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22 March 87

Subject: Interpretation of OSHA Asbestos Regulation

From: MRBeauregard - MMD

To: WAHayes, RJMikulak, MJDeLassus, ACBelden, JPRispoli, LPMacVane,
REQuaranto, AJEsposito, FLMorse, ARChambers - MMD

HHBirkenruth - Group

RFLee, WJWhiteley, TBGauthier - Corp Engineering

RCBerry - Corp Technology

The Department of Labor Occupational Safety and Health Administration published revised regulations for asbestos exposure on Friday, 20 June 1986 in the Federal Register Volume 51, No. 119. No action was taken at MMD on these regulations based on information that these were on hold pending litigation. Per OSHA, this regulation became law 20 July 86. The only litigation pending relates to the Construction Standard not the Industry Standard. The following is my interpretation of the regulations and the action required to bring MMD into compliance.

A. Summary

1. We are not in compliance with any section of these regulations. We do have parts of some sections in place.
2. The action level for asbestos in 0.1 fibers per cubic centimeter (f/cc) of air. This level triggers exposure monitoring, worker training, medical monitoring, and other requirements.
3. The PEL for asbestos is 0.2 fibers per cubic centimeter of air. This level triggers restricted areas, respiratory protection, protective clothing, and other requirements.
4. Compliance dates we have missed:

Exposure Monitoring *	20 Oct 86
Employee Information and Training	20 Oct 86
Regulated Areas	17 Nov 86
Respiratory Protection	17 Nov 86
Medical Surveillance*	17 Nov 86

* Modifications to our existing programs are required to bring us into compliance.

- 5 Compliance dates upcoming:
 - o Bring lunchroom and changerooms into compliance 20 July 87
 - o Engineering and work practice changings, bringing exposure level below 0.2 f/cc where possible 20 July 88

B. Exposure Monitoring (required if asbestos levels are above 0.1 f/cc)

1. Monitoring must take "samples representing full-shift exposures for each shift for each employee in each job classification in each work area."

We appear to be in compliance as far as the Operating Group, but we have never monitored the Staff Group working in asbestos regulated areas.

2. Monitoring must be done at six month (maximum) intervals or whenever there has been a process, procedure, or personnel change.

Monitoring was done the week of 16 March 87. It had not been done since Oct. 85.

3. Affected employees or their representatives must be offered the opportunity to observe the monitoring.
4. All affected employees must be notified of monitoring results within 15 days of receipt of the results.
5. Tim Gauthier has indicated that we are in compliance with the method requirements for monitoring.

C. Employee Information and Training (required if levels are above 0.1 f/cc)

1. Training must be done before an individual is assigned into an area and yearly afterwards.
2. Training must include:
 - o Health effect of asbestos exposure
 - o Relationship between smoking and asbestos exposure in producing lung cancer
 - o Procedures on use and storage of asbestos to minimize exposure
 - o Storage locations and quantities
 - o Engineering controls (e.g. dust collectors) in place and planned
 - o Purpose and proper use of respirators and protective clothing
 - o Purpose and description of monitoring.
 - o Purpose and description of medical surveillance
 - o A review of this OSHA regulation
3. Affected employees have right to a copy of the standard, if requested.
4. Signs with specific warnings must be placed outside regulated areas.
5. Labels with specific warnings must be placed on all WIP

D. Regulated Areas (required if levels are above 0.2 f/cc)

1. Must be demarcated from the rest of the workplace
2. Access limited to authorized persons
3. Each person entering the area must wear a respirator
4. Employees cannot eat, drink, smoke, chew tobacco or gum, or apply cosmetics
5. Compressed air may not be used
6. Engineering controls and operating procedures must be implemented to reduce exposures below 0.2 f/cc where feasible

I believe we can install feasible controls to get below 0.2 f/cc.

7. Protective clothing must be worn in regulated areas. These include:

- o Coveralls or similar full-body work clothing
- o Gloves, head coverings, and foot coverings
- o Face shields or vented goggles or safety glasses per 1910.133

Per Joe Hopkins of OSHA, our two-piece uniforms meet the work clothing requirement and work boots meet the foot covering requirements as long as they are not worn home. We must meet the head covering portion of this requirement.

E. Respiratory Protection (required if levels are above 0.2 f/cc)

1. Respirators must be worn by all persons entering regulated areas.
2. Half-mask respirators with high-efficiency filters such as the MSA Comfo II respirators we purchase meet the requirements. However, we must make available at least five different sizes from two manufacturers for each employee to select from.

Disposable masks are not acceptable.

3. The employer must provide a powered, air-purifying respirator whenever an employee chooses this type.
4. Employees must be fit tested in a complex procedure every six months.
5. There can be no facial hair between skin and the respirator.

Several employees will be required to modify or eliminate beards.

F. Medical Surveillance (required if levels are above 0.1 f/cc)

1. Preplacement examinations and periodic examinations are required.

Our program meets these requirements. However, we provide chest X-Rays much more frequently than required for most employees. Only employees with 10+ years exposure who are over 45 must be filmed annually. Employees with 10+ years exposure in the 35-45 age bracket must be filmed every two years. All other employees every five years.

F. Medical Surveillance (required if levels are above 0.1 f/cc) - cont.

2. An examination at termination of employment must be made available for any employee exposed to asbestos.
3. Physician's written opinion must contain:
 - o Opinion on any detected medical conditions
 - o Any recommended limitations on the employee or the use of personal protective equipment

G. Hygiene Facilities (required if levels are above 0.2 f/cc)

1. Changeroom required with two lockers for each employee. These lockers must be separated to prevent contamination of street clothes by work clothing or protective equipment.
2. Employer must ensure that employees shower at the end of the shift.
3. Lunchrooms must be provided which have a positive pressure, filtered air supply.

In my opinion, our Milled Area lunchroom will meet this regulation with the use of the room air conditioner and pulling air in from the outdoors.

4. Employees must vacuum themselves and wash their hands and face before entering the lunchroom.

H. Housekeeping (required with any asbestos use)

1. All surfaces must be kept free of asbestos containing dust and waste.
2. Compressed air may not be used to blow off surfaces.
3. Shoveling and dry sweeping are not permitted.
4. Vacuums must be equipped with HEPA filters.

We must discontinue use of the Sears portable vacuums in No. 2 GLP and No. 1 Extrusion. We meet this requirement with the central vacuums discharging into the dust collectors.

5. Asbestos-containing waste (including empty asbestos bags) must be disposed in impermeable bags or containers.

I. Recordkeeping (required with any asbestos use)

1. Records must be kept on exposure measurements, medical surveillance, and training.
2. Records must be kept for 30 years minimum.
3. Records for exposure monitoring must include:
 - o Date of measurement
 - o Operation involving exposure
 - o Sampling and analytical methods used and evidence of their accuracy
 - o Number, duration, and results of samples taken
 - o Type of respiratory protection worn
 - o Name, social security number, and exposure of employees

We have records containing most of this information.

4. Records on medical surveillance must include:
 - o Name and social security number of the employee
 - o Physician's written opinions
 - o Employee medical complaints related to asbestos exposure
 - o A copy of the information provided to the physician

We have records containing most of this information.

J. Action Plan - will bring us into compliance within six weeks

1. Exposure Monitoring

- o Complete monitoring/analysis of asbestos exposures
TBGauthier/MRBeauregard 17 April 87
- o Set up plan to monitor every six months
TBGauthier/MRBeauregard Sept 87
- o Employees notified of monitoring results
REQuaranto 15 Days After Receipt

2. Employee Information and Training

- o Training FIMorse 17 April 87
- o Warning Signs FIMorse 17 April 87
- o Warning Labels FIMorse 8 May 87

J. Action Plan - will bring us into compliance within six weeks

3. Regulated Areas

- o Monitor asbestos fiber levels at "edges" of work areas
TBGauthier/MRBeauregard 3 April 87
- o Based on results above, determine whether isolation walls or demarcation lines on the floor are required
MRBeauregard 24 April 87
- o Design engineering controls to lower exposure levels below 0.2 f/cc
ARChambers 20 July 88
- o Enforce other aspects of regulations for regulated areas
JPRispoli/LPMacVane 17 April 87

4. Respiratory protection

- o Selection and fit testing
REQuaranto 1 May 87
- o Enforcement of use
JPRispoli/LPMacVane After 1 May 87

5. Medical Surveillance

- o Bring us into compliance
REQuaranto 17 April 87

6. Hygiene Facilities

- o Plan for upgrading changerooms and lunchroom
MRBeauregard 10 April 87
- o Upgrade changerooms and lunchrooms
MRBeauregard/ARChambers 20 July 87
- o Enforce showering at shift-end and vacuuming/
washing before entering lunchrooms
JPRispoli/LPMacVane 1 May 87

7. Housekeeping

- o Bring us into compliance
JPRispoli/LPMacVane 1 May 87

J. Action Plan - will bring us into compliance within six weeks -- cont.

8. Recordkeeping

- o Pull together existing records into a
central file
REQuaranto 24 April 87
- o Set up forms and formats for future records
REQuaranto 1 May 87
- o Keep records up to date
REQuaranto After 1 May 87

/bah