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INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS • P. O. BOX 8361, SOUTH CHARLESTON, WEST VIRGINIA 25303

PLAINTIFF'S EXHIBIT
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UC-1513

To (Name) Mr. R. J. Taylor
Division
Location Building 740

Date November 8, 1972

Originating Dept.

Subject

Copy to Mr. D. E. Deese
Mr. N. H. Ketcham
Mr. B. L. Murray
Mr. R. E. Peele

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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