3/14/79 QC TO KGT 3-8-79

Lee, Summary of OSHA requirements (not all) that present a problem with Asbestos – Contract Workers.

Items that must be addressed for asbestos handling by contract workers,

PLAINTIFF'S EXHIBIT

UC-1775

When the orgiral standard for asbestos came out the standard was 5 fibers not longer than 5 micrometers and no action level. BHR personnel were monitored by using a BHR person to place the samples on the person and we sent samples to Regan City. No exposures were detected except most were between 2 or 3 fibers/cm³ Now the standard has been lowered to 2 fibers so BHR personnel should be monitored again. Exposures above 2 fibers/cm³ will require:

1. Special clothing shall be provided by employer (whole body) if level of 2 fibers is exceeded required
2. Special change rooms are required if 10 is exceeded.
3. Special lockers must be provided to separate street clothes.

Medical Examinations: Baseline of employees. Preplacement physical within 30 days if assigned to area or task where exposure to asbestos (any concentration) is expected. Chest X-ray and pulmonary function test and medical history.

BRF 0263

Regardless of exposure, personnel handling asbestos must have annual physical and termination of employment physicals. B+R should be responsible for these OSHA requirements, but I feel that they are not and that they may be expecting us to take care of such things.

I recommend the following action plan.

1. Contract with B+R is reviewed to determine responsibility of OSHA requirement. (If B+R responsible – no further action (If UCC is responsible go to next item)
2. B+R asbestos handlers are trained well in proper handling procedures. (trained to the point that no exposures above the TLV could possibly exist.)
3. B+R asbestos handlers are monitored for exposure (no overexposures exist – no need for change rooms or special clothing)
4. Medical requirements for annual and termination physicals ~~are given to~~ asbestos handlers. ~~to be given~~ (expense for physicals is negotiated)

K.G.T.

BRF 0264