BASF Wyandotte Corporation

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PLAINTIFF'S EXHIBIT BASF-21
PENGAD-Bayonne, N.J.

February 10, 1975

The Travelers Insurance Company
Engineering Division
230 Loyola Avenue
New Orleans, LA 70112

Attention: C. S. Swalm

Dear Sir:

As a result of your survey conducted at the Geismar Works on November 9, 1974, recommendation #74-1 was submitted relative to physical examinations for employees engaged in asbestos handling. The recommendation was based on OSHA, Section 93A (H)(2) and (J).

We have researched this section of the standard thoroughly and have received an official opinion from Mr. K. Clark, Region V Headquarters, OSHA. Mr. Clark's opinion was that medical surveillance (physical examinations) of workers be employed when exposure levels are at or above 1 fiber per cubic centimeter. This is not written into the standard, and failure to comply with this desire would not provoke a citation.

The NIOSH Criteria Document on asbestos stipulates the action level for employee physical examinations as a TWA of 1 fiber per cubic centimeter, but was not included in the standard.

Based on the results of sampling conducted at Geismar, which has verified levels of asbestos in the atmosphere far below 1 fiber per cubic centimeter, we feel that we are currently in compliance with the existing asbestos standard. We do plan to increase the frequency of sampling. This should satisfy the requirements of your recommendation #74-1.

Your usual cooperation will be appreciated.

Sincerely,

BASF WYANDOTTE CORPORATION

J. O. Philley

J. O. Philley
Area Coordinator, Safety-Loss Prevention

JOP/d

cc - W. McNab, R. Cushman, Dr. [redacted] Ronayne, P. E. Armstrong, G. Moore, G. J. Melanson - BWC; E. R. Quarton - Johnson & Higgins; John K. Buchanan - Travelers