

SHELL OIL COMPANY

PLAINTIFF'S EXHIBIT

SH-1380

Shell Oil
asbestos
Policy

TO SEE ATTACHED LIST

DATE DECEMBER 4, 1973

FROM MEDICAL DIRECTOR &
MANAGER - INDUSTRIAL HYGIENE

SUBJECT CALIFORNIA OSH REGULATIONS
ON ASBESTOS

Attached is a copy of the new California regulations on asbestos. Note particularly § 5208 (g) on monitoring and § 5208 (j) (1) on medical examinations which calls for action when:

"... asbestos concentrations may reasonably be expected to exceed 1 fiber, longer than 5 micrometers, per cubic centimeter."

No time frame of exposure is given. An unofficial interpretation by the California State Department of Health indicates that the level is to be considered a peak or ceiling level.

In our memorandum of November 13, 1972, we recommended medical examinations at the 1 fiber time-weighted level. From the medical and industrial hygiene viewpoints, we see no reason to change that recommendation. We feel that the California action may be unnecessarily stringent. However, since this is the law in California, any action required by the regulation should be referred to the regional industrial hygienist and to the Legal Department.



R. E. Joyner, M.D.
Medical Director



H. L. Kusnetz
Manager
Industrial Hygiene

Attachments

LAM 024390

ABS-007569

SHELL OIL COMPANY

DATE MARCH 5, 1974

FROM GENERAL MANAGER - CHEMICAL PLANTS
AND REFINERIES

SUBJECT OSHA ASBESTOS STANDARD
AIR MONITORING PROGRAM

DATE REC'D:

3/6

TO REFINERY MANAGERS

ANACORTES ODESSA/CINIZA
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MARTINEZ WOOD RIVER
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Compliance with the provisions of the Occupational Safety and Health (OSHA) Asbestos Standard requires that air monitoring for asbestos "shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of employees". The current provisions of federal and state standards will reduce the allowable airborne concentration of asbestos fibers to two fibers/per cubic centimeter, as of July 1, 1976.

To ensure compliance with federal and state regulations, we believe that each location should consider a second round of sampling for airborne concentrations of asbestos fibers to include routine refinery work practices involving those materials which contain asbestos. However, we do not recommend the staging of special situations similar to the initial monitoring efforts, since the purpose of this series of samples is to document compliance with the asbestos standards.

The OSHA Asbestos Standard also specifies that "affected employees, or their representative, shall be given a reasonable opportunity to observe monitoring--and shall have access to the records thereof". In our opinion, compliance with the intent of the observation portion of this provision of the standard is achieved during the monitoring procedures when the affected employees wear the air sampling equipment. We also interpret the latter part of this provision of the standard to require a direct request from the affected employees or their representative before it is mandatory that we display the results of our air monitoring program.

We believe that each location should assume the initiative in regard to employee communication on health and safety matters. Improved communications on our health and safety programs will give employees a greater sense of participation, which is essential to the success of our overall efforts. Therefore, we recommend that you consider the positive step of discussing the results of the asbestos air monitoring with the affected employees. Further, we suggest that each location seriously consider the involvement of a member of the health and safety committee or an employee representative as an observer in future asbestos air monitoring efforts.

A detailed outline of monitoring procedures for airborne concentrations of asbestos fibers was included in our memorandum of October 13, 1972, which discussed the results of test sampling at Houston and Wood River. The memorandum also included a sample survey form which should be prepared to document the circumstances associated with each sample. The information is essential to

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REFINERY MANAGERS

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evaluate actual employee exposure, and the form should be completed, insofar as practical. Additional guidelines were forwarded by our memorandum of December 21, 1972, for handling of the sampling cassettes. You may wish to request assistance from the Regional Industrial Hygienist during the actual sampling activities, and the Refinery Liaison - Health and Safety Group will be happy to assist in these arrangements.

The median asbestos counts from the first round of monitoring generally were well below the allowable eight-hour time-weighted average exposure level of five fibers/cc as specified in the asbestos standard, and the peak fiber counts were far below the allowable ceiling concentration of ten fibers/cc. Furthermore, most locations have minimized potential employee exposure to asbestos fibers by use of insulation which does not contain asbestos fibers. We believe that results of the additional air monitoring will confirm the earlier survey, and that significant changes will not be required in current procedures. For example, there still should be no need to provide special clothing and lockers. However, we recommend that employees continue to use respirators where work will result in the evolution of significant quantities of visible dust. Employees also should be encouraged to follow work practices which will minimize creation of unnecessary dust, to wet down asbestos materials with a fine spray of water during demolition and cleanup operations, and to add water to dry mortar material in the original container, where practical.

We would appreciate receiving copies of the completed survey forms and lab results for our guidance in developing future monitoring frequencies. Also, please let us know if there are questions or comments concerning air monitoring for asbestos fibers.


W. G. Eddleman

cc - Shell Oil Company
General Manager Refining
Occupational Safety and Health - Manager
Public Affairs - Medical Director
Employee Relations - Industrial Relations -
Manager
Manufacturing Engineering - Manager
Legal Department - Mr. J. A. Evans
Manufacturing Operations - Mr. R. H. Tubman
Shell Chemical Company
General Manager Chemical Manufacturing and
Distribution

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