

CHEMICALS AND PLASTICS

ONE CALIFORNIA STREET, SAN FRANCISCO, CALIFORNIA 94111

To (Name) Mr. J. L. Meyers Date July 17, 1973
 Division
 Location Niagara Falls Originating Dept. Group I - San Francisco Field Office
 Answering letter date
 Copy to Messrs. W. J. Fitzpatrick Subject
 H. W. Greenhood
 G. Kyriopoulos

PLAINTIFF'S
EXHIBIT

UC-578

Georgia - Pacific wants the most current information on Asbestos as it pertains to O.S.H.A. Regulations. Please forward pertinent data to me for delivery to Georgia - Pacific.

A call on Georgia - Pacific's Technical Center in Tigard, Oregon, would be worthwhile if you come West.

R. C. Tomczak

RCTomczak/cmm

We have been working with G-P on dust sampling, regulations etc since late last year. I talked to Gene O'Neill earlier this month and met this week with their chief engineer from Portland (John Di Lorenzo) and their plant personnel at the Alkon Plant. We gave them drawings of our packaging area, discussed their recent citations and fines, and reviewed OSHA & EPA regulations. Today (7/19) they picked up 130# of SG-200x (1/8" pellets) from our NF lab for evaluation.

(over)

some time was a can sample of ...
but is soon moving to Marietta I understand.

We have monitored dust at all their plants
except Acme (Quincy) and are scheduling
another test at Marietta. I would ^{be glad} ~~try~~ to
discuss the situation with their corporate
personnel (such as Ken Gibson, safety director) at
Portland, but I don't know of anything
specific which I can send you, which
they don't have. Let me know if there is
a specific problem or question.

John Myers
7-19-73

July 18, 1973

Mr. John DiLorenzo
Georgia Pacific Corporation
900 SW 5th Avenue
Portland, OR 97204

503-222-5561

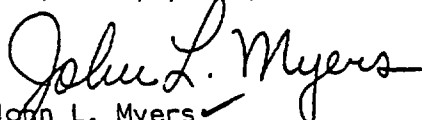
Dear John:

Enclosed is a copy of the recently enacted EPA regulations per your request at our meeting in Akron on July 17, 1973. I've also included some information on dust sampling equipment and procedures.

Please let me know if you would like any additional information or assistance. We have a "package" on the bulk handling of "Calidria" Asbestos pellets if you ever get to that stage.

I enjoyed meeting you and look forward to seeing you again.

Very truly yours,


John L. Myers
Marketing Manager

/ds
Enclosure



INTERNAL CORRESPONDENCE

MINING AND METALS DIVISION

P. O. BOX 579, NIAGARA FALLS, NEW YORK 14302

To (Name) Mr. W. C. Thurber
Division Mining and Metals
Location New York, NY

Date July 27, 1973
Originating Dept. "Calidria" Asbestos - Marketing
Answering letter date
Subject OSHA Citation

Copy to

Enclosed is a copy of the Subject issued to Georgia-Pacific Corporation, Akron, New York, for which they were fined a total of \$3000. I will send a copy to all personnel without identifying Georgia-Pacific, as this should be considered confidential information.

Georgia-Pacific personnel, including counsel, attended a hearing in New York City but did not contest the citation. Since they did not contest, OSHA advised them that they could not see the dust monitoring results. Therefore, they do not know where specific improvements are needed.

There seem to be several areas where OSHA demands clearly exceed legal requirements. Based on our field experience, EPA, OSHA and state authorities are making it common practice to do this and tend to create an aura of harassment or unfounded fear for our customers. Have we received any satisfactory response on the EPA letter from Atlanta, for instance; and should we make some high-level waves via AIA or direct? It can only get worse if there are no complaints.

Following are some specific comments (with my thanks to H. B. Rhodes for his participation):

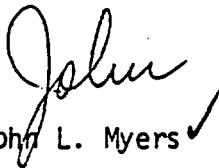
Citation Item 1. The regulations do not specify clothing to prevent skin contact. We know of no deleterious effect of skin contact with asbestos. The most obvious reason for clothing changes is to minimize the transfer of asbestos dust to non-occupational areas.

Posting of Citation - The asbestos regulations do not require posting of citation but are very specific on employee notification if he has been exposed to excess concentrations. Without data Georgia-Pacific does not know which employees to notify or where to take corrective action. Perhaps posting of the citation is required by the original Occupational Safety and Health Act of 1970.

July 27, 1973

Multi-Step Abatement - Items 3 through 7 are required to become permanent controls. It is assumed that Georgia-Pacific will install dust control equipment and take other engineering and administrative steps to reduce airborne dust to acceptable levels. Except for Item 5, it is clear in the regulations that the other items are not required unless dust levels are or are reasonably expected to exceed the prescribed levels. It seems that the prescribed abatement procedures exceed the legal requirements. This recalls one comment on the OSHA regulations: "You cannot exceed the threshold limit values - but, if you do, you must do this and this, etc. ---"

There is no question in our minds or in Georgia-Pacific's that the Akron plant is dirty and deserved citation. We are working closely with them on dust monitoring and possible control measures, including the use of pellets.


John L. Myers ✓

Enclosure
/ds

203 Midtown Plaza
700 E. Water St.
Syracuse, N. Y. 13210

CSHO NO.	OSHA-1 NO.
P-1568	48
AREA	REGION
6010	2

CITATION*

Citation Number 1, Page 1 of 5

Date Issued

JUN 13 1973

EMPLOYER _____

(Street _____)

ADDRESS (

(City _____)

An inspection of a workp _____

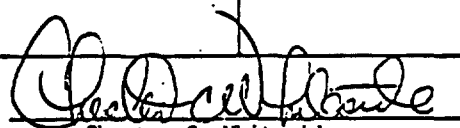
_____ and described as follows

Manufactures gypsum wallboard and jointing compound

has been conducted. On the basis of the inspection it is alleged that you have violated the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, in the following respects:

Item number	Standard or regulation allegedly violated	Description of alleged violation	Date on which alleged violation must be corrected
1.	29 CFR 1910.93a (d)(3), Page 22143	Failure of the employer to provide and require use of special clothing, such as coveralls or similar whole body coverings, gloves, and foot coverings to prevent skin contact with asbestos fibers, of employees within the dry mix and packout area.	Multi-Step Abatement (See Reverse Side of this Citation)
2.	29 CFR 1910.93a (d)(4) Page 22143	Failure of the employer to provide change rooms, two separate clothes lockers for work and street clothes, and the laundering and handling of work clothes for all employees exposed to airborne concentrations of asbestos fibers in excess of prescribed limits, within the joint compound mixing and packout area.	Multi-Step Abatement (See Reverse Side of this Citation)

Area Director's Signature


Chester C. Whiteside

The issuance of a citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless the citation is affirmed by the Occupational Safety and Health Review Commission.

RIGHTS OF EMPLOYEES

Any employee or representative of employees who believes that any period of time fixed in this citation for the correction of a violation is unreasonable has the right to contest such time for correction by filing a notice with the U.S. Department of Labor at the address shown above within 15 working days of the receipt by the employer of notice of proposed penalty or notice that no penalty is being proposed.

"No person shall discharge or in any manner discriminate against any employee because such employee has filed any complaint or instituted or caused to be instituted any proceeding under or related to this Act or has testified or is about to testify in such proceeding or because of the exercise by such employee on behalf of himself or others of any right afforded by this Act." Sec. 11 (c)(1) of the Occupational Safety and Health Act of 1970, 29 U.S.C. 651.

The law requires that a copy of the enclosed citation(s) "shall be prominently posted" in a conspicuous place "at or near each place a violation referred to in the citation occurred." It must remain posted until all violations cited therein are corrected, or for 3 working days, whichever period is longer.

* Alleged violations covered by this citation are those which are not serious violations within the meaning of the Act but which have a direct or immediate relationship to occupational safety and health.

MULTI-STEP ABATEMENT

I. Immediate Temporary Administrative Controls

Initiate immediate temporary administrative controls to prevent employee exposure to excessive asbestos dust concentrations by July 31, 1973. A Compliance Officer will determine if these temporary controls are preventing employee exposure.

- (1) Provide U. S. Bureau of Mines approved respirators for all packout areas of the main plant. Continue the use of respirators until the installation of permanent engineering controls.
- (2) Establish a complete respirator program in accordance with the provisions of the American National Standard Practices for Respiratory Protection 288.2-1969.
- (3) Establish a program for maintaining the joint compound dry mixing and packout areas of the main plant in a clean, orderly and sanitary condition to prevent asbestos dust contamination of the air. This program will include utilizing sealed impermeable bags for the storage of waste asbestos.
- (4) Provide employees with protective clothing that can be maintained in a sanitary and reliable condition from becoming contaminated with asbestos. In addition, provide employees with individual clothes lockers to prevent their personal clothing from becoming contaminated with asbestos dust.
- (5) Establish a personal monitoring program to determine, at six month intervals, the concentrations of asbestos dust.
- (6) Post asbestos "Caution" signs at all approaches to the work area to prevent unprotected persons from entering.
- (7) Affix asbestos "Caution" labels on all raw materials, mixtures, scrap, waste, debris and other products containing asbestos to prevent exposure to asbestos dust.

II. Permanent Engineering and Administrative Controls

- (1) By July 27, 1973, submit a plan for approval to the U. S. Department of Labor, Occupational Safety and Health Administration, 203 Midtown Plaza, 700 E. Water Street, Syracuse, New York 13210, Mr. Chester C. Whiteside, Area Director, showing a timetable for the installation of engineering controls to prevent employee exposure to asbestos dust concentrations above allowable limits.
- (2) Incorporate items (3) through (7) (listed as temporary administrative controls in Part I) as permanent administrative controls to prevent employee asbestos dust exposure.

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

203 Midtown Plaza
700 E. Water St.
Syracuse, N. Y. 13210

OSHA NO. P-1568	OSHA-1 NO. 48
AREA 6010	REGION 2

CITATION*

Citation Number 1. Page 2 of 5 Date Issued JUN 13 1973

EMPLOYER _____

(Street _____)

ADDRESS (_____)

(City _____)

An inspection of _____

Manufactures gypsum wallboard and jointing compound

has been conducted. On the basis of the inspection it is alleged that you have violated the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, in the following respects:

Item number	Standard or regulation allegedly violated	Description of alleged violation	Date on which alleged violation must be corrected
3.	29 CFR 1910.93a (f)(2)(ii) Page 22143	Failure of the employer to establish a personal monitoring program at intervals not greater than 6 months within the joint compound mixing and packout areas where asbestos exposure may reasonably be foreseen to exceed prescribed limits.	Multi-Step Abatement (See Reverse Side of this Citation)
4.	29 CFR 1910.93a (g)(1)(i) Page 22143	Failure of employer to post "Caution" signs at all approaches to the joint compound mixing and packout area where airborne concentrations of asbestos fibers may be in excess of prescribed limits.	Multi-Step Abatement (See Reverse Side of this Citation)

Area Director's Signature _____

Chester C. Whiteside
Chester C. Whiteside

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- (2) Establish a complete respirator program in accordance with the provisions of the American National Standard Practices for Respiratory Protection Z88.2-1969.
- (3) Establish a program for maintaining the joint compound dry mixing and packout areas of the main plant in a clean, orderly and sanitary condition to prevent asbestos dust contamination of the air. This program will include utilizing sealed impermeable bags for the storage of waste asbestos.
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Occupational Safety and Health Administration
203 Midtown Plaza
700 E. Water St.
Syracuse, N. Y. 13210

CSHO NO.	OSHA-1 NO.
P-1568	48
AREA	REGION
6010	2

CITATION*

Citation Number 1, Page 3 of 5 Date Issued JUN 13 1973

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(Street

ADDRESS (

(City

An inspection of _____

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Item number	Standard or regulation allegedly violated	Description of alleged violation	Date on which alleged violation must be corrected
5.	29 CFR 1910.93a (g)(2)(1) Page 22144	Failure of the employer to affix a "Caution" label to all raw materials, mixtures, scrap, waste, debris and other products containing asbestos fibers to prevent exposure to concentrations above prescribed limits during any reasonably foreseeable use.	Multi-Step Abatement (See Reverse Side of this Citation)
6.	29 CFR 1910.93a (h)(1) Page 22144	Failure of the employer to maintain all external surfaces within the joint compound, dry mixing and packout area, free of accumulations of asbestos fibers (dry sweeping is to be discouraged, utilize vacuum sweeping methods).	Multi-Step Abatement (See Reverse Side of this Citation)

Area Director's Signature

Chester C. Whiteside
Chester C. Whiteside

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CENOS NO.	OSHA-1 NO.
P-1568	48
AREA	REGION
6010	2

CITATION*

Citation Number 1, Page 4 of 5 Date Issued JUN 13 1973

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7.	29 CFR 1910.93a (h)(2) Page 22144	Failure of the employer to collect and dispose of all asbestos waste, scrap, debris, bags, containers, contaminated clothing in sealed impermeable bags to prevent any foreseeable airborne concentrations of asbestos fibers above the allowable limit.	Multi-Step Abatement (See Reverse Side of this Citation)

Area Director's Signature

Chester C. Whiteside
Chester C. Whiteside

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Occupational Safety and Health Administration

203 Midtown Plaza
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CSHO NO.	OSHA-1 NO.
P-1568	48
AREA	REGION
6010	2

AMENDMENT TO CITATION*

Citation Number 1. Page 5 of 5 Date Issued July 10, 1973

EMPLOYER

ADDRESS

An inspection

Manufactures gypsum wallboard and jointing compound

has been conducted. On the basis of the inspection it is alleged that you have violated the Occupational Safety and Health Act of 1970, 29 U.S.C. 651, in the following respects:

Item number	Standard or regulation allegedly violated	Description of alleged violation	Date on which alleged violation must be corrected
8.	Citations for Serious Violation #2 and #3, issued on the 13th day of June, 1973 are amended as set forth below: 29 CFR 1910.93a (d)(2) Page 22143	Failure of the employer to provide, and for the employees to use, U.S. Bureau of Mines approved respirators to prevent inhalation of airborne asbestos dust fibers (within the dry mixing and packout area).	Multi-Step Abatement (See reverse side of this citation)
9.	29 CFR 1910.93a (d)(2)(iv) Page 22143	Failure of employer to establish a respiratory program throughout the dry mixing area in accordance with the American National Standard Practice for Respiratory Protection Z88.2-1969, for employees who are exposed to excessive asbestos dust concentrations.	Multi-Step Abatement (See reverse side of this citation)

Area Director's Signature

Chester C. Whiteside
Chester C. Whiteside

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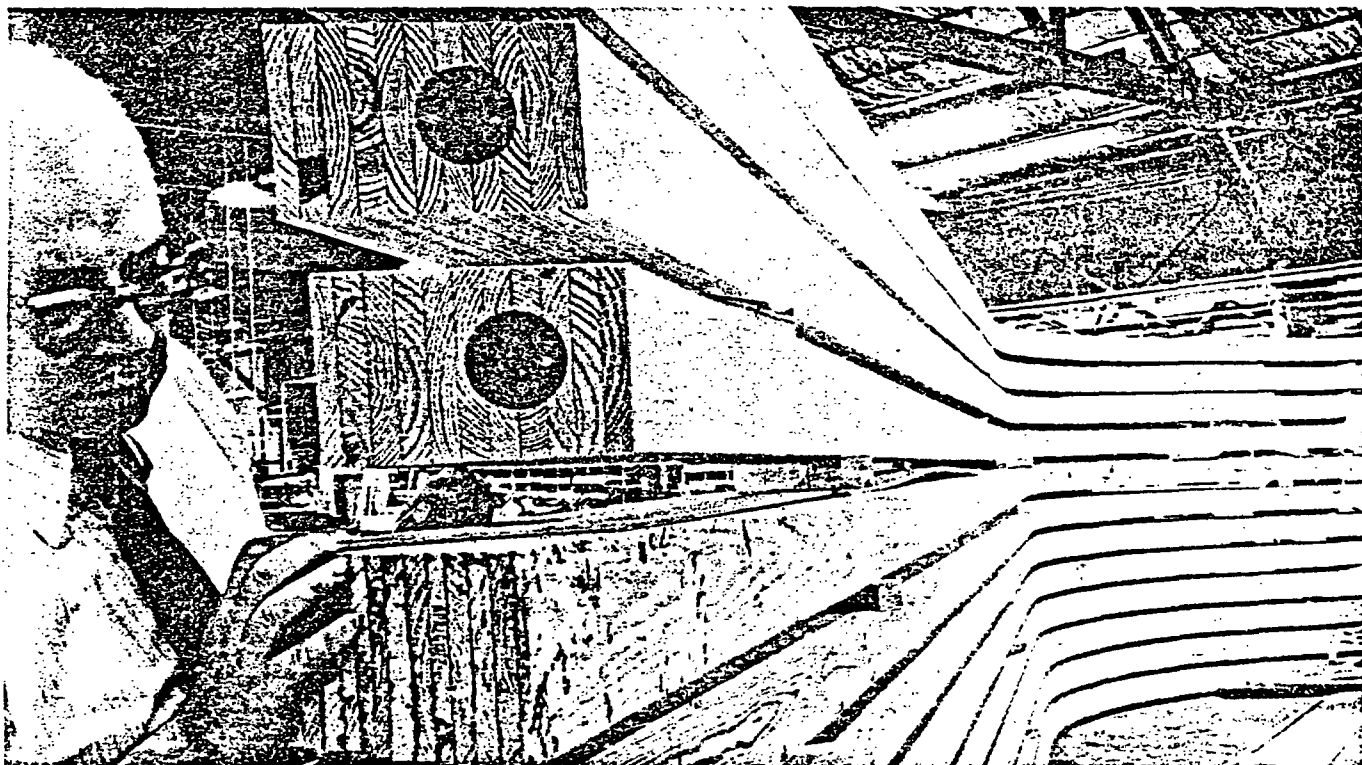
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Laminated wood Used to Construct \$9 Million Commercial Complex



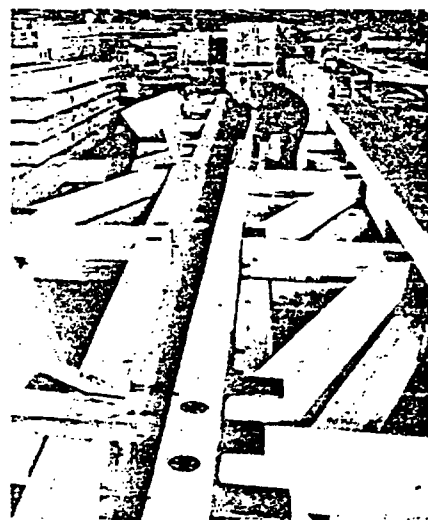
Finished curved members are shown ready for shipment.

The Exchange is a 245,000-square-foot commercial center at Farmington, Conn., which is part of a "total living" community known as Talcott Village. Designed by Warren Callister and August Rath of Tiburon, Calif., the \$9 million center is constructed almost entirely of wood, with laminated trusses as long as 75 feet.

"We wanted to maintain the rustic atmosphere of Talcott Village," said Don Wild, head of the structural department of James S. Minges & Associates, consulting engineers, "and wood was the logical choice."

The job of providing laminated beams, columns and trusses to rigid specifications went to Unadilla Laminated Products (Una-Lam), at Unadilla, N.Y., 200 miles from the construction site. At Una-Lam, Arkansas pine is kiln dried to 10 to 12 per cent moisture content, converted into laminated beams as thick as 13½ inches for The Exchange, using Georgia-Pacific GP-117 Resi-Lam phenolic resorcinol glue for a lasting chemical weld.

Well in excess of one-million board feet of laminated material and one-million board feet of decking materials will be in ser-



Trusses are readied for delivery to The Exchange at Farmington, Conn.