GEORGIA-PACIFIC

INTERDEPARTMENTAL COMMUNICATION

DATE: February 8, 1973

TO: *See Below

LOCATION:

FROM: M. F. Fink

LOCATION: Tigard

SUBJECT: ASBESTOS CONTROL PROGRAM

PLAINTIFF'S EXHIBIT

GP-2136

To: *K. W. Brown - Acme
M. A. Palmowski - Chicago
J. D. Rauch - Akron THIS COPY FOR
R. V. Favero - Marietta
H. W. Scharf - Milford
H. W. Peele - Wilmington Gypsum

cc: T. W. Richards - Tigard
E. B. Hollingsworth - Wilmington Gypsum
C. W. Lehnert - Tigard

We wish to call your attention to the rules and regulations effective January 7, 1973. See attached.

There are several clauses that are not clear and we expect a ruling very shortly. The rule as it refers to posting areas where counts are above allowable threshhold limits is one. 14 point Gothic type is rather small print, approximately 5/16". The type sizes specified are minimum, we recommend larger type. Incidentally, we have had surveys conducted in all plants. Generally speaking the counts based on fiber counts, 5 microns or larger are below the allowable limit. Two areas or operations where limits are exceeded, loading hopper during shaking and operator dumping bags. In addition often the bags are filled and toppled over. The spout will contain small amounts of the mix which are released when the bag is toppled. The dust counts were extremely high and it was difficult to determine the fiber counts or length of fibers. We recommend that signs be posted in the joint system areas as instructed on Page 11321. Also wearing of respirators must be strictly enforced.

Note →

Label specifications. You will be notified by R & D how this will be handled.

While preparing this letter one of the joint system plants has been inspected by OSHA. Eight hour air tests were taken, also other clauses were discussed. The plant should receive a report in 3 or 4 weeks, also recommendations to correct any violation of the regulations. You will be informed of the recommendations and how they shall be applied in your operation.

MFF:jg
Attachment

M. F. F.

SGP 0006707

With the exception of asbestos, we can find no OSHA requirement for an employer to monitor environmental exposures to toxic materials. However, this is changing rapidly. The asbestos standard requiring both monitoring, recordkeeping, and employee apprisal is now in effect. Similar proposals have already been made by NIOSH for noise, carbon monoxide, beryllium, and heat stress. According to our information 40 more, over the next 24 months, are in the mill.

The four proposed standards follow the pattern of that set for asbestos. Let's look at how the situation is changing for the OSHA inspector and you.

1. If you are using asbestos, you must (by Jan. 7, 1973) monitor every place of employment where asbestos fibers are released to the working environment so as to make an initial determination of asbestos levels.

2. You must establish sampling frequencies and patterns that are representative. In no case can the sampling be more than six months apart in areas where you can reasonably foresee exceeding the exposure limits.

3. You must post caution signs and labels at each location where asbestos concentrations may exceed the exposure limits. Size and wording of the signs and labels are specified.

4. You must provide at your cost, preplacement, annual, and termination medical examinations for those exposed to asbestos.

5. You must maintain records of all personal or environmental sampling data as well as medical examinations.

6. Every employee has the right of access to any of these records which may indicate any of his exposures. Also employees shall be given a reasonable opportunity to observe the actual monitoring.

7. How the sampling is done is outlined in detail. Clean-up method, etc. are specified.

Note: All of this is in the current OSHA standards (para. 1910.93 a). The OSHA inspector's job has become much simpler. All he needs to do is ask to see your records, etc. If you have not followed the above procedures, you are subject to a citation regardless of the results.

The pattern should be clear. Rather than having to prove overexposures, the OSHA inspector now only has to prove that you have failed to conduct an occupational health evaluation of asbestos exposures and kept records.

Obviously many employers are not prepared for this. To assist you in deciding how you will meet these obligations, we have prepared a list of equipment and materials needed, exact counting techniques, sampling calibration information, etc. (If you want this kit, please request it on the enclosed card.) As standards are adopted for the other materials we will try to release similar sets of information for each one.