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SOUTH CHARLESTON TECHNICAL CENTER

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April 28, 1988

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5/30/88
BELIEVE THESE REGULATIONS DIFFER FROM OUR CURRENT PRACTICES. AM I CORRECT?? WHERE DO WE GO FROM HERE??
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FROM: T. E. Hanning - 511

SUBJECT: Procedures for Handling
Asbestos-containing Gaskets or Packing

The Manufacturing Council has accepted a recommendation by the Asbestos Phaseout Task Group to cease purchasing asbestos-containing materials after January 1, 1989.

Early work by the Task Group identified asbestos-containing gaskets and packing as the high-priority issue since the purchase of asbestos insulation had been discontinued in 1976. The Task Group determined UCC's GRAFOIL™ to be the designated replacement for asbestos-containing gaskets and packing in most applications.

During the transition period when inventory supplies of asbestos-containing gaskets or packing are being consumed and replaced with non-asbestos alternatives, appropriate worker protection and proper handling and disposal procedures for these asbestos-containing materials must be followed. In the near future an update and revision of the current C&P Standard Practice SH-256, Removal and Handling Asbestos-containing Insulation Material, is planned to document standards and practices for other asbestos-containing materials.

On behalf of the Asbestos Phaseout Task Group and until SH-256 is updated and revised, a discussion of the minimum requirements needed to meet the intent of OSHA regulation 29 CFR 1926.58 (asbestos requirements in the construction industry) and specific recommendations on handling asbestos-containing gaskets and packing will follow.

UCTC 16945

PLAINTIFF'S EXHIBIT
UC-4372

DISCUSSION

OSHA regulation 29 CFR 1926.58 applies to construction, alteration, repair, maintenance, or renovation activities that include asbestos-containing materials. Appendix G to 29 CFR 1926.58 (Work Practices and Engineering Controls for Small-scale, Short-duration Asbestos Renovation and Maintenance Activities) becomes mandatory when employers wish to be exempted from the regulated area (paragraph e(6)) and initial monitoring (paragraph (f)(2)(ii)) requirements of 29 CFR 1926.58. Appendix G is applicable when handling asbestos-containing gaskets or packing.

Appendix G describes the use of glove bags as an engineering control to enclose the work area during small-scale, short-duration maintenance or renovation activities which will result in employee exposures to asbestos that are below the standard's action level of 0.1 fibers per cubic centimeters of air. Glove bags are anticipated to provide a degree of employee protection equivalent to that provided by compliance with all provisions of the final rule.

Paragraph (h)(ii) of 29 CFR 1926.58 states that respirators shall be used in work operations such as maintenance and repair activities, or other activities for which engineering and work practice controls are not feasible.

Therefore, a reasonable interpretation is that half-mask, dual cartridge air purifying respirators with high efficiency particulate air (HEPA) filters (NIOSH approved for asbestos fiber concentrations up to 2.0 fibers per cc) must be used in place of glove bags unless exposure monitoring data shows that concentrations of asbestos fibers from handling asbestos-containing gaskets or packing are below the action level of 0.1 fibers/cc. Approximately 10 to 20 monitoring samples should be taken to characterize a statistically valid representation of potential asbestos fiber concentrations.

MAINTENANCE PROGRAM

An asbestos maintenance program must be initiated in all facilities that have asbestos-containing materials. As stated in Appendix G, such a program should include:

1. Development of an inventory of all asbestos-containing materials in the facility,
2. Periodic examination of all asbestos-containing materials to detect deterioration,
3. Written procedures for asbestos disposal, and
4. Written procedures for dealing with asbestos-related emergencies.

Workers who may be required to handle asbestos-containing materials should be trained in safe procedures. Such training should include:

1. Information regarding types of asbestos and its various uses and forms,

Union Carbide trial exhibit UC-4372: T. E. Hanning to D. A. Boggs and Others on Procedures for Handling Asbestos... Published by AsbestosClaims.Law
ACL Doc 18947 · Page 2 of 5 asbestosclaims.law/library/18947/2

2. Information on the health effects associated with asbestos exposure,
3. Descriptions of the proper methods of handling asbestos-containing materials, and
4. Information on the use of HEPA-equipped dual cartridge respiratory and other personal protection during maintenance activities.

RECOMMENDATIONS

The following recommendations are offered to the locations for their programs on handling asbestos-containing gaskets or packing:

Personal Protective Equipment

Item	Position
Coveralls	Not Recommended
Gloves (disposable cotton)	Recommended
Goggles (not for corrosives)	Not Recommended
Head Covering (not hard hat)	Not Recommended
Foot Covering (not safety shoes)	Not Recommended
Respirator (half-mask, dual cartridge air purifying with HEPA filter)	Recommend when using no glove bags unless exposure data shows below action level.

Associated Maintenance Procedures and Engineering Controls

Item	Position
Disposal (labeling and bagging)	Mandatory
Employee training	Mandatory
Engineering controls	
HEPA vacuum	Not recommended
Glove bags	Recommend when using no respirator unless exposure data shows below action level.
Safe work practices	
Wetting down	Mandatory
Housekeeping	Mandatory
Prohibit cutting, drilling, scraping, punching,etc.	Recommend unless absolutely necessary

Sincerely,

Terry E. Hanning

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