

*plus 2 all
Chambers*

*Paul with Staff w/ 10/11
Carr to w/12 10/16*

CC: E. G. Johnson
H. A. Kress

SPINNING FIBERS PLANT
Richmond, Virginia
August 24, 1972

E. S. Martin
Personnel Manager
Wilmington

ASBESTOS DUST CONTROL

Attached is a copy of the outline used in a presentation made to the Spinning Plant Staff on August 11, 1972 on the implementation of proposed tighter asbestos dust control standards at Spinning.

The Division Engineers office has prepared a statement on asbestos dust administration that is proposed to be control for all employees in the Textile Fibers Department. This statement has been routed to Employee Relations, P.I.R.B., Legal and all Textile Fibers Plants for comments. When finalized, we will initiate our program for improved controls at Spinning.

If additional information is needed, please advise.

C. F. Fisner
Engineering Superintendent

By: J. M. Coleman

CFF:JMC:ju

DUP 1100097

ASBESTOS DUST CONTROL

- OBJECTIVE - Protect our employees from exposure to asbestos dust which could do them bodily harm.
- PHILOSOPHY - If we err, it will be in a safer direction rather than being more loose.

DUP 1100098

STANDARD TO MEET

A. CURRENT (Effective July 7, 1972)

- 1) 8-hour time weighted average concentrations of asbestos fibers to which any employee may be exposed shall not exceed 5 fibers, longer than 5 micrometers/CC of air.
- 2) Concentrations of 5 fibers, but not to exceed 10 fibers/CC permitted up to 15 minutes per hour not to exceed 5 hours per day.

B. July 1, 1976

8-hour time weighted average not to exceed 2 fibers longer than 5 micrometers/CC of air.

C. MAXIMUM CONCENTRATION

No employee shall be exposed (without protective equipment) at any time to concentration in excess of 10 fibers longer than 5 micrometers/CC of air.

MONITORING

- A. EQUIPMENT - We have 6 air sampling devices on hand ready for use. These are personal monitoring devices which are worn on the lapel within the breathing zone of the employees.
- B. PROCEDURES - We have a procedure worked up for taking samples, as well as a list of jobs to be sampled throughout the plants.
- C. ANALYSIS OF SAMPLES - We plan to send samples taken to an outside vendor for analysis. We also plan to run an analysis in our lab, which will give us faster results and a check against those that are sent out.

ACTION ITEMS TO CONTROL EXPOSURE

- A. EXHAUST SYSTEMS - We have installed an exhaust and filter system on our band saws, enclosed them in a separate room and provide exhaust from these rooms. We also have installed two Torit downdraft work tables, which have their own exhaust and filter systems in the Insulation Shop.
- B. ROPING OFF - We plan to rope off areas where dust is being created above the allowable limit.
- C. WARNING SIGNS - We plan to install warning signs at each Insulation Shop according to OSHA regulations and we have sample signs that we will identify roped off areas and other areas where asbestos dust might be above allowable limit.
- D. MATERIAL - Substitute materials are being sought to replace asbestos, but to date there is no good substitute. We do have a cement now that we are using that does not contain any asbestos.
- E. WORK PRACTICES - Scrap insulation is being disposed of at present in plastic bags to eliminate dust. General work practices will be changed through training with the philosophy that dust collection systems, good housekeeping, and good work practices can generally maintain dust concentrations at safe levels. When removing insulation from boxes, at present a corner is cut off the edge of the box and a vacuum hose is attached to pull off the fine particles of dust as the insulation is removed from the box. Waynesboro is experimenting with spray guns to wet insulation before removing, cutting, etc. We plan to experiment some in the field on small insulating jobs to establish if and where this method might be practical at Spruance.

DUP 1100101

PROTECTIVE EQUIPMENT

A. RESPIRATORS

- We provide our people with respirators at present, but do not require them to wear these except when cleaning out filters. We have ample respirators and the procedure for care and maintenance of respiratory equipment, and now in the process of developing a training program on the proper use of this equipment. We have a list of jobs that we feel respiratory equipment will have to be worn. These will be verified through sampling.

B. SPECIAL CLOTHING -

When respirators are required, special clothing is to be provided. It was recommended in our meeting in Wilmington that the special clothing be provided to be of the disposable type. Tyvek® was mentioned as a candidate. We have sent some samples of different types of insulation we use to Glen White at Centre Road at Wilmington to be used in testing Tyvek® for its ability, not to pick up asbestos dust. Paper uniforms were also mentioned as a candidate. We don't know what type of clothing we will provide as yet, but we will provide special clothing anytime an employee is required to wear a respirator. Also when special clothing is provided a change room and separate lockers are to be provided to prevent the contamination of street clothes.

PROBLEM AREAS

A. EXHAUST SYSTEMS FOR HAND TOOLS

To date no one has developed a satisfactory exhaust system for hand tools used in the field such as, knives and saws. We are looking at how we might use a vacuum cleaner to do the job. The wetting method may prove out to be the only way.

B. SPECIAL CLOTHING

Who other than Insulators should wear protective clothing is a problem we will be faced with. On line overhauls the decision as to whether we should have the insulating crew go in and strip the area before the pipefitters and millwrights go in to dismantle the equipment, or furnish everyone with protective clothing and let them all go in doing the job wearing respirators. If we cannot get satisfactory disposable clothing, the problem of how we will handle the laundering to meet OSHA requirements has to be solved.

C. LOCKERING

We can provide extra lockers for the insulators in field maintenance, but this may become a problem in the areas and if we consider all the people that could work in an area being furnished special clothing and separate lockers, this could become a major problem. Another problem area will be the changing of the habits of consuming of food, and smoking in the shop as well as in roped off areas in the field where insulation dust may not be in the air but is on the equipment.

COMMUNICATION

TO

EMPLOYEES

- What? - Statement for all Textile Fibers employees.
- How? - Through Line Organization
- When? - ~~September 15,~~ 1972

DUP 1100104