



E. I. DU PONT DE NEMOURS & COMPANY
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CHEMICALS, DYES AND PIGMENTS DEPARTMENT

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TO: CD&P PLANT MANAGERS
CD&P O.H. COORDINATORS
CD&P SAFETY SUPERVISORS

FROM: J. R. MACCONI *JRC 11*

OSHA INSPECTIONS - ASBESTOS STANDARD

Within the past several months, OSHA has been increasing its efforts and focusing attention on compliance with the asbestos standard. In view of OSHA's increased activity in this area, it is recommended that each site review its' present compliance position with respect to this standard and take whatever steps are necessary to strengthen its' position with respect to compliance. A list of points to be reviewed is attached.

Background - Several Du Pont plants either have had or are in the process of having inspections wherein compliance with the asbestos standard is the prime issue.

OSHA appears to be increasingly concerned about potential exposure to personnel not directly involved with handling asbestos or asbestos containing materials, e.g. all maintenance personnel. In one instance, the OSHA Area Director specifically asked for medical records of welders, pipefitters, instrument mechanics, etc. under the authority of the asbestos standard. The request was denied on the basis that the site did not consider the individuals mentioned as being covered by the standard (i.e. - their exposure, if any, was considered "casual"). The asbestos standard is not specific concerning covered employees and we are currently awaiting further action by OSHA on this point.

An article summarizing HEW Secretary Califano's recent remarks on occupational cancer is attached for your information. Note the emphasis placed on asbestos exposure. We do not agree with Califano's numbers, but this subject received wide publicity.

DUP 0821295

DU 011710

The plants are reminded that EPA also regulates asbestos under the regulations promulgated for hazardous air pollutants. These regulations (40 CFR 61.20-61.25) require EPA notification prior to demolition or renovation of friable asbestos and specify asbestos handling and disposal procedures. Any plant program on asbestos should include compliance with these EPA regulations.

~~I will be happy to assist in whatever way I can to clarify positions and aid the site in firming up their desired program.~~

JRM/bam
Att.

DUP 0821296

DU 011711

REVIEW PROCEDURE - ASBESTOS STANDARD

1. An in-depth, step-by-step, review of the asbestos standard should be undertaken by the site OSH coordinator. Subsequent discussions should be held with mechanical supts. and plant physicians to ensure understanding of the standard by all concerned.
2. A survey of the site should be made to catalog all asbestos containing material, e.g. insulation, gasketing, etc. Only those materials wherein the asbestos is in an unbound condition (i.e. can result in airborne fibers) need be considered.
3. A decision must be made as to the sites' coverage by the asbestos standard. Care must be exercised not to arbitrarily discount coverage on the basis that asbestos insulation is no longer used. Many sites, while not presently using asbestos containing insulation, may well have significant quantities of old insulation already installed which would warrant the site being covered by the standard until all such insulation has been removed.
4. If the investigation and review leads to a conclusion that the site is not covered by the standard, that fact should be documented and filed for possible future use, especially if significant judgement had to be employed in arriving at the conclusion.
5. If the site decision is that it is covered by the standard, a list of the specific individuals involved should be developed. This list should be reviewed at least semi-annually.
6. The medical records of the individuals covered should be reviewed to ensure that those items specifically required by the asbestos standard have been addressed, i.e. (1) annual x-ray; (2) annual pulmonary function test; (3) annual history of symptoms related to respiratory disease. Note that the medical requirements are not age dependent.
7. The sites' air-monitoring program relative to asbestos exposure should be reviewed for compliance with the standard.
8. Work practices related to handling asbestos containing materials should be reviewed for compliance with the standard. An audit for actual use of the "wet method" during asbestos handling should be conducted.

DUP 0821297

9. Other points to keep in mind:

- (a) an employee newly assigned to an occupation wherein the potential exists for exposure to airborne concentrations of asbestos must receive a physical exam within 30 days of such assignment,
- (b) an employee covered by the standard must receive a physical within 30 days of termination. This includes transfers, lay-offs, retirements, etc.
- (c) the standard requires annual physical examinations. Care must be exercised to avoid backlogs at medical facilities which would result in an extended period between examinations. (For reference, a letter outlining corporate medical advice is attached.)
- (d) If some part of the medical requirement is not accomplished at the annual physical (e.g. no pulmonary function because of a "cold"), that part should be rescheduled when it can be completed.

DUP 0821298

DU 011713