

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

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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 against excessive exposure to airborne asbestos particles. As a result of this request, there is a need to provide guidance to the OTCs so that they may develop and implement the programs needed to assure compliance with the current OSHA Standards for asbestos.

Baseline environmental studies conducted by the Environmental Health and Safety Department of Bell Telephone Laboratories have shown that there are two categories of asbestos usage which may potentially result in excessive employee exposures:

1. Motor vehicle maintenance operations on brakes and clutches.
2. Operations in areas where sprayed-on asbestos was used for fire-proofing and heat insulation.

Instructions contained in GL 77-07-024 and GL 78-08-045 establish procedures for protecting employees from excessive exposure to airborne asbestos fibers while performing maintenance operations on brakes and clutches in company-owned vehicles. However, at present there remains a need for guidance concerning employees in facilities (owned and leased) with sprayed-on asbestos.

PLAINTIFF'S EXHIBIT

ATT-311

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NOTICE

Not for use or disclosure outside the
Bell System except as authorized in writing

In order to develop guidelines which are both meaningful and realistic, there is a need for basic information concerning the extent of sprayed-on asbestos in Bell System facilities. As a result, each OTC is requested to perform a comprehensive survey of all their facilities (owned and leased) to identify all buildings which appear to have sprayed-on asbestos. Although bulk sample tests are not requested at this time, the OTCs might choose to do some sampling for corroboration.

This request supercedes a previous request for data (GL 77-04-133). The 1977 data was accumulated within a very short time frame, and the information on leased facilities was generally incomplete. However, each company should review this data to determine its completeness with respect to owned and leased facilities. This might simplify and expedite the present request for information.

A form is attached which must be completed for each facility with sprayed-on material. Also attached is a transmittal sheet which requests the total number of leased and owned locations in that company.

Each OTC is encouraged to keep an official record of all facilities (owned and leased), with and without sprayed-on asbestos, since OSHA might request this information some time in the future.

For your information sprayed-on asbestos was used extensively in construction during the period from 1953 to 1972, after which it was banned by the Environmental Protection Agency. In addition it was employed primarily in low-cost light-weight construction. Within the Bell System this means it would, in general, not exist in equipment buildings since this type of construction is not employed for these facilities. However, asbestos was probably used in a number of administrative buildings, which may be company owned or leased. The likelihood is that it was used extensively in leased buildings built during this period, and these facilities presently comprise approximately 23% of all Bell System space. Thus, a comprehensive survey of leased facilities is essential.

THE SURVEY PACKAGE, WITH A FORM COMPLETED FOR EACH BUILDING WITH SPRAYED-ON MATERIAL SHOULD BE FORWARDED TO AT&T BY JULY 1, 1979.

Since the survey data will be used to design models for evaluating employee exposures to airborne asbestos during typical work procedures, a formal solution to asbestos compliance will not be available until 1980. However, interim guidelines are presently being developed for specific situations where employees might be exposed to excessive levels of asbestos. These guidelines will be issued shortly.

Questions pertaining to this letter may be addressed to N. J. DeCapua
201-221-4984.

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