



A Subsidiary of Union Pacific Corporation

INTER-OFFICE CORRESPONDENCE

TO: Braxton D. Routh

OFFICE: Safety

FROM: R. A. Koy

DATE: October 11, 1984

SUBJECT: Asbestos Seminar, Corpus Christi, Texas

On Tuesday, October 9, 1984 the Coastal Bend Chapter of the American Society of Safety Engineers sponsored a one-day seminar on "Working Safely with Asbestos". Corpus Christi Refinery management level attendance was comprised of the writer - R. A. Koy, Maintenance Safety Engineer, J. K. Thomas, Senior Environmental Specialist, both of Champlin and C. T. Sullinger, Mundy Industrial Maintenance Incorporated Safety Engineer.

Vallen Corporation's Dave Taylor, Vice President Occupational Health Products, acted as moderator during the meeting. The stage was set for the various presentations by showing a slide program produced by the Asbestos Workers Union - "No More Asbestos". The slides depicted the health hazards of this mineral. Results of inhalation and ingestion of asbestos fibers after extended periods beyond the actual over-exposure were shown. Asbestos was found to be the most prevalent cause of death as compared to non-asbestos workers, a ratio of 40 to 0. Asbestos workers who smoke were noted to be highly vulnerable to lung cancer - 50 times more susceptible. The various asbestos diseases and the illness syndrome leading to them served to introduce the topic of the next speaker

The talk by Micky Sullivan, Vice President of Sales, Health Testing, Inc. of Houston focussed on Medical Surveillance. This was somewhat of an abstract from 29 Code of the Federal Register 1910:1001, (f), (i)(1 - 5)(i)(ii) and (d)(iv)(c). It is considered paramount to have a medical history record on each employee which includes posterior-anterior 14" x 17" x-rays and pulmonary function tests that determine forced capacity and expiratory volume FVC and FEV.

At this point the meeting had progressed to Tom Major's topic, "Safe Handling, Removal and Decontamination Procedures. His subject matter was consistent with 29 CFR 1910: 1001, (c)(1)(i) Engineering Controls, (2) Work Practices, (d) Personal Protective Equipment, (4) Change Rooms, (f) Monitoring, and (h) Housekeeping.

In concluding the agenda scheduled for the seminar, Ray Skinner, of the local O.S.H.A. Enforcement Office, related the mandatory compliance requirements of the asbestos regulations, 29 CFR 1910:1001. In his opinion all aspects of this section of subpart Z must be implemented by the employer. He expressed that it was incumbent upon him to ensure that there was compliance in view of the extreme potential hazard of asbestos exposure.

In summarizing the safety measures and precautions expressed by the speakers during the course of the meeting, a comprehensive and effective asbestos safety program must cover the following:

Braxton D. Routh
Asbestos Seminar
October 11, 1984

- Step 1. Medical Examinations and Surveillance.
2. Maintenance of Records.
 3. Before handling asbestos - obtain background count.
 4. Monitor operations with sample pump.
 5. Require Class "C" air supplied breathing equipment until airborne asbestos fiber level established from analysis of sample indicates otherwise.
 6. Isolate potential asbestos exposure area and post warning signs.
 7. Provide personal protective clothing and equipment.
 8. Provide change room with individual lockers and shower and require compliance.
 9. Execute respirator program and require proper use of protective equipment and clothing.
 10. Protect other crafts assigned work in or near asbestos contaminated area.
 11. Be alert to wind velocity and direction, negative ventilation inadequacies.
 12. Employ wet method for handling and maintain proper housekeeping.
 13. Establish the area and provide equipment for asbestos material to be discarded in sealed bags and label properly.
 14. Make arrangements for disposal.
 15. Prompt action by environmental control on location for removal to approved disposal firm.

The Corpus Christi Refinery's asbestos handling procedure embodies the majority of these steps. However, there are definite shortcomings regarding proper change facilities, obtaining asbestos fiber level background count, requiring Class C respiratory equipment and personnel exposure monitoring. Management deliberation in determining what approach will be taken to resolve these is essential in order to be in compliance, such as, purchase or rent required equipment, obtain consultant services or deal directly with a laboratory for potential asbestos exposure analysis.


R. A. Koy

Enclosures: 29 CFR 1910:1001 Asbestos
Mobile Personnel Decontamination Unit
Job Site 3 Piece Decontamination Unit

Copies to: R. E. Schneck
J. W. Bryant
J. F. Gay
R. A. Loveless
P. D. Vrazel

E- 000912

1910.1001—ASBESTOS

(a) Definitions.

For the purpose of this section.

(1) "Asbestos" includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite.

(2) "Asbestos fibers" means asbestos fibers longer than 5 micrometers.

(b) Permissible exposure to airborne concentrations of asbestos fibers.

(1) **Standard effective July 7, 1972.** The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed five fibers, longer than 5 micrometers, per cubic centimeter of air, as determined by the method prescribed in paragraph (e) of this section.

(2) **Standard effective July 1, 1976.** The 8-hour time-weighted average airborne concentrations of asbestos fibers to which any employee may be exposed shall not exceed two fibers, longer than 5 micrometers, per cubic centimeter of air, as determined by the method prescribed in paragraph (e) of this section.

(3) **Ceiling concentration.** No employee shall be exposed at any time to airborne concentrations of asbestos fibers in excess of 10 fibers, longer than 5 micrometers, per cubic centimeter of air, as determined by the method prescribed in paragraph (e) of this section.

(c) Methods of compliance.

(1) Engineering methods.

(i) **Engineering controls.** Engineering controls, such as, but not limited to, isolation, enclosure, exhaust ventilation, and dust

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collection, shall be used to meet the exposure limits prescribed in paragraph (b) of this section.

(ii) Local exhaust ventilation.

(a) Local exhaust ventilation and dust collection systems shall be designed, constructed, installed, and maintained in accordance with the American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems, ANSI Z9.2-1971, which is incorporated by reference herein.

(b) See § 1910.6 concerning the availability of ANSI Z9.2-1971, and the maintenance of a historic file in connection therewith. The address of the American National Standards Institute is given in § 1910.100.

(iii) Particular tools. All hand-operated and power-operated tools which may produce or release asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, such as, but not limited to, saws, scorers, abrasive wheels, and drills, shall be provided with local exhaust ventilation systems in accordance with subdivision (ii) of this subparagraph.

(2) Work practices.

(i) Wet methods. Insofar as practicable, asbestos shall be handled, mixed, applied, removed, cut, scored, or otherwise worked in a wet state sufficient to prevent the emission of airborne fibers in excess of the exposure limits prescribed in paragraph (b) of this section, unless the usefulness of the product would be diminished thereby.

(ii) Particular products and operations. No asbestos cement, mortar, coating, grout, plaster, or similar material containing asbestos shall be removed from bags, cartons, or other containers in which they are shipped, without being either wetted, or enclosed, or ventilated so as to prevent effectively the release of airborne asbestos fibers in excess of the limits prescribed in paragraph (b) of this section.

(iii) Spraying, demolition, or removal. Employees engaged in the spraying of asbestos, the removal, or demolition of pipes, structures, or equipment covered or insulated with asbestos, and in the removal or demolition of asbestos insulation or coverings shall be provided with respiratory equipment in accordance with paragraph (d)(2)(iii) of this section and with special clothing in accordance with paragraph (d)(3) of this section.

(d) Personal protective equipment.

(1) Compliance with the exposure limits prescribed by paragraph (b) of this section may not be achieved by the use of respirators or shift rotation of employees, except:

(i) During the time period necessary to install the engineering controls and to institute the work practices required by paragraph (c) of this section;

(ii) In work situations in which the methods prescribed in paragraph (c) of this section are either technically not feasible or feasible to an extent insufficient to reduce the airborne concentrations of asbestos fibers below the limits prescribed by paragraph (b) of this section; or

(iii) In emergencies.

(iv) Where both respirators and personnel rotation are allowed by subdivisions (i), (ii), or (iii) of this subparagraph, and both are practicable, personnel rotation shall be preferred and used.

(2) Where a respirator is permitted by subparagraph (1) of this paragraph, it shall be selected from among those approved by the Bureau of Mines, Department of the Interior, or the National Institute for Occupational Safety and Health, Department of Health, Education, and Welfare, under the provisions of 30 CFR Part 11 (37 F.R. 6244, Mar. 25, 1972), and shall be used in accordance with subdivisions (i), (ii), (iii), and (iv) of this subparagraph.

(i) Air purifying respirators. A reusable or single use air purifying respirator, or a

STANDARDS AND INTERPRETATIONS

respirator described in subdivision (ii) or (iii) of this subparagraph, shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average airborne concentrations of asbestos fibers are reasonably expected to exceed no more than 10 times those limits.

(ii) **Powered air, purifying respirators.** A full facepiece, powered air purifying respirator, or a powered air purifying respirator, or a respirator described in subdivision (iii) of this subparagraph, shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average concentrations of asbestos fibers are reasonably expected to exceed 10 times, but not 100 times, those limits.

(iii) **Type "C" supplied-air respirators, continuous flow or pressure-demand class.** A type "C" continuous flow or pressure-demand, supplied-air respirator shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the exposure limits prescribed in paragraph (b) of this section, when the ceiling or the 8-hour time-weighted average airborne concentrations of asbestos fibers are reasonably expected to exceed 100 times those limits.

(iv) **Establishment of a respirator program.**

(a) The employer shall establish a respirator program in accordance with the requirements of the American National Standard Practices for Respiratory Protection, ANSI Z88.2-1969, which is incorporated by reference herein.

(b) See § 1910.6 concerning the availability of ANSI Z88.2-1969 and the maintenance of an historic file in connection therewith. The address of the American National Standards Institute is given in § 1910.100.

(c) No employee shall be assigned to tasks requiring the use of respirators if, based upon his most recent examination, an examining physician determines that the employee will be unable to function normally wearing a respirator, or that the safety or health of the employee or other employees will be impaired by his use of a respirator. Such employee shall be rotated to another job or given the opportunity to transfer to a different position whose duties he is able to perform with the same employer, in the same geographical area and with the same seniority, status, and rate of pay he had just prior to such transfer, if such a different position is available.

(3) **Special clothing:** The employer shall provide, and require the use of, special clothing, such as coveralls or similar whole body clothing, head coverings, gloves, and foot coverings for any employee exposed to airborne concentrations of asbestos fibers, which exceed the ceiling level prescribed in paragraph (b) of this section.

(4) **Change rooms:**

(i) At any fixed place of employment exposed to airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section, the employer shall provide change rooms for employees working regularly at the place.

(ii) **Clothes lockers:** The employer shall provide two separate lockers or containers for each employee, so separated or isolated as to prevent contamination of the employee's street clothes from his work clothes.

(iii) **Laundrying:**

(a) Laundrying of asbestos contaminated clothing shall be done so as to prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

(b) Any employer who gives asbestos-contaminated clothing to another per-

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son for laundering shall inform such person of the requirement in (a) of this subdivision to effectively prevent the release of airborne asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section.

(c) Contaminated clothing shall be transported in sealed impermeable bags, or other closed, impermeable containers, and labeled in accordance with paragraph (g) of this section.

(e) Method of measurement.

All determinations of airborne concentrations of asbestos fibers shall be made by the membrane filter method at 400-450 × (magnification) (4 millimeter objective) with phase contrast illumination.

(f) Monitoring.

(1) **Initial determinations.** Within 6 months of the publication of this section, every employer shall cause every place of employment where asbestos fibers are released to be monitored in such a way as to determine whether every employee's exposure to asbestos fibers is below the limits prescribed in paragraph (b) of this section. If the limits are exceeded, the employer shall immediately undertake a compliance program in accordance with paragraph (c) of this section.

(2) Personal monitoring.

(i) Samples shall be collected from within the breathing zone of the employees, on membrane filters of 0.8 micrometer porosity mounted in an open-face filter holder. Samples shall be taken for the determination of the 8-hour time-weighted average airborne concentrations and of the ceiling concentrations of asbestos fibers.

(ii) **Sampling frequency and patterns.** After the initial determinations required by subparagraph (1) of this paragraph, samples shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of employees. In no case shall the sampling be done at intervals greater than 6 months for employees whose

exposure to asbestos may reasonably be foreseen to exceed the limits prescribed by paragraph (b) of this section.

(3) Environmental monitoring.

(i) Samples shall be collected from areas of a work environment which are representative of the airborne concentrations of asbestos fibers which may reach the breathing zone of employees. Samples shall be collected on a membrane filter of 0.8 micrometer porosity mounted in an open-face filter holder. Samples shall be taken for the determination of the 8-hour time-weighted average airborne concentrations and of the ceiling concentrations of asbestos fibers.

(ii) **Sampling frequency and patterns.** After the initial determinations required by subparagraph (1) of this paragraph, samples shall be of such frequency and pattern as to represent with reasonable accuracy the levels of exposure of the employees. In no case shall sampling be at intervals greater than 6 months for employees whose exposures to asbestos may reasonably be foreseen to exceed the exposure limits prescribed in paragraph (b) of this section.

(4) **Employee observation of monitoring.** Affected employees, or their representatives, shall be given a reasonable opportunity to observe any monitoring required by this paragraph and shall have access to the records thereof.

(g) Caution signs and labels.

(1) Caution signs.

(i) **Posting.** Caution signs shall be provided and displayed at each location where airborne concentrations of asbestos fibers may be in excess of the exposure limits prescribed in paragraph (b) of this section. Signs shall be posted at such a distance from such a location so that an employee may read the signs and take necessary protective steps before entering the area marked by the signs. Signs shall be posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers.

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(ii) **Sign specifications.** The warning signs required by subdivision (i) of this subparagraph shall conform to the requirements of 20" x 14" vertical format signs specified in § 1910.145(d)(4), and to this subdivision. The signs shall display the following legend in the lower panel, with letter sizes and styles of a visibility at least equal to that specified in this subdivision.

<i>Legend</i>	<i>Notation</i>
Asbestos.....	1" Sans Serif, Gothic or Block.
Dust Hazard.....	¾" Sans Serif, Gothic or Block.
Avoid Breathing Dust.....	¼" Gothic.
Wear Assigned Protective Equipment...	¼" Gothic.
Do Not Remain In Area Unless Your Work Requires It.	¼" Gothic.
Breathing Asbestos Dust May Be Haz- ardous To Your Health.	14 point Gothic.

Spacing between lines shall be at least equal to the height of the upper of any two lines.

(2) **Caution labels.**

(i) **Labeling.** Caution labels shall be affixed to all raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, except that no label is required where asbestos fibers have been modified by a bonding agent, coating, binder, or other material so that during any reasonably foreseeable use, handling, storage, disposal, processing, or transportation, no airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section will be released.

(ii) **Label specifications.** The caution labels required by subdivision (i) of this subparagraph shall be printed in letters of sufficient size and contrast as to be readily visible and legible. The label shall state:

CAUTION

Contains Asbestos Fibers
Avoid Creating Dust
Breathing Asbestos Dust May Cause
Serious Bodily Harm

(h) **Housekeeping.**

(1) **Cleaning.** All external surfaces in any place of employment shall be maintained free of accumulations of asbestos fibers if, with their dispersion, there would be an excessive concentration.

(2) **Waste disposal.** Asbestos waste, scrap, debris, bags, containers, equipment, and asbestos-contaminated clothing, consigned for disposal, which may produce in any reasonably foreseeable use, handling, storage, processing, disposal, or transportation airborne concentrations of asbestos fibers in excess of the exposure limits prescribed in paragraph (b) of this section shall be collected and disposed of in sealed impermeable bags, or other closed, impermeable containers.

(i) **Recordkeeping.**

(1) **Exposure records.** Every employer shall maintain records of any personal or environmental monitoring required by this section. Records shall be maintained for a period of at least 20 years and shall be made available upon request to the Assistant Secretary of Labor for Occupational Safety and Health, the Director of the National Institute for Occupational Safety and Health, and to authorized representatives of either.

[41 F.R. 11504, March 19, 1976.]

(2) **Access.** Employee exposure records required by this paragraph shall be provided upon request to employees, designated representatives, and the Assistant Secretary in accordance with 29 CFR 1910.20 (a)-(e) and (g)-(i).

[45 F.R. 35281, May 23, 1980.]

(3) **Employee notification.** Any employee found to have been exposed at any time to airborne concentrations of asbestos fibers in excess of the limits prescribed in paragraph (b) of this section shall be notified in writing of the exposure as soon as practicable but not later than 5 days of the finding. The employee shall also be timely notified of the corrective action being taken.

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(j) Medical examinations.

(1) **General.** The employer shall provide or make available at his cost, medical examinations relative to exposure to asbestos required by this paragraph.

(2) **Preplacement.** The employer shall provide or make available to each of his employees, within 30 calendar days following his first employment in an occupation exposed to airborne concentrations of asbestos fibers, a comprehensive medical examination, which shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 x 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV_{1.0}).

(3) **Annual examinations.** On or before January 31, 1973, and at least annually thereafter, every employer shall provide, or make available, comprehensive medical examinations to each of his employees engaged in occupations exposed to airborne concentrations of asbestos fibers. Such annual examination shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 x 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV_{1.0}).

(4) **Termination of employment.** The employer shall provide, or make available, within 30 calendar days before or after the termination of employment of any employee engaged in an occupation exposed to airborne concentrations of asbestos fibers, a comprehensive medical examination which shall include, as a minimum, a chest roentgenogram (posterior-anterior 14 x 17 inches), a history to elicit symptomatology of respiratory disease, and pulmonary function tests to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV_{1.0}).

(5) **Recent examinations.** No medical examination is required of any employee, if adequate records show that the employee has been examined in accordance with this paragraph within the past 1 year period.

(6) **Medical records**

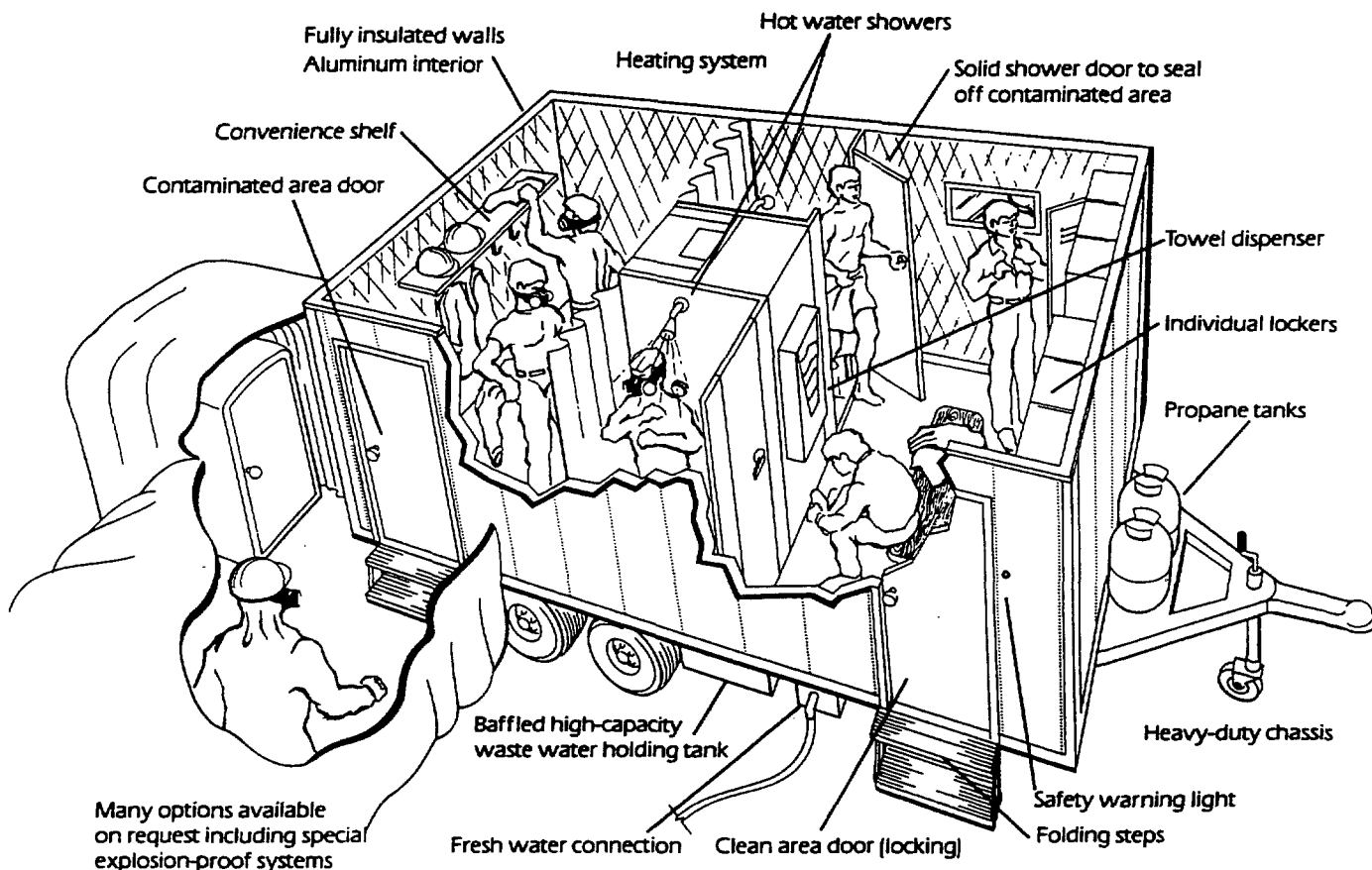
(i) **Maintenance.** Employers of employees examined pursuant to this paragraph shall cause to be maintained complete and accurate records of all such medical examinations. Records shall be retained by employers for at least 20 years.

(ii) **Access.** Records of the medical examinations required by this paragraph shall be provided upon request to employees, designated representatives, and the Assistant Secretary in accordance with 29 CFR 1910.20 (a)-(e) and (g)-(i). These records shall also be provided upon request to the Director of NIOSH. Any physician who conducts a medical examination required by this paragraph shall furnish to the employer of the examined employee all the information specifically required by this paragraph, and any other medical information related to occupational exposure to asbestos fibers.

[45 F.R. 54333, August 15, 1980.]

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Specifications

Tongue weight: 280 lbs.
Size: 8' x 12'
Height: 9'8"
Weight: 3400 lbs.
Length: 17'4" (Tip of tongue to rear of unit)
Chassis: 3300 lbs., tandem axle
Frame: 1 3/4" aluminum Z-bar
Exterior: .050" aluminum box siding
Interior: .040" aluminum walls and ceiling
Showers: Pre-molded fiberglass
Lockers: Twelve, all metal
Flooring: Special non-slip
Insulation: 1 3/4" styrofoam sheet, R7 thermal rating

Hot water tank: 30-gallon, propane
Holding tank: Baffled 160-gallon fiberglass
Heating units: Two 110-volt heat, ceiling mounted
Ventilation: Negative-force blower system with high-efficiency filter for clean emission.
Propane storage: Two 20-lb. tanks
Tires: Four 15" 4-ply on 5-hole rims
Warning system: Self checking
Exterior lights: Travel and warning

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For one (1) year from date of purchase, your Evergreen Industries Warranty covers all parts and labor necessary to repair or replace any component parts that prove to be defective in materials or workmanship. Evergreen Industries will repair or replace free of charge, F.O.B. place of manufacture, any part of equipment manufactured by Evergreen Industries that is claimed defective in materials or workmanship within one (1) year from date of shipment, and that upon inspection, is proved to Evergreen's satisfaction to have been defective at time of shipment.

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List F.O.B. Denver, Colorado (see price list). Rental or leasing available.

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30% down, to be submitted with purchase order. Balance due when unit is shipped from Denver, or net 30 days with approved credit.



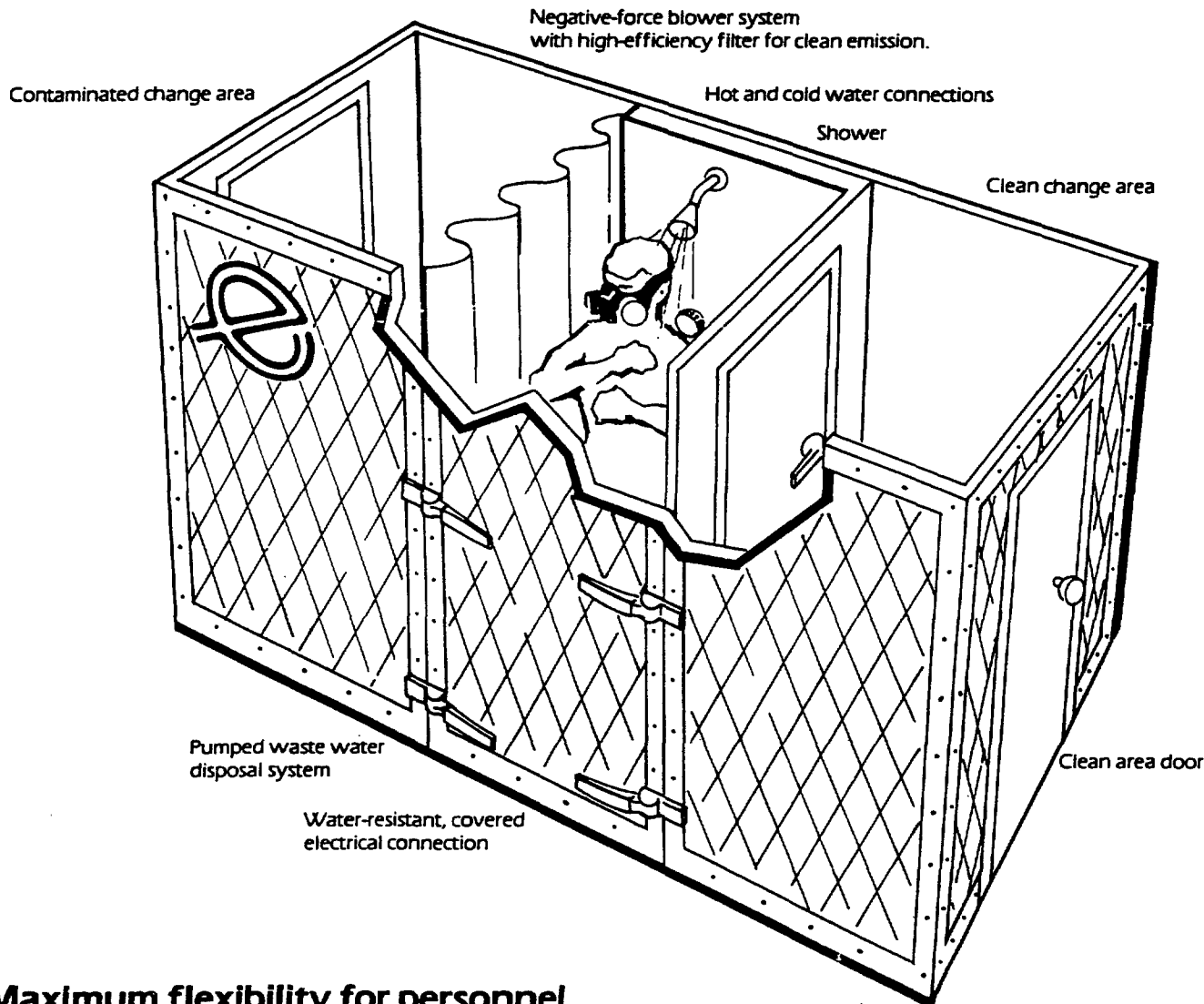
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E- 000920

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* Patents pending

E- 000921

Evergreen MDU-3P

Specifications

Section dimensions: Clean area—40" x 40" x 80"
Shower—40" x 34" x 80"
Contaminated area—40" x 40" x 80"

Assembled width: 40"
Assembled height: 80"
Assembled length: 114"

Weight: 580 lbs.
Frame: 1" x 2" aluminum tubing
Exterior: .040" quilted aluminum
Interior: .040" aluminum walls,
plexiglass ceiling

Insulation: 1 3/4" styrofoam sheet, R7
thermal rating

Ventilation: Negative-force blower system,
9 1/4" x 15" x 3/4" filter.

Warranty

For one (1) year from date of purchase, your Evergreen Industries Warranty covers all parts and labor necessary to repair or replace any component parts that prove to be defective in materials or workmanship. Evergreen Industries will repair or replace free of charge, F.O.B. place of manufacture, any part of equipment manufactured by Evergreen Industries that is claimed defective in materials or workmanship within one (1) year from date of shipment, and that upon inspection, is proved to Evergreen's satisfaction to have been defective at time of shipment.

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