From

L. L. RIPPEY

PITTSBURGH OFFICE - 6

To

DISTRIBUTION

1989 APRIL 28

PLAINTIFF'S EXHIBIT AL-984

RE: ASBESTOS SAMPLING DATA COLLECTION PROJECT - ORC

The deadline for submission of samples for this project is June 30 as noted in the attached letter from ORC. This project has the potential to eliminate costly and unnecessary monitoring fro certain tasks which could be shown by objective data not to exceed OSHA's action level of 0.1 f/cc.

Thus far plants which have submitted data for inclusion in the ORC database include Point Comfort, Massena and ATC. If there is other personal exposure data for jobs where the exposure levels are less than 0.1 f/cc they should be submitted on the attached form.

LAURA RIPPEY
LLR:mz

ASBES11.LLR

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ALCOA

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Organization Resources Counselors, Inc.

Memorandum

April 4, 1989

To: ORC Occupational Safety and Health Group
ORC Western Occupational Safety and Health Group
ORC Occupational Safety and Health Lawyers Group

From: Rebecca L. Daiss Becky

Subject: June 30, 1989 Deadline for Asbestos Data Collection Project Continuation Decision

Background and Long and Short Terms Goals of the Asbestos Data Collection Project

The Asbestos Data Collection Project was initiated two years ago to assist employers in compiling data which would be accepted by OSHA as "objective data" demonstrating that, for particular small jobs, asbestos levels greater than the 0.1 f/cc action level do not exist. Based on this data, an employer could, within the provisions of the Asbestos Standard, decide not to monitor some small jobs which would otherwise require initial monitoring under the standard. The immediate goal of the Asbestos Data Collection Project, then, is to eliminate costly, unnecessary, and counter-productive monitoring. Although the data collection effort has waned periodically, ORC has been persistent in pursuing the goals of the asbestos data collection project.

ORC's persistence is largely due to the long-term implications of the project's success. ORC has consistently recommended that OSHA allow the use of representative data to avoid situations similar to that presented by the benzene standard where, somewhat incongruously, OSHA used representative data to set the standard but does not allow for its use by employers to demonstrate the absence of exposures above the standard.

In the Asbestos Standard published in October 1987, and again in the September 1988 amendment to the standard establishing an excursion limit (EL), ORC was gratified to find that OSHA had included provisions which allow for the use of objective data "gained from an industry-wide study."

In comments to OSHA on its proposed generic exposure monitoring standard, ORC has strongly advocated that OSHA allow use of objective data to meet exposure monitoring requirements. ORC believes that the use of objective data is essential to ensuring the effectiveness and feasibility of a generic standard. By effectively capitalizing on OSHA's allowance of objective data, a precedent can be set for its use in future standards.

In the Asbestos Standard, OSHA has provided industry with an opportunity to demonstrate the prudence of provisions permitting the use of objective data. ORC would like to take advantage of that opportunity through the Asbestos Data Collection Project.

June 30 Deadline for Data Submission & Final Decision re: Project Continuation

Although ORC strongly supports the Asbestos Data Collection Project, as do many ORC companies, we cannot continue to justify devoting resources to a project that is intended to but has not gone beyond the conceptual stage, regardless of its long-term significance. Therefore, ORC has decided to discontinue the Asbestos Data Collection Project if, by June 30, 1989, we have not collected sufficient data to generate an initial report. According to Adrianne Whyte, the consultant ORC has contracted with to compile, manage, and interpret the data, a minimum of 600 data sheets is necessary to produce a substantive report. To date, approximately 300 sheet have been submitted. If sufficient data are received by June 30, the first report assessing the data should be available in October 1989 according to Ms. Whyte.

Promulgation of Asbestos Excursion Limit (EL)

OSHA's recently promulgated Excursion Limit amendment to the Asbestos Standard helped to resolve the issue concerning appropriate sampling time, not only from the standpoint of statistical significance, but of what is acceptable to OSHA. The amendment provides for the use of the OSHA Recommended Method (ORM) of sampling for the presence of asbestos fibers. The ORM provides for a minimum 30-minute sampling period. Adherence to the OSHA ORM sampling method in future collection of data for the ORC project will reduce the amount of unusable data submitted.

The EL amendment provides further impetus to collect data for the ORC project as the data can potentially be used by individual companies to meet the monitoring requirements established in the EL amendment. Also, specific reference to "objective data" again in the EL amendment reaffirms the value of the proposed data base.

We anticipate receiving enough data by the June 30 deadline to warrant continuation of the project. We will keep you informed of the status of the Asbestos Data Collection Project. If your company is a potential participant in the ORC Asbestos project, please call me or Darrell Mattheis. If your company is participating, please make every effort to submit data collection sheets prior to June 30.

BD3:lgs

INSTRUCTIONS FOR FILLING OUT ASBESTOS SAMPLING DATA SHEET FOR SMALL JOBS

1. Sheet Number

   The sheet number will be preassigned.

2. Task

   The Asbestos Sampling Data Sheet is to be completed only for jobs in which removal of asbestos containing material (ACM) is not the primary goal.

   a. Task Description

      What is the nature of the actual work being performed? Check the one entry which best describes the task.

   b. ACM Activity Resulting from Task

      What was done in regard to actually working with or handling the acm:

   c. ACM Form

      What is the form of the ACM encountered on the task? Check all that apply.

Questions 2(d), 2(e) and 2(f) are to be completed only by telecommunications and utility industry employees.

   d. ACM Location

      Where is the specific location of the ACM encountered on the task?
      Check all that apply.

   e. Location of Job with Respect to ACM

      Where, in relation to the ACM, is the task being performed?

   f. Distance to ACM

      What is the distance between the site of the task and the ACM. If the distance varies, indicate the average distance.

3. Type of Asbestos (Indicate % if known)

   What type of asbestos is present - amosite, crocidolite, chrysotile, unknown?
   Check all that apply and, if possible, indicate the percentage of amosite, crocidolite, and/or chrysotile present in the ACM.

4. ACM Condition

Is the material being removed loose, crumbly, - does it flake off, when worked with; is it hard to the touch; or has it been encapsulated with another material?
Check the appropriate box.

5. ACM Disturbed?

Was the ACM disturbed during the task.
Check the appropriate box

6. Amount of Asbestos Removed During Sample

How much asbestos was removed if any? Estimate in lengths of pipe removed, square feet of boiler insulation, or tiles etc. Fill in the appropriate amount.

7. Other Fibrous Materials Present

Are fibrous materials other than asbestos present?
Check the appropriate box.

8. Physical Conditions

a. Location

Is the task being performed indoors or outdoors?
Check the appropriate box.

b. Elevation

Is the task being performed at ground level, above ground level or below ground?
Check the appropriate box.

c. Temperature of Equipment

If the task involves working on equipment that has ACM content, indicate the temperature of the equipment.

d. Air Temperature

Indicate whether the temperature is above or below freezing when the task is started and whether it is above or below freezing when the task is completed
Check the appropriate box.

9. Structure Ownership

Is the task being performed on a company owned premise, company leased premise, or customer owned premise? This question addresses premise ownership only. Ownership of the ACM equipment or materials being worked on (i.e. phone company cables etc.) is not the focus of this question.
Check the appropriate box.

10. Structure

Complete only section a) - type of building or section b) type of structure if other than a building. Do not complete both sections.

a. Type of Building

If in a building, in what type of building is the task being performed?
Check the appropriate box.

b. Structure if Other than a Building
If other than a building, identify the type of structure the task is being done in, or on (ex., tower, boiler, etc.)

11. Control Methods

What method(s) are being used to minimize the release or generation of airborne asbestos fibers?
Check all that apply.

12. Sampling/Analytical Method

What method is being used to analyze samples for the presence of asbestos, and if that test indicates the presence of asbestos, what kind of confirmatory analysis is performed?
Check the appropriate box or identify alternate method of analysis.

13. Sampling Completed By:

Was the sampling done by company employees, by an outside consultant/contractor hired by the company, or by a third party hired by the company's outside contractor?
Check the appropriate box.

14. Prior Knowledge of Presence of ACM:

Was there knowledge of the presence of ACM before the task was begun?
Check the appropriate box.

Each Task is to be Monitored from Start to Finish for the Purposes of this Survey

B. AIR SAMPLING DATA

1. Cassette #, One Worker Only, One Task Only

   Each cassette should be given a distinct identification number. If more than one cassette is used for a single task, record a separate number for each cassette in this space, combine the data for the separate cassettes and record the data requested below for the task. Indicate the reason for using more than one cassette in the comment section.

2. Date of Sample:

   Enter month, day and year.

3. Sample Duration (Minutes)

   Sampling should begin when the task is initiated and end when the task is completed. The sample duration should be identical to the duration of the task.

4. Fiber Concentration

   Record the fiber concentration (fibers per cc) as determined from the laboratory analysis. Use "GT" and "LT" for "greater than" and "less than" (respectively). If the sample filter is overloaded, note GT before the result.

5. Fiber Count (f/100 fields)

   Enter fibers/100 fields fiber count if this information is available or obtainable.

6. Actual TWA Exposure

   What was the time weighted average exposure for the duration of the job. This is to be determined from the information provided in numbers 3 (sample duration) and 4 (fiber concentration) above.

7. 8 Hour Time Weighted Average Exposure

   If more than one sample was taken on a person during a shift, a time weighted average should be calculated using the below formula:

$$\frac{C1T1 + C2T2 + \ldots CnTn}{T1 + T2 \ldots Tn}$$

   Cn = the fiber concentration for sample n
   Tn = the sample duration for sample n

7. 8 Hour Time Weighted Average Exposure (Cont.)

In extrapolating from an acm exposure period of less than 8 hours to an 8 hour time period, assume zero exposure during the time in which no acm task is being performed and no sampling for acm is being done.

8. Pump Flow Rate: (Liters/Min)

The pump flowrate should be the averaged flowrate as determined by calibration with a primary standard such as a bubble tube. Enter the date the pre-sample and post-sample flow rate was checked.

9. Pump Serial Number:

Enter the pump serial number

10. Worker ID:

Enter the worker identification number, if any, used by your company.

11. Upset Conditions

Was there a greater than normal exposure to asbestos due to an unplanned event? Specify the event in the comments section. Mark the appropriate box.

DKM/20

ORC Asbestos Data Collection Project

SHEET NUMBER_____

10. **STRUCTURE**
(COMPLETE EITHER A *OR* B)

a. Type of Building
(CHECK ONE)

- ☐ School
- ☐ Hospital
- ☐ Office
- ☐ Telecom Central Office
- ☐ Warehouse
- ☐ Factory
- ☐ Garage
- ☐ Residential

b. Structure If other than building
(specify, ex. tower, boiler, etc.)

_____

11. **CONTROL METHODS**
(CHECK ALL THAT APPLY)

- ☐ Enclosure (without negative pressure)
- ☐ Enclosure (with negative pressure)
- ☐ Power tool with HEPA exhaust ventilation
- ☐ Local exhaust ventilation with fiber capture
- ☐ Wetting agent
- ☐ Glove bag
- ☐ HEPA vac
- ☐ Wet wipe
- ☐ Alternate route (telecom/utility)
- ☐ Removal of entire structure
- ☐ Mini Enclosure
- ☐ Other
- ☐ None

12. **SAMPLING/ANALYTICAL METHOD**

- ☐ Appendix A OSHA Standard
- ☐ Appendix A OSHA Standard; (37 mm cassette)
- ☐ Confirmatory Analysis (by SEM, TEM, XRD, PLM)

_____

- ☐ Other_____

13. **SAMPLING COMPLETED BY**

- ☐ In-house
- ☐ Contractor
- ☐ Third-party contractor

14. **PRIOR KNOWLEDGE OF PRESENCE OF ACM?**

☐ Yes ☐ No ☐ Unknown

15. **REMARKS**

AIR SAMPLING DATA
ORC Asbestos Data Collection Project

SHEET NUMBER_____

1. Cassette #: * _____
   (One worker only; One task only)
   * If more than one cassette is used for the same task number each separately but combine the data for the questions below.

2. Date of Sample: ____/____/____
   (month) (day) (year)

3. Sample duration: (minutes) _____

4. Fiber Concentration: (f/cc) _____

5. Fiber Count: (f/100 fields) (if available)_____

6. Actual TWA Exposure: _____

7. 8 hour TWA Exposure: _____

8. Pump flow rate: (ltr/min) Pre-sample _____ Post-sample _____
   Date Checked Pre: ____/____/____ (month) (day) (year) Post: ____/____/____ (month) (day) (year)

9. Pump Serial Number_____

10. Worker ID (if applicable): _____

11. Upset conditions ☐ Yes ☐ No

Comments (spills, unplanned events, etc.)

_____

Signature/title of person filling out form

Print name in full:_____Phone No._____

Company name (print) _____

City _____ State _____

ORC Asbestos Data Collection Project

SHEET NUMBER_____

f. DISTANCE TO ACM
(Telecom/Utility Specific)

- ☐ <1 ft.
- ☐ 1-3 ft.
- ☐ 3-5 ft.
- ☐ 5-10 ft.
- ☐ 10-20 ft.
- ☐ >20 ft.

3. TYPE OF ASBESTOS
(INDICATE % IF KNOWN)

- ☐ _____% amosite
- ☐ _____% chrysotile
- ☐ _____% crocidolite
- ☐ Unknown

4. ACM CONDITION

- ☐ Loose/friable
- ☐ Hardened/non-friable
- ☐ Encapsulated

5. ACM DISTURBED

☐ Yes ☐ No

6. ESTIMATED AMOUNT OF ACM REMOVED

- _____square feet
- _____cubic feet
- _____linear feet
- _____pipe diameter
- ☐ unknown
- ☐ none

7. OTHER FIBROUS MATERIALS PRESENT

☐ Yes ☐ No ☐ Unknown

8. PHYSICAL CONDITIONS

a. ☐ Indoor
☐ Outdoor

b. ☐ Elevated
☐ Ground level
☐ Below ground

c. Temp. of Equipment
(if applicable)
☐ approximately ambient
☐ above ambient
☐ below ambient

d. Air Temperature
(when task begun)
☐ >32°F
☐ <32°F
Air Temperature
(when task completed)
☐ >32°F
☐ <32°F

e. Wind speed
(if applicable)
_____mph

9. STRUCTURE OWNERSHIP

- ☐ Company Owned
- ☐ Leased
- ☐ Customer Premise

ASBESTOS SAMPLING DATA SHEET

Small Jobs

ORC Asbestos Data Collection Project

Please Use Red Ink to Complete the Form

1. SHEET NUMBER_____

2. TASK (REMOVAL OF ACM IS NOT PRIMARY GOAL)

a. TASK DESCRIPTION (CHECK ONE PER SAMPLING ACTIVITY)

- ☐ Open ceiling tiles
- ☐ Remove cable cover
- ☐ Cable maintenance
- ☐ Splicing cable
- ☐ Pulling cable
- ☐ Task clean-up
- ☐ Equipment installation
- ☐ Equipment removal
- ☐ Brake work
- ☐ Clutch work
- ☐ Gasket work
- ☐ Boiler maintenance
- ☐ Pipe maintenance
- ☐ Valve maintenance
- ☐ Other equipment maintenance _____
- ☐ Shipwork_____
- ☐ Other_____

b. ACM ACTIVITY RESULTING FROM TASK (CHECK ALL THAT APPLY)

- ☐ Wetting
- ☐ Removal
- ☐ Bagging
- ☐ Transportation
- ☐ Drilling/cutting/grinding
- ☐ Incidental disturbing
- ☐ Other_____
- ☐ None

c . ACM FORM (CHECK ALL THAT APPLY)

- ☐ Sprayed on insulation
- ☐ Troweled on insulation
- ☐ Equipment insulation
- ☐ Boiler insulation
- ☐ Pipe insulation (g.t. 12" diameter)
- ☐ Pipe insulation (l.t. 12" diameter)
- ☐ Pipe fittings
- ☐ Transite Pipe
- ☐ Floor tiles
- ☐ Ceiling tiles
- ☐ Roofing
- ☐ Transite Board
- ☐ Asbestos cement
- ☐ ACM fabricated items
- ☐ Other_____

d. ACM LOCATION (CHECK ALL THAT APPLY) (Telecom/Utility Specific)

- ☐ Above hung ceiling
- ☐ Beams/columns
- ☐ Crawl space
- ☐ Tunnel
- ☐ Manhole
- ☐ Cable vaults
- ☐ Piping
- ☐ Other

e. LOCATION OF JOB WITH RESPECT TO ACM (Telecom/Utility Specific)

- ☐ Adjacent to
- ☐ On
- ☐ Through
- ☐ Other_____