COMMUNICATIONS
teletypewriter message

COMMUNICATIONS DEPARTMENT USE ONLY

MESSAGE NUMBER	TIME	OPERATOR & POSITION	
PRIVATE LINE	TWX	TELEX	OTHER

PLEASE TYPE OR PRINT AND BE AS BRIEF AS POSSIBLE

MESSAGE BILLING CODE (SHOW 4 DIGIT NUMERICAL CODE ONLY) ▷ 6 7 8 0

MESSAGE ADDRESSED TO

ADDRESSEE	UCC ACTIVITY	CITY
Division of Industrial Safety Department of Industrial Relations		
455 Golden Gate Avenue San Francisco, California		

PLAINTIFF'S EXHIBIT
UC-3550

MESSAGE SECTION — If additional addressees are required continue to list below:

Attention: Mr. Richard Wilkins

Subject: General Industrial Safety Orders Section 5208, Asbestos and Section 5155, Threshold Limit Values

Pursuant to your letter of January 29 addressed to E. A. Piersall of Union Carbide Corporation, the following are our comments regarding the proposed Asbestos standard for review by the Industrial Safety Board.

AAA Section 5208(g)(2) requires that caution labels be affixed to all waste as well as other products containing Asbestos Fibers. It must be recognized that the OSHA regulations were not specifically concerned with mining operations and therefore did not consider the problems of ore tailings piles. It is obviously not possible to package and label the large quantities of material in ore tailings. The piles can be treated to minimize dusting and posted if necessary. We suggest that tailings piles be specifically exempt from the labeling provision although they should be subject to the posting of caution signs if excess airborne concentrations exist.

Accepted

BBB In Paragraph 5208(h) medical examinations are required "within thirty days of effective date of this regulation for existing

[CONTINUED ON PAGE 2 .....]

DATE	SIGNATURE	UCC ACTIVITY	CITY
			A20906

— TO COMMUNICATIONS DEPARTMENT —

UC 149-28A

UCC 007477

Published by AsbestosClaims.Law
asbestosclaims.law/library/18292/1

UNION CARBIDE

COMMUNICATIONS
teletypewriter message

COMMUNICATIONS DEPARTMENT USE ONLY

MESSAGE NUMBER	TIME	OPERATOR'S POSITION

PRIVATE LINE	TWX	TELEX	OTHER

PLEASE TYPE OR PRINT AND BE AS BRIEF AS POSSIBLE

MESSAGE BILLING CODE ▷ (SHOW 4 DIGIT NUMERICAL CODE ONLY)

MESSAGE ADDRESSED TO

ADDRESSEE	UCC ACTIVITY	CITY

MESSAGE SECTION — If additional addressees are required continue to list below:

employees." This could be interpreted to require an additional examination for existing employees who had been previously examined within a relatively short period. We suggest that this sentence be revised to read "Such examination should be given within thirty days of the effective date for existing employees who have not had such an examination within one year."

Accepted

CCC Also in Paragraph 5208(h)(2) it is required that records be kept of employees showing the date of the employee's first date of exposure to Asbestos Fibers. In a case of an employee who has previously worked elsewhere, we will not necessarily be able to obtain an adequate and verified record of his previous employment. We can keep on record what the employee listed in his application. We would have no way of determining where or when he may have first been exposed to Asbestos Fibers except for the statement made by the employee as he was hired.

Accepted

DDD Lastly, the OSHA regulation included a paragraph on waste disposal which you may wish to include in the State Regulations.

Our reply does have warning label. Probably better to keep.

William N. Johnson
Union Carbide Corporation
270 Park Avenue
New York, New York 10017

DATE	SIGNATURE	UCC ACTIVITY	CITY
/15/73	W. N. Johnson	Mining & Metals Div.	38th Floor

UC 149-28A

— TO COMMUNICATIONS DEPARTMENT —

A20303 UCC 007478

Union Carbide trial exhibit UC-3550: W. N. Johnson to Richard Wilkins (California Division of Industrial Safety) on C...
Published by AsbestosClaims.Law
ACL Doc 18292 · Page 2 of 2
asbestosclaims.law/library/18292/2