GRACE

Construction Products Division

TO: File

DATE: October 8, 1976

FROM: J. W. Wolter

SUBJECT: Omaha - OSHA

cc: H. A. Brown
R. H. Locke
W. R. Wright
L. McClanahan - Zono/Omaha

Wednesday, October 6th, Les McClanahan, Plant Manager of the Omaha expanding plant, met with me at the Occupational Safety and Health Administration building with Mr. Warren Wright, the Area Director of the Eastern Region of Nebraska, along with Gary Moss, the Industrial Hygienst for this area. The purpose of this meeting was to attempt to gain an extension on the requirement to label our finished product as well as to label and contain our waste material that we get from our furnace operation from this plant.

For the record, the meeting commenced by reviewing our status regarding citation No. H2859 which resulted from an inspection on January 20 and 21, 1976 and precipitated two serious and three non-serious violations at the Omaha plant. We went over non-serious items with the Area Director and explained to him that we had met all the criteria with regard to giving the employees an adequate respirator program, proper lockers and change room that was required in that citation. We then explained our plan with regard to the impending installation of a new D-18 furnace along with the peripheral items including new silos, enclosed conveyor, baghouse and dust systems and the facilities that would allow us to gain what we expected would be a cleaner and more fiber-free plant than the present operation would allow. I showed him the internal construction schedule and informed Mr. Wright that was a schedule we required from our Engineering Department and we would use that strictly internally and that we needed the additional time at the completion of the schedule for start-up and breaking in the facilities and that even though we intend to get it completed by July we well may require until September of 1977 to complete the project due to unforeseen delays or in order to get the bugs worked out of the newly constructed facility. After this short monologue I requested that since the new furnace and related equipment would not be installed until somewhere around July, 1977, we should tie the entire compliance schedule together.

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At that point in time Mr. Gary Moss, the Industrial Hygienst, was called in to see if he had any objections to our proposal and Moss indicated that he was strongly in favor of us having our material labeled because he felt that in the meantime we should have labeling on all the bags because we could be criticized if someone found out that we were exceeding the fiber count of the finished product. I indicated to him that this would cause us some concern because we were not totally confident that all of our product at this point in time would meet the requirements of the two fiber count from the plant and that we would rather wait until we were certain that all of our product met the standard before subjecting ourselves to a test.

After much discussion with the Industrial Hygienst, we convinced him that it would be inappropriate for us to label any of our product because while we were confident that most of our products met the standards, we were still reluctant to give them a guarantee that all of them presently meet the standard. After this discussion we were informed that he was still concerned about the product that we were shipping from the furnace up to the MONOKOTE mixer; therefore, I agreed that we would put labels on the paper bags that we use internally in the plant for moving expanded vermiculite from the furnace up to the MONOKOTE mixer and that we would not label any other bags in the plant. With this he agreed not to force the labeling issue. Les McClanahan has been instructed to immediately go about putting the labels on those bags that are used internally.

In order to gain the extensions of Item 4 and 5 which is the labeling of the waste and the finished product we are to send a letter over Les McClanahan's signature to Warren Wright, the Area Director. Prior to his final concurrence he indicated this letter must be posted for ten calendar days on the bulletin board for all employees to see to give them the opportunity to object to our request if they so wish. We do not see that as a problem and feel the Area Director will approve the extension to the September 1977 deadline for the furnace and plant modification completion as requested.

As a result of our discussions, I am reasonably confident that once we have been able to demonstrate that the furnace meets the required condition with regard to fiber count in the plant that we will not have too much of a problem gaining the Industrial Hygienst's approval for us to not have to label the bags. However, he did give some strong indication that he may want to do some testing of our finished product to make sure that the application of this product would not subject someone to fiber counts in excess of two fiber counts. In essence he said he wanted labels on the bags that contain fibers that when emptied or spilled would cause an employee to be subjected to levels above the standards imposed by OSHA.

J. W. Walter

JWW:dlc