PLAINTIFF'S EXHIBIT
GP-1642

GEORGIA-PACIFIC
CORPORATION
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July 27, 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 in reply to your citation cover letter and the nine citations dated July 10, 1973 and June 13, 1973. Please be advised that the citations were received on July 12, 1973 and were posted as required on July 13, 1973.

A "Request for Check" form was issued to our Portland, Oregon, office for $1,340.00 on July 12, 1973. This was for the proposed penalty.

At this time we would enter the following progress report:

MULTI-STEP ABATEMENT

1. Immediate Temporary Administrative Controls

Initiate immediate temporary administrative controls to prevent employee exposure to excessive asbestos dust concentrations by July 31, 1973. A Compliance Officer will determine if these temporary controls are preventing employee exposure.

(1) Provide U.S. Bureau of Mines approved respirators for all packout areas of the main plant. Continue the use of respirators until the installation of permanent engineering controls.

Approved respirators have been provided for all employees as required. Constant use of these approved respirators is a condition of employment in the Department.

(2) Establish a complete respirator program in accordance with the provisions of the American National Standard Practices for Respiratory Protection Z88.2-1969.

A respirator program has been established in accordance with the provisions of 288.2-1969. Competent instruction was provided to all employees in the Department during the week of 7-16-73. Storage lockers for each employees respirator are on order and will be placed in use as required when they arrive.

(3) Establish a program for maintaining the joint compound dry 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.

This program is in effect at this time. We have scheduled a total cleaning of the entire building, wall, beams, tank tops, etc. on the week end of 7-28-73. We have ordered three portable dust collectors for the bag packer, we have removed the portable fan from the bag packer, we have enclosed the bag slitter area and increased the effectiveness of the present dust collection system. In this regard the face velocity has been increased from 50 feet/min. to 275 feet/min. New York State has requested an increase to 200 feet/min. Waste from the area will be stored in impermeable containers with proper warning labels.

(4) Provide employees with protective clothing that can be maintained in a sanitary and reliable 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 protective clothing has been ordered for all employees in the area, a seperate change area has been provided and individual clothes lockers have been ordered for the change area. Proper use of the protective clothing system is a condition of employment in the Department.

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

Every work area or workman has had the required monitor check during the month of July 1973. This program is scheduled to continue as long as we use asbestos.

(6) Post asbestos "Caution" signs at all approaches to the work area to prevent unprotected persons from entering.

Approved "Caution" signs have been posted at all approaches as directed.

(7) Affix asbestos "Caution" labels on all raw materials, mixtures, scrap, waste, debris and other products containing asbestos to prevent exposure to asbestos dust.

Approved "Caution" labels will be affixed to all asbestos raw materials, dry mixtures, scrap, waste, and debris by the required date of 7-30-73.

II. Permanent Engineering and Administrative Controls

(1) By July 27, 1973, submit a plan for approval to the U.S. Department of Labor, Occupational Safety and Health Administration, 203 Midtown Plaza, 700 E. Water Street, Syracuse, New York 13210, Mr. Chester C. Whiteside, Area Director, showing a timetable for the installation of engineering controls to prevent employee exposure to asbestos dust concentrations above allowable limits.

(2) Incorporate items (3) through (7) (listed as temporary administrative controls in Part I) as permanent administrative controls to prevent employee asbestos dust exposure.

This entire area was covered by Mr. Turner's letter to you dated 7-19-73. At this time everything stated in this memo is on schedule or ahead of schedule. He had mentioned that approval of funds was scheduled for 8-6-73, this is to advise that this approval was obtained on 7/20/73 and we have already placed equipment orders against these funds.

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

Sincerely,

GEORGIA PACIFIC CORP.

J. D. Rauch
Plant Manager

cc: Mr. Alfred Barden
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