Attachment A

INTERNAL CORRESPONDENCE

RECEIVED
MAY 22 1984
D. A. GOSSELIN

UNION CARBIDE CORPORATION SILICONES PLANT
SILICONES AND ORGANIC INTERMEDIATES P.O. BOX 1830, SISTERSVILLE, WV 26175

PLAINTIFF'S EXHIBIT
UC-2338

To (Name) Mr. D. A. Gosselin
Division Union Carbide Corporation
Location Post Office Box 8361
Area Building 3005
South Charleston, West Virginia 25303

Date May 21, 1984
Department, Dept. Purchasing
Area
Subject Cleaning of Insulators Clothing

Copy to

Dear Don:

Confirming our recent phone conversation regarding the cleaning of insulators clothing at Vogue-Swift Cleaners in Marietta, Ohio, the following is a brief outline of the procedure used:

(1) Purchase order issued describing clothing as contaminated. Copy attached.

(2) Clothing is put into special heavy black polyethylene bags imprinted with statement as follows:

- CAUTION -	(2-3/8" Letters)
CONTAINS ASBESTOS FIBERS	(1-5/8" Letters)
AVOID CREATING DUST	(1-5/8" Letters)
BREATHING ASBESTOS DUST MAY	(1-5/8" Letters)
CAUSE SERIOUS BODILY HARM	(1-5/8" Letters)

(3) We have talked to Mr. Mahlon Fauss, the Owner of Vogue-Swift Cleaners, by phone, and advised him how we are labeling the bags. Mr. Fauss agreed to inform his employees. Nothing has been sent to Vogue-Swift in writing regarding how to handle clothing.

(4) Each time we send a bag of clothing a Special Shipping Order is prepared. Our truck delivers bag to cleaner and our truck picks up cleaned clothing. Estimate clothing is sent out for cleaning 2 to 3 days weekly.

Please advise if we are meeting all OSHA requirements and any further obligations we might have to the vendor rendering this service.

Thanks for your help.

Very truly yours,

J. R. Buzzard
Purchasing Agent

J. R. Buzzard:lk

Attachments

UCC 003216

Union Carbide trial exhibit UC-2338: J. R. Buzzard to D. A. Gosselin on Cleaning of Insulators Clothing at Vogue-S...
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Published by AsbestosClaims.Law
asbestosclaims.law/library/173272

(b) See § 1910.6 concerning the availability of ANSI Z9.2-1971, and the maintenance of a historic file in connection therewith. The address of the American National Standards Institute is given in § 1910.100.

(iii) *Particular tools.* All hand-operated and power-operated tools which may produce or release asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, such as, but not limited to, saws, scorers, abrasive wheels, and drills, shall be provided with local exhaust ventilation systems in accordance with subdivision (ii) of this subparagraph.

(2) *Work practices*—(i) *Wet methods.* Insofar as practicable, asbestos shall be handled, mixed, applied, removed, cut, scored, or otherwise worked in a wet state sufficient to prevent the emission of airborne fibers in excess of the exposure limits prescribed in paragraph (b) of this section, unless the usefulness of the product would be diminished thereby.

(ii) *Particular products and operations.* No asbestos cement, mortar, coating, grout, plaster, or similar material containing asbestos shall be removed from bags, cartons, or other containers in which they are shipped, without being either wetted, or enclosed, or ventilated so as to prevent effectively the release of airborne asbestos fibers in excess of the limits prescribed in paragraph (b) of this section.

(iii) *Spraying, demolition, or removal.* Employees engaged in the spraying of asbestos, the removal, or demolition of pipes, structures, or equipment covered or insulated with asbestos, and in the removal or demolition of asbestos insulation or coverings shall be provided with respiratory equipment in accordance with paragraph (d)(2)(iii) of this section and with special clothing in accordance with paragraph (d)(3) of this section.

(d) *Personal protective equipment*—(1) Compliance with the exposure limits prescribed by paragraph (b) of this section may not be achieved by the use of respirators or shift rotation of employees, except:

(i) During the time period necessary to install the engineering controls and to institute the work practices required by paragraph (c) of this section;

(ii) In work situations in which the methods prescribed in paragraph (c) of this section are either technically not feasible or feasible to an extent not sufficient to reduce the airborne concentrations of asbestos fibers below the limits prescribed by paragraph (b) of this section; or

(iii) In emergencies.

(iv) Where both respirators and personnel rotation are allowed by paragraphs (d)(1) (i), (ii), or (iii) of this section, and both are practicable, personnel rotation shall be preferred and used.

(2) Where a respirator is permitted by paragraph (d)(1) of this section, it shall be selected from among those approved by the Bureau of Mines, Department of the Interior, or the National Institute for Occupational Safety and Health, Department of Health, Education, and Welfare, under the provisions of 30 CFR Part 11 (37 F.R. 6244, Mar. 25, 1972), and shall be used in accordance with subdivisions (i), (ii), (iii), and (iv) of this subparagraph.

(i) *Air purifying respirators.* A reusable or single use air purifying respirator, or a respirator described in paragraphs (d)(2) (ii) or (iii) of this section, shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average airborne concentrations of asbestos fibers are reasonably expected to exceed no more than 10 times those limits.

(ii) *Powered air purifying respirators.* A full facepiece powered air purifying respirator, or a powered air purifying respirator, or a respirator described in paragraph (d)(2)(iii) of this section, shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average concentrations of asbestos fibers are reasonably expected to exceed 10 times but not 100 times, those limits.

(iii) *Type "C" supplied-air respirators, continuous flow or pressure-demand class.* A type "C" continuous flow or pressure-demand, supplied-air respirator shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average airborne concentrations of asbestos fibers are reasonably expected to exceed 100 times those limits.

(iv) *Establishment of a respirator program.* (a) The employer shall establish a respirator program in accordance with the requirements of the American National Standards Practices for Respiratory Protection, ANSI Z88.2-1969, which is incorporated by reference herein.

(b) See § 1910.6 concerning the availability of ANSI Z88.2-1969 and the maintenance of a historic file in connection therewith. The address of the American National Standards Institute is given in § 1910.100.

(c) No employee shall be assigned to tasks requiring the use of respirators if, based upon his most recent examination, an examining physician determines that the employee will be unable to function normally wearing a respirator, or that the safety or health of the employee or other employees will be impaired by his use of a respirator. Such employee shall be rotated to another job or given the opportunity to transfer to a different position whose duties he is able to perform with the same employer, in the same geographical area and with the same seniority, status, and rate of pay he had just prior to such transfer, if such a different position is available.

(3) Special clothing: The employer shall provide, and require the use of, special clothing, such as coveralls or similar whole body clothing, head coverings, gloves, and foot coverings for any employee exposed to airborne concentrations of asbestos fibers, which exceed the ceiling level prescribed in paragraph (b) of this section.

(4) Change rooms: (i) At any fixed place of employment exposed to airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, the employer shall provide

change rooms for employees working regularly at the place.

(ii) Clothes lockers: The employer shall provide two separate lockers or containers for each employee, so separated or isolated as to prevent contamination of the employee's street clothes from his work clothes.

(iii) Laundering: (a) Laundering of asbestos contaminated clothing shall be done so as to prevent the release of air-borne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

(b) Any employer who gives asbestos-contaminated clothing to another person for laundering shall inform such person of the requirement in paragraph (d)(4)(iii)(a) of this section to effectively prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

(c) Contaminated clothing shall be transported in sealed impermeable bags, or other closed, impermeable containers, and labeled in accordance with paragraph (g) of this section.

(e) *Method of measurement.* All determinations of airborne concentrations of asbestos fibers shall be made by the membrane filter method at 400-450 × (magnification) (4 millimeter objective) with phase contrast illumination.

(f) *Monitoring*—(1) *Initial determinations.* Within 6 months of the publication of this section, every employer shall cause every place of employment where asbestos fibers are released to be monitored in such a way as to determine whether every employee's exposure to asbestos fibers is below the limits prescribed in paragraph (b) of this section. If the limits are exceeded, the employer shall immediately undertake a compliance program in accordance with paragraph (c) of this section.

(2) *Personal monitoring*—(i) Samples shall be collected from within the breathing zone of the employees, on membrane filters of 0.8 micrometer porosity mounted in an open-face filter holder. Samples shall be taken for the determination of the 8-hour time-weighted average airborne concentrations and of the ceiling concentrations of asbestos fibers.

MAINTENANCE CHECKLIST FOR ASBESTOS REMOVAL/DISPOSAL

AREA _____ ZONE _____ BLDG _____ UNIT _____ DATE _____

JOB DESCRIPTION _____

_____

ESTIMATED LINEAL FEET REMOVED _____ JOB SUPERVISOR _____

NAMES OF PEOPLE INVOLVED IN ACTUAL JOBS _____

_____

	YES	NO	N/A
Plant 514 Hygienist Notified	___	___	___
Plant E.P. Department Notified (large jobs only)	___	___	___
Barrier Tape Used	___	___	___
Warning Signs Used	___	___	___
Protective Clothing Used	___	___	___
Coveralls Changed Daily	___	___	___
Respirators Used	___	___	___
Drop Cloth Used	___	___	___
Wet Down Area	___	___	___
Proper Disposal - (Bags to Landfill)	___	___	___
Dumpster Sealed or Wet Down	___	___	___
Proper Clean-up (Area Housekeeping)	___	___	___
Barricades Down (After Clean-up Only)	___	___	___

COMMENTS _____

_____

_____

_____
Form filed by

Copies

1. Area Safety File
2. W. C. Young - Safety Dept.
3. B. P. Johnson - Trucking

April 1984

UCC 003218