PLAINTIFF'S
EXHIBIT
UC-1073

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration
WASHINGTON, D.C. 20210

November 3, 1972

Mr. Donald E. Deese
Senior Industrial Hygienist
Union Carbide Corporation
Chemicals and Plastics
P. O. Box 471
Texas City, Texas 77590

Dear Mr. Deese:

This is in reply to your letter dated September 27, 1972.

Section 1910.93a (f)(2)(ii) requires monitoring at least every six months when the exposure limits for asbestos fibers may be reasonably foreseen to be exceeded. In other cases, even though initial determinations show exposure to asbestos fibers below the limits set in 29 CFR 1910.93(b), monitoring most take place with such frequency and pattern so as to determine with reasonable accuracy the various levels of asbestos fibers to which employees are exposed.

Section 1910.93a (J)(3) requires medical examination for every employee who is regularly engaged in an occupation exposed to any airborne concentration of asbestos fibers, even if this concentration is below the limits in Section 1910.93a (b).

Sincerely,

John P. O'Neill

JOHN P. O'NEILL
Chief, Division of General
Industry Standards

UCTC 10890

OC Maintenance/Miller/McWatters

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NOV 3 1972
SEADRIFT PLANT LABORATORY

A. E. BRANSFORD
LABORATORY
BLDG. #2

C1--29X4

TO: PLANT LETTER LISTS
"A", "B", & "C2"

PROCEDURE FOR REMOVAL OF ASBESTOS INSULATION

OSHA → A36-16

1.0 SCOPE

The following procedures, requirements and considerations are necessary when and where asbestos insulation removal is required. This information, properly used, will allow us to perform this task well within the limits as prescribed by OSHA Article 1910.93a asbestos, dated October 18, 1972.

2.0 PROCEDURE

All personnel involved in the removal of asbestos insulation must be aware of the health hazard. It is mandatory that protective equipment as described in 2.1 and 2.2 be worn as situation warrant.

2.1 MINIMUM REQUIREMENTS

All personnel involved in the removal of asbestos insulation must wear Comfo Type "H" respirator equipped with an 0.3 micron filter.

A. Insulation is thoroughly wet, conditions are dust free.

B. Where test results indicate we are within the limits as described by OSHA.

2.2 MAXIMUM REQUIREMENTS

Where test results indicate the asbestos fiber concentration is over the limits as established by OSHA.

A. Type "C" respirator equipment (supplied air)
B. Protective Clothing
C. Area of work barricaded
D. OSHA approved asbestos hazard signs properly displayed

2.3 HANDLING AND DISPOSAL

A. All scrap asbestos insulation must be placed in plastic or plastic lined bags and securely closed.

B. OSHA approved asbestos hazard labels must be attached to each bag.

C. Bags should be removed from the area to our regular trash containers.

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2.4 GENERAL CONSIDERATIONS IN ALL CASES

A. Concentration of people in the immediate area
B. Large amount or small amount to be removed
C. Condition of insulation, wet or dry
D. Inclosed area or in the open
E. Wind direction

K. G. Brink

/lr

Union Carbide trial exhibit UC-1073: OSHA Reply to D. E. Deese on Asbestos Monitoring and Medical Exams, with... Published by AsbestosClaims.Law
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UNION CARBIDE

INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

Mr. R. J. Taylor
Building 740

November 8, 1972

Mr. D. E. Deese
Mr. N. H. Ketcham
Mr. B. L. Murray
Mr. R. E. Poole

Dear Rod:

Your memorandum, "Asbestos Guideline Clarification," October 27, 1972, creates concern about increased air sampling to justify the need for wearing or not wearing respiratory protection.

To date, according to my interpretation of the recent revision of OSHA, October 18, 1972, we have had no condition that required wearing Type "C" respirators with supplied air. The demolition of insulation in the Technical Center is usually done on such small scale that proper precautions can control the amount of asbestos in the air to well below the 10 fibers per cubic centimeter limit.

The following is recommended to protect personnel from inhaling asbestos fibers in the Technical Center.

1. Collect air samples at least every six months to evaluate personnel exposures to asbestos; keep records.

2. Jobs, location and planning for air sampling of operations involving asbestos will be based on the judgment of the industrial hygienist.

3. Demolition is usually of short duration; personnel are required to take necessary precautions to control dust and wear respirators fitted with approved filters. Previous air sampling or judgment will be made to determine whether additional respiratory protection is required. All asbestos wastes are to be put in plastic bags for burial. Truck loads of asbestos insulation-piping may be wet down and hauled to site for burial.

4. Personnel are required to wear respirators fitted with approved filters for short term applications of insulation containing asbestos when controls are being used but there is doubt about the level being below ten fibers per cc (longer than five microns in length), or if previous air sampling for similar operations has shown results to be greater than two fibers per cc time-weighted average.

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5. Good housekeeping must be maintained at all times. No dry sweeping; area must be cleaned "wet" or with an approved vacuum cleaner.

6. Insulators are furnished coveralls. They are required to wear these during demolition or operations that may be considered dusty.

7. There are situations when controls are not feasible. If, for any reason, asbestos cannot be wet down or controlled by good techniques and housekeeping, personnel must wear protective clothing and supplied air, Type "C," respiratory protection. Air sampling must also be done to evaluate airborne concentrations of asbestos during these operations.

The above procedure not only complies with the regulation about air sampling, but will also protect personnel from excessive exposure to asbestos.

I would like your opinion about the value of this procedure for compliance with OSHA, while at the same time avoid collecting numerous air samples, which are time-consuming and afford only historical data.

Preliminary work is being done to compile similar information about asbestos for use in the Construction Department.

Yours very truly,

Fred Williams

Industrial Hygienist

F. Williams/ebc

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