers with 10 or more years employment at the Tyler plant meet at least 3 of 4 criteria for asbestosis. These criteria include:

1. Forced vital capacity below 80% of predicted.
2. Dyspnea.
3. Finger clubbing.
4. Rales.

Positive X-rays could increase further the number of cases of asbestosis. Reduced pulmonary function was also observed in a few workers with less than five years employment.

In conclusion, the following medical recommendations are set forth:

1. Chest X-rays obtained in August 1971, should be forwarded to NIOSH and its expert panel of radiologists for the benefit of the Tyler employees.
2. Reduction of asbestos exposure levels to conform to existing standards is imperative in order to prevent any irreversible pulmonary damage.
3. Following a review of the X-rays, further and more specific medical recommendations will be made.
4. Medical follow-up of present and past employees is indicated. Certainly asbestosis has been reported to progress following cessation of asbestos exposure.

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DISCUSSION AND CONCLUSIONS

Inhalation of asbestos dust has long been recognized as a serious occupational health hazard. Asbestos-related health effects were detected in many Tyler employees.

This plant has been in operation since 1954. NIOSH surveys in 1967 and 1970 yielded excessive fiber concentrations, and again, this survey yielded fiber concentrations grossly in excess of current and proposed standards.

Housekeeping practices and the ventilation system were inadequate. According to the AIHA Industrial Ventilation Manual, a minimum capture velocity of 200 fpm at the face of the material feeders and a duct velocity of 3500 to 4500 fpm should be maintained. Since the open area of the material feeders is approximately 9 sq.ft., the minimum effective air movement would be 8 ft. x 200 fpm = 1600 cfm. The carrying velocity in the main duct should be approximately 3100 cfm. The present system does not meet these criteria.

The respirator program is inadequate and does not offer sufficient protection.

In conclusion, immediate measures should be taken to insure the employees a safe and health work environment. Further asbestos exposure could result in irreversible pulmonary damage. Immediate corrective action is mandatory and the following industrial hygiene recommendations are set forth:

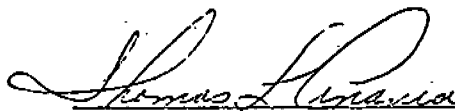
1. A complete redesign of the ventilation system.
2. Locate all dust collectors on outside building and equip collectors with automatic shakers.
3. Appoint a safety committee to educate employees to hazards of asbestos.
4. Remove all homemade gas heaters from the plant.

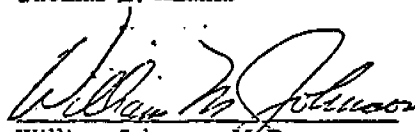
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5. Do not allow employees to use compressed air to remove dust from clothes.
6. Establish a company operated and controlled respirator program providing for proper selection, fitting, maintenance and cleaning.
7. The lunch room should be located in a clean area of the plant and employees should not be allowed to enter with dirty clothing.
8. All employees should be issued protective clothing such as coveralls and cotton caps and these clothes should be removed before eating and before going home.
9. All scrap materials should be buried.
10. Used asbestos bags should be buried also and not sold to nurseries or removed to the local dump.
11. Do not use sand on floor to transport cartons.

REPORT PREPARED BY:


Thomas L. Anania


William Johnson, M.D.

NOTE: THIS DOCUMENT DID
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REFERENCES

1. Documentation of Threshold Limit Values, American Conference of Governmental Industrial Hygienists, Committee on Threshold Limit Values, Cincinnati, Ohio 1971.
2. Threshold Limit Values of Airborne Contaminants and Physical Agents, American Conference of Governmental Industrial Hygienists (1971).
3. Industrial Ventilation - A Method of Recommended Practice. 11th ed.

NOTE: THIS DOCUMENT DID
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TABLE I

ANALYSIS OF PERSONAL SAMPLESPITTSBURGH-CORNING ASBESTOS PLANT, TYLER, TEXAS

ASBESTOS PIPE-INSULATORS

<u>OPERATION</u>	<u>SAMPLE</u>	<u>CONC. (FIBERS >5μ/ml)</u>
Mixing		
Feeder	45	54.04
Feeder	139	105.83
Feeder	117*	101.71
Feeder	99*	169.7
Scrap Feeder	106	9.58
Feeder	60*	188.91
Feeder	12*	92.77
Feeder	57	26.4
Feeder	82	9.14
Feeder	132	22.5
Feeder	29	37.6
Maximum Concentration		189
Average Concentration		75
Forming		
Builder	18	40.93
Builder	91	26.11
Builder	103	14.61
Builder	88	7.45
Builder	119	9.42
Builder	83	25.79
Builder	85	42.77
Relief Builder	105	22.33
Builder	89	6.67
Builder	121	25.53
Builder	54	12.28
Builder	25	57.72
Relief Builder	71	35.24
Builder	90	17.
Builder	92	37.54
Builder	120*	90.9
Builder	110	70.36
Builder	107*	103.97
Relief Builder	111	30.43
Builder	16*	134.41
Builder	20	53.23
Builder	14	44.31
Builder	17	59.58
Builder	53	42.99

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Page 2 - Pittsburgh-Corning Asbestos Plant

Forming :

Maximum Concentration		134
Average Concentration		42
Relief Builder	27	72.12
Builder	74	9.74
Builder	15	64.35
Builder	24*	111.15
Builder	131	13.8
Builder	136	9.9
Builder	122	14.8
Builder	101	26.9
Builder	124	8.44
Builder	65	56.45
Builder	95	36.41
Builder	58	14.75
Relief Builder	56	24.27
Builder	102	31.2
Labor	52	11.26
Maximum Concentration		134
Average Concentration		36

Curing

Oven Tender	47	23.5
Oven Tender	140	5.08
Oven Tender	112	6.89
Oven Tender	93	19.87
Oven Tender	84	16.40
Maximum Concentration		29
Average Concentration		14

Finishing

Supervisor	68	20.38
Wrapper	130	11.43
Wrapper	98	37.45
Finishing Laborer	1	30.43
Utility-Finishing	3	48.53
Utility-Finishing	66	12.03
Wrapper	8	94.81
Utility-Finishing	4	55.11
Finishing Laborer	22	22.83
Saw Operator	30	27.36
Saw Operator	126	19.38
Saw Helper	78	14.18
Saw Operator	76	31.23
Saw Operator	94	21.9
SRL Saw	118	1.73
Cutting Saw	51	91.76

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Page 3 - Pittsburgh-Corning Asbestos Plant

Finishing

SRL Cutting Saw	55	40.28
Saw Feeder	35	2.30
Pine Machine Oper.	006*	208.42
Saw Labor	007	97.26
Saw Labor	116	6.59
SRL Saw	134	25.97
SRL Saw	141	1.96
Saw Labor	109	11.62
SRL Labor	26	91.52
Maximum Concentration		208
Average Concentration		41

Inspection

Box Marker	86	20.71
Weigher	59	34.49
Fork Lift Operator	2	11.71
Packer	21	9.5
Packer	42	1.84
Shipping Supervisor	43	2.18
Packer	10	13.08
Fork Lift Operator	62	20.42
Labeler	63	20.72
Inspector	69	92.26
Weigher	5	29.45
Inspector	23	73.62
Packer	9	3.83
Packer	44	.71
Weigher	125	6.8
Maximum Concentration		92
Average Concentration		23

Miscellaneous

Maintenance	75	32.08
Utility	135	2.09
Utility	133	8.36
Maintenance	108	18.12
Utility	39	30.38
Maintenance	11	42.28
Maintenance	13	26.81
Maintenance	50	28.43
Maintenance	64	37.54
Sweeper	97	3.61
Maintenance	123	2.10
Maintenance	127	0.94
Janitor	129	2.29
Shipping	40	1.36
Guard	73	1.94

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Page 4 - Pittsburgh-Corning Asbestos Plant

Miscellaneous

Guard	113	4.58
Guard	72	0.64
Supervisor	128	1.57
Supervisor	080	14.92
Supervisor	19	29.91
Supervisor	79	6.28
Supervisor	77	24.25
Supervisor	104	25.2
Supervisor	115	2.28
Maximum Concentration		42
Average Concentration		14

Office Workers

	154	0.04
	152	0.04
	158	0.03
	155	0.66
Maximum Concentration		.66
Average Concentration		.22

* = Approximate (too many to count)

Samples taken on October 26, 27, 28, 29, 1971

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Oil, Chemical and Atomic Workers International Union

ANTHONY MAZZOCCHI, DIRECTOR
CITIZENSHIP-LEGISLATIVE DEPARTMENT



1126 - 16TH STREET, N. W.
WASHINGTON, D. C. 20036
PHONE: 222-2188

CERTIFIED MAIL

January 14, 1972

Mr. John K. Barto
Regional Administrator
Occupational Safety and Health Administration
United States Department of Labor
Suite 600, Texaco Building
1512 Commerce Street
Dallas, Texas 75201

RECEIVED
JAN 19 1972
U.S. DEPARTMENT OF LABOR - OSHA

Dear Mr. Barto:

Per our phone conversation on January 7th, I would like to formally request from your office documents relating to the Pittsburgh Corning Corporation plant in Tyler, Texas. If there is a copying charge, please bill us and you will be promptly reimbursed.

The items are:

- 1) Reports of surveys conducted under the Walsh-Healey Act.
- 2) Copies of the citations and notice of proposed penalties issued against the Tyler plant by OSHA in 1971.
- 3) Report of the asbestos dust counts taken during the aforementioned OSHA inspection.

The reports of Walsh-Healey inspections have been made available to us since the case of Weckslar et al. vs. Schultz. There should be no problem with the OSHA citations and notice of proposed penalties.

In the matter of releasing the results of your dust sampling during the OSHA inspection, precedents have already been set in other parts of the country. For instance on September 22, 1971, OSHA Region III issued a citation for serious violation against Kawecki-Berylco Industries in Hazleton, Pa. for excessive beryllium concentrations in workplace areas. The beryllium dust counts were listed under "Description of Alleged Violation."

Besides precedents such as this one, the failure to release such data violate one of the basic premises of OSHA. Congress included the inspection provision in OSHA so that workers would have an opportunity for a third "independent" party to evaluate their workplace. Congress also wanted to guard against the serious information problem that developed during Walsh-Healey, so the posting of citations under OSHA was made mandatory.

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(2)

Of course, the easy way to render the citation posting provision meaningless is to strip the citation of important technical data. Workers in the Tyler plant know that the work conditions are bad, but they also need to know where and to what extent the conditions are unhealthy so that they can protect themselves. Had this information been made available ten years ago, do you think that we would now have the seven cases of workers with the symptoms of asbestosis that both the company and NIOSH have found?

Furthermore, the new emergency asbestos standard calls for different respiratory protection at different levels of ambient asbestos dust. Again, the workers need to know of the specific dust levels in order to evaluate if they are being properly protected.

Lastly, let me refer you to Assistant Secretary Guenther's remarks to the first meeting of the National Advisory Committee on Occupational Safety and Health in Washington on August 11, 1971. Mr. Guenther made several statements concerning the availability of OSHA information and he concluded by saying, "Everything we write is in the public domain."

Please forward the documents in question to me as soon as possible. If future citations and penalties are assessed against the Pittsburgh Corning plant in Tyler, please forward them also. If you have any questions, please do not hesitate to call.

Sincerely yours,

Steven Wodka

Steven Wodka
Legislative Assistant
for Special Projects

cc: Mr. Herman Yandle, OCAW Local 4-202
Mr. Morris Akin, Dir. OCAW Dist. 4
Mr. Billie Stokes, Int. Rep.
Mr. John Tadlock, OCAW
Mr. Ray Davidson, OCAW
Mr. George Guenther, OSHA

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XXXXXX

- 7th Floor

March 13, 1972

Mr. Steve Wodka
Legislative Aide
Oil, Chemical and Atomic Workers
International Union
1126 - 16th Street, N. W.
Washington, D. C. 20036

Re: Pittsburgh Corning Corporation
Owensboro, Texas

Dear Mr. Wodka:

The files on the above captioned case have been forwarded to our
Legal Department and you should be hearing from us in the near
future.

I apologize for our delay in answering your request but we had a
Three-Region Meeting in Dallas and the U. S. Department of Labor's
59th Anniversary Honor Awards Ceremony.

Yours very truly,

JOHN K. BARTO
Regional Administrator

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reading files

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XXXXXXXX

- 7th Floor

March 13, 1972

60SHA

Pittsburgh Corning
Owentown, Texas

M. J. Parmenter
Regional Solicitor

I am forwarding Pittsburgh Corning OSHA file and Walsh-Healey file
as a result of Mr. Steve Wodka's letter of March 1 for determination
as to whether or not the information he requested may be released.

JOHN K. BARTO
Regional Administrator

CRHolder:mls
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reading files

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U.S. DEPARTMENT OF LABOR
OFFICE OF THE SOLICITOR
Federal Building & U. S. Courthouse - Room 7C52

Dallas, Texas 75202

DATE: April 4, 1972
REPLY TO: SOL:SHS
ATTN OF: SOL:SHStrickler:sw
SUBJECT: Request for Documents -
Pittsburgh Corning Corporation
TO: John K. Barto
Regional Director, OSHA

RECEIVED

APR 7 1972

DALLAS REGIONAL OFFICE
U. S. DEPARTMENT OF LABOR - OSHA



This is in response to your request for a legal opinion as to what portions of the OSHA and Walsh-Healey files in this case may be released to Mr. Steve Wodka, Legislative Aid, Oil, Chemical and Atomic Workers' International Union. Mr. Wodka requested the following items: (1) reports of surveys conducted under the Walsh-Healey Act, (2) the report of the OSHA inspector and industrial hygienist resulting from the inspection on November 23-24 and November 29-December 1, 1971, and also January 13, 1972, and (3) any further citations, notices of proposed penalties and inspector reports issued since January 13, 1972. Consequently, these determinations will be limited to what portions of the afore-mentioned documents may be released. Both files in this case are being returned with this memorandum.

This memorandum will be divided into two parts. The first, entitled "deleted material", will consist of a list of the wording to be deleted, the file and document in which it is found, and the location of the wording within the document. The second part, entitled "reasons and authority", will consist of a statement of the factors considered and the grounds for the previously stated deletions. The interrelationship between these two parts will be shown by means of a code using capital letters under the heading "Justification."

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It should be emphasized that the opinions stated herein are not binding on the officer authorized to release these documents. 29 CFR §70.22(b) states, as follows:

"Although the Department of Labor is not required by the Freedom of Information Act to make available for inspection or copying any materials or documents included in its records which are within the categories described in 5 U.S.C. 552(b)(2), (4), (5), (6), (7), (8), or (9) (see §§70.23 - 70.28), under the Department's disclosure policy set forth in §70.11 particular records requested which come within these categories, or portions thereof, shall nevertheless be made available to the extent, but only to the extent, that the appropriate officer authorized to disclose information from Department records determines that the disclosure will further the public interest and will not impede the discharge of any of the functions of the Department of Labor."

Further guidelines for carrying out this exercise of discretionary judgment are contained in the remaining portions of the above-cited regulation.

DELETED MATERIAL

OSHA File

NOTE: THIS DOCUMENT DID NOT COME FROM PPG FILES

<u>Justification</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
A, B	Safety and Health Report for inspection date 2/29/72	bottom of page, Time Invested, Nos. 41,43,45	"4.0", "1.0", and "5.0"
B, C	same, attached Narrative (printed form)	bottom of page "3 . In your opinion, is a follow-up inspection necessary?"	"x" marked in 'no' box
C or E	same, attached Narrative (hand-written Summary continued)	Page 1, paragraph 1 lines 11-14	"The disposal procedure may take one or more months with the remaining personnel."

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<u>Justifica- tion</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
C or E	same	page 4, paragraph 2, lines 18-20	"It would take up to 2 months to sell the equip- ment, buiding, and land."
A, B	Safety and Health Report for inspection date 2/9/72	bottom of page, Time Invested, Nos. 41, 42, 43, 44, and 45	"4.0", "1.0", "2.0", "3.0" and "10.0"
Notification of Failure to Correct Violation and of Proposed Additional Penalty may be released in its entirety			
A, B	Safety and Health Report dated 1/14/72	bottom of page, Time Invested, Nos. 41, 42, 43, 44 and 45	"4.0", "2.0", "1.0", "4.0" and "11.0"
B, C	same, attach- ed Narrative (printed form)	bottom of page, "In your opinion, is a follow-up inspection neces- sary?"	"x" marked in 'yes' box
C	same, attach- ed Narrative, additional typewritten pages	page 1, third paragraph after Citation Status list, lines 4 and 5	"Such a procedure of physical exams for new employees would be acceptable to J. P. Boyle. No commitment was made regarding this point."
C	same	page 2, para- graph 2, lines 8-10	"Mr. Holder stated that in his judgment equivalent house cleaning would be necessary to keep levels within the established stan- dards."

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Page 4

<u>Justifi- cation</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
C	same	page 2, paragraph 3 lines 3 and 4	"Apparently there is no plan to shut down the plant until all orders are filled."
D, E	same	page 2, paragraph 4, entire paragraph	"We are not aware of any firm agree- ment to sell the plant. Mr. Van Horne indicated that two different persons were inter- ested during the past few weeks."

Penalty Assessment Worksheet - Other Violations may be
released in its entirety

Intervening materials not requested - NIOSH report, Citation,
Notification of Proposed Penalty

E	Safety and Health Re- port dated 12/2/71	No. 33(3) Descrip- tion of Processes	"Raw material as- bestos (Amosite fiber), Dicalite, Silicate soda, Min- eral wool, Snowbrite Clay and recycled scrap, ground and feed through duct system to building area, sprayed with Solution of silicate of soda, rolled or mandrel into var- ious sizes of pipe insulation, placed on finishing rolls, coated and placed in oven to dry end trimmed, split & packaged."
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Page 5

NOTES: IT DID
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<u>Justifi- cation</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
F	same, attach- ed Narrative (typewritten)	paragraph 2 lines 12 and 13	"109 E. Granville, Tyler, Texas."
C	Report of indus- trial hygienist John P. Boyle dated 12/14/71	page 1, paragraph 5, lines 2 and 3	"For this reason, the immediate hazard is not regarded as a serious violation."
G	same, attach- ment 1, letter to Dr. Peavy dated November 16, 1971	Page 1, paragraph 2 lines 5 and 6	"the local member- ship of the Oil Chemical and Atomic Workers Interna- tional Union"
D	same	page 1, para- graph 4, lines 5-7 and page 2 paragraph 1, line 1	"One film was read as a pulmonary neo- plasm by Dr. Hurst, and this diagnosis was confirmed following hospitalization. In addition, several films were read as possible pulmonary fibrosis."
B, C	same	page 2, paragraph 2, entire paragraph	"Therefore, medical follow-up of current and past employees is indi- cated. Immediate corrective action is necessary to reduce asbestos exposure levels to conform to existing standards."

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page 6

Analysis of Personal Samples, Operations Test Data (see Footnotes) and Time Weighted Exposure Data portions of attachments may be disclosed in entirety

<u>Justifi-</u> <u>cation</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
F	same, attach- ment 3, Work History Data	one page	Delete entire page

Ventilation System Analysis, five pages (see Footnotes) and Picture Record, attachments 5 and 6 to report, may be disclosed in entirety.

B, C	same, attach- ment 7, Medi- cal Data Summary	page 1 of 6, paragraph 1, lines 3-8	"It is the opin- ion of Mr. Boyle and Mr. Holder that med- ical file information is confidential where the employee is identified since this information was taken from per- sonal medical files by Mr. Van Horne without the knowledge of the individual employees. It is recommended that such medical information related to individual employees be treated as confidential information."
H	same	pages 2 of 6, 3 of 6, 4 of 6 and 5 of 6	Delete these four pages in their entirety.

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Page 7

Page 6 of 6, Medical Data Summary, may be released in its entirety

<u>Justifi-</u> <u>cation</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
C	same, attach- ment 8, Exist- ing Control Programs	page 1 of 2, third paragraph under (2) Possible substitu- tion of material	"Not very good when procedures similar to asbestos opera- tions are used"
C	same	page 2 of 2, paragraph 1, entire paragraph	"A recent cast process for mineral wool shows some promise. The ini- tial cost is high."
C	same	page 2 of 2, paragraph 2, entire paragraph	"Pearlite may be the answer for substitution. It shows some promise."
C	same	page 2 of 2, first paragraph under (4) Shut-down procedure	"Rework of large inventories of scrap will not be a problem."

Safety and Health Program Evaluation may be released in its entirety

D	Narrative dated 12/2/71	"3. Closing confer- ence Summary", lines 5 and 6	"admitted know- ledge of excessive concentrations of asbestos"
B, C	same	"3. Closing con- ference Summary", lines 8 and 9	"No legal action expected"

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Page 8

<u>Justifi-</u> <u>cation</u>	<u>Document</u>	<u>Location</u>	<u>Wording</u>
B, C	same	bottom of page "3. In your opinion, is a follow-up inspection neces- sary?"	"x" marked in 'yes' box

WALSH-HEALEY FILE

(All material other than that listed below - not requested)

A, B	Safety and Health Report, for inspection date 2/13/69	Time invested, Nos. 3-43, 3-50, 3-53, and x-14	"1.0", "6.0", "1.5" and "8.5"
C	same	Unsatisfactory Conditions Noted; Process Area, 2.	"Ex. Recommend that several employ- ees be trained so that each shift will have qualified personnel to take care of emergencies."
C	same	reverse side of page, handwritten notation at bottom of page	"(c) Not to be cited as violations. MP"

Report of industrial hygienist Jack D. Torrey (dated February 24, 1969) and memo to M. Padilla from J. D. Torrey (dated June 2, 1969) may be released in their entirety.

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REASONS AND AUTHORITY

General - The determinations which have been made are based on the Freedom of Information Act and the regulations applying its provisions to Department of Labor documents. Said regulations are contained in 29 CFR Part 70 as printed in Volume 37, Number 56, Part III of the Federal Register on Wednesday, March 22, 1972.

29 CFR § 70.77(a) states, as follows:

"Supplementary regulations governing the disclosure of records in the custody of the Occupational Safety and Health Administration pursuant to the Williams-Steiger Occupational Safety and Health Act of 1970 (84 Stat. 1590, 29 U.S.C. 651) will be published in Part 1913 of this title."

While the regulations in Part 1913 have not yet been published, a draft copy of them has been used as a guide in these determinations. In no case, however, was reliance placed solely on these provisions. It should be noted that 29 CFR §1913.1(b)(1) and (2) as drafted states that:

"The rules in this part govern the disclosure of information compiled in the administration of the safety and health provisions by the Administration or the Bureau of the following: (1) Williams-Steiger Occupational Safety and Health Act of 1970; (2) The Walsh-Healey Public Contracts Act, as amended, ..."

The files in question were compiled in investigations authorized by these Acts.

A - This information concerns the amount of time spent by the Government in conducting an investigation. Based on the draft version of 29 CFR § 1913.33(h), its deletion is recommended. Such information is also a matter of internal personnel practices.

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Page 10

B - This information relates to internal personnel practices protected from disclosure by exemption No. 2 of the Freedom of Information Act (FIA). See also 29 CFR §70.23 and 29 CFR § 1913.22(a) [draft].

C - This information consists of conclusions or opinions of an investigator and/or recommendations made in the course of developing official Department action. As such, it is exempted from disclosure by exemption No. 5 of the F.I.A., 29 CFR §70.25(c), 29 CFR §1913.25(a) [draft] and 29 CFR §1913.33(b) [draft].

D - This material consists of statements which, by their very nature, indicate they were information furnished and accepted in confidence. As such, they are exempted from disclosure, as privileged or confidential information, by exemption 4 of the F.I.A. See 29 CFR §70.24(b), which states in part:

"This exemption [No. 4] is further intended to extend protection to other information in Government records which has been furnished and accepted in confidence and which would not customarily be released to the public by the person from whom the Government obtained it."

See also 29 CFR §1913.24(c) (2) [draft].

E - This information consists of trade secrets and of confidential commercial and financial information relating to the operations of the investigated company. As such, it is protected from disclosure by exemption 4 of the F.I.A., 29 CFR §70.24(a), 29 CFR §1913.24(a) [draft] and 29 CFR §1913.33(b) [draft].

F - This information consists of private or personal information which, if disclosed to the public, would amount to an invasion of privacy. Exemption 6 of the F.I.A. allows nondisclosure, as do 29 CFR §§70.26(b) (3) and (4) and 29 CFR §§1913.26(a) and (b) (3) [draft].

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Page 11

G - This information reveals the identity of an informer. As such, it is protected from disclosure by the informer's privilege, which has its roots in exemptions 4 (information submitted in confidence) and 7 (investigatory files compiled for law enforcement purposes) of the F.I.A. See also 29 CFR §70.27(c), 29 CFR §1913.27[draft] and 29 CFR §1913.33(g)[draft].

H - These materials are personal medical records protected from disclosure by exemption 6 of the F.I.A., 29 CFR §70.26(b)(2) and 29 CFR §1913.26(b)(2)[draft].

FOOTNOTES

Consideration was given to the deletion of the names of the employees tested in the Operations Test Data portion of the OSHA file. It was decided that said persons probably would not be classified as informers and that the medical records exemption probably wasn't applicable. An invasion of privacy does not appear since the examinations were for testing and data collection rather than for treatment purposes. In other words, these men were more like volunteers for an experiment than patients in the true sense.

Consideration was also given to the deletion of the Ventilation System Analysis portion of the OSHA file. The decision was made that this is probably not protected as a trade secret since the ventilation system is presumably not a part of the manufacturing process. Hence it is collateral and not central to Pittsburgh Corning's operations.

The decision was also made not to release Dr. Morton Corn's Industrial Hygiene Survey of Selected Plant Operations. Since this was a study commissioned by the company, it wasn't a "survey conducted under the Walsh-Healey Act." Hence, it isn't within the scope of the requested materials. An alternative grounds for not releasing it is that it was submitted and accepted in confidence in support of the company's position.

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Page 12

Under 29 CFR §70.62, the requesting party, in this case Mr. Wodka, must be charged for the cost of producing and copying this file. The cost of determining which portions of the file must be deleted is to be included in the charge. See 29 CFR §70.62(c). A total of six hours has been spent in making these determinations and, accordingly, \$22.50 should be added to whatever other costs are incurred.

M. J. Parmenter
Regional Solicitor

Attachment: Files (2)

NOTE: THIS DOCUMENT DID
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XXXXXX

7th Floor

April 10, 1972

Mr. Steve Wodka, Legislative Aide
Oil, Chemical and Atomic Workers
International Union
1126 - 16th Street, N.W.
Washington, D. C. 20036

Dear Mr. Wodka:

As requested in your letter of March 1, and several phone conversations thereafter, I am attaching the material from our files which you desired.

The cost for transmission of these reports, in line with the regulations published under 29 CFR, paragraph 70-62, is as follows:

Labor (Solicitor) 24 quarters	\$ 23.00
Labor (Compliance Office) 16 quarters	15.00
Reproduction of material (51 pages @ 20¢ each)	10.20
TOTAL	48.20

You will note some information has been removed from the reports. This is in accordance with the rules and regulations as contained in 29 CFR Part 70 as printed in Volume 37, Number 56, Part III of the Federal Register on Wednesday, March 22, 1972, as set forth in Paragraph 70.11 particular records requested which come within these categories, or portions thereof, shall nevertheless be made available to the extent, but only to the extent, that the appropriate officer authorized to disclose information from Department records determines that the disclosure will further the public interest and will not impede the discharge of any of the functions of the Department of Labor.

I will appreciate your remittance of \$48.20 to this office by certified check or money order, payable to the Secretary of Labor.

If you have any questions concerning this matter, please do not hesitate to contact me.

Very truly yours,

JOHN K. BARTO
Regional Administrator
Attachments

Official file

✓ Request for Documents File
Reading File

Refer to OSHA File For Documents
for documents released
JKBarto/mb 4/10/72

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LAW OFFICES
CLINT A. BARHAM
DANE A. BARHAM
MAIN BANK BUILDING
MAIN AND LAMAR
DALLAS, TEXAS 75202

September 14, 1973

BY APPOINTMENT ONLY
OFFICE PHONE
AC 214 741-1151

Consumer Affairs Division
Department of Commerce
Capitol Building
Washington, D. C.

Re: Pittsburgh Corning Corporation
Tyler (Owentown), Texas

NOTE: THIS DOCUMENT DID
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Dear Sirs:

Mr. Lindley G. Beckworth of Longview and I are representing three parties in Workmen's Compensation occupational disease cases in Tyler, Texas. We have alleged in each of these cases that their condition was caused by asbestos while breathing the same as employees of the Pittsburgh Corning Corporation.

We understand that your Division either through the Justice Department or through other agencies recommended or forced the closing of the Pittsburgh Corning Company in Owentown near Tyler back in the middle 1960's after an intensive investigation of the working conditions with reference to the breathing of asbestos fibres.

In order for us to adequately present our cases to the Court and the jury we would appreciate your arranging to send to us a copy of an official report, signed by the proper authorities that would permit the introduction of the same into evidence in behalf of our clients at your earliest convenience.

You may feel free to send to us a charge for your fee in the preparation and sending of this report to us.

Yours sincerely,

CLINT A. BARHAM
DANE A. BARHAM

By _____

CAB:es

cc Mr. Lindley G. Beckworth, Sr.
Mr. Gary Beckworth
Mrs. Rogene Belcher
Mr. Johnny Rufus Lee
Mr. James J. Fitzgerald

GG 20128

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Memo to File:

Subject: release of information: Pittsburgh Corning, Tyler, Texas

A review of this file in conjunction with several articles written for the New Yorker Magazine revealed that essentially all of the material requested had been disclosed and published. Accordingly, we advised HEW that the FOIA request could be answered with the exception of the medical and personnel records, which the attorneys understood would not be available except with written permission of the individuals; and the employee lists. Mr. Walderman advises that he understood that neither of these items, if withheld, would create any problem with the requestor. ~~Re:indicated#~~
If there is any problem with regard to further information on this case, HEW will contact us.

Sofia P. Petters
Counsel for Regulations and Enforcement
June 10, 1974

*all persons interested persons in Soc
were notified informally before final action
on this matter.*

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