

Correspondence

Henry Smith

To: All Plant Managers, Personnel Managers
and Safety Coordinators (Excl. Distr.
Centers, Cons. Photo Centers and Photo
Service Plants)

October 31, 1977

From: W. Fassuliotis
Subject: Safety, Security & Occupational
Health

cc: T. Dent J. Gow
R. Dixon W. Greig
L. Faneuf S. Kantor
J. Fitzwilliams R. Mullen
T. Gedettis F. Wetherill

Re: MEDICAL EXAMINATIONS -
OSHA ASBESTOS STANDARD

Until recently it has been the company's position that the requirement for medical examinations under the OSHA Asbestos Standard - P1910.1001(j) related to exposures at or above the allowable permissible fiber levels. The interpretation of the wording "exposed to airborne concentrations" was a matter of dispute with OSHA in several contested citations. The Review Commission upheld the Department of Labor's interpretation as did the District of Columbia Court of Appeals.

Except in California where the state plan requires medical examinations above 1.0 fibers/cc TWA, all other areas are now bound by the Department of Labor's interpretation that "concentrations" means any measurable quantity of fiber found in the work environment.

In order that we are not found in violation of this standard on a "repeat" or a "willful" basis, it is essential that all operations that handle or use asbestos or products containing asbestos that release fiber into the work atmosphere initiate the following medical examinations:

- a) Preplacement - 14x17 chest X-ray, pulmonary function and history to elicit symptomatology of respiratory disease, within 30 days of initial assignment in an occupation exposed to asbestos fibers.
- b) Annual Examination - Make available to exposed employees an examination including a 14x17 chest X-ray, pulmonary function and history of respiratory disease.
- c) Termination Examination - Within 30 days before or after termination of employment in occupations exposed to asbestos fiber, provide or make available an examination as above. No medical is required if records show an examination within the past 1-year period.

A medical record file shall be maintained at each location providing these examinations and a copy of the file shall be forwarded to the Safety, Security and Occupational Health Department for our retention and review.

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Employees shall be advised in writing of the results of their medical examinations and a record of the examination shall be furnished to the employee's physician if requested by the employee.

If there are any questions relative to the application of the standard to specific job assignments and/or the extent to which these examinations are to be provided, please advise.

By November 15, 1977, we would appreciate a status report from each location where this standard is applicable indicating the number of employees examined or scheduled for examination, cost of the examination and any problems encountered in complying with the above requirements.

A handwritten signature in cursive script, likely belonging to a company representative, is positioned in the center-right of the page.

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