Environmental Control Department
Denver GHQ
December 27, 1971

H. B. Moreno

cc: J. E. Hesse - Finderne
H. M. Jackson - New York GHQ
G. L. Swallow - DHQ
R. M. Billings - New York GHQ
C. L. Stake - Manville
File

EMERGENCY STANDARD FOR EXPOSURE TO ASBESTOS DUST
YOUR LETTER OF DECEMBER 22, 1971

H. M. Jackson, G. L. Swallow and I have discussed your proposal to train a salaried employee at each of four of your plants in order that they may take personal air samples to determine asbestos fiber dust concentrations. The reason for your proposal is, of course, to speed the flow of information regarding corrective measures taken at these plants.

The type of service you are seeking is already available and in practice at both Manville and Waukegan where approximately 90% of your problems exist. Because we already have Industrial Hygiene laboratories at these locations, special surveys have been and are being made regularly and almost continually at the request of your plant managers. We have on numerous occasions been told by these people that the service was entirely satisfactory for their needs.

The promptness with which survey results have been submitted to your plant managers has been a function of the urgency involved. Our reports have varied from over-night service to a matter of several days or weeks when a low priority was involved. With your more urgent need for fast results, we can rearrange our priorities and give you whatever service is required.

The Manville laboratory has conducted special surveys at Billerica on several occasions and can continue to do so, again with greater speed as greater urgency demands it. Since Billerica is within a day's drive or a few hours by air and automobile combination, we can give service at least equal to what you could achieve through sampling with your own people and depending upon the mail service to transport your samples to the laboratory.

While Laurinburg is somewhat less accessible than Billerica, we can here again provide service equal to or better than any other means.

There are a number of factors which make the use of plant salaried employees as "sample takers" somewhat more complex than one might at first think.

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Seldom will a single pump suffice for sampling an operation where you are looking for definitive information. To determine how to correct a dust situation or to determine what improvement you have made, multiple samples should be employed. This requirement plus the normal maintenance required on pumps makes it essential that you have about six rather than one pump. You would also need battery chargers for each. Additionally, frequent calibration is required if the results are to be accurate. You would therefore require a wet test meter also. The approximate cost of these items is $1,600, not including any provisions for maintenance, storage and general laboratory facilities.

We feel that to whatever extent we attempt to use data obtained by local plant people, our credibility would be impaired particularly insofar as OSHA is concerned. The sampling procedure is acknowledged by all to be approximate at best, and any departure from the use of thoroughly trained and experienced people further depreciates the accuracy and credibility of the data.

Paragraph 4 of your letter discusses a master list and a book of all stations. Each plant presently has a master list of all stations and in addition has a history going back to the base survey of all stations; dust, fume and noise; that have been or are now over TLV. The practice of having complete Industrial Hygiene Survey permanent record books at each location was discontinued approximately two years ago at the request of the legal department. Preparation of new complete books for each plant would be a difficult and time-consuming task since we would have to duplicate the books that are on file here. Special reports are now provided each plant for discussion with OSHA inspectors whenever necessary.

Paragraph 6 of your letter discusses notification to H. M. Jackson and Industrial Relations Department of all inspections and citations. The Environmental Control Department also should be notified of any OSHA inspection and citation. H. M. Jackson now receives the same information concerning Industrial Hygiene Surveys that plant management does.

May I please have your comments.

E. M. Fenner

EMF/lh

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