PLAINTIFF'S EXHIBIT

GP-1655

GEORGIA-PACIFIC
CORPORATION
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September 4, 1973

Mr. Chester C. Whiteside, Area Director
U.S. Department of Labor
Occupational Safety and Health Administration
203 Midtown Plaza
700 East Water Street
Syracuse, New York 14210

Subject: O.S.H.A. Citation - CSHO No. P-1568
Akron, New York Joint System Plant

Dear Mr. Whiteside:

This is a follow-up report on my July 27, 1973 report regarding the above subject. At this time we would enter the following progress report covering only the items considered incomplete when we last contacted your Department.

MULTI-STEP ABATEMENT

I. Immediate Temporary Administrative Controls

(3) Establish a program for maintaining the Joint Compound mixing and packout areas of the main plant in a clean, orderly and sanitary condition to prevent asbestos dust contamination of the air. This program will include utilizing sealed impermeable bags for the storage of waste asbestos.

A total cleaning of the area walls, beams, tank tops, etc. was accomplished on 7-28-73. The three portable dust collectors for the bag packer have been installed. Waste from the area is being collected, stored, properly marked and disposed of at this time. A new floor vacuum sweeper was ordered on July 12, 1973. This unit was delivered to us on August 28, 1973. We have to provide a propane fuel system for the sweeper. This is presently in progress and we would expect the unit to be in operation the week of 9/3/73. This unit is not only a floor sweeper, but has an attachment so that a long 2 1/2" hose can be attached to keep the above mentioned areas cleaned. This citation states that a program for maintaining the area in a clean and orderly manner is to be established. At this time we plan to sweep the entire floor area at least once each 16 hours of operation. If we find this provides insufficient cleaning we will increase the frequency of cleaning.

(4) Provide employees with protective clothing that can be maintained in a sanitary and releable condition from becoming contaminated with asbestos. In addition, provide employees with individual clothes lockers to prevent their personal clothing from becoming contaminated with asbestos dust.

Disposable clothing has been ordered for all employees in the required area. This includes disposable footwear. A seperate change area has been provided. Individual clothes lockers, one for work clothing, one for street clothing, and one for respirator storage, were ordered on 7/10/73. The lockers were all delivered on 8/28/73. At this time they are being assembled and installed in the change area. They will be available for use the week of 9/3/73. The plastic disposable foot covering present a

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slipping hazard and we are reluctant to use them. Perhaps we could have our employees wear street shoes to work, change into work shoes and back to street shoes before leaving work.

(5) Establish a personal monitoring program to determine, at six month intervals, the concentrations of asbestos dust.

On July 23, 1973 we had ten (10), dust monitoring units placed on various employees and in various work areas to determine the concentrations of asbestos dust. We are attaching a copy of this test report. This report indicates that none of our areas now exceed the time-weighted average of 5 fibers longer than 5 micrometers per cubic centimeter of air. We have scheduled a retest for February 1974. Our understanding now is that (4) above would no longer apply.

I would also like to advise that we have a very active program underway to try to replace asbestos in all of our product line. We have made limited amounts of asbestos free materials, and have made field trials in various parts of our shipping area. The Permanent Engineering and administrative controls is still on schedule and no problems are anticipated in this regard.

If you or your staff require further information, please advise.

Very truly yours,

GEORGIA PACIFIC CORP.

J. D. Rauch
Plant Manager

cc: Mr. Alfred Barden
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JDR:k