IN RE: ABRAMS November 1992

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HHBB-0002864

April 11, 1989

Mr. Richard M. Dayoub
U.S. Department of Labor
Occupational Safety & Health Administration
Jacksonville Area Office
Suite 303
3100 University Boulevard, South
Jacksonville, Florida 32216

Re:

Dear Mr. Dayoub:

In response to your letter, dated April 6, 1989, we have reviewed the allegations in the complaint of March 7, 1989. Our response to each of these allegations is as follows:

1. Allegation Employees were exposed to asbestos materials while removing "wedges" from an electrical generator, 29 CFR 1910.1001(c).

Answer

1.1 Our materials standard description of the wedges, which would be the source of any possible exposure to asbestos in this operation, indicates that the asbestos fibers are locked into a resin matrix.

1.2 Analysis of the wedge material by Pensacola P.O.C. on March 8, 1989 indicates the wedge to be very hard (Sample No. 1004) and nonfriable.

1.3 A full-shift personnel air sample was collected on March 7, 1989 to characterize the operation in question. The stator builder C removed the wedges during this work shift and also engaged in cleanup operations related to the removal of the wedges from the stator (Clayton Laboratory Sample No. 718060). The TWA phase contrast microscopy results of 0.019 fibers greater than 5u/cm^3 indicate an exposure that is well below the OSHA action limit for asbestos, which is 0.10 fibers greater than 5u/cm^3 as a TWA exposure.

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1.4 Further, we are providing the following historical data from similar operations where these same type of wedges were driven out of stators. As can be seen, all potential exposures are well below the 0.10 fibers greater than 5u/cm^3 action limit for asbestos. These samples were also analyzed by Clayton Environmental Consultants.

Westinghouse I.H. No.	Sample Date	Sample Type	Sample Time (Min.)	Fibers 5u/cm^3
9593	12/8/83	Personnel	235	0.010
9595	12/9/83	Personnel	150	0.020
9597	12/9/83	Personnel	225	0.020
9598	12/9/83	Personnel	160	0.041
9599	12/9/83	Personnel	190	0.020
9606	12/10/83	Personnel	410	0.005

2. Allegation Employees were not provided personal protective equipment, such as respirators, coveralls while removing "wedges" where asbestos was present, 29 CFR 1910.1001(g) & (h).

Answer

On March 4, 1989, it is true that our employees removed asbestos-containing wedges from the stators without the use of respiratory equipment or other personal protective equipment for about a 4-hour period. Although plant personnel understood that the wedges contained asbestos, as this asbestos is impregnated in a micarta sheet, it was not understood that it presented a potential hazard on this date. It is our practice to provide respiratory protection (HEPA filters) and full clothing coveralls when there is any potential for exposure to asbestos. On Monday, March 6, 1989, such protection was provided, as our plant personnel were now aware of the potential hazard. As our historical and current data shows, no exposure above the action level of 29 CFR 1910.1001 (0.10 fibers greater than 5u/cm^3) occurred. Therefore, we provided this protection not as a compliance requirement, but as a precautionary measure.

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