PLAINTIFF'S EXHIBIT

CT-1539

CertainTeed Corporation
Pipe & Plastics Group
P.O. Box 860
Valley Forge, PA 19482
(215) 687-5000

CertainTeed

May 8, 1984

Ms. Marsha S. Branscome
Center for Environmental Systems
Research Triangle Institute
Post Office Box 12194
Research Triangle Park, North Carolina 27709

RE: March 21, 1984 Request for Information
Asbestos Data Collection Form
Contract No. J-9-F-4-0027 (OSHA)

Dear Ms. Branscome:

The purpose of this letter is to provide the information requested by you to be used by the U. S. Department of Labor with their regulatory analysis of a proposed permanent standard covering workplace exposure to asbestos.

The information requested --concerning averages of airborne asbestos exposure, exposure control equipment, and safety/health programs for CertainTeed Corporation's Hillsboro, Texas and Riverside, California, asbestos/cement pipe plants--is attached.

Should you require further information or have questions with regard to the attached, please contact me in writing at the above letterhead address.

Sincerely,

D. R. Hall

Darwin R. Hall
Manager, Health and Safety

DRH/d

90-2125

CTD005916

ASBESTOS DATA COLLECTION FORM

1. Company Name CertainTeed Corporation

2. Plant Address 2100 Avalon Avenue, Riverside, CA 92501

3. Contact Name Darwin R. Hall, Manager, Health and Safety
CertainTeed Corporation
Pipe and Plastics Group
P.O. Box 860
Valley Forge, PA 19482

Phone (215) 687-5000

Date April 5, 1984

4. Total Employment at Plant 103

5.	Product Code (Annual Production)	Major Job Categories	# of Workers Exposed	8-Hr. TWA Asbestos Exposure (fibers/cc)
(1)	14	Fiber Introduction	3	0.2*
	(55,194)	Wet Mechanical Operations	15	0.1*
	short tons	Dry Mechanical Operations	13	0.1*
		Other Production Workers	22	0.1*
		Other Workers	50	0.1*

*These figures are averages only.
Changes in day-to-day environmental conditions, fluctuations in environmental control system efficiencies, unforeseen equipment mechanical problems, and unpredictability of employee actions can cause

CTD005917

significant variations in the exposure. While the magnitude of these variations are minor when compared to a 2 f/cc standard, they can be significant upon comparison to such values as 0.5, 0.2, and 0.1 f/cc. This is further complicated by the inaccuracy of sampling and analytical methods at such low level fiber exposures.

Method of measuring fiber concentrations NIOSH Method P&CAM 239

Sampling done by: [X] In-House [ ] Contractor

Sampling Frequency On-going Program

6. Engineering Controls: (Including Automatic Equipment)

(1) Work Station/Product Controlled Fiber Introduction and Dry Mechanical Operations

Control Type: [X] LEV [ ] Isolation [ ] Other

Date Installed 1964-1978 Est. remaining life Not determinable - dependent on conditions and maintenance

7. Existing Ancillary Asbestos Programs:

[X] Medical Surveillance	[X] Employee Training
[X] Work Practice Program	[X] Respirator Program
[X] Lunch Facilities	[X] Personal Protection Equipment
[X] Shower Facilities	[ ] Regulated Areas - Not Required by Standard
[X] Change Rooms	[X] Environmental Monitoring

8. What would you have to do to achieve an 8-hr. TWA fiber concentration of:

0.5 f/cc? see below*

0.2 f/cc? see below*

0.1 f/cc? see below*

*The answers to the above 3 questions cannot be readily determined. Each employee's exposure would need evaluation as to work positions, present controls, engineering and equipment needs, operation suitability to further control, and numerous other aspects to include those variables presented in answer to question 5 above. In summary, achievement of such TWA levels would have to be analyzed on an individual, case by case basis.

9. Will you provide us a copy of the company's Annual Report?

[X] Yes [ ] No

Attached

Additional Information to be Obtained by Interviewer

Item 6. If a ventilation system is used for control, what is the method of air filtration?

[X] baghouse [ ] cyclone [ ] scrubber [ ] HEPA [ ] Other

Is air [ ] returned to work place [X] exhausted outside

Air volume 56,571 cfm

How is collected waste disposed of? All collected quantities are recycled direct to the production process.

Item 7. Medical Surveillance:

How often are medical exams conducted? 1. Pre-employment 2. Annually 3. Termination (except when an exam has been administered within the past 12 months)

What does medical exam consist of? Medical history; height, weight, blood pressure, pulse; visual acuity corrected and uncorrected; audiogram; pulmonary function, FVC, FEV1; chest x-ray 14" x 17"; urinalysis, test tape; complete blood count; blood chemistry, SMA-12; special tests deemed necessary by examining physician.

Work Practices:

What are the practices? use of vacuums; use of wet mops; emergency procedures to be implemented during equipment breakdown or maintenance where potential exist for fiber spill or release; taping of cut or damaged shipping bags; proper recognition and reporting of conditions that may result in the release of fiber; supervisor to employee and on-the-job training of job procedure with emphasis on not allowing dust buildup, not plugging or hampering exhaust intakes, maintaining good housekeeping, not using shop air for cleaning, transporting full bags and disposing of empty bags correctly, proper stacking of bags of asbestos.

Are employees trained? yes

Employee Training:

What does it consist of? Films, pamphlets, on-job-training, tool-box safety talks, and job instruction by supervisors in work practices, respirator use, emergency procedures, housekeeping practices, and personnel protective equipment, and also covers hazards of asbestos and smoking to health.

How often is it done? New employee indoctrination; annual retraining; any other time deemed necessary as result of enforcement of program aspects.

Respirator Program:

Types of respirators? Respirators are not required as present levels are below the 2.0 f/cc level of the present standard. However, appropriate disposable type respirators are kept on hand and provided to employees who request to use them.

Replacement interval Disposable, if used, daily.

Job catagories where used? No category requires use. Due to changing conditions or unforeseen situations which may affect exposure, determination of respirator use would be made for job category involved.

Estimated Administrative Time Unknown due to present exposures being below 2.0 f/cc level.

Are the following included:

- [x] fitting
- [ ] cleaning (disposables)
- [x] training
- [x] medical certification

Protective Equipment:

What equipment is used? None required. Exposures below 2.0 f/cc level.

Under what circumstances? n/a

ASBESTOS DATA COLLECTION FORM

1. Company Name CertainTeed Corporation
2. Plant Address Route 81 (E), Hillsboro, Texas 76645
3. Contact Name Darwin R. Hall, Manager, Health & Safety
   CertainTeed Corporation
   Pipe and Plastics Group
   P.O. Box 860
   Valley Forge, PA 19482
   Phone (215) 687-5000
   Date April 5, 1984
4. Total Employment at Plant 148
5. Product Code / Major Job Categories / No. Workers Exposed / 8-Hr. TWA Asbestos Exposure (fibers/cc)

(Annual Production)

(1)	14	Fiber Introduction	7	0.2*
	(67,075)	Wet Mechanical Oper.	30	0.2*
	short tons	Dry Mechanical Oper.	19	0.2*
		Other Production Workers	29	0.1*
		Other Workers	63	---

*These figures are averages only.
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significant variations in the exposure. While the magnitude of these variations are minor when compared to a 2 f/cc standard, they can be significant upon comparison to such values as 0.5, 0.2 and 0.1 f/cc. This is further complicated by the inaccuracy of sampling and analytical methods at such low level fiber exposures.

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- ☒ Change Rooms
- ☒ Employee Training
- ☒ Respirator Program
- ☒ Personal Protective Equipment
- ☐ Regulated Areas - Not Required by Standard
- ☒ Environmental Monitoring

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Is air ☐ returned to work place ☒ exhausted outside

Air volume 69,406 cfm

How is collected waste disposed of? All collected quantities are recycled direct to the production process.

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