COMMENT NO. 4 - If this comes under OSHA, we will also have to cover in arrangements with insulating contractors.

E. V. FLYNN, COMMENTS BY R. D. GOTWALS/W. S. PERSON - ORCHEM - CH. WKS.
COMMENT NO 5 - Does the TLV (S2T) meet proposed Federal limits?

COMMENT NO. 6 - Exposure in a shop operation is somewhat different from working on pipe lines in the field. Should we not mention the application of this Standard in field work as well?

J. J. LAURINO, COMMENT BY J. J. LAURINO - PHOTO PRODUCTS - WILMINGTON
COMMENT NO. 7 - Recommend that this standard not be issued until the new format indicating the part covered by OSHA is in use.

J. A. SIGMAN, COMMENTS BY G. B. KIRKPARTICK - TEX. FIB. - OLD HICKORY
COMMENT NO. 8 - 2.2b - "Opening boxes of new insulation" should read, "Opening boxes and stocking bins from new boxes of insulation.". Old Hickory has made repeated sampling tests of this bin stocking operation and found them over TLV limits. Our safety rules are being changed to include this operation where dust respirators will be worn.

COMMENT NO. 9 - 3.1 - This may have to be rewritten to harmonize with comments above for 2.2b.

COMMENT NO. 10 - 3.4.1 - This wetting down of insulation should carry a caution to refrain from wetting down hot lines where: a) Water could be flashed off to vapor and cause burns; b) Water could fracture pipe or weldments; c) Water could freeze out or slow down process flow in "on stream" lines.

COMMENT NO. 11 - Dust respirators are to be worn anyway when removing insulation.(2.2c).

COMMENT NO. 12 - 6.1.1 - Each area group of insulators at Old Hickory are asked to take at least one sample (not necessarily of 8 hrs. duration) on a different job each week. More samples are requested when there are indications of any change taking place or new types of materials are being tried. This type of sampling provides us with new data in some jobs and shows results of our efforts to improve dust control in other jobs.

J. A. SIGMAN, COMMENTS BY P. E. M. SOONS - TEX. FIB. - DORDRECHT
COMMENT NO. 13 - Change point 3.1.4 as follows: "Glaze coating on block insulation reduces asbestos as a potential dust source." Available or not available is of minor importance here.

COMMENT NO. 14 - Add to 3.2.2: "Consideration also must be given to exposure of other personnel working in the area who are not directly involved". The same warning has been given in point 3.4.2. To our opinion, it applies here too.

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