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File 15.2.2

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TO: W. H. BERRY

FROM: J. B. YOUNG

ASBESTOS SAFETY - PROGRAM

Our asbestos safety program is divided into five parts:

1. Control of asbestos dust
2. Respiratory protection
3. Personal hygiene
4. Sampling
5. Medical monitoring

1. Control of Asbestos Dust

The principal sources of asbestos dust exposure are sawing and cutting, removing old insulation, opening boxes of new insulation, mixing and handling asbestos cement and removal of clothing after completing insulating work. Our program includes a number of activities for controlling the dust hazard from these sources:

- Further improvements and refinements will be made to the exhaust systems in the insulation fabricating shop.
- Portable work benches that collect the dust when block insulation is hand cut or sawed in the field will be provided.
- Insofar as possible, the work areas and insulation storage areas will be isolated from the gang headquarters and eating areas.
- Vacuum clean-up systems will be provided for minimizing dusting during cleanup of shops and storage areas.
- Vacuuming the accumulated dust from new cartons of block insulation when the cartons are opened will be established as a work practice.
- Insofar as possible the natural "dust catchers" in the insulation fabricating shop, such as cracks, crevices, ledges, etc. will be eliminated.

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- The procedures for handling and mixing asbestos cement will be tightened up to minimize exposure.
- Our procedure will be tightened up on removal of old insulation from piping, vessels, etc. by requiring wetting down prior to and during removal and the use of respirators.
- The handling and disposal of scrap insulation will be controlled more rigorously by including wetting down, use of sealed plastic bags and "insulation only" dumpsters for keeping scrap insulation separate from other types of scrap materials.
- Warning signs as per OSHA specifications will be obtained and displayed at locations where asbestos dust hazards are present.

The timing on the completion of the various activities has not been established yet. Primarily this is because we are just getting started and because insulator supervision has been in a state of change. H. Nunley replaced J. B. Winfree as Insulator Supervisor on June 12, 1972. J. Givens will be assigned foreman responsibilities for roughly one half of the insulators for the first time when he returns from vacation on June 19. S. Vandevander, the other insulator foreman, has (until this week) been running a gang of 25-35 insulators and has not been available to work on the program.

The longer range items in this part of the program are the vacuum systems and the isolation of the work areas and storage areas from the headquarters and eating areas. Some of the other items involve, more than anything else, educating the insulators to do things differently than they have done them in the past. Our objective is to train them and change their work habits but without scaring them. The speed with which these items can be accomplished will be governed largely by this objective.

2. Respiratory Protection

A number of things will be done to improve respiratory protection and bring our practices in line with OSHA requirements:

- A respirator program will be established in accordance with the requirements of the American National Standard Practice for Respiratory Protection Z88.2-1969. (We have ordered a copy of Z88.2-1969.)
- Procedures will be established for inspecting, cleaning, and storing respirators.
- The proper types of respirators meeting OSHA requirements for our particular levels of asbestos dust concentrations will be determined, specified and obtained.

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- The use of respirators will be expanded from the present levels of usage. For example, respirators will be required when asbestos insulation is removed and when hand cutting and sawing where vacuum removal of the dust is not provided.

A time table for completing this phase of the program has not yet been established. Again, we are just getting started. The first task is to find out exactly what is required to meet OSHA specifications. Harry Nunley has been given this responsibility.

3. Personal Hygiene

The clothing of men working with asbestos insulation must be kept free of dust accumulations. Also, it is essential that they avoid breathing asbestos dust when removing their work clothes. It is also necessary to avoid asbestos dust when placing food, tobacco, gum, etc. in the mouth.

The following steps will be taken to improve our position as regards the problem of personal hygiene:

- Isolate (insofar as possible) the work areas and insulation storage areas from the headquarters and eating areas (this item listed in the first section also).
- Restrict men from putting food, gum, tobacco, and other materials in the mouth in work areas where asbestos dust may be present, and prohibit these materials from being kept in the work areas.
- Provide vacuum facilities so men can vacuum their work clothes prior to coffee break, lunch, and quitting time.

The isolation of the work areas and storage areas from the headquarters and eating areas will pose the greatest problem in the west end of the plant where the present facilities are temporary and where a time schedule for moving into permanent facilities in the old nylon office has not been established (as far as we know). A study is underway for effecting the necessary changes and rearrangement at the insulation fabricating shop and at the east-end-insulator headquarters. At this point, we see no reason why the changes at these latter two locations will not be completed by around mid-year.

The restrictions on the consumption of food, tobacco, etc. in the work areas is a matter of education and then enforcement. We will move in on this as soon as we get the eating areas isolated from the work areas.

A schedule for the vacuum systems has not been established. The first order of business here is to determine what is needed and the cost. Here again, we are just getting started.

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4. Sampling

We took our first air sample to determine asbestos fiber concentration on 3/7/72. To date, a total of five samples have been taken. All were made in the insulation fabricating shop which is our greatest exposure area. All of the sample results have been below OSHA permissible limits with the highest reading being 2.8 fibers.

Much more sampling work is planned. This is necessary in order to develop the documentation necessary to represent accurately the level of exposure of our people.

- Beginning this month and for an indefinite period of time, 4-5 samples will be taken every month.
- Samples will be collected with the sampler intake attached to the worker's lapel within the normal breathing zone or as per OSHA specifications.
- Both 8-hour time weighted average samples and 15-minute high-concentration samples will be taken.
- Sampling will be conducted in all areas in which our people are exposed to concentrations of air-borne asbestos dust - not just in the shop area.
- The need for a second sampler will be determined, and if one is needed authorization for the purchase of this second unit will be requested.

5. Medical Monitoring

It appears that something more than in the past will be required in the way of record keeping and medical monitoring of employees exposed to asbestos dust. A program will have to be developed in conjunction with Medical when sufficient information becomes available to determine what is needed. Again, we are just getting started.

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