UNION CARBIDE

INTERNAL CORRESPONDENCE

PLAINTIFF'S EXHIBIT

UC-4623

NG 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.

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

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 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 occured." 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.

Form OSHA-2
AUG. 1971

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 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.

(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 unprptected 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

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

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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 occured." 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.

Form OSHA-7
AUG. 1971

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 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 utilising 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 unprptected persons from entering.

(7) Affix asbestos "Caution" labels on all raw materials, mixtures, scrap, wasts, 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

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

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
5.	29 CFR 1910.93a (g)(2)(i) 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 forseeable 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

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RIGHTS OF EMPLOYEES

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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 occured." 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.

Form OSHA-2

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 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.

(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 unprptected 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

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

CITATION*

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

EMPLOYER

ADDRESS

An inspec

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
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 forseeable 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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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 occured." It must remain posted until all violations cited therein are corrected, or for 3 working days, whichever period is longer.

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Form OSHA-1

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 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.

(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 unprptected 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

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(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

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 inspe

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
	Citations for Serious Violation #2 and #3, issued on the 13th day of June, 1973 are amended as set forth below:		
8.	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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RIGHTS OF EMPLOYEES

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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 occured." It must remain posted until all violations cited therein are corrected, or for 3 working days, whichever period is longer.

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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.

(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.