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PLAINTIFF'S EXHIBIT

UC-3888

To (Name) Mr. J. L. Myers
Division UCC - Metals
Location Niagara Falls, NY

Date October 29, 1979

Originating Dept. "Calidria" Asbestos

Answering letter date

Copy to Mr. R. E. Byrne, Jr.
Dr. H. B. Rhodes
Mr. F. L. Smith

Subject Chapter X of OSHA's IHFON

The Industrial Hygiene Operations Manual referred to is principally a procedural manual for OSHA field inspectors. With respect to those sections applicable to airborne asbestos sampling, we differ somewhat in three areas:

1. We do not correct our calculations for temperature and pressure variations that might exist between our laboratory and actual field site conditions. As you may have noted from the correction charts in the manual, even extreme differences in temperature or pressure do not change the calculated values appreciably. The vast majority of our sampling is performed in enclosed areas with temperatures usually about 68-72°F. On rare occasion, we have run tests outdoors under conditions approaching 20°F to 100°F but these are the exception.

2. We do not make a practice of counting blanks each time we run a test as OSHA does. We count blanks perhaps once or twice a year. We rarely find any appreciable amount of fiber in the blanks. Furthermore, any fiber in the blank is subtracted from the total fiber count by OSHA, which lowers the fiber count. Therefore, our numbers, if anything, would tend to be higher than OSHA's.

3. Another area in which we differ in procedure from OSHA is that we do not check the calibration of our pumps in the field. Harry seems to feel that it might be better if we did - more from a legal standpoint than a technical one per se. I wouldn't argue with his reasoning; however, I do feel that calibration on site before and after sample taking is somewhat redundant, considering the limitations of the equipment accuracy, etc. Furthermore, we do calibrate our pumps each time they are returned to the laboratory with occasional exceptions when we are immediately going back into the field again and there is not sufficient time. This is very rare. We maintain a permanent record of these calibrations in our files. Should there be any discrepancies with the pump performance, it would be detected when it is recalibrated. We also make periodic visual inspections

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