PLAINTIFF'S EXHIBIT

UC-3338

INTERNAL CORRESPONDENCE

METALS DIVISION

State of Oregon

To (Name) Mr. W. C. Thurber
Division UCC - Metals Division
Location 38th Floor
270 Park Avenue
New York, NY 10017

Date April 14, 1976 RECEIVED

Originating Dept. "Calidria" Asbestos APR 19 1976

Answering letter date

Copy to Messrs. R. E. Byrne, Jr.
D. M. Mintzes
J. L. Myers
T. P. Norris
R. F. X. Fusaro
File

Subject State of Oregon - Occupational Health Regulations for Asbestos

In accordance with your request, the above noted state regulation has been reviewed. A copy is attached. The AIA/NA informs me that the Oregon regulations are OSHA approved and enforcement is being done by the state.

The Oregon regulation follows the June 7, 1972 Federal OSHA asbestos regulations quite closely with an important exception; i.e., in a number of situations where the Federal rules trigger action if the allowable limits may be or are exceeded, the Oregon rules go into effect if any level of airborne asbestos is present. A respirator is required "wherever asbestos releasing materials are handled".

Specifically, the main differences are as follows:

1. Tools that release fiber must be provided with local exhaust ventilation. There is no "over the allowable limits requirement" as in the Federal Standards.

2. Insofar as is practical wet methods are to be used to prevent all emissions, not just those over the allowable limits.

3. Respirators are required wherever asbestos dust is released, regardless of how low the level.

4. Type "C" supplied air respirators appear to be required for the removal of asbestos containing materials with hand or power operated tools, even when the tools are fitted with local exhaust ventilation.

5. Special clothing and change rooms are required when concentrations "are reasonably expected to be" over the prescribed limit. The Federal Regulations require this only when the limits are exceeded.

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6. Caution signs are required where fibers may reasonably be expected to be released, regardless of the expected level. Federal rules require this "where airborne concentrations of asbestos fibers may be in excess of the exposure limits..."

7. Caution labels are required in all cases, even for products with bound asbestos, if any concentration of airborne fibers will be released not just not just where concentrations over the allowable limits may occur in any reasonably foreseeable use.

8. "Housekeeping" requires that all surfaces be kept clear of accumulations of asbestos fiber. The "...if their dispersion would create an airborne concentration in excess of the exposure limits..." wording from the Federal regulations has been deleted.

9. In "Waste Disposal" the words "which may produce....airborne concentrations in excess of the exposure limits... have been deleted from the Federal Standard. Sealed, impermeable bags are required for all waste disposal that will produce any concentrations of airborne asbestos fiber.

J. L. Myers
for H. B. Rhodes

HBR:dal
Attach.

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