

C-0023

PLAINTIFF'S
EXHIBIT

DUP-149

February 12, 1975

0120

RICHARD W. PRUGH
EMPLOYEE RELATIONS DEPARTMENT
SAFETY AND FIRE DIVISION - N 12452

ENGINEERING STANDARD S4T - ASBESTOS

(Ref: Letter R. W. Prugh to J. A. Zapp, Jr., 9/10/74)

In reference to Section 7. Sampling, proper collection of air samples is the main item in assessing the worker's exposure. The person evaluating the sample has to assume that the sample he receives is representative of the situation and must therefore rely on the ability of the person collecting it. The concept of an unskilled person doing air sampling is not in keeping with Du Pont's usual procedure of excellence in health protection.

Air sampling for asbestos is a skilled procedure which requires training and judgment. Training courses have been given within Du Pont. Similar courses are routinely available through NIOSH. Assistance and guidance can be provided by either Haskell Laboratory or Marshall Laboratory (T. Nelson). To treat the subject properly and in agreement with your statement, there would have to be considerable expansion of this section which I do not think is necessary at this time.

In reference to 7. 1.1, please note that the Federal Register does not specify that samples must be taken at least every six months. The statement about taking a sample for a minimum of 15 minutes is misleading. There are many situations where 15 minutes is too long for a sample. A heavy dust deposit prevents proper evaluation of a sample and sometimes even five minutes is too long of a sample period for some operations.

The number "316" in paragraph 7. 3.5 is valid only for Marshall Lab. I question the usefulness of presenting this formula. A better concept could be obtained by saying: "If it's extremely dusty, sample for 5 to 15 minutes; visibly dusty, 30 minutes to 1 hour; and not dusty, up to 4 hours."

1409

ORIGINAL SIGNED BY

RICHARD J. HUBIAK

Richard J. Hubiak
Consultant - Industrial Hygiene

RJH/egg

DUP 0903533