INTER/OFFICE COMMUNICATION

Armstrong

To See Attached List

February 21, 1969

From C. W. Nickel, Employee Relations

Subject PROPOSED ASBESTOS DUST CONTROL PROGRAM

PLAINTIFF'S EXHIBIT
tabbies
ACS-56

This letter expresses my thoughts on this subject as to what action Armstrong Cork should take in the next decade. In this light, the proposed program is submitted to you for comment and criticism.

I. Objectives

A. No Armstrong employee be exposed to any level of asbestos dust greater than allowed in the "Threshold Limit Values, 1968, Notice of Intended Changes."

B. Employee exposure to asbestos dust be evaluated and monitored at least once every two years with accurate documentation. This time period could eventually be lengthened as experience dictates. Ultimately, this would prevent asbestos dust becoming a potential source of lung cancer. Future litigations in court by employees are also minimized by this approach.

C. No asbestos dust be allowed to pass beyond the perimeter of any plant location. This action could be of great benefit in defending future court actions from aggravated neighbors.

II. Accomplishment

A. All new and existing installations where asbestos fiber is used be monitored by a qualified industrial hygienist, and the exposure to all employees be well documented.

B. Where the exposure is over 2 million particles per cubic foot, (as counted by the standard impinger light field count technique) ventilation changes be made to the system to bring the exposure within the standard.

C. Evaluation of all plant asbestos dust exposure be repeated, at least once every two years.

Liddell 7
CMG

D. All new installations involving asbestos fiber be so ventilated and designed that no asbestos dust can reach beyond the outside perimeter of any plant as air-borne particles. One recognized method to accomplish this, is the use of wet collectors instead of using dry collectors or venting directly into the atmosphere.

E. Existing installations presently using asbestos fiber be modified within two years so that no asbestos dust from these processes can reach beyond the outside perimeter of any plant as air-borne particles.

Attached is an article from the New Yorker that has received wide-spread circulation concerning this subject. The new Walsh-Healey Health and Safety Regulation (new effective date, May 17, 1969) also specifies the same standard for exposure as mentioned in II, B above.

Would you please return your comments on this proposed program to me by March 21. Thank you.

PAE:SAH

George Nichol

Enclosure

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