

INTEROFFICE CORRESPONDENCE
FILMS DIVISION

PLAINTIFF'S EXHIBIT

MBL-272

June 6, 1983

TO: E. J. Paulsen

ASBESTOS PROGRAM
STATUS REPORT

In response to your recent request concerning captioned, I have highlighted below the present status of Mobil Chemical's program, and it's impact on Films Division locations.

MCC Asbestos Program

In late 1981, a study was initiated in Mobil Chemical domestic operations to identify past and current use of asbestos-containing materials and employees potentially exposed to airborne asbestos as a result of handling such materials.

Preliminary findings indicated that asbestos-containing materials remain in service at various Mobil Chemical facilities; however, installation of most such materials was discontinued in the early 1970's. Representative types and uses of asbestos-containing materials found in Films Division locations were process pipe insulation, steam pipe and boiler insulation, sheet insulation on certain oven ducts and door seals, and insulating materials on MDO/TDO drives.

Although potential employee exposures to asbestos are limited, it may occur on an intermittent basis in some maintenance and mechanical activities such as demolition or repair of insulation on equipment/duct work, gasket cutting, or other routine maintenance activities around asbestos insulated boilers and steam pipes.

Following this, MCC Industrial Hygiene and Division Loss Prevention Managers assumed a coordinated role to assist facilities in compiling comprehensive rosters of current and previously exposed employees. Following review and confirmation of employee exposure listing by Division Employee Relations/Loss Prevention, names of employees will be provided to Medical Department to include on an asbestos medical surveillance program for each affected facility. Medical rosters are to be updated periodically as required based on findings of workplace monitoring.

A slide/tape training program and formal Mobil procedures for handling asbestos-containing materials was developed by MCC Industrial Hygiene with final distribution to Division Loss Prevention managers completed in March, 1983. Materials are to be used at appropriate facilities to continue to assure that Mobil Chemical employees are adequately protected. Note: Local management/loss prevention personnel are responsible for ensuring that outside contractors also follow proper procedures when handling/disposing of asbestos.

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Films Division Impact

Facilities found to have significant amounts of asbestos-containing materials in Films Division were Stratford and Macedon Commercial Films plants only. All plants do have very minor exposures to asbestos from brake linings on fork lifts and slitters; however, potential for excessive employee exposures is so limited, plants with brake lining only exposures were exempted from further study.

In April, 1983, both Stratford and Macedon Commercial Films plants were sent all training materials provided by MCC Industrial Hygiene. Covering memo included comprehensive recommendations on controlling all future potential employee exposures to asbestos. (Copy attached)

Next step to be taken is identification of employees eligible to participate in medical testing programs based on past and current potential exposures in excess of OSHA's present action level. To accomplish this, MCC Industrial Hygiene, working with Division Loss Prevention and local facility management, will conduct workplace exposure monitoring to assess/document asbestos exposures to jobs potentially exposed over the OSHA action level. Typically, only maintenance and mechanical jobs are suspect in Films Division.

Once exposure levels have been confirmed at each plant, appropriate actions will be recommended through Division Employee Relations/Loss Prevention to local facility management. Note: Comprehensive industrial hygiene survey, including asbestos monitoring, is scheduled at Stratford the week of July 25.

As further information is received on this program, I will keep you advised.

If you have any questions or additional comments, please let me know.



R. P. Fricke

Att.

INTEROFFICE CORRESPONDENCE
FILMS DIVISION

April 27, 1983

TO: M. J. Bauer
P. J. Sequeira

cc: W. F. Beveridge w/o/a
R. J. Brant "
G. W. Conrad, M.D. "
T. J. Gill "
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D. E. Marshall "
E. J. Paulsen "
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ASBESTOS EXPOSURES
COMMERCIAL FILMS

In late 1981, a study was initiated by MCC Industrial Hygiene to identify asbestos-containing materials currently in use at Films Division locations, and to evaluate potential employee exposures as a result of handling such materials. Based on those preliminary findings, asbestos-containing materials were found in pipe/oven duct insulation, certain types of gaskets and lift truck brake linings in both Stratford and Macedon Commercial Films plants.

Potential employee exposure to asbestos is limited at both locations, and should not exceed the OSHA Permissible Exposure Limit of 2 fibers/cc. However, exposures may occur on an intermittent basis in some maintenance and mechanical activities such as demolition or repair of insulation on equipment/duct work, replacement of brake linings and gaskets, or other routine maintenance activities around asbestos-insulated boilers and steam pipes.

Recently OSHA established extremely conservative, low-level workplace exposure limits for triggering asbestos medical surveillance (0.1 fibers/cc) in addition to the existing Permissible Exposure Limit (2.0 fibers/cc). In order to ensure compliance with OSHA and Mobil requirements concerning asbestos usage and exposure, as well as protect our employees, the following recommendations are made:

1. Workplace Exposure Monitoring

Exposure monitoring will be necessary to document asbestos exposure for those jobs potentially exposed which could reasonably be expected to result in exposures greater than 0.1 fibers/cc TWA. (Maintenance/Mechanics) MCC Industrial Hygiene will assist us in completing required asbestos monitoring.

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Asbestos Exposures

2. Safe Work Procedures

Procedures for minimizing employee exposure to asbestos in accordance with OSHA and EPA requirements should be followed whenever asbestos-containing materials are handled or disposed of. (Copy of "Procedures for Handling Asbestos-Containing Materials" is attached) These procedures are to be reviewed by appropriate personnel, including contract employees, prior to initiating activities involving removal, disposal or handling of these materials.

3. Employee Training

Employees assigned to positions having potential exposures to asbestos should receive annual training regarding asbestos hazards, appropriate safe handling procedures and protective equipment. The slide/tape program entitled "Mobil Chemical Asbestos Safety Program", developed to serve as a training aid in this effort, is attached for your use. This training should also be required for contract employees, where appropriate. Employee/contractor sign-off verifying receipt of training is required.

4. Elimination/Substitution of Asbestos

In order to limit employee exposures to asbestos-containing materials, the following actions should be taken:

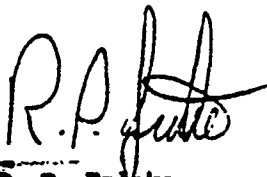
- a. Where possible, avoid use of asbestos in insulation, gasket materials, brake linings or other materials.
- b. Existing torn and exposed asbestos-containing insulation around ducts, pipes or boilers should be covered or wrapped to eliminate on-going employee exposures in ambient air.
- c. Maintenance activities requiring cutting into asbestos-containing insulation for line/equipment repairs or replacement should be monitored closely to ensure required procedures are followed.
- d. Each plant should develop an action plan for removing all asbestos-containing materials from the plant. These plans should be reviewed and approved by Division Loss Prevention, then progressed through normal budget planning procedures.

Asbestos Exposures

5. Medical Surveillance

A list of employees eligible to participate in medical testing programs, based on past or current potential exposures in excess of the OSHA action level (0.1 fibers/cc), will be developed with the assistance of MCC Industrial Hygiene, Loss Prevention and plant Employee Relations. Employees identified should be counseled as to the purpose of the exams, and be encouraged to participate. Further information on employee lists will follow at a later date.

Your cooperation and assistance in implementing this most important program will be appreciated. Please provide me with periodic updates of your progress.


R. P. Fricke

Att.