

INTRACOMPANY CORRESPONDENCE

R-98 (Rev. 12-89)

PLAINTIFF'S
EXHIBIT

RMC-349

FROM

Ronald E. Benton - Industrial Hygiene, GOB

TO

C. E. YOUNG - RABPCO, Stratford

COPY

Dr. E. C. Irby - Medical, EXO

DATE &

SUBJECT

1981 May 12

ASBESTOS DUST

I am in receipt of your 1981 May 7 memo to E. A. Patterson (Safety Dept.), regarding his safety inspection. Under Item 4-D, reference is made to asbestos dust - clean-up, etc.

This has been brought to our attention by Mr. Patterson and The Travelers; however, the problem which you and Mr. Patterson describe seems to be more extensive than we had initially realized. As a result, please find enclosed a copy of the Reynolds program for demolition and/or removal of asbestos-containing material. Strict adherence to these guidelines is necessary, to ensure minimum employee exposure to asbestos fibers as well as compliance with existing OSHA regulations.

We will be happy to send someone from this department to Stratford to carry out the asbestos monitoring program. On the other hand, we will be glad to assist your personnel in carrying out this function in-house.

One other possibility would be to have the asbestos removed by an outside contractor that specializes in this type work. This may, of course, be the method of choice, since the contractor would have the proper equipment and know-how to conduct this job with minimum asbestos exposure to his as well as RABPCO employees. Utilizing this approach would also eliminate the need to follow the enclosed guidelines on asbestos removal and/or demolition.

In any event, please notify this department, so that we may take the necessary steps to ensure the protection of RABPCO employees and compliance with existing OSHA regulations.

Ronald E. Benton
Ronald E. Benton

REB/mjm

Enc.

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**DEMOLITION AND/OR REMOVAL OF
ASBESTOS-CONTAINING INSULATION**

WORK PRACTICES

- (1) Prior to beginning removal or demolition of any asbestos insulation, caution signs are to be placed around the work area, at a distance safely away from any dust which may be created. The signs must be located so as to warn anyone approaching the area.
- (2) Rope off the area, to prevent anyone from entering it unknowingly.
- (3) Whenever practical, asbestos insulation is to be wetted sufficiently to prevent emission of airborne fibers.
- (4) All scrap asbestos insulation material is to be placed and sealed in labelled bags and disposed of at an approved sanitary landfill.
- (5) Whenever possible, dry asbestos material shall be vacuumed into impermeable plastic bags. Dry sweeping of such material is prohibited. Vacuum cleaners used for asbestos clean up should be equipped with a filter to prevent re-introduction of the asbestos fibers into the work environment.
- (6) The caution signs and rope around the area are to be taken down at the end of the shift, unless the work is to be continued on the following shift.

PERSONAL PROTECTIVE EQUIPMENT

- (1) Personnel engaged in removal, demolition, or clean-up of asbestos insulation or removal of coverings from asbestos insulation must wear an approved asbestos respirator.
- (2) Employees shall be trained in the proper use and limitations of each respirator issued for protection against asbestos.
- (3) The Company will provide the necessary disposable coveralls, gloves, and head and shoe coverings.

- (4) After each use, contaminated coveralls, gloves, and head and shoe coverings shall be placed and sealed in labelled plastic bags and disposed of at an approved sanitary landfill.

MONITORING

- (1) Measurements of airborne asbestos fiber levels shall be conducted by the Corporate Industrial Hygiene Department during the removal or demolition of asbestos-containing materials, or the handling of any other asbestos-containing products (Marimet, Marinite, Transite, Asbestos paper, Thermocouple wire).
- (2) If monitoring shows that the exposure level is in excess of the federal standard, monitoring shall be repeated whenever the job is performed.
- (3) If monitoring results made at least five days, but not more than three months apart, show exposure levels to be below both federal standards (eight hour TWA and ceiling value), no additional monitoring is required.

EMPLOYEE NOTIFICATION

Any employee found to be exposed to asbestos fiber in excess of the federal standard must be notified in writing of his results within five working days. The employee must, also, be notified in writing of what efforts are being taken to control such exposure levels.

MEDICAL EXAMINATIONS

Personnel assigned to work involving exposures to airborne asbestos in excess of 0.1 fibers/cc must have had, within the past year, a comprehensive medical examination. The exam shall include as a minimum:

- (1) A chest x-ray.
- (2) A history of elicited symptomatology of respiratory disease.
- (3) A pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume at 1 second (FEV₁).