



Shell Oil Company  
Interoffice Memorandum

AUGUST 18, 1987

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| ENVIRONMENTAL/IND. HYGIENE          |                          |
|-------------------------------------|--------------------------|
| DATE <i>8/20/87</i>                 | NAME <i>A. F. Schmit</i> |
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FROM: SR. INDUSTRIAL HYGIENIST, HEALTH & SAFETY, MFG. & TECH.  
TO: SEE ATTACHED DISTRIBUTION LIST  
SUBJECT: FEDERAL OSHA ASBESTOS STANDARD

PLAINTIFF'S EXHIBIT

SH-2009

The attached correspondence is for your information.

*Phil Snyder*  
P. J. Snyder *1/20*

PJS:bjd

Attachment

cc: K. C. Crawford  
O. D. Long  
J. D. Ransdell  
A. F. Schmit

BT8723003

ABS-003951

INDUSTRIAL HYGIENE REPRESENTATIVES

ANACORTES REFINERY  
F. J. KING

GEISMAR PLANT  
M. T. BARCLAY

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M. W. HERSHMAN

MARTINEZ MANUFACTURING COMPLEX  
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ODESSA REFINERY  
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WOOD RIVER MANUFACTURING COMPLEX  
W. M. CUNNINGHAM



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Interoffice Memorandum

|                                              |     |          |     |     |
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| ADD                                          | KCC | JHB      | PJS | PJW |
| HEALTH & SAFETY<br>MANUFACTURING & TECHNICAL |     |          |     |     |
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| BJD                                          |     |          |     |     |
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AUGUST 14, 1987

FROM: A. F. SCHMIT, STAFF INDUSTRIAL HYGIENIST, HEALTH & SAFETY  
DEER PARK MANUFACTURING COMPLEX

TO: P. J. SNYDER, SENIOR INDUSTRIAL HYGIENIST, HEALTH & SAFETY  
MANUFACTURING & TECHNICAL

SUBJECT: "COMPETENT PERSON" UNDER OSHA ASBESTOS STANDARD

The attached memo indicates that the "competent person" under the OSHA Asbestos standard must have attended an EPA-approved training course or be State certified in those States with asbestos abatement certification and training programs. This information may be useful to share with Shell location personnel.

A. F. Schmit

Attachment

cc: DPMC  
T. E. Gillespie  
B. T. Waggoner  
AFS Chron  
ECB Satellite

OSP  
H. L. Kusnetz  
J. L. Rivard

U.S. Department of Labor

Occupational Safety and Health Administration  
Washington, D.C. 20210

Reply to the Attention of:

SEP 5 1986



MEMORANDUM FOR: GIBERT J. SAULTER  
Regional Administrator

FROM: CHARLES E. ADKINS *Chad E. Adkins*  
Acting Director  
Health Standards Programs

THROUGH: JOHN B. MILES, JR. *JB*  
Director  
Field Operations

SUBJECT: Asbestos Construction Standard  
a) Competent Person  
b) OSHA Reference Method

*Copies Made*  
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*RRZ*

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This is in response to your memo of July 25 requesting clarification as to the minimum qualifications a "competent person" must possess and for clarification as to what constitutes a method equivalent to the OSHA Reference Method (Appendix A) for asbestos sampling and analysis.

A "competent person" must have academic credentials and/or field experience in asbestos abatement. By virtue of his or her background, this individual will be capable of identifying existing asbestos hazards in the workplace and will be a person who has the authority to take prompt corrective measures to eliminate them, as specified in §1926.32(f). The "competent person" will be knowledgeable of the contents of the new asbestos standard (29 CFR 1926.58), the identification of asbestos and its removal procedures, and other practices for reducing the hazard. This individual must also have attended an EPA-approved training course or be State certified in those States with asbestos abatement certification and training programs. (States with certification and training programs are Alabama, Alaska, Arkansas, Illinois, Iowa, Kansas, Maryland, New Jersey, Oklahoma, Ohio, Rhode Island, Tennessee and Washington.)

In regard to your second question, methods equivalent to the OSHA Reference Method are the NIOSH 7400 method (Revision #2) and the OSHA ID 160 method developed by the OSHA Salt Lake City Laboratory. Any other method would have to be evaluated on a case-by-case basis by our laboratory.

FEB 16 1987

ABS-003954