UV-0142 cwr 11/8/72

PLAINTIFF'S EXHIBIT

UC-3463

OSHA TECHNOLOGY MEMORANDUM

SUBJECT: MONITORING EXPOSURE TO ASBESTOS

To provide timely guidance, memoranda will be used to transmit technical information pertinent to NIOSH - OSHA health standards and to supplement the Group I Guidelines for compliance with the standards.

The following information pertains to monitoring of personnel exposure to asbestos fiber:

1. The Occupational Safety and Health Reporter (Bureau of National Affairs, Inc.) published on September 28, 1972 an OSHA Sampling Data Sheet No. 2 (Revised) for asbestos. This sheet was to be used by OSHA inspectors and made part of their Compliance Operations Manual. The sheet dealt with several subjects, including sampling time, ceiling limits, and calculation of 8-hour time-weighted average exposure. The sheet contains several errors and omissions. It will be reissued by OSHA within two weeks according to an OSHA spokesman.

2. We are receiving questions about how to distinguish between asbestos and other fibers, such as wood or glass, which are seen in some air samples. This can be done, but it is not a simple matter. It involves techniques such as using polarized lighting, sample staining, electron microscopy, or experienced "eye-ball" identification at high magnification. Neither we nor the NIOSH people can offer a simple method at this time. The NIOSH people recognize the need, and possibly some suggestions from them may be forthcoming. In the meantime let's procede in the following manner.

a) If the total fiber count you get is below the limit for asbestos, there is no need (for the present) to try to identify the fibers.

b) If the total count exceeds the asbestos limit, and if you suspect the presence of fibers other than asbestos and feel an effort to identify them is justified, advise us of the circumstances. We will work with you in making the identification and selective count. Each problem and the priority of the work will need to be considered individually.

3. Cressend Schonberg, Taft Plant Industrial Hygienist, recently attended NIOSH course No. 550, Industrial Hygiene Measurements, at Cincinnati. While there, he obtained a copy of their laboratory procedure for mounting slides, calibrating the magnification, and counting asbestos samples. He concluded that our Laboratory Method 38C-29X4-R1 is generally consistent with the NIOSH method. He has supplied us with a copy and we are currently examining both methods in detail. We find only very minor differences which do not impair the suitability of our method for our use. (See next item for possible revision of Method 38C-29X4-R1 at a later date.)

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