

W. F. Wanzong  
Works Manager  
Norfolk Plant

TO:

FROM: Chicago #176-2 - L. A. Pursell

May 10, 1984

SUBJECT: ASBESTOS HANDLING

The past use of asbestos in insulation, and in other products, presents a problem for plants. both in maintaining safe conditions in areas where the material was used, and in its removal when necessary.

The objectives in any asbestos control program are to protect all persons from exposure to airborne fibers in all sections where asbestos is present, and if removal is necessary, to remove and dispose of the material in the manner prescribed by Federal Regulations.

Guidelines for plants in managing this potentially hazardous condition are being distributed, attached, to provide each plant a basis for planning and implementing an asbestos control program, as individual needs arise.

Most of this material has been sent previously, but with the passing of time, a repetition seems warranted.

Further details and help with specific problems can be obtained from Department #176-2.

*LAP*

L. A. Pursell

LAP:sam List 4, 5 - Codes U and H

cc: All U.S.A. Plants - Except A. P. Green

All Manufacturing Managers

Information Copies to:

CGC - Toronto - R. B. Horn  
A. P. Green, Mexico - R. E. Besalke  
Mexico Companies - G. E. Verhage  
Chicago #170-1 - R. W. Deneke  
Chicago #176-1 - E. W. Lucke  
Chicago #170-6 - J. D. Cornell

*Lawson Exhibit 2A*  
*5/17/84*  
*BBW*



## MANAGING AN ASBESTOS CONTROL PROGRAM

### MAINTAINING IN PLACE

Identify and list all plant areas where the presence of asbestos is known or suspected.

Inspect these areas on a regular basis and log conditions relative to damage, spalling or "fuzzy" surfaces. The frequency of such inspection will vary with the activity level in the areas and could be as often as monthly in some sections or as infrequent as yearly in others.

When any unsatisfactory surface condition appears, determine whether sealing, patching or removal should be done and take such action, immediately.

Sealing or encapsulation in place is an acceptable maintenance practice, and any high strength binder, such as epoxy paint, would be suitable.

If patching, or any other activity is undertaken which will disturb the surface of asbestos containing material, any person in the area must wear an approved respirator and the surface must be wet before any work begins.

Wetting by spraying with water only, is effective for short periods, but can be made more effective by using a 1 to 5 mixture of ethylene glycol and water.

All areas being maintained as above, should be treated in the manner described whether the presence of asbestos is either known or suspected.

When removal becomes necessary, and the presence of asbestos is only suspected, a sample should be taken, with proper protection for involved employees, placed in a sealed container and sent to a laboratory for positive identification. If locating a local laboratory is a problem, Department #176-2 may be able to help.

### REMOVAL OF FRIABLE ASBESTOS

#### FRIABLE ASBESTOS DEFINED:

"ANY MATERIAL CONTAINING MORE THAN ONE PERCENT OF ASBESTOS BY WEIGHT THAT HAND PRESSURE CAN CRUMBLE, PULVERIZE, OR REDUCE TO POWDER WHEN DRY."

If the material is positively identified as friable asbestos, and removal is to be done, all applicable sections of 40 CFR Part-61, attached, must be followed.

Refer Specifically to Sections: 61.145; 61.146; 61.147; 61.152