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PLAINTIFF'S EXHIBIT

UC-3462

INDUSTRIAL HYGIENE MEMORANDUM

To: SID Supervisors (938)
R&D Supervisors
Services Supervisors
Mr. H. L. Robinson

January 24, 1972

From: Fred Williams

Increasing concern about asbestos has resulted in the issuance of an emergency standard that reduces the concentration of airborne asbestos dust to which personnel may be exposed without approved respiratory protection. This standard became effective December 7, 1971, as reported in the Federal Register, Chapter XVII, Part 1910 - Occupational Safety and Health Standards.

Section 1910.93a Asbestos dust states:

(a) The 8-hour time-weighted average airborne concentration of asbestos dust to which employees are exposed shall not exceed 5 fibers per milliliter greater than 5 microns in length, as determined by the membrance filter method at 400-450 X magnification (4 millimeter objective) phase contrast illumination. Concentrations above 5 fibers per milliliter but, not to exceed 10 fibers per milliliter, may be permitted up to a total of 15 minutes in an hour for up to 5 hours in an 8-hour day.

(b) Engineering methods, such as but not limited to, enclosure, vacuum sweeping, and local exhaust ventilation, shall be used to meet the exposure limits prescribed in paragraph (a) of this section. Where such engineering methods are not feasible, or do not otherwise reduce the concentrations below those prescribed in paragraph (a) of this section, respiratory protective devices shall be provided and used in accordance with paragraph (c) of the Federal Register.

(d) (2) All hand - or power-operated tools which produce asbestos dust such as, but not limited to, saws, scorers, abrasive wheels, and drills shall be provided with local exhaust ventilation and dust collectors in accordance with the American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems; ANSI Z9.2 - 1971.

(d) (3) Employees exposed to the spraying of asbestos or the demolition of pipes, structures, or equipment covered or insulated with asbestos shall be provided with respiratory protective devices in accordance with paragraph (c) (4) of the Federal Register.

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(e) Asbestos cement, mortar, coatings, grout, and plaster shall be mixed in closed bags or other containers.

(f) Asbestos waste and scrap shall be collected and disposed of in sealed bags or other containers.

(g) All cleanup of asbestos dust and blowing shall be performed by vacuum cleaners. No dry sweeping shall be performed.

In order to protect individuals working with asbestos and to assure compliance with the Occupational Safety and Health Act, the following is recommended:

1. Notify the industrial hygienist when work with asbestos is to be performed that can create a dust, eg: sawing, grinding, blending, demolition, etc.

(a) Air samples may be collected to evaluate potential personnel exposures to asbestos.

(b) An evaluation will be made on the extent and type of personnel protection that will be needed.

(c) Waste disposal arrangements can be made.

(d) Record of personnel working with asbestos can be maintained.

2. When possible, substitute an insulation containing no asbestos.

Fred Williams
Industrial Hygienist

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