FILE NAME: Reichhold (REI)

DATE: 0000

DOC#: REI029

DOCUMENT DESCRIPTION: Form Letter Declining Physical Examination

REICHHOLD CHEMICALS, INC.

Creative Chemistry . . . Your Partner in Progress

Executive Offices • RCI BUILDING, WHITE PLAINS, N. Y. 10602

CABLE: BECKACITE WHITE PLAINS
TELEPHONE: 914 — 948-6200

Reichhold Chemicals, Inc.

Attention: Plant Manager

Dear Sir:

I acknowledge that I have been offered a comprehensive medical examination as set out in the Occupational Safety and Health Standards, paragraph 1910.93(a)-Asbestos, at the expense of Reichhold Chemicals, Inc.

I decline such physical examination.

Very truly yours,

RCI ASBESTOS HANDLING PROCEDURE

I. All employees are required to wear respirators when:

   A. Handling and unloading asbestos containers in the work area.

   B. Disposing of empty asbestos containers.

   C. Cleaning up asbestos waste and spills.

   D. Performing routine housekeeping duties in work areas in which asbestos has been used.

II. Each employee who is required to wear a respirator as prescribed above shall be issued an American Optical Corporation R-2090 model respirator with an R-90 filter or its equivalent.

III. An employee respirator program shall be established.

IV. Every employee shall be provided with a clean work uniform daily when handling asbestos.

V. Dirty work uniforms will be placed in a plastic bag for laundering.

VI. Caution signs must be posted at each work area in which asbestos is handled and at all storage areas.

VII. Scrap asbestos, empty bags and other debris which may contain free asbestos must be placed in a covered container for disposal.

VIII. Each employee routinely handling asbestos in production will be provided with a comprehensive medical examination in accordance with the regulations at the following times:

   A. Prior to or within 30 calendar days of his first employment in an area where he is routinely exposed to airborne asbestos.

   B. Every year during his employment, as described above, within 30 calendar days of the anniversary of his last examination.

   C. Upon the employee's termination of employment with RCI or upon his transfer to another work area where he is not routinely exposed to airborne concentrations of asbestos fibers.

IX. All areas in which asbestos is handled shall be monitored at least once every 4 months in accordance with the regulations.

X. Broken or open bags containing asbestos shall be placed in a sealed container until used.

FILE NAME: Reichhold (REI)

DATE: 1974 Nov 1

DOC#: REI030

DOCUMENT DESCRIPTION: Memo – Use of Asbestos in Polyesters

Due to the dramatic increase in the price of thixotropic agents used in polyesters, you are again considering the use of asbestos. As you know, there has been extensive correspondence on this subject throughout the corporation. This correspondence was initiated by a letter addressed to me from Ed Jansen dated March 15 to which I replied with my now famous March 28 memorandum. This memorandum was written without the benefit of knowledge of any testing that was done within RCR relating to the use of asbestos in polyesters. The memorandum to which you have repeatedly referred giving the results of testing done in Azusa is dated May 7, six weeks after my memorandum.

The form of asbestos which you contemplate using in your polyesters is a pelletized material supplied by the Union Carbide Corporation, known as Calidria®. Because of the pelletized form of this material, it is promoted as a non-dusting material. It is claimed that through the use of Calidria few, if any, free asbestos fibers are released into the atmosphere thus negating to a large degree an employer's responsibility under the current OSHA asbestos standards.

My letter of March 28 is correct and is the corporate guideline for the use of all asbestos products regardless of form. However, this memorandum must be read in view of the specific circumstances (testing results) at any given location.

RECEIVED
NOV 5 1974
REICHHOLD CHEMICAL, INC.
AZUSA, CALIF.





Reichhold Chemicals, Inc.

Inter-Office Communication

To: Mr. T. V. Morrow

From: White Plains

Date: November 1, 1974

Subject: Use of Asbestos in Polyesters

cc: Messrs. H. H. Reichhold
E. E. Shea
P. J. Pass
C. S. Stryker
C. B. Breedlove - Detroit
P. S. Hewett - "
J. E. Haass - Azusa
R. H. Melinat - "
T. P. Shumaker - Tuscaloosa
R. K. Stanerud - Tacoma
R. B. Walker - " "
D. L. Wasson - Azusa
J. G. Weinmann - Elizabeth

Dear Vinny:

Union Carbide conducted tests at Asuza on November 7, 1972 wherein they measured a ceiling concentration fiber count of 1.6 or a TWA of .27 for the preparation of four batches in an 8 hour shift. This is considerably below the .5 fiber permissible 8 hour TWA. If you make the assumption that the TWA in any work or storage location is in this range, then according to my letter of March 28, Reichhold will be required to do the following:

1. Respirators - Respirators are not required as long as the 8 hour TWA and ceiling limits are observed. Employees, however, should be required to wear respirators when (a) dumping asbestos containers in the work area, (b) disposing of empty asbestos containers, i.e., placing them in a sealed drum and covering them, (c) cleaning up asbestos waste and spills and (d) unloading any box, car or trailer in which loose asbestos is apparent. A respirator program complying with OSHA Regulation 1910.134 as outlined in your RCI Safety Manual must be instituted and observed.

2. Clothing - No special clothing or change rooms and/or clothes lockers are required. However, RCI should provide each employee who routinely handles asbestos with at least one clean work uniform each work week. Dirty uniforms will be placed in a plastic bag bearing a caution label for laundering at the expense of RCI. The laundry must be notified in writing of the asbestos and a standard form letter is attached.

3. Monitoring - Monitoring of both the breathing zone of the employee and the representative work areas are required at least every six months. Records must be maintained for at least three years. Employees normally working in areas subject to sampling and/or their designated representatives shall have access to the records.

4. Caution Signs - Caution signs are not required providing airborne concentrations of asbestos fibers are less than the prescribed exposure limits. However, scrap asbestos and other materials which may contain free asbestos must be placed in sealed containers and labeled. Any outside waste disposal contractor handling any of the above must be notified that the waste may contain asbestos. A standard form letter is attached.

5. Medical Examinations - We must provide, or make available, to each employee routinely handling or exposed to airborne concentrations of asbestos fibers, at our expense, a comprehensive medical examination as specified in the regulations, i.e., 1910.93a (f). These examinations will be conducted or made available to the employee at the following times:

(a) Prior to or within 30 calendar days of his first employment in an area where he is exposed to airborne asbestos.

(b) Every year during his employment, as described above, within 30 calendar days of the anniversary of his last examination.

(c) Upon the employee's termination of employment with RCI or upon his transfer to another work area where he is not exposed to airborne concentrations of asbestos fibers.

All medical records shall be retained for at least 20 years. These records must be made available upon the request of an employee or former employee to his physician.

Those employees who decline to take any medical examination provided by RCI, at its expense, will be required to sign a waiver form to be provided by White Plains.

Each employee who has been exposed to a concentration in excess of the ceiling limit must be notified in writing within five days. Employees or their representatives (i.e., the union) must be given access to the records.

Union Carbide has advised that the state of California has adopted a new rule regarding the medical examinations. Their interpretation is that if the TWA is half of the standard, then medical examinations are waived. I am currently verifying this and will advise as soon as this is confirmed.

Attached is a copy of the OSHA Standard 1910.93a "Asbestos".

Please do not hesitate to contact me if any of my comments appear to conflict with the information provided to you by your supplier.

Very truly yours,

T. M. Madden

TMM:ab

Attachments