DATE February 5, 1975

FEB 7 1975

J. L. WESCOAT

TO J. L. Wescoat
Attn: R. W. Masters

C. C.

FILE: 112

ASBESTOS HANDLING REQUIREMENTS

As requested in your letter of 1-27-75, the draft for Asbestos Handling Requirements guide has been reviewed. The following questions and comments are offered on the subject material.

Page 1 Coverage Does all insulation installed prior to January 1, 1973, contain asbestos? Does mineral wool, fiber glass come under this category? Also, cold temperature insulations such as cork. It appears that an exception should be made if insulation can be identified as asbestos free.

Page 2 Would these requirements apply where small areas of insulation are removed for inspection of base material or thickness readings?

Page 3 Item 9 Since pipe insulation is normally jacketed, it would not seem necessary or practical to try to wet it for lowering. The requirement for wetting should be restricted to those instances where a jacketing has been removed.

General It is difficult to believe that these very strict regulations would apply to the occasional removal of asbestos bearing materials, particularly since monitoring of concentrations indicated concentrations significantly below permissible TWA.

E. D. KEIPER

By: J. D. Humble

RMHowe:dmg

PLAINTIFF'S EXHIBIT

MBL-242