

Pg 47658 col3 Sampling of Ceiling Concentration

... sampling period of up to 15 minutes

Why do they say up to? Suppose it's 6 fibers/ml for 5 minutes
Is that a violation?

The employee information and training requirement is new

There are changes in the definitions (b). Size of fibers under (2)
might affect counting some.

(F)(7) infers that control of fiber levels to be less than limits
~~set~~ by engineering and work practice controls
will always be feasible.

are
Regulated laboratory facilities per (i)(5) not practiced
for furnace bricklayers, pot repair and maintenance
people servicing insulated pipelines, if they are covered.

(i) (6) belongs under (d) regulated areas, not (i)



(a) Scope and application section all new. Exclusion of construction may have some effect on Alcoa. But ~~for~~ until proposal for construction issued we should apply ~~the~~ general industry standard ~~to~~ to Alcoa construction people. Since "construction" under 1910.12 not clear with respect to its application to our repair and maint. people we should apply standard ~~to~~ ^{which} affords greater degree of protection.

(b) Definitions. Some changes. Probably most important is addition of "authorized person" as a person required by his duties to enter a "regulated area" [see (d) below]

(c) Permissible exposure to airborne concentrations of asbestos fibers. Contains important changes. Present standard specified that July 1, 1976, TWA (8 hour) limit would drop from 5 fibers/ml to 2 fibers/ml. Proposed standard would reduce the TWA to 0.5 fibers/ml, leaving the effective date to be based on technological and economic feasibility and inviting comments on this.

Present standard calls for a ceiling even of 10 fibers/ml measured for 15 minutes. Proposed standard would reduce this to 5 fibers/ml for a period of up to (emphasis ours) 15 minutes. What the significance of the "up to" is not clear even from the Preamble.

(d) Regulated areas. This section new. Regulated area defined as one where a person may be exposed to ^{an} airborne asbestos fiber concentration in excess of either the TWA or ceiling limit. A daily roster of ~~the~~ all persons entering a regulated

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area is to be made and retained.

(e) Monitoring. Section expanded and revised. Selection of representative employees for monitoring described. Area monitoring eliminated. If either exposure limit is exceeded a compliance program and monthly monitoring are to be undertaken. If neither exposure limit is exceeded for two surveys at least 5 days, but not more than three months apart, no further monitoring is required unless there is reason to believe an employee's exposure has increased. ~~Also~~ Each employee is to be notified within 5 working days of the results of tests representing his exposure. If either exposure limit is exceeded, he is to be also notified what corrective action is being taken.

(f) Method of compliance. Where work exposures exceed either limit feasible engineering controls to reduce ^{the} exposures. If needed to meet exposure limits, work practice controls are also to be used. If airborne levels after institution of engineering and work practice controls ~~are~~ still exceed the limits, respirators are to be used to protect the employees.

A new provision requires measurements such as capture velocity, duct velocity or static pressure ~~in each~~ every three months ~~to insure that~~ in each ~~ventilation~~ exhaust system used for fume level control to demonstrate exhaust effectiveness.

Another new requirement is the establishment and implementation of a ^{detailed} written program ~~for~~ why any employee.

* Add - are to be used

cont'd pg 3

* Add - even if ~~the~~ another person his job group was actually monitored.

exposure exceeds the limits to reduce the fiber levels within limits solely by engineering and work practice controls; (Editorial comment:)

- (g) Respiratory protection, new and expanded as a separate paragraph.
- (h) Personal protective clothing, Retitled and does not include respirators which have been split out in separate. TP
 major change made, requiring provision by employer of ^{daily} clean full-body protective clothing for all employees whose exposure exceeds either the ceiling or the TWA limit. (Present standard requires this only if the ceiling limit is exceeded.)
- (i) Another major change is the requirement in such cases for clean change rooms, with required showers for all employees.
 Also required are separate lavatory facilities for regulated areas used only by authorized persons.
- (j) Medical surveillance, A major change provides for informing an employee who refuses a medical examination of the possible health consequences and obtaining a signed statement from him that he has been so informed and refuses to be examined. ~~Another~~ significant change is the addition ~~to the scope~~ of sputum cytology to the required examination for employees 45 years of age or older.

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(j) (contd) Another is ~~the~~ requirement to obtain from the examining physician, a written ~~statement~~ opinion, copy to be given to employee, ~~is~~ containing ~~written opinion~~.

(A) (B) (C)

(k) Employee information and training. New paragraph.

Detailed training required for employees assigned to regulated areas, including (1) nature of operations causing exposures and necessary protective steps, (2) engineering controls and work practices involved, (3) full instructions for appropriate respirators, (4) purpose for and description of medical surveillance program (5) review of this standard. Copies of standard and appendices to be readily available to these employees.

(l) Danger signs and labels Formerly "Caution signs and labels." Words "Cancer hazard" ^{to replace} "Must hazard" ^{in regulated areas} ~~in present regulation on signs~~, and "Danger - Cancer hazard" to replace "Caution - Breathing asbestos may dust may cause serious bodily harm" on labels for raw materials and scrap materials.

(m) Housekeeping Essentially unchanged.

(n) Recordkeeping. Greatly expanded to require specific details of monitoring tests, exposures, ^{rotas, and ventilation} and medical records, including retention of all of these for at least 40 years, or duration of employment plus 20 years whichever is longer.
 x - 01 0 - 00.00 training

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- (c) Observation & monitoring .. New paragraph expanding (f) (4) of present regulation to require necessary personal protective equipment and explanation of methods of measurement as well as allowing recording the results obtained.
- (p) Appendices New paragraph providing material for training of employees. ~~and for~~