

cc: J. M. Leathers

T. W. Misher

H. W. Snyder

J. A. Bigners

H. L. Gordon

H. R. Hoyle

M. Kelyman

R. L. Ruell

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Occupational Safety and Health Standards
Room 304
400 First Street, N.W.
Washington, D. C. 20210

Gentlemen:

The following comments relative to the proposed Standard for Exposure to Asbestos Dust (F.R. Vol. 37, No. 7, 1972, page 466) are respectfully submitted as a result of suggestions received from several of the most interested persons within The Dow Chemical Company.

1. Section 1910.22a(d)(2) - we suggest a wording change so that the section would read, "All hand-or power-operated tools used in fabrication shops which produce asbestos dust such as, but not limited to, saws, scorers, abrasive wheels, and drills, shall be provided with local exhaust ventilation and dust collectors in accordance with the American National Standard Fundamentals Governing the Design and Operation of Local Exhaust Systems: ANSI Z9.2-1971."

We believe respiratory protection should be sufficient for use of such tools while applying asbestos insulation equipment. Further, it is not practical to use a local exhaust system while applying asbestos insulation to equipment while using a scaffold or ladder.

2. Section 1910.22a(d)(3) - we suggest a wording change so that the section would read, "Employees exposed to the hazard of asbestos dust from the spraying of asbestos; the demolition of pipes, structures, or equipment covered or insulated with asbestos; or the demolition of insulating strippings, shall be provided with respiratory protective devices in accordance with paragraph (c)(3) of this section."

We believe the above would allow the use of methods that would effectively eliminate the asbestos dust hazard, such as wetting down asbestos insulation before removing it, without the need of a respirator. We do believe such alternate methods should be permitted only if the atmosphere in the area can be shown to be free of asbestos dust.

In addition to the above changes, we suggest that asbestos should be shipped and/or contained in a package that will prohibit passage of asbestos fibers.

Very truly yours,

WMA
Wayne M. Hancock, Director
Labor Relations & Safety

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