



0634561

GRACE

Construction Products Division

TO: T. P. Feit/Santa Ana

DATE: November 1, 1983

FROM: S. Venuti

SUBJECT: Cal/OSHA

CC: R. J. Bettacchi
R. C. Ericson
H. A. Eschenbach
J. A. Danneker
M. Stoler
P. J. Walsh

FILE: Cal/OSHA

Tom, as requested, I have reexamined the proposed changes to Cal/OSHA, Title 8: Construction Safety Orders, Article 4, Dusts, Fumes, Mists, Vapors, and Gases. Cal/OSHA's Digest of Proposed Action describes the changes as, "Various nonsubstantive, editorial, and grammatical revisions...proposed to provide clarity and consistency..."

There is nothing in the proposed changes which suggests any new impact on those using MONOKOTE or other BPD products. It's worth noting, however, portions of Section 1528, General, contained in both the existing and proposed article:

- (a) "Whenever...harmful dusts, fumes, mists, vapors or gases exist...such hazards shall be controlled by 1) removing the employees from exposure to the hazard, 2) by limiting the daily exposure of employees to the hazard, or 3) by application of engineering controls, 4) whenever such controls are not practical or fail to achieve full compliance, respiratory protective equipment shall be provided."
- (d) "The spray of any substance containing any amount of asbestos in or upon a building or other structure, during its construction alteration or repair is prohibited." Except for substances containing less than one-quarter of one percent solely as a result of naturally-occurring impurities in the substance or its components."

On the other matter, I also examined the draft, "Toxics Management in California, an Identification of Issues." The introduction section to this draft indicates that the current California Administration wants a single document which identifies the issues now handled by several different state agencies, hopefully, to allow a more coordinated effort. It is careful to point out that these issues are not new. Most were identified years ago.

Since this is not a regulation, no comment seems necessary. It could be a useful reference document. Anyone on the copy list to this memo is welcome to review it if they would like to.

SV:dm


S. Venuti