

Subject: Occupational Safety and Health - Exposure to Airborne
Asbestos Fibers

SL SR 80-11-100

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to: Personnel Vice Presidents
Copies to Assistant Vice Presidents - Support Services,
Company Medical Directors and Safety Coordinators

from: Assistant Vice Presidents - Human Resources and Support
Services; Corporate Medical Director

description: Provides guidelines to protect employees from occupational exposure to
airborne asbestos fibers.



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PLAINTIFF'S EXHIBIT

ATT-199

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Section 29 CFR 1910.1001 of Standards issued by the Occupational Safety and Health Administration (OSHA) requires all employers to establish and maintain an effective program for protecting their employees from exposures to airborne asbestos fibers which are above those permitted by this Standard. This letter and its attachment provide guidelines and procedures to assist the Operating Telephone Companies in developing and implementing the programs that are necessary to safeguard the health of their employees and to assure compliance with the current OSHA Standard for asbestos.

In recent years, the Bell System has made substantial progress toward eliminating the purchase and use of buildings, products and other materials which contain asbestos. Unfortunately, the elimination of asbestos in new production processes, products, and materials, and in the construction of new buildings and other facilities, does not guarantee that all potential exposures to asbestos have been eliminated in the existing work environment. Baseline environmental studies conducted by the Environmental Health and Safety Department of Bell Telephone Laboratories show that Bell System workplaces generally do not expose employees to hazardous concentrations of asbestos fibers. Where exposures do occur, they are generally well below those permitted by the current OSHA standard. However, these studies have identified several potential sources of contamination which result either from earlier use of asbestos (i.e., fireproofing and insulation for buildings, steam pipes, boilers, air plenums, etc.) or from existing uses of asbestos for which no suitable substitutes have yet been found (i.e., motor vehicle brake shoes and clutches).

NOTICE

Not for use or disclosure outside the

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GL 77-07-024, Motor Vehicle Maintenance - Brakes and Clutches, and GL 78-08-054, Motor Vehicle Maintenance - Protection Against Exposure to Asbestos Fibers, provided recommendations and procedures for protecting employees from exposure to airborne asbestos fibers while performing maintenance operations on brake and clutch assemblies in Company-owned motor vehicles. When properly implemented, these procedures will reduce asbestos exposure levels below those allowed by the present Standard.

SR 79-05-398, Occupational Safety and Health - Exposure to Airborne Asbestos Fibers - Request for Survey requested the Operating Telephone Companies to initiate a comprehensive survey to identify Company-owned and leased facilities in which sprayed-on asbestos was used for fireproofing and heat insulation. RL 79-07-254, Asbestos Hazards in Leased Buildings, recommended that facilities under consideration for lease be reviewed for potential hazards caused by the use of building materials that contain asbestos. SR 80-06-010, Occupational Safety and Health - Sprayed-on Asbestos in Company-owned and Leased Buildings, recommends procedures that should be followed in buildings identified by this survey to minimize the risk of exposing employees to asbestos fibers which are potentially harmful to their health.

Station and PBX installation, rearrangement, and repair operations require employees to enter and work in buildings owned or leased by customers in which sprayed-on asbestos may have been used for general fireproofing or heat insulation. Where exposures to asbestos fibers jeopardize the safety or health of company employees who must enter these workplaces to conduct company business, the Companies should follow policies and procedures included in PO 80-07-216.

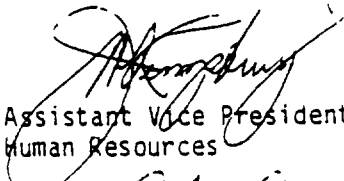
Detailed information is included in the attached "Guidelines for Controlling Occupational Exposure to Asbestos Fibers" to assist the Companies in developing and implementing a program for identifying, evaluating, and controlling potential sources of exposure found in their work environments. Copies of all pertinent documentation are included in the Appendix. Estimated costs for implementing this program in Company-owned and leased buildings were included in SR 80-06-010. Estimated costs for customer premises have not been provided since estimates of the frequency and severity of asbestos hazards on customer premises are not available.

An information package is being developed to assist the Companies to inform their employees about the nature and source of potential exposure to asbestos in their workplaces and work environments. Information concerning cost and availability of this package will be available later this year.

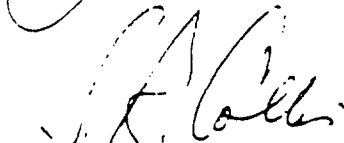
Questions regarding this letter, or its attachment, should be referred to the following persons:

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Assistant Vice President
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Corporate Medical Director

Attachment

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REQUIREMENTS FOR
A MINIMAL ACCEPTABLE RESPIRATORY PROGRAM

The Eleven Commandments of 29 CFR 1910.134

1. Written standard operating procedures governing the selection and use of respirators shall be established.
2. Respirators shall be selected on the basis of hazards to which the worker is exposed.
3. The user shall be instructed and trained in the proper use of respirators and their limitations.
4. Where practicable, the respirators should be assigned to individual workers for their exclusive use.
5. Respirators shall be regularly cleaned and disinfected. Those issued for the exclusive use of one worker should be cleaned after each day's use, or more often, if necessary. Those used by more than one worker shall be thoroughly cleaned and disinfected after each use.
6. Respirators shall be stored in a convenient, clean and sanitary location.
7. Respirators used routinely shall be inspected during each cleaning. Worn or deteriorated parts shall be replaced. Respirators for emergency use, such as self-contained devices shall be thoroughly inspected at least once a month and after each use.
8. Appropriate surveillance of work areas condition and degree of employee exposure or stress shall be maintained.
9. There shall be regular inspections and evaluations to determine the continued effectiveness of the program.
10. Persons should not be assigned to tasks requiring use of respirators unless it has been determined that they are physically able to perform the work and use the equipment. The local physician shall determine what conditions are pertinent. The respirator user's medical status should be reviewed periodically (for instance, annually).
11. Approved or accepted respirators shall be used when they are available. The respirator furnished shall provide adequate respiratory protection against the particular hazard for which it was designed in accordance with standards established by competent authorities.

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APPENDIX II

USPHS/NIOSH MEMBRANE FILTER METHOD FOR EVALUATING AIRBORNE ASBESTOS FIBERS

I SCOPE

- A This method describes the equipment and procedures for collecting, mounting, sizing, and counting asbestos fibers on membrane filters in the evaluation of breathing zone samples of airborne asbestos fibers.

- B The method has been successfully applied using 37 mm Millipore AA filters and small battery operated personal sampling pumps at a flow rate of 1.0 to 2.5 liters per minute for time periods of 15 to 150 minutes at concentrations of 1 to 20 fibers (longer than 5 micrometers)/cubic centimeter. Large deviations from these conditions may result in filters with either too few or too many fibers, which will yield air concentration estimates of low statistical precision and accuracy.

- C This method considers only fibers with a length to width ratio of 3 to 1 or greater and a length greater than 5 micrometers.

II SUMMARY OF METHOD

- A The sample is collected by drawing air through a membrane filter by means of a battery powered personal sampling pump. The filter is transformed from an opaque solid membrane to a transparent, optically homogeneous gel. The fibers are sized and counted by phase-contrast microscope at 400-450X magnification.

III SIGNIFICANCE

- A This method was first used by the Asbestosis Research Council in Great Britain⁽¹⁾ and later was slightly modified by the U.S. Public Health Service for asbestos dust studies in the United States⁽²⁾. It has been specified as the method of test⁽³⁾ for the Federal Standard

for asbestos in industrial air (29 C.F.R. Part 1910. 93a), in the U.S. Public Health Service Criteria Document on occupational exposure to asbestos⁽⁴⁾, and in sampling procedures of the Occupational Safety and Health Administration, Department of Labor.⁽⁵⁾

IV DEFINITIONS

- A For definitions of terms used in this method, refer to ASTM Definitions D 1356, Terms Relating to Atmospheric Sampling and Analysis.

V INTERFERENCES

All particulates with a length to width ratio of 3 to 1 or greater and a length greater than 5 micrometers should, in the absence of other information, be considered to be asbestos fibers and counted as such.

VI APPARATUS

A Sampling Equipment

The personal sampling equipment train consists of 1) personal sampling pump, 2) tubing, 3) clothing spring clip, 4) tubing-to-field monitor metal adaptor, and 5) field monitor (collecting filter and holder).

- 1 Personal sampler pump. The pump must be battery powered and weigh less than 2 pounds (0.91 kg). The pump must be capable of sampling at 1.0 to 2.5 lpm against a flow resistance of 7.5 inches H₂O (1.4 cm Hg) for 8 continuous hours on a fully charged battery. See Note A for sources of pumps that have been found satisfactory for this method.

- 2 Tubing. Laboratory tubing such as rubber or plastic with 5 mm bore (1/4 inch) and about 90 cm length (3 feet).

Prepared by Nelson A. Leidel, Stephen G. Bayer, and Ralph D. Zumwalde, NIOSH, 11/73.

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