

May 14, 1982

Rudolph Bayerle,
Director, OSHA
1200 Main St.
Springfield, Ma 01103

Dear Mr. Bayerle:

I write to complain about my employer's failure to provide an adequate list of materials to which I was exposed during my employment from 1943 to present. It is my understanding that OSHA regulation 20 CFR 1910.20 covers this request.

A brief chronology follows:

Aug. 10, 1981 - During discussion with my Union (Local 288, IUE) officials re mandatory personal respirator policy in the 99 Saflex Lab, I agreed with Acting President Richard Brodowski's suggestion that a list of chemical exposures would be helpful in answering most of my questions. Following this meeting, V.P. Brodowski made a verbal request for this information to Paul Bureau, Personnel Director.

Aug. 26, 1981 - Received letter dated Aug. 14 from P. Bureau¹. My work history and two lists of chemicals included.

Phoned L. 288 Co-ordinator of Health and Welfare Daniel O'Brien with two specific complaints: 1) The current Saflex Lab list was incomplete. 2) ~~The East Control Lab~~ list omitted at least 100 chemical substances, most conspicuously, PVC and VCM. Requested he investigate. Mr. O'Brien was told that the list represented all available chemicals, and that the reason polyvinyl chloride and VCM were not given was that the records had only been kept "a couple of years ago", after PVC units had been closed.

Oct. 23, 1981 - Sent letter to Plant Manager James Shriver, certified; and copies to R. Soucy (Pres. L. 288); R. Bayerle (OSHA); R. Berra (V.P. Monsanto, St. Louis.)² Repeated request, citing 20 CFR 1910.20, "for work records, exposure monitoring results (personal or area), raw material lists, material safety data sheets, and any other records which reveal the identity of possible toxic substances or harmful physical agents to which I was exposed while employed at the Monsanto-Springfield plant (1943-present)."

Nov. 2-? 1981 - Received letter from P. Bureau dated Nov. 10, enclosing selected monitoring, and safety data sheets, with the identical lists of materials previously sent, Aug. 26, 1981.²

(Enclosures numbered 1, 2, and 3 represent a complete file, to date, of my correspondence regarding this right-to-know complaint.)

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