UC 149-2

UNION CARBIDE

INTERNAL CORRESPONDENCE

PLAINTIFF'S EXHIBIT
UC-1045

X

METALS DIVISION

P. O. BOX 579 - 4625 ROYAL AVE., NIAGARA FALLS, NEW YORK 143

To (Name) Mr. J. L. Myers
Division UCC - Metals
Location Niagara Falls, NY

Date December 4, 1978

Originating Dept. "Calidria" Asbestos

Answering letter date

Copy to Messrs. R. E. Byrne, Jr.
R. F. X. Fusaro
F. J. Shortsleeve

Subject OSHA Consulting Service in Louisiana

A free, basically anonymous, OSHA consulting service is now available in Louisiana. It is suggested that we let our customers in that state know that it is available. Please let me have your comments.

H. B. Rhodes

Harrison B. Rhodes

HBR/rmm
Attachment

A20331

management affect both.

The author is John M. Hochstrasser, Ph.D., now with Tenneco Chemicals but formerly with G.D. Searle Co. It's interesting, not only from the personal experiences, but also within the context of a continuing debate about the independence of the industrial hygienist, or lack of same—a debate which sometimes reaches AIHA meetings.

He divides the authority of hygienists between recognition and evaluation phases and the control phase. The hygienist's professional experience in the former is rarely questioned, but in the control phase some problems may and do arise, Hochstrasser notes. Industrial hygiene, he says, is a staff function, reporting to "line" authority.

For the most part, industrial hygienists can only recommend control activities and it is up to the line authorities to determine whether or not to accept them. Although the hygienist is thus considered not accountable, he nevertheless should use every skill to convenience line officers to implement the control, he says.

"If all attempts to convince line fail," Hochstrasser wrote, "the industrial hygienist must have open lines of communication with upper management, secure their support and thus bring pressure to bear on the line to implement the control," he wrote.

". . .I believe it to be totally unreasonable for upper management to hold an industrial hygienist 'accountable' for implementation of a control if functional staff authority has not been granted in writing and communicated to the line."

OSHA PROVIDES FREE HEALTH AND SAFETY ADVICE FOR LOUISIANA FIRMS:

Free, on-site health and safety consultation for Louisiana employers is now available under a contract signed by OSHA with JRB Associates, Vienna, Va.

OSHA Regional Administrator Gilbert J. Saulter explained that Federal law prevents regular OSHA inspectors from providing such on-site consultation.

"OSHA's contract with JRB Associates stipulates that the identity of an employer who requests a consultation will not be made known to OSHA," Saulter said. "So there should be no fear that asking for help might 'trigger' an OSHA inspection.

"The only exception to the confidentiality rule would be in case an employer refuses to correct a hazard that could result in death or serious injury."

JRB is well trained in OSHA health and safety requirements and will give priority in responding to requests from smaller businesses, especially those in high risk industries, because many small businesses cannot afford such consultation, Saulter said.

A consultation visit will include an opening conference with the employer at the workplace, an on-site review of health and safety conditions, a closing conference to report findings and a follow-up report to the employer. It will note any hazard identified and recommend ways for correction, including cost estimates.

"When businesses want to eliminate or control the hazards in their workplaces voluntarily, but need assistance to do so, we want to offer such assistance to the full extent our resources permit," Saulter said. "Employers and employees both benefit when such voluntary action is taken and the possibility that we will have to resort to enforcement is removed.

"The goal is to encourage employers to establish a job safety and heath program, based on the consultants' recommendations, which will make safety and healthful work practices and conditions a routine part of the work."

A consultation visit can be arranged by writing to Louisiana Safety and Health Consultation Project, P.O. Box 692, Vienna, VA 22180; (800) 336-0488.

SOEH TO SPONSOR MEETING ON PESTICIDES—AND TELLS INDUSTRY WELL IN ADVANCE:

The Society for Occupational and Environmental Health will sponsor a conference on pesticides and human health Dec. 10-13 at Washington's Hyatt Regency Hotel—and this time industry will not be able to complain, as it did last year, that it was not invited or was given short shrift.

Aware of the problems which grew out of the 1977 meeting, SOEH wrote in early November to Dr.