PLAINTIFF'S EXHIBIT

UC-2336

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SOUTH CHARLESTON PLANT
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SUBJECT: New Asbestos Construction Standard

Attached for your information is a summary of the Asbestos Construction Industry Standard. This standard establishes a permissible exposure level of 0.2 fibers per cubic centimeter which represents an order of magnitude reduction in comparison with the prior limit of 2 fibers per cubic centimeter.

If you have any questions, please contact me at your convenience.

W. J. Vincent
W. J. Vincent

WJV/yc
1692A

Attachment

UCC 003210

SUMMARY OF THE CONSTRUCTION STANDARD

The construction standard has nine (9) appendices. Appendices A, C, D, and E are mandatory. The other five (5) B, F, G, H, and J, are non-mandatory.

KEY POINTS

P.E.L. (Permissible Exposure Limit) = 0.2 - Fibers per cubic centimeter of air determined as an 8-hour time - weighted average airborne concentration. Triggers restricted areas, respiratory protection, protective clothing, and other requirement.

Action Level = 0.1 f/cc as an 8-hour TWA. Triggers exposure monitoring, worker training, medical monitoring.

No Ceiling Limit

Separate Standards - Apply to general industry and to construction, because of differences in work forces and work sites. (Industry's fixed site manufacturing workplace, long term employees versus construction's short-term projects, temporary work sites, highly mobile work force, and unique characteristics of some operations.)

Both standards provide requirements for methods of compliance, personal protective equipment, employee monitoring, medical surveillance, communication of hazards to employees, regulated areas, housekeeping procedures, and record keeping.

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Scope and Application of the Construction Standard

The construction standard is geared to apply increasingly stringent requirements to the highest potential exposures. Six key construction activities that are associated with asbestos are listed; demolition/salvage; removal/encapsulation; construction/alteration/repair/maintenance/renovating; installation; spill/emergency cleanup, and transportation/disposal/containment on site.

Startup Dates

For the construction standard, (effective July 21, 1986) all requirements must be complied no later than January 16, 1987.

Communication Among Employees

This requirement provides for the safety and health of other workers on multi-employer work sites. Construction employees directly involved in asbestos related activities must inform other employers working nearby of the existence of asbestos, hazard levels, regulated areas, and rules.

Exposure Monitoring

The new asbestos standards cover specific provisions for monitoring, including methods, frequency, initial monitoring, and employee notification, because of the differences in work sites, the general industry and the construction standards differ in some monitoring practices (i.e. frequency). However required monitoring methods and equipment for sampling are identical.

The construction standard calls for daily monitoring of employees unless all employees are equipped with positive pressure supplied air respirators. The standard also allows for discontinuation of monitoring if employee exposures can be statistically shown to be below the action level (0.1 f/cc). In addition, the standard does require initial monitoring to determine the effectiveness of engineering controls.

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Respiratory Protection

The standard stipulates rules for respirator selection, program of proper use, and facepiece fit. The standard stipulates that the employer must provide respirators appropriate for an employee exposure. To help assure that respirators provide employee with the necessary protection, the standard requires employers to periodically perform either qualitative (QLFT) or quantitative (QNFT) fit test on all users of half mask negative pressure respirators. If negative pressures are used, high efficiency filters are mandatory.

Protective Clothing and Equipment

The new standard stipulates that protective clothing is to be supplied to all employees exposed above the PEL of 0.2 flcc (a regulated area). An additional stipulation in the construction standard is that a "competent person" at the asbestos removal demolition site must periodically examine clothing (worn by employees within negative pressure enclosures) for rips and tears, and mend/replace that clothing. A competent person is defined as an authority on site who identifies existing asbestos hazards and has authority to reduce/eliminate them, is trained formally in all aspects of abatement and removal procedures, supervises employee monitoring, personal protection, and understands and carries out provisions of the standard.

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