88 REV. 1 (3-68)

INTERNAL LETTERHEAD

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H. J. Kolodner - Charlotte	SD-71-544-HJK	Oct. 21, 1971



Subject: Safety Meeting - Clear Lake, Texas Plant

It appears as if the flood of new Occupational Safety and Health Act regulations has somewhat subsided. Although this is a temporary lull, it provides us with an opportunity to consolidate our thoughts and assure ourselves that there is a proper understanding of the intent, direction and applicable implementation dates for all phases of the material published in the Federal Register thus far.

To accomplish uniformity of interpretation amongst all Celanese plants, a meeting has been scheduled for Wednesday, November 10, 1971 at 9:00 A.M. in the conference room at the Clear Lake Plant. It is suggested that all personnel who are involved with OSHA attend this meeting so that we can discuss the general safety requirements, noise, toxicity and legal ramifications of the act. Representatives from corporate legal, medical and safety departments will be on hand to discuss problems or questions of mutual interest to the group. Plan on spending the entire day so that we can pursue this to the fullest degree.

This meeting is not the regular safety personnel conference but is designed to fulfill the needs for further clarification of the Occupational Safety and Health Act.

H. J. Kolodner

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Table I

Airborne Asbestos Levels in the Plastics Area
During Celanex Production

Source Identification	Date	Fibers/ml[1,2] >5 μm in Length
Building 533[3]		
MS 409 Extruder Product Chopper Area	4-08-75	0.02
MS 409 Extruder Operator Stand	4-08-75	0.01
Second Floor Extruder Feed Line by Balance	4-08-75	0.01
Third Floor MFE 226 Belt Drive	4-08-75	0.02
Ground Floor Beside MS 409 Extruder	4-10-75	0.01
Third Floor MFE 226 Belt Drive (Top Off)	4-10-75	0.32
Second Floor Extruder Feed Line by Balance	4-10-75	<0.01
Asbestos Filter Blending Area (6th Floor)	4-10-75	0.01

References:

[1]Microscopic Fiber Counting by M. A. Sieminski, Celanese Research Co., Summit, N.J., Ref. MAS 75-121, July 2, 1975 (attached to file copy).

[2]Threshold Limit Value (TLV) American Conference of Governmental Industrial Hygienists, 1972 - (5 fibers/ml >5 μm in length).

[3]Regular first quarter, 1975 sampling.

File: 259.0

APPENDIX I

Occupational Safety and Health Act
Asbestos Regulation Section 1910.93a

Section 1910.93a Asbestos

Sampling Frequency and Patterns

"After initial determinations, samples shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of employees. In no case shall sampling be at intervals greater than 6 months for employees whose exposures to asbestos may reasonably be foreseen to exceed exposure limits."

File: 259.0