

AT&T
Bell Laboratories

subject: Asbestos Monitoring

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from: C. P. Lichtenwalner
MH 77621
1F-110 X5399M. Glowatz
MH 77621
1F-106 X4143**Industrial Hygiene and Safety Group:**

Attached are two policy letters from the Avenel OSHA office regarding asbestos monitoring that may impact our work.

Aside from the information on 0.1 fibers/cm³ TWA which we already knew and use as our own action level (which in all probability was an outgrowth of GMW's letter to Eula Bingham in 1977-78) there are several other interesting items.

1. On the last page it is stated that 0.5 fibers/cm³ over a 15 minute period would appear sufficient for requiring medical monitoring. Note, however, that this appears to be only a Region II policy and may not apply in other regions. Indeed, CPL 2-2.21A G.1. and G.4.b. would seem to require 7 or 8 hour sampling. (New Jersey/New York/Puerto Rico is Region II).
2. On page 3 of CPL 2-2.21A it seems that when air samples cannot be taken on the day of the inspection OSHA can use the employers own data to require medical examinations (G.5.a Note), or simply "document . . . employees were exposed to significant amounts of dust-containing asbestos" (G.5.b.). The latter criteria appears very nebulous - especially as no definition is given of "significant" other than "employee, employee representative, and union interviews." This would appear to be a very indefensible position.

C. P. Lichtenwalner
M. Glowatz, Jr.

MH-77621-CPL-MG-jve

Copy to:
H. R. Fitch
W. J. Schreibeis
G. M. Wilkening

LLA 001737