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April 27, 1972

Mr. John D. Ehrlichman Assistant to the President for Domestic Affairs The White House Washington, D. C.

Dear John:

Over the past several months I have been inundated by mail from the National Committee, The Congressional Boosters Club, the Re-Election of President Nixon Committee, the State Republican Committee and the King County Republican Committee.

And then to cap everything off, I have found it necessary to familiarize myself to some extent with the Williams-Steiger Occupational Safety and Health Act of 1970, and the rules and regulations pertaining thereto. I am astonished that a Republican administration would have enacted this legislation which I consider to be about as unAmerican as any that has ever come to my attention. It makes one wonder whether the dollars we contribute toward the perpetuation of our great institutions of government are really worth it. suppose, in a sense, that without the support given to the National Party and to national candidates by those of us who make substantial contributions, the chances of preserving any reasonable form of acceptable institutions would be materially lessened. However, I do feel compelled to strenuously register my complaint about the direction we are taking in socialistic regulations and controls which affect all employers.

I have enclosed for your amusement and edification a sample of the ludicrous lengths to which the Federal Government has gone in employee protection.

It is truly disheartening.

Best personal regards,

A. H. Clise

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water supply or to the location or temporary nature of the operation requiring the facility. The number of units required for a place of employment shall be as specified in §§ 1910.141 and 1910.142.

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(2) Privies constructed in conformity with paragraph (b) of this section may be used for the disposal of human excreta where their use will not contaminate ground or surface water because of privy location, type of soil, or ground-water

(3) Chemical toilets constructed in conformity with paragraph (c) of this section may be used in place of privies or where a privy is not permitted due to possible contamination of ground and surface water.

(4) Recirculating toilets constructed in conformity with paragraph (f) of this section may be used in place of privies or chemical toilets.

(5) Combustion toilets constructed in conformity with paragraph (e) of this section may be used in place of privies, chemical toilets, or recirculating toilets.

(6) Portable toilets constructed in conformity with paragraph (g) of this section may be used for temporary or mobile installations. Such temporary units may

(i) Chemical, recirculating, or combustion toilets designed for installation in or as an integral part of a skid mounted portable privy building, or in a separate toilet room, or

(ii) Portable privies designed for installation over a manhole of a sanitary or a combined waste water sewer system.

(7) A seepage pit constructed in conformity with paragraph (d) of this section may be used for the disposal of waste water from culinary activity, temporary bathing facilities, and clothes washing facilities where there is no available piped water supply. Human excreta shall not be discharged into a seepage pit. All units described in this paragraph shall comply with applicable codes and regulations of local authorities.

(b) Privy specifications. (1) A privy pit shall be separated by a minimum distance of 100 feet between the privy and a well, spring, or other source of water supply for drinking, bathing, or culinary

purposes.

(i) At no time shall the pit bottom of a privy extend into ground water, nor shall it be constructed within 100 feet of the shoreline of any open body of water. Phreatic water, such as may be found in surface soil at depths of 10 feet or less, shall not be interpreted as ground water unless there is evidence of positive directional flow through the

(ii) The privy shall be so located and so constructed that no surface water may enter into the pit either as runou or as flood water.

(iii) The pit shall be constructed of such material and in such a manner as to prevent rapid deterioration, provide adequate capacity, and facilitate maintenance in a satisfactory manner under ordinary conditions of usage,

(iv) The pit and seat area shall be vented by a flue or vent pipe having not less than 7 square inches cross-sectional area, so as to provide a continuous escape of odors.

(v) The pit shall provide a capacity of 50 cubic feet for each seat installed in the privy building. The vault within 16 inches of the surface grade shall not be counted as part of the 50-cubic-foot

(vi) Pit cribbing shall fit firmly and be in uniform contact with the earth walls on all sides, and shall rise at least 6 inches above the original ground line and descend to the full depth of the pit. However, pit cribbing below the soil line may be omitted in rock formations.

(vii) An earth plateau shall be constructed level with the top of the pit cribbing, and extend horizontally for a distance of at least 18 inches before slop-

ing to the original ground level.

(2) Privy building shall be firmly anchored, rigidly constructed, and free from hostile surface features, such as exposed nail points, sharp edges, rough or broken boards, etc., and shall provide privacy and protection from the elements. It shall be ventilated by leaving a 4-inch open-ing at the top of all the walls just beneath the roof.

(i) The building shall be of fly-tight construction, doors shall be self-closing, and vent and building openings shall be screened with 16-mesh screen of durable material. The vent shall extend 12 inches

above the roof.
(ii) The scat shall be so spaced as to provide a minimum clear space of 24 inches between each seat in multiple unit installations, and shall provide 12 inches clear space from the seat opening to the side wall in single and multiple units.

(iii) The seat riser shall have an inside clearance of not less than 21 inches. from the front wall and not less than 24 inches from the rear wall of the privy building.

(iv) The seat top shall be not less than 12 inches nor more than 16 inches above

the floor.

(v) The seat opening shall be covered with an attached, movable toilet seat and lid, so constructed and installed that when closed it will limit access of insects, and which can be raised to allow sanitary use as a urinal.

(vi) The floor and riser shall be built. of impervious material or tongue and groove lumber, and in a manner to deny

(vii) Where electricity is available, lighting shall be provided with an intensity of not less than 10 foot-candles 30 inches above the floor

(viil) A conveniently located receptacle or dispenser containing an adequate supply of tollet paper shall be provided for each seat in each privy building.

(c) Chemical toilet specifications. (1) Rooms, buildings, or shelters housing chemical toilets shall be of sound construction and easy to clean, and shall provide shelter and privacy. The toilet rooms shall be ventilated to the outside ... and adequately lighted, and all openings

into the toilet'room shall be covered with 16-mesh screen. The minimum requirements given in subparagraphs (2) through (7) of this paragraph shal apply.

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(2) Caustic receptacles shall be durable and corrosion proof, and provide a minimum capacity of 100 gallons per

(3) The caustic receptacle charge per seat shall be a minimum of 25 pounds of caustic dissolved in 10 gallons of water.

(4) The chemical shall be drained and receptacle recharged every 6 months of continuous use, or at the beginning of each season of operation when in intermittent use, or when three-fourths full, whichever occurs first.

(5) Each seat in the building shall be provided with a conveniently located

agitator.

(6) Receptacles shall be vented as prescribed in paragraph (b) (1) (iv) of this section.

(7) The receptacle shall be equipped with a manhole external to the privy building for cleaning and caustic removal purposes. The manhole shall be covered so as to prevent the escape of gases and odors.

(d) Seepage pit construction. (1) Seepage pit construction shall conform with requirements for privy pit construction in paragraph (b) (1) (i), (ii), (iii), (vi) and (vii) of this section. The seepage pit may be filled with stone or rubble of not less than nominal 1 inch diameter.

(2) Seepage pits shall be of such dimensions as to provide side wall area equal to at least 10 square feet per person served by the facility, or such greater area as may be required by the health

agency having jurisdiction.
(3) Temporary piping connections from sinks or shower platforms may be discharged beneath the floor if they have traps in accordance with the provisions of American National Standard National Plumbing Code, A 40.8-1955.

(4) The platform covering the seepage pits shall be built-of impervious material and in a manner to exclude insects.

(5) The platform shall be provided with an opening at least 1 foot in each dimension and have a rim at least 1 inch above the floor to prevent precipitation from accumulating on the platform floor.

(6) The platform opening shall be covered with a self-closing lid, so constructed that it can be easily opened by foot or hand, and so installed that when closed it will exclude insects and fit closely over the raised rim of the opening.

(e) Combustion toilet. (1) Combustion tollets and combustion toilet buildings. rooms, or shelters shall conform to the applicable specifications given for chemical toilets in paragraph (c) of this section.

(2) All external surfaces, including bowl and hopper, shall be easy to clean.

(3) The residue must be sterile and inert.

(4) The flue effluents must be free of bacteria.

(5) The combustion system and all fuel and electrical parts shall be safe