

To: Plant Managers
Division Superintendents
and Staff Heads



PLAINTIFF'S
EXHIBIT
USX-132

Interorganization Correspondence

Date: August 24, 1983

From: E. M. Gorden, Superintendent
Safety and Environmental Health
Mon Valley Works

Subject: Mon Valley Works Guidelines for the Removal
and Disposal of Asbestos Containing Materials.

The attached guideline needs to be followed to protect employees against the hazards of exposure to asbestos. This supersedes all existing plant guidelines.

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JRD/gdc

Attachment

cc: S. A. Bennett, Jr.
E. E. Harris
T. F. Weir, M.D.
J. R. Dierdorf
Industrial Hygiene Staff

C. Personal Protective Equipment

1. All employees involved in asbestos handling operations shall be required to wear NIOSH-approved respirators. The use of a particular type respirator shall be determined by the exposure level as outlined below. It should be noted that single use, disposable respirators are not permitted within the Corporation for protection against asbestos.

<u>Respirator Type</u>	<u>Exposure Level</u>
Air Purifying Dust Respirator (Must have specific NIOSH approval for protection against asbestos-containing dusts)	Not more than 10 times the 8-hour time-weighted average exposure level.
Powered Air Purifying Respirator	Not more than 100 times the time-weighted average exposure level.
Type "C" Supplied Air Respirator	Not more than 1000 times the time-weighted average exposure level.

If the asbestos material is thoroughly wetted, hand tools are used and the operation is in an area of good ventilation, air purifying respirators should be adequate to reduce employee exposures to below the permissible levels. Respirator wearers shall be given proper fitting instructions. Due to the extremely hazardous nature of asbestos, it is important to comply with the OSHA regulations governing the use of respiratory protection as stated in 29 CFR 1910.134 and our plant respirator programs.

2. Disposable protective garments should be worn by employees during asbestos removal. ~~These garments, some hoods, and coveralls~~ without pockets or cuffs made of Dupont's Tyvek material is the preferred clothing. A vacuum cleaner should be used to remove loose fibers adhering to contaminated work clothing. The use of compressed air to dislodge asbestos fibers from contaminated clothing or tools is strictly forbidden.

Respirators should continue to be worn until contaminated work clothing is removed. Upon completion of the shift, the disposable clothing and respirator filters should be placed in bags for disposal with the waste insulation.

D. Monitoring

Whenever an extensive (two days or greater duration) asbestos removal project is undertaken, personnel monitoring shall be conducted until worker exposure levels have been established for the particular removal operation. If possible, the Industrial Hygiene Staff should be notified several days prior to starting an insulation removal job so the necessary arrangements can be made for monitoring.

E. Personal Hygiene

The employees should be instructed to wash hands, face and forearms prior to drinking, eating, or smoking.

F. Housekeeping

Dry sweeping of insulation is prohibited. Vacuum cleaning methods should be utilized on floors and other surfaces contaminated with asbestos. Where vacuuming is not feasible, wet shovelling or wet-sweeping may be used. The use of compressed air for clean-up is strictly forbidden.

G. Restricted Area

All employees whose work does not require occupancy in the area of insulation removal are prohibited. Areas should be roped off as a minimum. In some applications, such as indoors removal, the work area may need to be sealed to prevent exposure of nearby employees and areas. Industrial Hygiene should be contacted for consultation in these instances.

H. Training

The employees should be instructed on the hazards of asbestos and the precautionary measures that are being taken to control their exposures.

I. Disposal

Asbestos waste must be accumulated separately from other refuse. All asbestos containing materials, after they are properly packaged and labeled, must be taken to a licensed land fill. Contact A. Eross, Senior Environmental Engineer (H 3111), for information regarding approved waste haulers and licensed land fills.

J. Medical Surveillance

The OSHA Standard requires that all employees exposed to airborne asbestos fibers, regardless of concentration, must be given annual medical examinations, including chest x-rays and pulmonary function tests. Arrangements should be made with plant medical directors to insure proper scheduling is provided.

MON VALLEY WORKS GUIDELINES FOR THE REMOVAL AND
DISPOSAL OF ASBESTOS CONTAINING MATERIAL

OSHA has established a Permissible Exposure Limit of two (2) asbestos fibers, longer than five (5) microns, per cubic centimeter of air averaged over an 8-hour period. In addition, a maximum concentration of ten (10) fibers per cubic centimeter, longer than 5 microns, which is not to be exceeded at any time during the workday has also been established.

In recent times, asbestos exposure has been shown to have a causal relationship with a variety of pulmonary abnormalities when continuing exposures are in excess of Permissible Exposure Limits. The risk resulting from asbestos exposure is also greatly compounded by the effects of cigarette smoking.

The teardown and removal of asbestos insulation materials from walls, ceilings, steam pipes, furnaces, etc., has the potential to generate atmospheric concentration of asbestos fibers in excess of OSHA Permissible Exposure Limits. In the event that any such material is to be removed, the following procedures must be followed to minimize employee asbestos exposure.

A. Initial Determination

When feasible the Industrial Hygiene Organization shall be notified prior to any major insulation removal job of two or more days duration, and/or prior to any insulation removal job for which the asbestos content or lack thereof cannot be confirmed. Where uncertainty of asbestos content exists, a bulk sample will be collected and analyzed by the Industrial Hygiene Organization. In all cases where asbestos content has not been determined prior to work beginning, and in all cases where asbestos-bearing material is present, precautions must be taken. Should the absence of asbestos be confirmed, no precautions are required.

B. Work Practices - To Minimize Dust Generation

1. Prior to handling, the insulation should be thoroughly wetted when conditions permit such application. Additionally, the water spray should be controlled to prevent breakdown of the material.
2. The insulation should be removed in as large of sections as possible. That is, the amount of fracturing should be minimized.
3. Where the asbestos material must be cut, hand tools, such as chisels or knives, are preferable to hand saws or power tools. Use of power tools is prohibited without approval of the Superintendent of Safety and Industrial Hygiene.
4. All asbestos debris must be collected and placed in sealed, labeled, impermeable bags.

The bags shall then be placed in a sealed drum which is labeled as follows:

C A U T I O N

CONTAINS ASBESTOS FIBERS

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY CAUSE BODILY HARM