PLAINTIFF'S EXHIBIT

UC-2451

Mr. J. F. Emerson October 15, 1971

Grand Junction

P. W. McDaniel
E. A. Piersall
L. P. Twichell

The King City facility was inspected for airborne asbestos dust by 3 Federal Bureau of Mines inspectors and 2 California Division of Industrial Safety inspectors on 10-5-71. No advance notice was received from either group. The Federal inspectors were Messrs. Walter Bank and Amin Alameddin of the Denver Field Health Group and K. L. High from the Alameda California office. The California men were Messrs. Ed Davis and Walter Van Sandt.

The Federal people arrived at the mill at 3:00 P.M., 10-4-71 and were through at 4:00 P.M., 10-5-71. The State Industrial people were here on 10-5 as observers and to collaberate with the Federal group.

Portable samplers were attached to 5 operators and 1 foreman for the 8 hr. day shift with filters being changed each hour. Eleven area locations were sampled for 1 hr. periods with 3 samples at each location. The State inspectors took 6 area samples.

Mr. Bank, who was in charge of the Federal group, informed me that he did not know who requested that they sample the plant but did not feel that it was a complaint type request. During the consultation following completion of their sampling program, the main discussion centered upon the bagging areas and Mr. Bank pointed out that in his opinion we were not justified in our use of a respirator area around the bagging machines. He cited Title 30 Part 55 Paragraph 55.55D, mandatory, which says "Respirators shall not be substituted for invironmental control measures." He feels that assigning a person to work essentially a full shift wearing a respirator is not a "reasonable period of time" as allowed by the above regulation. His report will include these opinions.

I feel their samples will show the bagging areas high as our monthly samples always have. Citation and enforcement authority in these matters is the responsibility of the California State Division of Industrial Safety and what action they will take after receipt of the Federal report and analysis of samples they took is unknown. I believe that we are going to have to program to clean up these areas.

continued.....

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The sampling was accomplished under the best conditions we have, i.e., we were bagging SG-100 (our least dusty products), and the weather was hot, dry, and no wind. Area cleanup the morning of 10-5 and throughout the day was normal-much better than is the case when we are bagging open material.

Very truly yours,

Floyd H. Larrison Jr. /clg

F. H. Larrison, Jr.

/clg

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