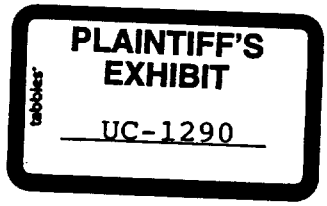
cc: R. E. Byrne, Jr.
J. L. Myers
W. C. Thurber
File



May 24, 1974

Mr. E. M. Fenner
Johns-Manville Corporation
Greenwood Plaza
Denver, CO 80217

Dear Ed:

My comments on the AIA/NA work practice drafts are attached. Basically, I feel that the broad-base mandatory work practices are unworkable for an industry as diverse as ours. Since OSHA has shifted recently to about this same view, my comments tend to oppose things in the drafts which are more restrictive than the present regulations.

I would also like to take this opportunity to put forth for consideration some ideas that have developed from our meeting with Harry Gilbert and from a number of papers presented at the recent Industrial Hygiene meeting in Miami. The government regulatory agencies seem to have looked at the number of places that need to be monitored for dust and the number of people available to do this monitoring. They have arrived at the realization that it is totally impractical to control and enforce dust levels by a monitoring program. NIOSH is making a strong pitch for mandatory work practices as the way to overcome the problem. This NIOSH approach was tried in the recent Carcinogenic Substances regulations and drew a strong negative reaction from the industrial hygiene profession as an infringement on their professional prerogatives. OSHA appears to have recognized the problems in writing good, equitable but broad work practices and has tended to back away from this approach. No viable alternative was suggested, however.

In looking at the situation, it has occurred to me that some form of nonmandatory but official work practices may be a very useful approach. In the proposed arrangement, the OSHA regulations would prescribe maximum allowable exposure levels and in a general way what procedures are and are not acceptable to attain these levels. This is really the way they are written now except for a couple of places where they went overboard on work practices where a high dust level was assumed to always exist.

The regulations would then be supplemented by a series of nonmandatory work practices that had been reviewed and approved by OSHA. These practices could be written by asbestos suppliers, end user trade groups, the Unions, NIOSH, etc. They would be specific to a particular industry or substantial segment thereof.

A 19481

The key point, however, would be that they are nonmandatory. An asbestos user would have the option of following the appropriate work practice or complying with the regulations by alternative means. Those who follow the approved practice, however, would be allowed certain key exemptions such as a sharp reduction in eliminating monitoring requirements and, if the levels were low enough, from physical examinations.

This approach has the advantage that it would clearly and unambiguously point the way to compliance in the industry covered. It protects the workers without resorting to an extensive monitoring program. It allows the flexibility to come up with new solutions. The nonmandatory aspect provides a safeguard against abuse from too restrictive work practices. In essence, it is the British ARC booklet approach expanded somewhat and given an official position in the regulations.

It can be argued that a great multiplicity of work practices will result. Based on our experience, however, the development of good, usable work practice takes considerable effort. This should limit the number developed and accepted to the places where they make a positive contribution to compliance. This could also be controlled, if necessary, by setting some minimum number of workers to be covered before a work practice would be considered.

I would be very much interested to receive your comments on this approach to the problem. If you think it would be useful, feel free to discuss it with any others you choose.

Regards,

H. B. Rhodes
Area Manager
Marketing & Technology

HBR:cjb
Attachments

A 19482

UNLOADING AND STORING BAGGED ASBESTOS FIBER

(A) The real objective is to ascertain whether the car is free of loose fiber that can generate airborne dust when disturbed. This can come from damaged bags or from leakage out of spouts in valve-pack bags.

The concept is good. The present wording is too detailed and in part incorrect.

(B) Is there such a thing as an "approved" type of vacuum cleaner? If adopted, this would require a vacuum cleaner be available at every place a rail car or a truck is unloaded. This may be acceptable to large, regular users but becomes an extreme burden for the lesser users.

We have begun to look at sweeping compounds to control dust during cleanup at construction sites. Results are encouraging but data so far are limited. Do you have any experience in this area?

I would suggest the words be:

> "A vacuum cleaner or other procedures where airborne dust generation is minimized should be used to clean up...."

(C) This implies a rigid container. A heavy plastic bag would be equally suitable.

(D) If "impermeable" means not permitting passage of dust under ordinary circumstances, the usage is acceptable. If it means not permitting the passage of anything, it is too extreme. It could be taken to mean steel containers. This word seems to have crept into the jargon from the British ARC publications. Let's avoid it.

(E) There is no objection to this wording but it really doesn't define anything. The mask requirements in the regulations would presumably be in effect anyway as well as the protective clothing requirements.

A 19483

WORK PRACTICE FOR UNLOADING AND STORING BAGGED ASBESTOS FIBER

1. Prior to unloading bagged fiber from a box car or truck, a visual inspection of the cargo should be made to determine the extent of damage, if any, and subsequently the fiber exposure potential that will exist during the unloading operation. (A)

2. If the cargo has not been damaged it is safe to proceed to unload the fiber and transport it to its place of storage. Fiber shipped in pressure packed plastic and paper bags, that have not been punctured, presents no exposure problems and therefore the use of respiratory protective equipment is not required.

The fiber bags should be handled and stored in such a manner as to protect them from any damage that would present a future dust exposure problem.

3. If after making a visual inspection of the fiber cargo it is determined that the bags have been punctured, then unloading should proceed only after the necessary precautions have been taken to minimize the worker's exposure. (A)

An approved type vacuum cleaner should be used to pick up all loose fiber and the damaged bags should be repaired by some suitable means such as taping. (B) Where the bag is beyond practical repair then the damaged bag of fiber should be inserted into a container with an impermeable liner and thoroughly sealed. (C) (D) These repairs should be made before transporting the fiber, to its place of storage, so as to minimize the amount of exposure. If damage to the fiber bags has allowed large amounts of asbestos to escape, then suitable respiratory protective equipment should be employed by the workers during clean-up operations. The type of respiratory equipment used should be consistent with the level of exposure, however a properly fitted half (E)

A 19483

face type mask will generally be sufficient in all but the most severe cases of exposure.

A 19484

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(A) Same comment as (A) under "Dust and Scrap Removal and Disposal" applies here. Suggest:

> "Empty fiber bags containing visible residues of asbestos fiber shall be..."

(B) Wet methods or the use of dust controlling sweeping compounds are precluded. These alternatives should be allowed..

Suggest:

> "...shall be removed periodically during each shift by vacuum cleaning or other procedures where airborne dust generation is minimized."

A19485

April 5, 1974

ASBESTOS INDUSTRY WORK PRACTICES STANDARD - FIRST DRAFT

INTRODUCTION OF ASBESTOS FIBER INTO MANUFACTURING PROCESSES

In all continuous production operations, asbestos fiber must be introduced into the process under dust controlled conditions and work station fiber counts associated with this process must be below the OSHA fiber standard.

In those operations where bagged asbestos fiber is being used, the fiber bags shall arrive at the work station in clean condition, free of loose fiber on the bag surface. If the bags are stacked on pallets, the pallets must be clean and free from loose fiber.

In those operations where the fiber and its container, either a kraft paper bag, a plastic bag or other, can be introduced directly into the process without the necessity of opening the bag and removing the contents, dust control can be achieved without dust collection devices and systems.

In those operations where the fiber bag must be opened and contents removed from the bag prior to introduction into the operation, then the fiber bag opening and empty bag disposal station must be equipped with a dust collection system in order to achieve dust controlled conditions. Commercially available automatic bag handling and opening devices, with provision for

A 19483

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empty bag disposal, include dust collection hoods for attachment to dust collection systems. For manufacturers of such equipment, refer to page 16 of ANSI Standard Z9.5 - 1974.

In many operations it is not practical or economical to use an automatic bag opening device. In these instances a manual fiber bag opening and bag disposal station, with provisions for dust collection, such as shown on page 14 of ANSI Standard Z9.5 - 1974 shall be used.

Asbestos fiber in the form of compressed blocks or bagged extruded pellets are virtually dust free and can be safely introduced into a process without the need for a dust collection system.

Empty fiber bags shall either be loosely bagged, compressed and bagged, shredded and bagged, or shredded and conveyed to a use point and shall be disposed of by introduction into a manufacturing process or placed in sealed containers for disposal by the plant or waste disposal contractor.

Small intermittent production operations, regardless of the type of fiber used, may not require dust collection systems in order to achieve dust controlled conditions. This can be determined by dust level monitoring during the operation.

A19487

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In many operations it is not practical or economical to use an automatic bag opening device. In these instances a manual fiber bag opening and bag disposal station, with provisions for dust collection, such as shown on page 14 of ANSI Standard Z9.5 - 1974 shall be used.

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A19487

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INTRODUCTION OF ASBESTOS FIBER INTO MANUFACTURING PROCESSES

(A) Same comment as (A) under "Dust and Scrap Removal and Disposal" applies here. Suggest:

> "Empty fiber bags containing visible residues of asbestos fiber shall be..."

(B) Wet methods or the use of dust controlling sweeping compounds are precluded. These alternatives should be allowed..

Suggest:

> "...shall be removed periodically during each shift by vacuum cleaning or other procedures where airborne dust generation is minimized."

A 19485

April 5, 1974

ASBESTOS INDUSTRY WORK PRACTICES STANDARD - FIRST DRAFT

INTRODUCTION OF ASBESTOS FIBER INTO MANUFACTURING PROCESSES

In all continuous production operations, asbestos fiber must be introduced into the process under dust controlled conditions and work station fiber counts associated with this process must be below the OSHA fiber standard.

In those operations where bagged asbestos fiber is being used, the fiber bags shall arrive at the work station in clean condition, free of loose fiber on the bag surface. If the bags are stacked on pallets, the pallets must be clean and free from loose fiber.

In those operations where the fiber and its container, either a kraft paper bag, a plastic bag or other, can be introduced directly into the process without the necessity of opening the bag and removing the contents, dust control can be achieved without dust collection devices and systems.

In those operations where the fiber bag must be opened and contents removed from the bag prior to introduction into the operation, then the fiber bag opening and empty bag disposal station must be equipped with a dust collection system in order to achieve dust controlled conditions. Commercially available automatic bag handling and opening devices, with provision for

A 19483

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DUST AND SCRAP REMOVAL AND DISPOSAL

(A) Paper and plastic bags from compressed fiber blocks, certain pellet bags, and even some "open" fiber bags can be emptied so that all visible fiber has been removed. These should not present any significant disposal hazard. It is suggested that this be allowed for by:

> "Empty fiber bags containing visible residues of asbestos fiber shall be..."

A19483

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Any fiber spills, either on equipment or on the floor resulting from the fiber feed operation, shall be vacuum cleaned periodically during each shift. Vacuum cleaning shall be done often enough to assure that fiber does not accumulate in sufficient quantity to blow about the plant and contaminate plant atmosphere.

(B)

A 19488

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ASBESTOS INDUSTRY WORK PRACTICES STANDARD

FIRST DRAFT

DUST AND SCRAP REMOVAL AND DISPOSAL

Dust and scrap shall be removed by methods that do not generate asbestos fiber dust levels above OSHA allowable limits. If such methods are not available, exposed employees shall wear approved respirators.

Scrap material shall be loaded into closed containers or sealed plastic bags for transport to a disposal site.

Empty fiber bags shall be disposed of in accordance with ANSI Standard Z9.5 1974 entitled "Fundamentals Governing the Design and Operation of Local Exhaust Systems for the Control of Asbestos-Containing Dusts". Bags disposed of in the recommended manner will be transported to the disposal site in closed containers or sealed plastic bags.

Asbestos fiber containing dust from dust collection devices, such as fabric filter baghouses, must either be returned to the process in a dust tight system or transported to a waste disposal site in closed containers or sealed plastic bags.

A19430

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HOUSEKEEPING

(A) This about what the current regulations require.

(B) Must it be vacuumed every day whether it needs it or not? A total commitment to vacuum cleaning is made. Use of wet methods is not allowed.

(C) This paragraph is already basically covered in the present regulations. Mandatory post vacuum cleaning is new, however. Cleaning by wet methods is not allowed.

General Comment: This is a beautiful example of the problems involved in trying to write a work practice that applies to thousands of different and varied locations. I think anything beyond the first paragraph can cause real problems if made mandatory.

A19401

ASBESTOS INDUSTRY WORK PRACTICES STANDARD

FIRST DRAFT

HOUSEKEEPING

In manufacturing plants where asbestos fiber is being used, asbestos fiber containing dust shall not be allowed to accumulate on machinery, on the floor, walls, ceiling and structural steel of a building to the point where dust dislodgement could cause the atmospheric fiber levels to exceed OSHA allowable limits. (A)

Manufacturing equipment is the most likely to accumulate asbestos fiber containing dusts and chips to the point where the requirements of the paragraph above would not be met. Therefore, manufacturing equipment shall be vacuum cleaned at least once each full day of operation. This vacuum cleaning shall be performed more frequently as conditions indicate necessary.

Buildings and building structures shall be vacuum cleaned as conditions dictate. If it is impossible to remove dust accumulations by vacuum cleaning, then compressed air may be used. During compressed air cleaning operations only personnel performing the cleaning operation shall be present in the building and cleaning personnel must wear Type C supplied air respirators. This operation must be followed by thorough vacuum cleaning.

A 19402

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DESIGN AND OPERATION OF

LOCAL EXHAUST SYSTEMS

Not reviewed in detail. We really have nothing to contribute in this area.

A 19403

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